



Livingstone Landowners Group

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Hon. Shannon Phillips

Minister of Environment and Parks
Legislature Office
425 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6
(AEP.minister@gov.ab.ca)

Transmission Impact on Native Prairie Due to Renewable Electricity Program

Dear Minister Phillips,

I am writing on behalf of the Livingstone Landowners Group (LLG) in the Pincher Creek area to make you aware of a major disconnect between the commendable environmental protection approach of your government and the pending detrimental transmission impact associated with the Renewable Electricity Program.

Your government has stated that the first three phases of the Renewable Electricity Program are limited to projects *“that are able to connect to the existing distribution and transmission system”* as per the directive to the Alberta Electric System Operation (AESO) from the Minister of Energy in February 2018.

The Alberta Government website, Renewable Electricity Program Overview – Successful Projects (REP 1,2 and 3) states: *“Projects are required to connect to **existing transmission** or distribution infrastructure to avoid indirect costs to electricity consumers.”*

Unfortunately, this is not reflected in the Alberta Electric System Operator’s (AESO) public position on new transmission development in the Pincher Creek area. Residents in our area were informed late last year that new transmission infrastructure is required in this area, at a cost of hundreds of millions of dollars, to integrate the growing renewable activity across Southern Alberta, not just our municipal district. According to AESO, transmission constraints elsewhere mean this area will be impacted by new transmission even if the new wind development is as far east as Lethbridge.

If this transmission goes ahead, it has the added risk of promoting further wind energy inside the AESO’s “target area” as the presence of transmission there will make it more economic for new industrial development and further fragmentation of the native grassland and wildlife areas.

The Livingstone Landowners Group (LLG) exists to promote responsible planning, use and protection of the rare and irreplaceable land and water resources between the Livingstone Range and the Porcupine Hills in Southwestern Alberta, Canada. We take our stewardship responsibilities seriously both as land

owners and as a community. For that reason, we are deeply concerned about the cumulative impact of the proposed wind and transmission development on our ecologically sensitive area of the province.

The Nature Conservancy of Canada says that this region of Alberta represents the last 1% of the Northern Great Plains' native grasslands and on that basis has invested many millions of dollars in protecting private grasslands from development. The area has been recognized by your government and many others as a critically important, environmentally-sensitive region that sustains many endangered species. There are numerous studies that detail the importance of preserving this Alberta legacy. The South Saskatchewan Regional Plan (SSRP) specifically emphasizes the protection of native prairie and requires new development to be concentrated in already disturbed lands.

Rough fescue grassland has never been successfully reclaimed after disturbance and as a result this type of vegetation is subject to protection from surface access (Alberta Energy Regulator Manual 007: Principles for Minimizing Surface Disturbance in Native Prairie and Parkland Areas). Likewise, the Wildlife Directive for Alberta Wind Projects requires a formal assessment and monitoring process by Alberta Environment for new wind projects. Transmission development should be subject at least to the same rigorous requirements to protect the native prairie, Environmentally Sensitive Areas and Key Wildlife Biodiversity Zones.

We are confident that with appropriate action Alberta's renewable energy goals and our shared desire to sustain the last vestiges of intact prairie grassland in Southwestern Alberta can be managed. But action is needed quickly to direct AESO to avoid the large remaining patches of native prairie and the associated impact on the unique biodiversity and beauty in their proposed transmission target area. Any new transmission in this region should be limited to already disturbed lands and/or to expand capacity where transmission infrastructure already exists. Additional detail is included in the attached briefing paper and we would be pleased to meet with you to discuss this further.

Sincerely,



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cc: Premier Rachel Notley (premier@gov.ab.ca)
Hon. Margaret McCuaig-Boyd, Minister of Energy (minister.energy@gov.ab.ca)
Hon. Oneil Carlier, Minister of Agriculture and Forestry (whitecourt.steanne@assembly.ab.ca)
Hon. Ricardo Miranda, Minister of Culture and Tourism (Calgary.cross@assembly.ab.ca)
Hon. Pat Stier, MLA for Livingstone-Macleod (Wildrose) (livingstone.macleod@assembly.ab.ca)

att: LLG Briefing Document – Impact of Wind-Related Industrialization on SW Alberta