



Hemmera Envirochem Inc.
18th Floor, 4730 Kingsway
Burnaby, BC V5H 0C6
T: 604.669.0424
F: 604.669.0430
hemmera.com

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Alberta Utilities Commission
1400, 600 Third Avenue S.W.
Calgary, Alberta T2P 0G5

Re: Spring Coulee Solar Project Letter of Enquiry

This Letter of Enquiry has been completed by Hemmera Envirochem Inc. (Hemmera), on behalf of and as authorized by Solar Krafte Utilities Inc. (Solar Krafte). Hemmera is a subcontractor of Solar Krafte and is authorized to act on behalf of Solar Krafte in this capacity.

1.0 INTRODUCTION

Pursuant to Approval 23326-D02-2018, Solar Krafte Utilities Inc. (Solar Krafte) has approval to construct and operate the 29.5-megawatt (MW) Spring Coulee Solar Project (the Project) in Cardston County, located approximately eight kilometers southwest of the hamlet of Spring Coulee. On January 31, 2019, Solar Krafte applied to the Alberta Utilities Commission (AUC) for approval to extend the construction completion date of the Project from March 31, 2019 to November 30, 2021, which was approved on April 14, 2020 (Approval 24290-D03-2020; the Approval).

Per condition 1 of the Approval, "*the power plant shall be located in the northwest, northeast and southwest quarters of Section 10, Township 4, Range 24, west of the Fourth Meridian, as further described in the application and Application 23326-A001*".

Per Section 11 of the *Hydro and Electric Energy Regulation* (the Regulation), Solar Krafte is requesting approval from the AUC to realign the Project boundary, to fully site the system on the west half of Section 15, Township 4, Range 24, west of the Fourth Meridian (W4M) (**Appendix A**). The following information satisfies Section 12 of the Regulation for this minor alteration to the Project.

2.0 NEED FOR THE PROPOSED UPDATE

The proposed revised Project boundary gives rise to a project that (1) is commercially more competitive, and (2) no longer seeks exceptions to and fully respects the *Wildlife Directive for Alberta Solar Energy Projects* (the Directive; Government of Alberta 2017).

3.0 THE NATURE AND EXTENT OF THE PROPOSED UPDATE

The revised Project boundary results in a decrease to the Project footprint size and remains sited entirely on cultivation land use.

4.0 LAND AFFECTED BY THE PROPOSED UPDATE

The revised Project boundary is located entirely within private, cultivated, land. Additionally, the revised Project boundary provides for a solar panel configuration that abuts an existing disturbance (i.e., a regional waste landfill located in the southeast quarter of Section 15, Township 4, Range 24, W4M).

5.0 TIMING OF PROPOSED UPDATE

Concurrent with this Letter of Enquiry, Solar Krafte is applying to the AUC to extend the construction completion date for the Project to December 31, 2022.

6.0 POTENTIAL ENVIRONMENTAL IMPACTS OF PROPOSED UPDATE

The Project received a Renewable Energy Referral Report (Referral Report) in April 2018, and an amendment letter from Alberta Environment and Parks Fish and Wildlife Stewardship (AEP-FWS) on August 17, 2018, which determined that the *“Project poses a low risk to wildlife and wildlife habitat as proposed, based on the wildlife assessment data provided by the Proponent and area specific wildlife knowledge”*.

The revised Project boundary is sited entirely on cultivation land use, and results in the reduction of a previously impacted seasonal wetland. This proposed update would reduce potential Project impacts to wetlands by 0.0042 hectares, thereby reducing the already low risk ranking to wildlife and wildlife habitat.

Additionally, the revised Project’s fence is now comprised of four contiguous, straight lines, which addresses the risks of entrapment, and reduces the restriction to wildlife movement in the Project area as per Standard 100.2.7 of the Directive.

In 2021, Basin Environmental Ltd. (Basin) completed the following surveys within the approved and revised Project boundary and 1,000 m buffer area, as required by Standard 100.2.1 and 100.2.4 of the Directive:

- Raptor nest searches
- Breeding bird surveys
- Sharp-tailed grouse (*Tympanuchus phasianellus*) surveys
- Piping plover (*Charadrius melodus*) surveys
- Habitat (land cover), wetland and watercourse surveys

All surveys were conducted following the protocols outlined in the *Sensitive Species Inventory Guidelines* (Government of Alberta 2013), the *Bird Migration Survey Protocol* (Government of Alberta 2020), and the Directive (Government of Alberta 2017).

During the 2021 surveys, no wildlife features were observed within the approved and revised Project boundary or 1,000 m buffer area; as such, there are no applicable wildlife feature setbacks.

7.0 AEP CONSULTATION

On August 19, 2021, Hemmera, on behalf of Solar Krafte, contacted AEP-FWS to discuss if an AEP-FWS Renewable Energy Project Amendment is required for this change in the Project. Per the discussion, the revised Project boundary update did not meet the requirements for an AEP-FWS Amendment review based on the following:

- There were no new wildlife features or infringements identified
- There are no changes to the wildlife mitigation plan outlined in the Referral Report for the Project
- Changes to the Project did not result in impacts to sensitive wildlife habitat (e.g., native grassland or wetlands)
- Changes to the Project did not result in increased infringements or setbacks of identified wildlife features (e.g., wetlands, nests, house, dens, leks, etc.)

Please feel free to contact the undersigned regarding any questions or further information that you may require.

Prepared by:
Hemmera Envirochem Inc.

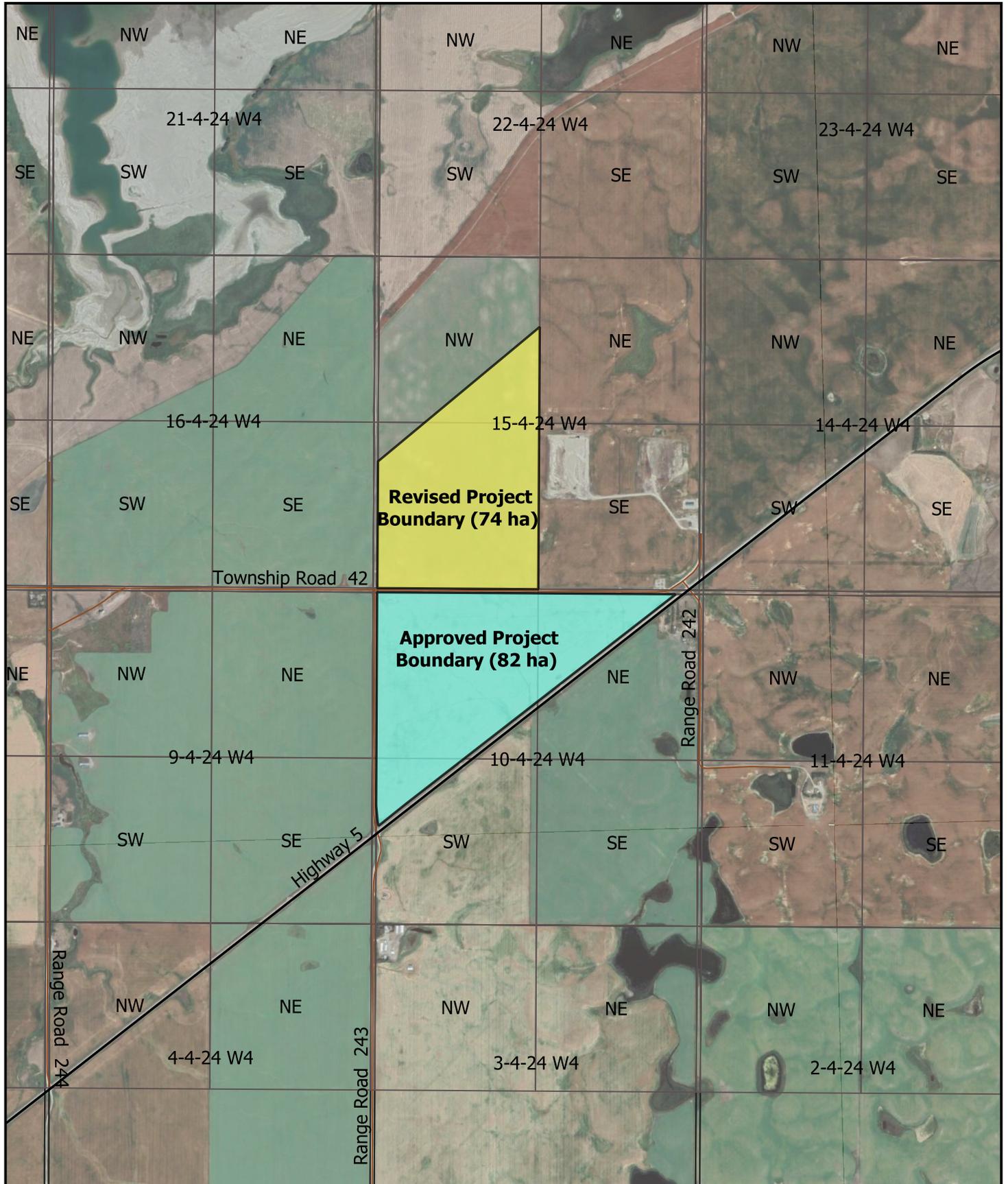


Tyler Reid, M.Sc., P.Biol.
Senior Project Manager
tyler.reid@hemmera.com

APPENDIX A

Revised Project Boundary

Spring Coulee Solar Project



0 500 1,000 1,500 2,000 m

Project boundaries are preliminary and subject to change*