

October 15, 2024

Mayor Linnsie Clark  
580 1 St SE  
Medicine Hat, AB T1A 8E6

Reference: AUC Application 29273 Saamis Solar Park

On September 3, 2024 Medicine Hat Utilities Ratepayers Association (MHURA) wrote a letter to you the Mayor and City Councillors asking for details about the AUC application for The City of Medicine Hat for Ownership Transfer of the Approved Saamis Solar Park power plant..Application by DP Energy 27788. MHURA did file an intention to pursue the application at the same time.

We did receive a response from the Office of the Energy, Land and Environment Managing Director Rochelle Pancoast dated September 9<sup>th</sup>. (copy attached).

After considering the detailed response that Ms Pancoast provided, and referring to the process for application we believe we are justified in saying that Step 1 of the brochure – consultation with stakeholders was not followed. This step states:

Step 1: Public consultation prior to applying to the AUC An applicant seeking approval of a proposed utility development project is required to engage in a participant involvement program prior to filing an application with the AUC. The public involvement program involves consultation with persons whose rights may be directly and adversely affected by the proposed project so that concerns may be raised, addressed and, if possible, resolved. The application guidelines and requirements for facility applications can be found in AUC Rule 007: Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines. Potentially affected parties are strongly encouraged to participate in the public consultation, also called a participant involvement program. Early, active and ongoing discussions with an applicant may lead to greater influence on project planning and what is submitted to the AUC for approval.

In response to the requirements of this step MHURA is requesting that the City of Medicine hat holds information meetings leading to a plebiscite regarding the application. Our hope is that

the process will allow for the Citizens of Medicine Hat to be adequately informed about the project so they can vote being fully informed of the plan to develop this \$600M plus project.

We suggest that the information meetings include information about at least the following:

1. The purpose of the purchase of the solar farm along with reasons why it should be developed by the CMH rather than allowing a private entity to do so.
2. A breakdown of the proposed development timeline along with realistic costs.
3. Is there a point in evaluations of the project that would determine the cost outweighs the income/benefit of the solar farm.
4. Based on projected electricity rates anticipated income and recovery of costs of development. A breakdown showing costs vs revenue for the first five years, followed by normal forecasting for the remainder of the life of the project.
5. Anticipated financial cost to the utility and tax payers.
6. Plans for reclamation of the land – along with proposed disposal of the solar panels showing projection costs in preparation for disposal.
7. Projected operating costs – insurance, maintenance, replacement contingencies etc
8. A plan for the additional requirements as included in the approval of the DP Energy project. AUC 27788.
9. What happens if AUC approves the purchase but demands the full 325MW of the solar field be developed immediately? Will the City go ahead or withdraw the application?
10. What effect will the increased power have on CMH exemption from regulation? Is there a risk of that exemption being withdrawn? If so at what point?
11. What is the percentage breakdown of the supplied power by commodity? Will this mix protect MH from potential power outages?

MHURA is also requesting that the request for approval of the project be delayed until such time as the plebiscite has been conducted. We will also be notifying AUC that we have requested a plebiscite answering the above questions as our request for process and transparency.

Thank you for your consideration of this request and the anticipated rapid action that will be taken in this regard.

Sincerely;

Sounantha Boss

President Medicine Hat Utilities Ratepayers Association

