

April 13, 2025

Honourable Danielle Smith

Premier of Alberta

Office of the Premier

307 Legislature Building

10800 97 Avenue

Edmonton, AB T5K 2B6

premier@gov.ab.ca (<mailto:premier@gov.ab.ca>)

CC: Honourable Nathan Neudorf

Minister of Affordability & Utilities

au.minister@gov.ab.ca (<mailto:au.minister@gov.ab.ca>)

Dear Premier Smith,

I am writing as the originator of Proceeding 29924 to review the Alberta Utilities Commission's (AUC) approval of the PACE Bang Energy Caroline Solar Farm (Decision 28295-D01-2025) and a member of the Rural Alberta Concerned Communities Group (RACCG), representing rural Albertans. Having reviewed Minister Neudorf's August 23, 2024, letter to a Lacombe citizen about Reconcept's proposed solar project and your recent talk show response to Mark Wight, a landowner in Provost, I am compelled to address a systemic crisis: the AUC's routine approval of solar and wind projects through unproven, inadequate mitigation efforts, violating core UCP mandates you and Minister Neudorf have championed—agricultural land protection, viewscape preservation, municipal input, and upfront reclamation assurance. Your call to respect agricultural classifications is encouraging, yet the AUC's actions, cloaked under a misreading of private property rights, undermine this commitment, demanding urgent action.

The AUC's process is not a neutral arbiter but a flawed system that rubber-stamps projects, as seen in Caroline and echoed by Wight's concerns in Provost. An appeal implies review by an independent authority, yet Proceeding 29924 is a self-review under Rule 016, asking the same AUC that approved PACE's project to judge its own errors. This closed loop cannot address the regulatory culture that

prioritizes developer interests over Alberta's values, contrary to your vision for a pragmatic, agriculture-first energy transition.

The Caroline case exemplifies this failure. The AUC approved a 14.67-megawatt solar farm on 57 acres zoned for residential use, just 21 meters from homes, based on an absurd "sheep grazing plan" (Decision, point 78)—no predator control, health protocols, or logistical detail, dismissed as uncertain yet accepted as mitigation—flouting your "agriculture first" directive for agriculture lands. Worse, the AUC's process requires PACE to report municipal support (Decision, point 13), a built-in conflict of interest that predictably yields a favorable outcome despite 2.5 years of opposition from our community and Clearwater County's post-amalgamation rejection (AUC, April 7, para. 23). Delayed reclamation security starting in Year 2 (Decision, point 88) defies your policy for upfront bonds, risking taxpayer liability while encroaching on prime agricultural land and shattering views. Across rural Alberta, this pattern persists, with the AUC coaching developers to reapply with "favourable suggestions," as Wight noted, rather than enforcing public interest standards.

In your talk show response, you emphasized balancing private property rights with grid stability, but private ownership does not grant carte blanche to landowners—nor has it ever. Restrictions on property use, from municipal zoning to environmental regulations, have long existed to protect the public interest, a principle the AUC disregards when it overrides local bylaws and community voices to approve disruptive projects. Your caution against blanket bans aligns with this balance, yet the AUC's leniency—treating developer proposals as sacrosanct under property rights—alienates rural Albertans who see their agricultural heritage and iconic landscapes sacrificed for untested renewables. Neudorf's Lacombe letter reinforces clear UCP directives: limiting projects on prime lands unless agriculture co-exists, ensuring developer-paid reclamation, and protecting views. The AUC's actions in Caroline betray these goals, approving projects that fracture communities and pollute natural vistas, as Wight described, despite your pledge to respect agricultural classifications.

I urge you to act decisively: implement an immediate pause on all new renewable energy approvals and order a comprehensive 12-month

review of AUC decisions, as I proposed to Neudorf on April 8. This is not about denying property rights but enforcing time-honored restrictions to align the AUC with your government's mandates through an independent lens, not a self-serving internal review. Rural Albertans deserve leadership that upholds the "agriculture first" and reclamation standards you've championed, not redirection to a broken process I'm already challenging.

I look forward to your response and am eager to discuss restoring trust in Alberta's renewable energy future. Please contact me at 403-888-6346 or rjb@russell.barnett.ca.

Sincerely,

Russell Barnett, CPA

On behalf of RACCG