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Date: June 1, 2026

Honourable RJ Sigurdson
Minister of Affordability and Utilities
Alberta Legislative Assembly
au.minister@gov.ab.ca

CC: Honourable Jason Nixon
MLA, Rimbey-Rocky Mountain House-Sundre
Rimbey.RockyMountainHouse.Sundre@assembly.ab.ca

Subject: Urgent Request for Intervention on Caroline Solar Project:

Current UCP Rules Would Deny Approval, Yet AUC Refuses Retroactive Application

Dear Minister Sigurdson,

Congratulations on your appointment as Minister of Affordability and Utilities. Your leadership in responsible energy policy, agricultural protection, and support for rural Alberta is greatly appreciated. I also copy Minister Nixon, whose constituency includes Caroline and Clearwater County, given the direct local impacts.

I am writing on behalf of the Caroline Concerned Citizens Group (CCCG), which forms part of the broader Rural Alberta Concerned Communities Group (RACCG), representing hundreds of affected residents.

The project's location remains the most indefensible aspect of this approval. Attached is a map/site plan of the 14.67 MW Caroline Solar Farm (approx. 57 acres). It is located on land zoned "Reserved for Future Residential Development" inside the Caroline hamlet boundary, on rolling

hills overlooking the community, as close as 41 metres from existing family homes and adjacent to a children's park. This siting creates unavoidable conflicts with zoning, viewsapes, residential integrity, and public safety.



For additional visuals, maps, side-by-side comparisons, and detailed project information, please visit:

<https://www.russellbarnett.ca/s-projects-side-by-side>

For visuals please see: <https://www.russellbarnett.ca/the-real-costs-of-solar-in-caroline>

This conditional approval (AUC Decision 28295-D01-2025, upheld in review Decision 29924-D01-2025) directly contradicts current UCP mandates. Under today's Electric Energy Land Use and Visual Assessment (EELUVA) Regulation and related policies, this project would almost certainly be denied. Yet the AUC has refused to apply these standards

retroactively, despite no construction having started and most conditions remaining unmet.

CRITICAL DEFICIENCIES UNDER CURRENT RULES

- **Agriculture First & EELUVA Requirements:** The project occupies cultivated land without a credible agricultural impact assessment proving long-term coexistence. The accepted “agrivoltaics” plan (sheep grazing) remains superficial and unfeasible. Current rules mandate robust assessments, post-construction productivity reports, and protections for high-value agricultural land — none of which were properly satisfied.
- **Viewscapes and Proximity:** Mandatory visual impact assessments and buffers in designated zones are not met. The 41-metre setbacks and delayed vegetative screen fail to protect pristine residential viewscapes. The current AUC minimum setbacks are 120 metres.
- **Reclamation Security:** Delayed posting (Year 2) with conflicted estimates violates UCP direction for upfront financial assurance to protect taxpayers. After year 2 the tax grants are vested and 100% of capital costs are written off. Time to leave, and they do.
- **Municipal Authority:** Post-amalgamation (January 1, 2025) Clearwater County’s formal opposition was dismissed with a palpable error of fact. Current emphasis on municipal input and alignment with development plans is ignored via Section 619 of the *Municipal Government Act*.
- **Public Safety – Inadequate Emergency Response Plan and Fire Risk:** The AUC accepted a vague draft ERP without rigorous, enforceable validation. Deficiencies include:
 - Inadequate provisions for solar-specific fire risks (electrical hazards, panel off-gassing, lithium storage).
 - Over-reliance on volunteer firefighters with limited capacity for a large-scale incident near homes.

- Failure to fully account for recent regional wildfire history and the project's proximity (41m) to residences and the hamlet.
- The plan remains incomplete (finalization deferred to development permit stage) with only generic commitments to training and inspections.

This falls short of Section 17 public interest requirements and current expectations for emergency preparedness.

The AUC's self-review process dismissed these issues, claiming no reviewable error and refusing retroactive application of post-approval UCP standards — even though construction has not begun. This creates an unfair precedent that undermines your government's policy objectives.

The AUC is well aware that NO PARTY supports this project in Caroline and yet they refuse to quit supporting the developer. In the case of Caroline this is a numbered company created a month after initial approval. These companies are SPV's (Special Purpose Vehicles) to shelter liability.

Requested Actions

We respectfully urge your leadership and support from Minister Nixon:

1. Personal Site Visit: Please visit Caroline to witness the 41-metre proximity, zoning conflict, and community impacts firsthand.

2. Immediate Pause and Reassessment: Direct or support a pause on construction for a full independent review applying current EELUVA Regulation, reclamation standards, credible ERP/fire protections, and proper municipal input. Since no construction has started and conditions are unmet, retroactive application is both feasible and necessary.

3. Municipal Empowerment: Advance reforms to strengthen county standing/veto on incompatible projects and limit inappropriate overrides of local plans.

4. Meeting: We request a discussion with you, Minister Nixon (or your officials), Clearwater County representatives, and RACCG/CCCG members at your earliest convenience.

Caroline residents support balanced renewables that respect UCP mandates, zoning, agriculture, viewsapes, and public safety — not industrial developments imposed on residential areas.

Your intervention can correct this and restore confidence in the regulatory framework and head off what will surely turn into an ugly situation if the residents are forced to stop this project with the only means left to them; civil disobedience.

Thank you for your attention. I am available at 403-888-6346 or rjb@russellbarnett.ca and look forward to your response.

Sincerely,

Russell Barnett, CPA

On behalf of the Caroline Concerned Citizens Group (CCCG)
and the Rural Alberta Concerned Communities Group (RACCG)