

From: MA Minister Minister.MunicipalAffairs@gov.ab.ca 
Subject: RE: Urgent Request for Intervention to Overrule AUC Decision 29924-D01-2025 on Caroline Solar Project and Protect Rural Municipal Interests
Date: November 21, 2025 at 9:32 AM
To: rjb@russellbarnett.ca
Cc: AU Minister AU.Minister@gov.ab.ca

MM

AR120315

Dear Mr. Barnett:

Thank you for your follow-up email of October 11, 2025, regarding the proposed solar farm project in Caroline, Alberta, approved by the Alberta Utilities Commission (AUC).

With respect to convening a meeting, while I value your interest in collaborative dialogue, I must emphasize that any practical solutions related to the approval or operation of energy projects must be pursued through the established processes for reviewing AUC decisions. This structured approach ensures transparency, fairness, and consistency in decision-making for all stakeholders involved.

Regarding your request to facilitate a provincial reassessment, a process is already in place for challenging or appealing AUC decisions. As you are aware, the Minister does not have a role in facilitating a reassessment or pausing project construction. These actions fall within the jurisdiction of the AUC and, where appropriate, the courts, to ensure all parties follow due process.

Citizens may express their opinions and concerns during public submissions and again at the AUC hearing. The resulting AUC decision may be appealed through the Court of Appeal based on law or jurisdiction. It is essential for affected parties to understand the specific laws and procedures applicable to the matter, which may be best explained by their legal representative. However, if no appeals are filed with the courts, the project applicant may proceed with the project.

If concerns with compliance with approval conditions and post-construction operations cannot be resolved with the project applicant, they can be brought to the AUC's attention for consideration. To contact the AUC, please call 310-4AUC (310-4282 in Alberta) or email info@auc.ab.ca. Additional information about the AUC's compliance and enforcement processes is available at [Compliance and enforcement Overview | AUC.ca](#).

With respect to empowering municipalities, thank you for your suggestion to consider amendments to Section 619 of the *Municipal Government Act*. Your feedback is appreciated and will be noted for consideration in a future review.

Thank you for your continued engagement on these matters. Should you have further questions about the legislated processes, I encourage you to contact the AUC directly or seek legal counsel regarding your options.

Sincerely,

Dan Williams, ECA
Minister of Municipal Affairs

cc: Honourable Nathan Neudorf, Minister of Affordability and Utilities

Classification: Protected A

From: rjb@russellbarnett.ca <rjb@russellbarnett.ca>

Sent: October 11, 2025 11:35 AM

To: MA Minister <Minister.MunicipalAffairs@gov.ab.ca>

Subject: Re: Urgent Request for Intervention to Overrule AUC Decision 29924-D01-2025 on Caroline Solar Project and Protect Rural Municipal Interests

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Subject: Re: Urgent Request for Intervention to Overrule AUC Decision 29924-D01-2025 on Caroline Solar Project and Protect Rural Municipal Interests

From: rjb@russellbarnett.ca

To: Minister.MunicipalAffairs@gov.ab.ca; Peace.River@assembly.ab.ca

Cc: AU.Minister@gov.ab.ca

Date: October 11, 2025

Dear Minister Williams,

Thank you for your email dated October 6, 2025, responding to my September 1, 2025, correspondence regarding the Caroline Solar Project and AUC Decision 29924-D01-2025. I appreciate the time you and Minister Neudorf took to review this matter, as well as the clarification on the limitations of your authority under current provincial legislation.

While I understand your position that the Minister of Municipal Affairs lacks the resolve to directly overrule AUC decisions, I remain deeply disappointed by the outcome, which continues to impose significant hardship on our rural community. As outlined in my previous letter, this project—located just 21 meters from residences on land zoned for future residential development—threatens Caroline's agricultural heritage, residential integrity, and local autonomy. It directly contradicts the UCP's "agriculture first" policies, including the Electric Energy Land Use and Visual Assessment (EELUVA) Regulation, by occupying prime lands without proven agrivoltaics, adequate visual or environmental mitigations, or upfront reclamation security. Clearwater County's post-amalgamation opposition, supported by our Rural Alberta Concerned Communities Group (RACCG), has been effectively sidelined, eroding trust in the process.

Regarding your suggestion to appeal to the Court of Appeal of Alberta, the 30-day window from the August 27, 2025, decision has unfortunately closed. As a resident-led group without substantial resources, pursuing independent legal advice—as you recommended—presents a significant barrier. In the interim, this leaves our community vulnerable to construction, with families stressed about potential home value losses, health risks, and environmental impacts.

I must respectfully refute your statement that AUC decisions are "made in the provincial interest" and must be respected by municipalities under Section 619 of the Municipal Government Act (MGA). In this case, the Caroline Solar Project itself is demonstrably not in Alberta's best interest. It undermines the province's

~~RCM IS DEMONSTRABLY NOT IN ALBERTA'S BEST INTEREST. IT UNDERMINES THE PROVINCE'S~~
agricultural priorities by converting 57 acres of cultivated land—zoned "Reserved for Future Residential Development" under the Caroline Land Use Bylaw—into an industrial site that conflicts with the Municipal Development Plan and Intermunicipal Development Plan (Decision 28295-D01-2025, para. 17). The project, situated on rolling hills that overlook Caroline, poses unmitigated risks, including proximity to homes (as close as 21 meters), visual blight where mitigation is impossible due to the elevated terrain, noise, stormwater drainage issues, soil erosion, wetland impacts, and fire hazards (paras. 6, 14-18). Far from advancing provincial goals, it burdens taxpayers with potential reclamation costs, diminishes rural quality of life, and prioritizes developer profits over community well-being and UCP-mandated "agriculture first" principles. **How can this be defended as serving Alberta's broader interests when it erodes the very rural foundations your government champions?** I urge you to explain and defend this position in light of these contradictions.

Furthermore, amending Section 619 is not required to resolve these issues if the AUC simply enforced existing provincial mandates, such as EELUVA requirements for agricultural impact assessments, visual protections, and upfront reclamation security. Instead, the AUC is working with and coaching developers on what to say to secure approvals, accepting the most ridiculous and nonsensical responses as fact without scrutiny. For example:

- The developer's superficial "agrivoltaics" plan—merely sheep grazing under panels—was accepted despite lacking any protocols for predator control, sheep health, or long-term feasibility, and was dismissed as "uncertain" yet deemed sufficient mitigation (Decision 28295-D01-2025, para. 78). This ignores real risks like attracting predators and fails to prove true agricultural coexistence.
- Delayed reclamation security starting in Year 2 was approved, risking taxpayer liability without upfront bonds as required by UCP policy, based on a developer estimate that conveniently nets low after inflated salvage values (para. 88).
- Clearwater County's explicit post-amalgamation opposition—via its Statement of Intent to Participate, council resolution (April 7, 2025), and reply submissions (Exhibit 29924-X0081)—was ignored, with the AUC falsely claiming "no municipal opposition" in a palpable error of fact (Decision 29924-D01-2025, para. 10).

These examples illustrate a flawed self-review process that favors developers over evidence-based scrutiny, perpetuating distrust in rural energy approvals.

Given your commitment to rural Alberta and municipal empowerment, as evidenced by your recent tours and mandate to support collaborative local governance, I respectfully renew my request for alternative intervention, **with the primary ask being for you to visit Caroline in person to see the impacts for yourself**—our community is in dire straits, and many residents are stressed about losing their homes:

1. Facilitate a Provincial Reassessment: Advocate within government for a pause on construction pending a retroactive application of EELUVA requirements or an independent review, ensuring compliance with agricultural coexistence, viewscape protections, and municipal input.

2. Empower Municipalities: While you noted no current intent to amend Section 619, I urge you to reconsider empowering counties like Clearwater with veto rights or automatic standing in proceedings, especially when AUC enforcement of mandates falls short.

3. Convene a Meeting: I would greatly value a virtual or in-person discussion with you, Minister Neudorf, Clearwater County representatives, and RACCG members to explore practical solutions. This could restore faith in rural energy development and address the broader implications for communities like Peace River. I am available at your earliest convenience—please let me know a suitable time.

Caroline residents are not opposed to renewables in principle, but we seek balanced growth that respects local voices and protects our way of life. Your leadership in this area could set a positive precedent for rural Alberta. Attached for reference are the original AUC decisions (28295-D01-2025 and 29924-D01-2025), Clearwater County's submissions, and related correspondence.

Thank you again for your attention. I look forward to your response and any actions you can take to support us. Please contact me at 403-888-6346 or rjb@russellbarnett.ca.

Sincerely,

Russell Barnett, CPA
Caroline, Alberta, T0M 0M0
rjb@russellbarnett.ca
403-888-6346

On behalf of the Rural Alberta Concerned Communities Group (RACCG)
Russell
403-888-6346
rjb@russellbarnett.ca

On Oct 6, 2025, at 11:28 AM, MA Minister
<Minister.MunicipalAffairs@gov.ab.ca> wrote:

AR120315

Dear Mr. Barnett:

Thank you for your email of September 1, 2025, regarding the proposed solar farm project in Caroline, Alberta and the related decision made by the Alberta Utilities Commission (AUC).

I acknowledge your request for intervention, but provincial legislation does not grant the Minister of Municipal Affairs authority to overrule AUC

decisions. To understand this matter more fully, I have consulted with my colleague, the Honourable Nathan Neudorf, Minister of Affordability and Utilities, and I am pleased to respond on behalf of the Government of Alberta.

The Rural Alberta Concerned Communities Group previously contacted the former Minister of Municipal Affairs, the Honourable Ric McIver, in November 2024. As previously stated, the AUC's decision to construct a solar farm in Caroline is a separate process outside municipal authority. Details on the process can be found at [Caroline Solar Project | AUC.ca](#).

A hearing was held on the matter, and the AUC approved the project on February 28, 2025. A request for the AUC to review the decision was submitted, and the board issued its final decision on August 27, 2025. A copy of the report is available on the AUC website at [Decisions | AUC.ca](#) and provides background, considerations, issues, and review panel findings.

As outlined in the AUC's review process, applicants or participants in a proceeding may make a formal request to the Court of Appeal of Alberta for permission to appeal an AUC decision within 30 days from the date the decision is issued.

If you are dissatisfied with the AUC's decision, you may want to consider independent legal advice to explore your options. If you do not have a lawyer, you can visit the Law Society of Alberta's lawyer directory. The directory helps connect Albertans with a lawyer based on a series of search criteria, including their area(s) of practice, location, and language. More information is available at [Find a Lawyer - Law Society of Alberta](#).

As you know, in Alberta, the *Municipal Government Act (MGA)* grants municipalities authority over land-use planning and development. This includes providing input and community concerns to the provincial boards and commissions on project applications within their jurisdictions. However, the Government of Alberta must ensure the decisions of provincial boards and commissions, made in the provincial interest, are respected by local municipalities, as outlined in Section 619 of the *MGA*. There is no intent to amend Section 619 at this time.

Thank you again for writing.

Sincerely,

Dan Williams, ECA
Minister of Municipal Affairs

cc: Honourable Nathan Neudorf, Minister of Affordability and Utilities

Classification: Protected A

From: rjb@russellbarnett.ca <rjb@russellbarnett.ca>
Sent: Monday, September 1, 2025 9:53 AM
To: Peace River <Peace.River@assembly.ab.ca>
Subject: Urgent Request for Intervention to Overrule AUC Decision 29924-D01-2025 on Caroline Solar Project and Protect Rural Municipal Interests

Dear Minister Williams please come to Caroline and see for yourself. Our community is in dire straits. Lot's of people are very stressed about loosing their homes....thank you...Caroline Residents

Russell Barnett, CPA
Caroline, Alberta, T0M 0M0
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403-888-6346]

Sept, 1, 2025

Honourable Dan Williams
Minister of Municipal Affairs
MLA for Peace River
Alberta Legislative Assembly
#3, 10013 - 101 Avenue
La Crete, AB T0H 2H0

Email: Peace.River@assembly.ab.ca

Dear Minister Williams,

Re: Urgent Request for Intervention to Overrule AUC Decision 29924-D01-2025 on Caroline Solar Project and Protect Rural Municipal Interests

I am writing as a concerned resident of Caroline, Alberta, and the originator of Proceeding 29924 before the Alberta Utilities Commission (AUC), which sought a review of the approval for the 14.67-megawatt Caroline Solar Project by PACE Bang Energy LP (PACE). As Minister of Municipal Affairs, with your deep roots in rural Alberta and commitment to empowering local governments, I urge you to intervene and overrule the AUC's decision dated August 27, 2025 (Decision 29924-D01-2025), which denied our review application. This project threatens Caroline's agricultural heritage, residential integrity, and municipal autonomy, contradicting the United Conservative Party's (UCP) "agriculture first" policies that you and your government champion.

Your advocacy for rural communities, demonstrated through your Peace River riding and recent tours of central and southern Alberta municipalities, underscores the importance of local decision-making in preserving our province's economic and cultural foundations. In Caroline, we face a crisis: an industrial solar project imposed on land zoned for future residential development, just 21 meters from homes, despite overwhelming local opposition and Clearwater County's post-amalgamation rejection. The AUC's denial undermines the municipal empowerment you advocate and demands your intervention.

Background on the Caroline Solar Project (pic 08/21/2025)





The project involves constructing a 14.67-megawatt solar power plant on 57 acres of privately owned land within the former Village of Caroline, now part of Clearwater County following the January 1, 2025, amalgamation approved by your ministry. The original AUC approval (Decision 28295-D01-2025, issued February 28, 2025) was granted despite:

- - The land being zoned “Reserved for Future Residential Development” under the Caroline Land Use Bylaw (LUB), conflicting with the Municipal Development Plan (MDP) and Inter-municipal Development Plan (IDP) that prioritize residential and agricultural growth (Decision 28295-D01-2025, para. 17).
- - Proximity to residences (as close as 21 meters), inadequate setbacks, unproven noise mitigation, visual blight from panels, and environmental risks including wetland impacts, stormwater drainage issues, soil erosion, and fire hazards (Decision 28295-D01-2025, paras. 6, 14-18).
- - A superficial “agrivoltaics” plan (sheep grazing under panels) lacking predator control, health protocols, or feasibility dismissed as uncertain yet accepted as mitigation

Health protocols, or feasibility, dismissed as uncertain yet accepted as mitigation (Decision 28295-D01-2025, para. 78).

- - Delayed reclamation security starting in Year 2, risking taxpayer liability without upfront bonds as mandated by UCP policy (Decision 28295-D01-2025, para. 88).

The Village of Caroline's pre-amalgamation "support" (Exhibits 28295-X0021, X0029) was secured without full resident consent and predated the amalgamation. Clearwater County's post-amalgamation opposition, evidenced by its Statement of Intent to Participate, council resolution (April 7, 2025), and reply submissions (Exhibit 29924-X0081), was ignored. Despite 2.5 years of resistance—including five days in court, 118 Caroline Concerned Citizens Group (CCCG) members, and now the Rural Alberta Concerned Communities Group (RACCG) with 302 members—the AUC claimed "no municipal opposition," a palpable error of fact under Rule 016, Section 5(1)(a) (Decision 29924-D01-2025, para. 10).

Our review application (Proceeding 29924) raised grounds including the amalgamation's impact (Section 5(1)(c)), procedural notice failures (Section 5(1)(d)), and errors of fact and mixed fact/law (Section 5(1)(a)), such as misalignment with land use documents and failure to account for local opposition. The AUC's denial on August 27, 2025, dismissed these without adequate scrutiny, perpetuating a flawed self-review process that favours developers over communities.

How This Contradicts UCP Policies and Your Mandate

Your government's February 28, 2024, directives, effective March 1, 2024, and codified in the *Electric Energy Land Use and Visual Assessment (EELUVA) Regulation* (December 6, 2024), mandate an "agriculture first" approach:

- - Renewable projects on high-quality (Class 1-3) agricultural land require agricultural impact assessments proving coexistence, post-construction productivity reports within 36 months, and irrigability assessments where applicable.
- - Visual impact assessments are mandatory in designated zones (over 82,000 sq km), with buffer zones scrutinizing solar projects near pristine viewscapes.
- - Upfront reclamation security to the province or landowners, ensuring no taxpayer burden.

The Caroline project, approved before these rules but reviewed afterward, violates them: it occupies cultivated lands without proven agrivoltaics, ruins residential viewscapes, and offers delayed security. Minister Neudorf's August 23, 2024, letter on the Reconcept solar project in Lacombe reinforces limiting projects on prime lands unless agriculture co-exists, protecting viewscapes, and ensuring developer-paid reclamation—principles betrayed here. Premier Smith's talk show comments (referenced in my April 13, 2025, letter to her) emphasize balancing property rights with agricultural classifications, yet the AUC overrides zoning and community voices under a misguided "private property" veil.

As Minister of Municipal Affairs, sworn in on May 16, 2025, your mandate includes supporting collaborative local government and respecting municipal bylaws (per your Premier's letter). The AUC's reliance on Section 619 of the *Municipal Government Act*, which allows its approvals to prevail over municipal land use bylaws, undermines Clearwater County's post-amalgamation authority and the LUB's residential zoning. Your rural roots in the sand and gravel industry and advocacy for families align with protecting Caroline's agricultural and residential future from this disruptive project.

Request for Your Intervention

I respectfully request that you:

¹ Overrule the AUC Decision: Exercise ministerial authority under the *Alberta Utilities Act*

- 1. Overrule the AUC Decision.** Exercise ministerial authority under the Alberta Utilities Commission Act* or *Municipal Government Act* to direct a full, independent review or revocation of Decisions 28295-D01-2025 and 29924-D01-2025, applying 2024-2025 policies retroactively where public interest demands.
- 2. Implement a Provincial Pause:** Support an immediate pause on this project's construction, pending reassessment of municipal opposition and compliance with EELUVA requirements.
- 3. Empower Municipalities:** Advocate for amending or revoking Section 619 of the *Municipal Government Act*, which permits the AUC to override municipal land use bylaws, to restore local planning authority. Additionally, support tools allowing counties like Clearwater to veto non-compliant projects, including automatic standing in AUC proceedings and cost recovery.
- 4. Convene a Meeting:** Arrange a discussion with myself, Clearwater County representatives, and RACCG members to explore solutions restoring trust in rural energy development.

This is not about denying renewables but enforcing UCP mandates for agriculture-first, viewscape-preserving, and municipally respectful growth. Rural Albertans in Caroline and your Peace River riding deserve leadership that upholds our heritage against corporate overreach. Attached are key documents: the original AUC decision, review submissions, Clearwater County's reply, my rebuttal to PACE, Minister Neudorf's letter, my letter to Premier Smith, and the review denial decision.

Thank you for your attention to this urgent matter. I am available at 403-888-6346 or rjb@russellbarnett.ca to discuss further. I look forward to your prompt response and action.

Sincerely,

Russell Barnett, CPA

403-888-6346

rjb@russellbarnett.ca

On behalf of the Rural Alberta Concerned Communities Group (RACCG)

