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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 (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 (CCCCG) 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 viewscales.
- - 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 viewscales, 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 viewscales, 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 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@russell.barnett.ca to discuss further. I look forward to your prompt response and action.

Sincerely,

Russell Barnett, CPA

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