



Alberta Electric System Operator

Modifications to Sunnybrook 510S and Livock 939S Substations Needs Identification Document

November 19, 2015

Alberta Utilities Commission

Decision 20736-D01-2015

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Modifications to Sunnybrook 510S and Livock 939S Substations

Needs Identification Document

Proceeding 20736

Application 20736-A001

November 19, 2015

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Fifth Avenue Place, Fourth Floor, 425 First Street S.W.

Calgary, Alberta

T2P 3L8

Telephone: 403-592-8845

Fax: 403-592-4406

Website: www.auc.ab.ca

1 Introduction and background

1. The Alberta Electric System Operator (AESO) filed an application with the Alberta Utilities Commission pursuant to Section 34 of the *Electric Utilities Act* for approval of the needs identification document (NID) for modifications to the existing Sunnybrook 510S and Livock 939S substations. The application was registered on August 13, 2015 as Application 20736-A001.
2. After reviewing the NID application, the Commission issued information requests to the AESO on September 1, 2015. The AESO responded to the requests on September 3, 2015, and September 14, 2015, respectively.
3. The Commission issued a notice of application on September 9, 2015. The notice was sent directly to the postal code addresses provided by the AESO for all landowners, occupants, agencies and other interested parties located in the area where the proposed modifications would be implemented. The notice was automatically emailed to eFiling System users who had chosen to be notified of notices of application issued by the Commission and was also published on the AUC website. The notice set out a deadline of September 29, 2015 for filing submissions of concerns about or in support of the application.
4. In response to the notice, the Commission received a letter on September 29, 2015 from counsel of the Bigstone Cree Nation requesting a time extension to file a written submission to allow the Bigstone Cree Nation to compile information.
5. On October 2, 2015, the Commission granted the requested time extension to the Bigstone Cree Nation to file a written submission in Proceeding 20736 on or before October 13, 2015.
6. The Bigstone Cree Nation filed a submission dated October 10, 2015 indicating that it had significant concerns that its treaty and aboriginal rights would be directly and adversely affected because the modifications to Sunnybrook 510S and Livock 939S substations proposed in the application would take place in the heart of its traditional territory. The Bigstone Cree Nation also submitted that it had not been adequately or meaningfully consulted in respect of the AESO NID application.
7. The Bigstone Cree Nation requested that the Commission not approve the AESO's NID application because the application did not demonstrate that the proposed modifications are in the public interest. The Bigstone Cree Nation also requested that the Commission consider the NID application and associated facility application jointly because it had concerns regarding cumulative impacts to its treaty and aboriginal rights.

8. On October 29, 2015, the Commission issued a ruling¹ denying standing to the Bigstone Cree Nation in this proceeding because it had not provided any information on how its treaty and aboriginal rights may be directly and adversely affected by the proposed modifications to the existing Sunnybrook and Livock substations.
9. No other objections were received or concerns expressed by the submission deadlines.
10. Because there was no party with standing to object to the application, the Commission decided that it was unnecessary to hold a hearing to consider the application and made its decision on the application based upon the record before it.

2 Discussion

11. The AESO stated that modifications to the existing Sunnybrook 510S and Livock 939S substations are required to facilitate the integration of the Fort McMurray West 500-kilovolt (kV) Transmission Project into the Alberta Interconnected Electric System. It explained that the Fort McMurray West 500-kV Transmission Project consists of a 500-kV transmission line segment between the Sunnybrook substation and the Livock substation and a 500-kV transmission line segment between the Livock substation and the Thickwood Hill substation. The Fort McMurray West 500-kV Transmission Project was designated as critical transmission infrastructure by the government of Alberta and does not require a NID application. The Sunnybrook and Livock substations modifications were not designated as critical transmission infrastructure and do require a NID application from the AESO.
12. In its NID application, the AESO proposed to add a 500-kV circuit breaker, a 500-kV line shunt reactor and an associated neutral reactor at the Sunnybrook 500-kV substation to reliably terminate the 500-kV transmission line segment of the Fort McMurray West 500-kV Transmission Project between the Sunnybrook substation and the Livock substation at the Sunnybrook substation.
13. The AESO proposed to modify the Livock 240-kV substation to enable alternating current station service for the Livock 500-kV switchyard to be supplied from the Livock 240-kV substation.
14. The AESO also proposed to modify, alter, add or remove equipment or devices, including switchgear and operational, protection, control and telecommunication devices at both Sunnybrook and Livock substations to integrate and reliably operate the Fort McMurray West 500-kV Transmission Project.
15. The AESO stated that the proposed modifications are minor in nature and would be confined to the existing facilities and on property owned by AltaLink Management Ltd. (AltaLink) and ATCO Electric Ltd. (ATCO), respectively.
16. The AESO stated that, subject to approval of the NID application, it intends to direct the incumbent transmission facility owners, AltaLink and ATCO, to submit their respective facility applications for the modifications to the Sunnybrook and Livock substations. The AESO also

¹ Exhibit 20736-X0023.

stated that it intends to direct AltaLink and ATCO to submit their facility applications at approximately the same time that a facility application for the Fort McMurray West 500-kV Transmission Project is submitted, to give the Commission an opportunity to combine and consider these applications jointly.

17. The AESO stated that it would direct AltaLink and ATCO to co-ordinate the in-service dates of the modifications to the Sunnybrook and Livock substations to facilitate commissioning, testing, and integration of the Fort McMurray West 500-kV Transmission Project. The AESO anticipated that the commissioning of the Fort McMurray West 500-kV Transmission Project and the Sunnybrook and Livock substations modifications would begin approximately in December 2018. The Fort McMurray West 500-kV Transmission Project is currently expected to be in-service in June 2019. The AESO submitted that should the in-service date of the Fort McMurray West 500-kV Transmission Project change, it would adjust the in-service date of the modifications to the Sunnybrook and Livock substations accordingly.

18. The AESO directed AltaLink and ATCO to prepare a cost estimation for the modifications to the Sunnybrook and Livock substations, respectively. AltaLink estimated the capital cost of the Sunnybrook substation modifications to be approximately \$40 million (\$2019, +/- 30 per cent). ATCO estimated the capital cost of the Livock substation modifications to be approximately \$3 million (\$2018, +/- 30 per cent). The AESO has determined that all estimated costs are system related.

19. The AESO conducted a participant involvement program as part of its application. The AESO provided public notification to the stakeholders in the area where the proposed modifications would be made. The stakeholders included the regional municipality and county, industrial companies, individual trappers, and First Nations, including the Bigstone Cree Nation. The AESO mailed a stakeholder notification letter and advertised its notification of the NID filing in the Edmonton Examiner and Wabasca Fever newspapers. It also set-up a dedicated telephone line and email address. The AESO stated that no issues or concerns were raised in relation to the need for the modifications to the Sunnybrook or Livock substations.

20. AltaLink and ATCO advised the AESO that they would address the major aspects of the modifications as specified in Section 6.1 of Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments* in the related facility applications. AltaLink and ATCO confirmed that the incremental impact of the project would be minor in nature and would be limited to or related to modification to the existing infrastructure on the existing property.

21. AltaLink stated that the proposed modifications to the existing Sunnybrook substation would not be located within the areas covered by any approved regional land use plan. ATCO stated that the Livock substation is located within the area covered by the Lower Athabasca Regional Plan and that it would address the requirements of the plan in its related facility application.

3 Findings

22. The Commission finds that the application meets the information requirements of a NID set out in Rule 007.

23. The Commission notes from the AESO's submission that a participant involvement program has been conducted and finds that there are no outstanding public or industry objections or concerns from any party with standing.

24. No interested party has demonstrated that the AESO's assessment of the need for the modifications to the Sunnybrook and Livock substations to facilitate the integration of the Fort McMurray West 500-kV Transmission Project into the Alberta Interconnected Electric System is technically deficient, or that approval of the NID application is not in the public interest. Therefore, the Commission considers the AESO's assessment of the need to be correct in accordance with subsection 38(e) of the *Transmission Regulation*, and approves the AESO's NID application.

25. The Commission expects that, as stated in the NID application, the AESO will direct AltaLink and ATCO to co-ordinate the filing of their respective facility applications for the Sunnybrook and Livock substations modifications with the filing of the Fort McMurray West 500-kV Transmission Project.

4 Decision

26. Pursuant to Section 34 of the *Electric Utilities Act*, the Commission approves the NID for the project and grants the AESO the approval set out in Appendix 1 - Needs Identification Document Approval 20736-D02-2015 – November 19, 2015 (Appendix 1 will be distributed separately).

Dated on November 19, 2015.

Alberta Utilities Commission

(original signed by)

Anne Michaud
Commission Member