AUC
Alberta Utilities Commission

Gransolar Alberta One, Inc.

Blue Heron Solar Project

April 1, 2026

Alberta Utilities Commission
Decision 30032-D01-2026
Gransolar Alberta One, Inc.
Blue Heron Solar Project
Proceeding 30032
Applications 30032-A001 to 30032-A003

April 1, 2026

Published by the:
Alberta Utilities Commission
Eau Claire Tower
1400, 600 Third Avenue S.W.
Calgary, Alberta T2P 0G5

Telephone: 310-4AUC (310-4282) in Alberta
1-833-511-4AUC (1-833-511-4282) outside Alberta
Email: info@auc.ab.ca
Website: www.auc.ab.ca

The Commission may, no later than 60 days from the date of this decision and without notice, correct typographical, spelling and calculation errors and other similar types of errors and post the corrected decision on its website.

Contents

1 Decision summary 1

2 Background 1

3 The approval process for the project 3

4 How does the Commission assess the public interest? 4

5 Findings 4

5.1 The emergency impacts of the project have not been sufficiently mitigated 5

5.1.1 Some residents do not have an escape route in the event of a fire in the project area 6

5.1.2 It is unclear whether local emergency responders can adequately respond in the event of emergency 7

5.2 Noise impacts from pile driving are significant and Gransolar's proposed mitigation is insufficient 10

5.3 The Commission is concerned with the use of agricultural land for this project 11

5.3.1 Application of the EELUVAR to the project 12

5.3.2 The appropriate use-cases for AGRASID LSRS classification as compared to field assessment LSRS classification; AGRASID should be used for LSRS classification in most cases 13

5.3.3 The LSRS classification is consistent between the experts 14

5.3.4 An agricultural impact assessment is required 15

6 Decision 16

Appendix A – Proceeding participants 17

Appendix B – Oral hearing – registered appearances 18

List of figures

Figure 1. Proposed Blue Heron Solar Project boundary 2

Figure 2. Residences in the project area 6

1 Decision summary

1. In this decision, the Alberta Utilities Commission denies applications from Gransolar Alberta One, Inc. to construct and operate the Blue Heron Solar Project (the project). The project would have consisted of a 200-megawatt (MW) solar power plant and a 200-MW battery energy storage system (BESS) with a storage capacity of 300 megawatt-hours.

2. In this decision, the Commission finds that the project has the following major deficiencies, which contributed to its overall conclusion that approval of the project is not in the public interest:

- Gransolar's emergency response plan was insufficient as it did not adequately consider or mitigate the potential impacts to local residents in the event of an emergency, which left concerns regarding the safety of those residents largely unaddressed. The siting is unsuitable given these concerns.

- Gransolar did not adequately mitigate off-site noise impacts.

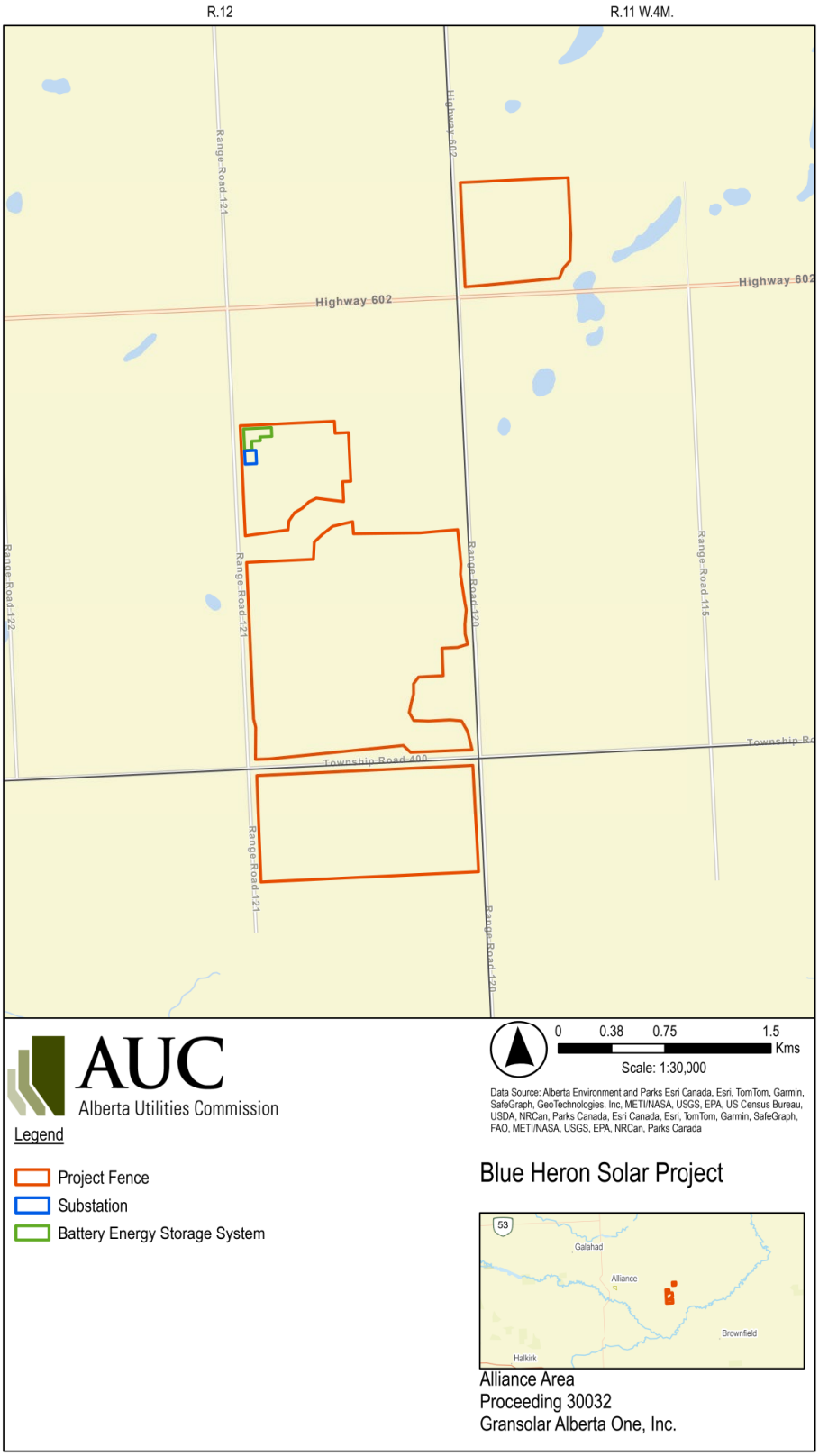
- Gransolar proposed to build the project on high-quality agricultural land and did not submit the required agricultural impact assessment, as mandated under the *Electric Energy Land Use and Visual Assessment Regulation* (EELUVAR).

2 Background

3. On May 12, 2025, Gransolar filed applications with the Commission for approval to construct and operate the Blue Heron Solar Project. The project would have consisted of a solar power plant with approximately 415,000 solar photovoltaic modules installed on a single-axis tracking system, 53 inverters, a BESS, an electrical collection system, internal access roads and a 240-kilovolt project collector substation.

4. The project was proposed to be located on approximately 1,064 fenced acres (430.8 hectares) of private, cultivated land in Flagstaff County, approximately 11.5 kilometres east of the village of Alliance as shown on the map in Figure 1.

Figure 1. Proposed Blue Heron Solar Project boundary



5. The Commission issued a notice for the applications and received statements of intent to participate from area landowners who formed the Blue Heron Landowners Group (BHLG). The Commission granted standing to this group and its members.

6. The BHLG was concerned about the project siting choice, decreased property values, visual effects, increased noise, interference with agricultural operations, use of agricultural land, solar glare, weeds and pests, decommissioning and reclamation, fire risk and emergency response, construction impacts to local roads, and effects on the environment.

7. The Commission held a virtual oral hearing from December 15, 2025, to December 17, 2025, and completed a site visit of the project area on January 16, 2026.

3 The approval process for the project

8. In this section of the decision, the Commission describes the legal framework in which its decisions are made. First, the Commission explains its mandate and powers when considering facility applications. Then, the Commission describes how it assesses the public interest.

9. The applicant bears the onus of demonstrating that approval of its project is in the public interest. Interveners may attempt to show that the applicant has not met its onus by demonstrating the effects of the project on their interests and explaining what a better balancing of the public interest might be. The Commission's role is to test and assess the evidence before it and engage in a multifaceted analysis established by the regulatory regime, to determine if the project should be approved, and if so, whether any conditions should apply.

10. On February 28, 2024, the Minister of Affordability and Utilities issued a letter to the AUC regarding upcoming legislative changes to be made with respect to renewable developments.[1] Among others, the letter indicated that the Government of Alberta would bring forward policy to direct the AUC to take an "Agriculture First" approach, and that "Alberta will no longer permit renewable generation developments on Class 1 and 2 lands, unless a proponent can demonstrate the ability for both crops and/or livestock and renewable generation to co-exist."

11. On December 6, 2024, the EELUVAR[2] was enacted. The regulation was established to protect high-quality agricultural land, irrigable land and valued viewscapes from the impacts of electric energy generation development. On December 18, 2024, the AUC issued Bulletin 2024-25,[3] which included interim information requirements intended to provide initial direction on how the Commission would apply the EELUVAR.

12. On July 8, 2025, the Ministry of Agriculture and Irrigation established the *Guidelines to evaluate agricultural land for renewable generation* (the Guidelines), which provided guidance in interpreting the EELUVAR. The Guidelines were issued after Gransolar had filed its applications but before a decision was issued. The Commission addresses how it applies the EELUVAR, Bulletin 2024-25, and the Guidelines in more detail below.

---

1 Letter re Policy Guidance to the Alberta Utilities Commission (28 February 2024) from Nathan Neudorf, Minister Affordability and Utilities.

2 Government of Alberta Order-in-Council 368/2024.

3 Alberta Utilities Commission. 2024. Changes to interim information requirements for power plant applications. https://media.auc.ab.ca/prd-wp-uploads/News/2024/Bulletin%202024-25.pdf

4 How does the Commission assess the public interest?

13. When the Commission receives an application to construct and operate a power plant, Section 17(1) of the *Alberta Utilities Commission Act* is engaged. This provision states that, in addition to any other matters it may or must consider, the Commission must consider whether the proposed project is in the public interest, having regard to its social, economic, environmental and other effects.

14. As a starting point, a power plant application filed with the Commission must comply with Rule 007: *Facility Applications*[4] and Rule 012: *Noise Control*. These rules provide a comprehensive set of requirements for a facility application.

15. The Commission also balances a variety of public interest considerations, taking into account the purposes of the *Hydro and Electric Energy Act* and the *Electric Utilities Act*. These statutes provide for the economic, orderly and efficient development of facilities and infrastructure, including power plants and energy storage facilities, that are in the public interest. They also set out a framework for a competitive generation market, where decisions about whether and where to generate electricity are left to the private sector.[5]

16. Conducting a public interest assessment requires the Commission to assess and balance the competing elements of the public interest in the context of each specific application before it. Part of this exercise is an analysis of the nature of the impacts associated with a particular project, and the degree to which the applicant has addressed these impacts. Balanced against this is an assessment of the project's potential public benefits. The assessment includes the positive and adverse impacts of the project on those nearby, such as landowners, and on those more distant, such as the general population of Alberta.

17. The Commission has previously affirmed that the public interest will be largely met if an application complies with existing regulatory standards and the project's public benefits outweigh its negative impacts.

5 Findings

18. For the reasons outlined below, the Commission finds that approval of the project is not in the public interest.

19. The Commission denies the project due to several major deficiencies. First, Gransolar's emergency response plan was insufficient as it did not adequately consider or mitigate the potential impacts to local residents in the event of an emergency, which left concerns regarding the safety of those residents largely unaddressed. Second, Gransolar has not adequately mitigated off-site noise impacts. Lastly, despite being located on high-quality agricultural land (as defined by the EELUVAR; Land Suitability Rating System (LSRS) Class 2 land), Gransolar did not submit the required agricultural impact assessment, as mandated under the EELUVAR.

---

[4] Rule 007: *Facility Applications* came into effect on November 6, 2025. Previously, the rule was named Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines*, which is the version of the rule that was in effect at the time of, and applicable to, this proceeding.

[5] *Hydro and Electric Energy Act*, sections 2 and 3; *Electric Utilities Act*, Section 5.

20. The Commission provides reasons for its decision in the following sections. First, the Commission discusses safety considerations relating to the project, especially if there is a fire that starts in the project area. The Commission then discusses the potential impacts associated with noise caused by the project. The Commission concludes with discussing the project's impacts to agricultural land and the application of the EELUVAR.

21. Given the Commission's denial of the project based on these major deficiencies, the Commission does not consider it necessary to comment on the other issues raised in this proceeding.

5.1 The emergency impacts of the project have not been sufficiently mitigated

22. The Commission finds that there is insufficient evidence to demonstrate that Gransolar has adequately considered and mitigated the potential safety impacts of the project.

23. Information requirements SP11 to SP13 of Rule 007[6] require applicants to develop an emergency response plan; identify site-specific risks, develop mitigation measures, and monitoring and communication protocols; and confirm that local responders and authorities have been contacted or notified regarding the plan. For the reasons discussed below, the Commission finds that Gransolar's emergency response planning is inadequate. The Commission is especially concerned about the siting of the project between several of the BHLG member residences and their only egress in the event of an emergency. Gransolar did not sufficiently address these concerns in its emergency response plan, nor throughout the course of this proceeding.

24. The BHLG was concerned about distance of the closest fire station, the capacity of volunteer fire responders to handle a fire at the project site, the availability of water on site in the event of an emergency, and evacuation procedure. The BHLG retained Integrated Modelling Inc. (INTMOD) to provide a report with a hazard assessment and reasonable worst-case fire scenario for the proposed BESS, including the resulting evacuation zone. Gransolar retained RWDI to complete an air quality dispersion modelling assessment in response to INTMOD's evidence.

25. The BESS would have been located in the northwest corner of the project site. The project's BESS would include a supervisory control and data acquisition monitoring system, emergency management system, battery management system, fire detection system and closed-circuit television for visual confirmation of fire.

26. The Commission understands that BESS modules are designed to burn out and not ignite neighbouring modules in the event of a fire. Although both experts extensively discussed potential health impacts from emissions in the event of a fire at the BESS, the Commission is also concerned about the potential impacts of a fire in the general power plant area, caused by the BESS or by other means, and the implications that would have on local landowners. Gransolar noted that the BESS would use sophisticated fire suppression systems, and the Commission understands that the potential for fires in the area is high as grass fires move quickly, and the windy nature of the area exacerbates the risk of fires spreading and leaping over roads. Gransolar did not discuss the potential for fire, from the project or surroundings (e.g., wildfires), to spread elsewhere in the area and how its emergency response plan accounted for the siting of the project between nearby residents and their only exit route.

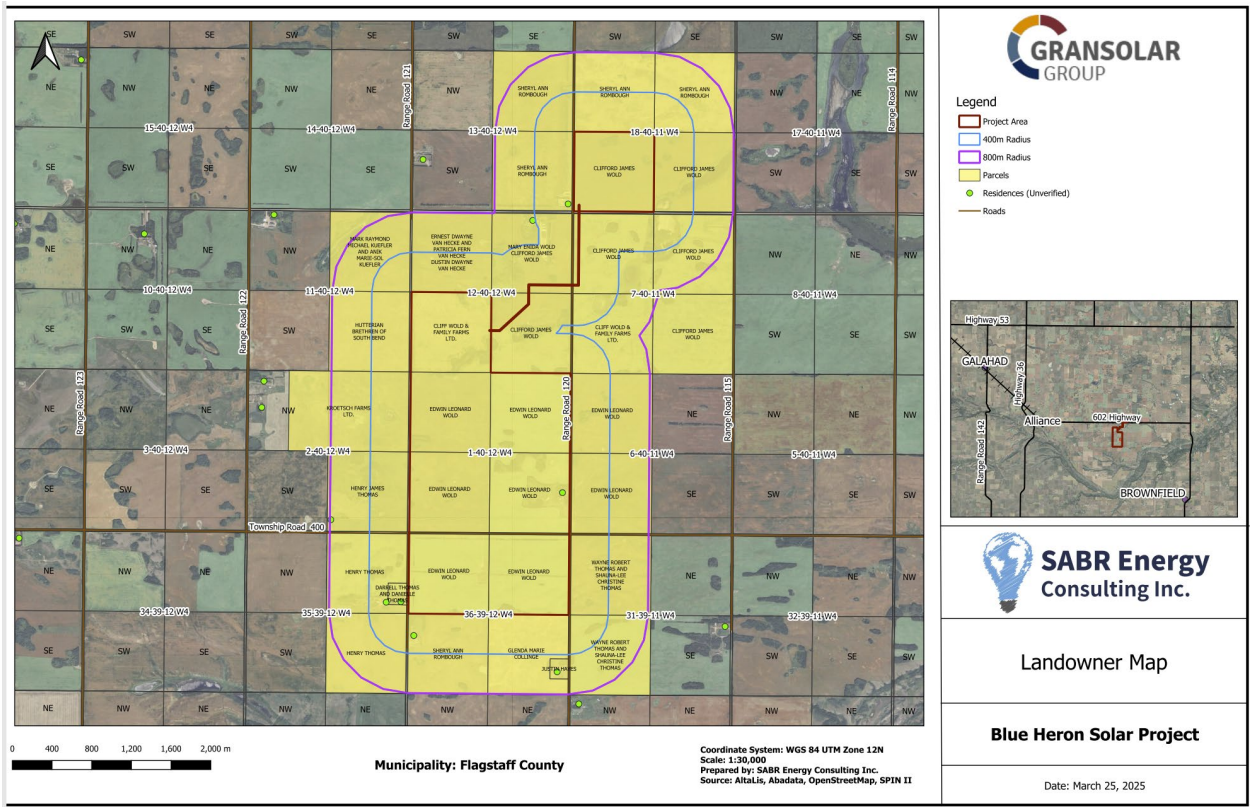
[6] The previous version, being Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines.*

5.1.1 Some residents do not have an escape route in the event of a fire in the project area

27. The Commission is extremely concerned about the safety implications for several residents living near the project. As described below, there are BHLG members who reside on dead-end roads near the project. For some residents, the project is sited between their houses and their only exit route. The Commission is concerned that a fire in the project area could block them from their only egress. Additionally, the roads on which these residences are sited are narrow, impacting their ability to evacuate the area.[7]

28. The figure below shows six residences on the southern end of the project that only have one exit route in the event of an emergency. Four of these residences belong to BHLG members. The remaining two residences are unverified.

Figure 2. Residences in the project area[8]



29. The following BHLG members reside on dead-end roads near the project:

- Darrell and Danielle Thomas reside on Range Road 121, which is a dead-end road with only one exit route. In the event of an emergency requiring evacuation, they would need to exit north on Range Road 121, which runs adjacent to the western edge of the project and exit the area via Township Road 400.[9]

[7] Exhibit 30032-X0100, Appendix D - Submissions of Justin and Emily Hayes_final, PDF page 3.
[8] Exhibit 30032-X0005, Appendix D - 2025-05-12 Blue Heron Solar - PIP Report_FINAL, PDF page 22.
[9] Exhibit 30032-X0098, Appendix B - Submissions of Darrell and Danielle Thomas_final, PDF page 5.

- Henry Thomas lives next to Darrell and Danielle on Range Road 121 and has the same sole exit route.[10]

- Emily and Justin Hayes reside on Range Road 120, which is a dead-end road with only one exit route. They would need to evacuate by heading north on Range Road 120, which runs adjacent to the eastern edge of the project and exit the area via Township Road 400.[11]

- Wayne and Shauna-Lee Thomas reside on Range Road 115, which is a dead-end road with only one exit route. They would need to evacuate by heading north on Range Road 115 and exit the area via Township Road 400.[12]

30. Of the above residences, the closest residents are Darrell and Danielle Thomas, whose house is located approximately 60 metres from the project boundary.[13]

31. There are other interveners who live similar distances to the project, but they would have multiple egress unlike the residents above.

32. BHLG members indicated that road upgrades were a potential mitigation to improve egress. Gransolar noted that Flagstaff County has not expressed any concerns regarding the need for road upgrades or other necessary safety measures for safe egress in the event of an emergency. Gransolar committed to addressing road concerns, upgrades and other safety measures with the County during the development permit stage for the project.

33. The Commission understands that Gransolar plans to defer to the County regarding matters involving road upgrades. Despite the concerns raised by interveners, Flagstaff County did not directly submit evidence or participate in the hearing. After considering the County's lack of input on these concerns to date, and the preliminary nature of the project's emergency response planning, the Commission is not satisfied that Gransolar and Flagstaff County would be able to adequately address these concerns at the development permit stage.

5.1.2 It is unclear whether local emergency responders can adequately respond in the event of emergency

34. BHLG members were concerned about the potential emergency response time given the volunteer capacity of the Alliance Fire Department – the closest fire department to the project area. The Commission agrees with the BHLG's concerns that Gransolar has not presented a realistic emergency response plan that addresses resident safety and evacuation if their only exit route is compromised. This is particularly concerning given the siting of the project.

35. The Commission notes that the draft emergency response plan provided by Gransolar does not provide site-specific emergency response procedures if a fire spreads to the

[10] Exhibit 30032-X0099, Appendix C - Submissions of Henry Thomas_final, PDF page 1.
[11] Exhibit 30032-X0100, Appendix D - Submissions of Justin and Emily Hayes_final, PDF page 3.
[12] Exhibit 30032-X0097, Appendix A - Submissions of Wayne and Shauna-lee Thomas with attachment, PDF page 2.
[13] Exhibit 30032-X0098, Appendix B - Submissions of Darrell and Danielle Thomas_final, PDF page 1; Exhibit X0080, Gransolar IR Response to GAO-BHLG-2025SEP2-001-049, PDF page 67.

neighbouring area and residents are trapped. Gransolar's plan relies on the response measures of the local fire department for fires external to the project's battery container or enclosure.[14]

36. Although Gransolar later committed to additional mitigation measures such as notifying all residents within a 1.5-kilometre radius in the event of a BESS fire, providing guidance on emergency response procedures to assist local municipal services, engaging with local emergency services to ensure a fully developed emergency response plan is in place prior to construction, installation of on-site water supply if determined necessary by the fire department, and retaining a third-party expert to ensure that emergency responders will have proper training on the emergency response plan, the Commission remains unsatisfied with the preliminary, general nature of these commitments to date, especially given the extensive evidence on the record regarding the potential risks to the specific residents discussed above.

37. W. and S.-L. Thomas explained that the drought conditions for many years have created a high-risk environment for fast fire spread.[15] They noted that, because the project will be fenced off, residents would not be able to get inside the project fence and build fire breaks with their farming equipment like they typically would in an open field.

38. S.-L. Thomas explained that a fire anywhere in the project area is a direct threat to her family's home, lives, livestock, and the future of their farming.[16] She also noted that fires can start quickly and easily in the area and arrive at residences before emergency responders have time to react:

> As discussed yesterday, emergency response relies on volunteers, with long response times. We have lived through years of drought. Fires can move fast here, and the predominant winds blow directly from the proposed battery facility towards our residence. In dry conditions in the area, fires can start simply from exhaust symptoms or metal equipment sparking a field rock. We've witnessed grass and stubble fires spread across quarter sections within minutes, and it's often the farmers present in the field at the time that are able to immediately immobilize and use their agriculture equipment to suppress those fires.[17]

39. Darrell Thomas provided similar testimony regarding the low likelihood of local emergency responders arriving on time and the difficulty of creating fire breaks with the project area fenced off:

> Grassfires here happen a lot, and they can start, and they expand at such a rapid pace, because it's not the ones that happen on a green, nice, rainy day that are the dangers. It's the ones when the winds are high and the grasses are high. And 90 percent of them -- actually, no, I'm going to rephrase that. 100 percent of the time that we have raging grassfires, it's not the fire departments or the volunteer fire departments that stop it. What it is is the farmers and the community gathering together, and all of a sudden a disc comes from one direction, farm equipment comes from the other direction, and we start creating these fire breaks.

---

14 Exhibit 30032-X0008, Appendix G - 250324_Blue Heron ERP_final, PDF page 14.
15 Exhibit 30032-X0097, Appendix A - Submissions of Wayne and Shauna-lee Thomas with attachment, PDF page 2.
16 Transcript, Volume 2, page 277, line 23 to page 278, line 1.
17 Transcript, Volume 2, page 278, lines 5-16.

> So my root and Number 1 concern is we now have all this vegetation fenced off. And with good concern. They don't want us entering their property because of the damage we may do. But now we got 600 acres of raging grassfires that we can't create fire breaks around, because that's what we do in -- on fields with crops. We go in there, we create fire breaks, that then the fire -- the volunteer fire department shows up and help us -- like, they finish off the job with water.[18]

40. Gransolar prepared a site-specific emergency response plan and provided the plan to Flagstaff County. Gransolar also provided the plan to the Regional Fire Chief with Flagstaff Regional Emergency Services, who provides emergency services throughout the region via fire departments such as the Alliance Fire Department. Because they have not responded, Gransolar is uncertain whether the draft emergency response plan has been shared with the Alliance Fire Department.[19] The Alliance Fire Department is the volunteer-staffed local emergency responder in the area, located approximately 10 minutes west of the project. No one from the County, the County's regional fire chief's office or the Alliance Fire Department submitted written evidence or testified at the hearing.

41. The Commission is concerned about Gransolar's lack of communication with the Alliance Fire Department to date, especially given the extensive emergency response concerns expressed by local residents and its siting choices. The Commission is also concerned that the draft emergency response plan, although site-specific, does not adequately address scenarios in which a general fire occurs on the project lands, and affects nearby residents who only have a single means of egress. While the plan outlines emergency response procedures for fires originating at the BESS, the plan suggests that fires external to the BESS should be addressed by contacting local emergency services and clearing personnel from the immediate area. The plan does not include measures for communicating with nearby residents who may be affected by such incidents.

42. The Commission notes that the water source for the project has not yet been determined, as Gransolar plans to assess these details after further discussion with the municipality and the local fire department. This is also concerning given the evidence on the record about the fire risk in the area. The Commission does not understand why Gransolar has not developed preliminary water sourcing plans at this stage of the project.

43. Interveners also noted the poor or lack of cellular reception in the project area, which would further hinder emergency response efforts. Many residents in the area do not have landlines as they are unreliable and difficult to set up, and they rely on two-way radios on their farm equipment to communicate when working on the field.

44. The Commission lacks confidence in Gransolar's emergency response planning and is not assured that Gransolar has adequately investigated the potential risks to nearby residents. Gransolar has not addressed the emergency egress concerns described in this section of the decision. Given the number of nearby residents with only one route of entry to and exit from their properties, the absence of plans for potential emergency exit routes, the lack of communication with the local fire department, the inability to provide early warning of a BESS (or other) fire due to unreliable cellular communication, and the fact that water sourcing remains unresolved, the Commission is not satisfied that Gransolar has demonstrated that the project is safe or in the public interest.

---

[18] Transcript, Volume 2, page 289, lines 3-25.

[19] Exhibit 30032-X0165, Gransolar letter to AUC re Undertaking Responses - December 16, 2025, PDF page 4.

5.2 Noise impacts from pile driving are significant and Gransolar's proposed mitigation is insufficient

45. In this section, the Commission finds that pile driving would create significant and unacceptable construction noise impacts for nearby residents and that Gransolar's proposed mitigation does not adequately address these impacts.

46. The BHLG raised concerns about construction and operational noise and retained Henk de Haan from dBA Noise Consultants Ltd. to provide evidence on noise impacts.[20] H. de Haan identified pile drivers, excavators, generators and civil-work equipment as major noise sources. He emphasized that pile driving produces high-intensity, impulsive and repetitive hammering, which may be highly disturbing to nearby residents. The BHLG and H. de Haan recommended that Gransolar develop a comprehensive construction noise management plan incorporating the following mitigation measures:

- prioritizing screw piles over driven piles where feasible,
- installing noise screens around pile-driving equipment,
- limiting pile driving to weekday daytime hours,
- using broadband backup alarms,
- locating laydown areas away from residences,
- restricting generator use to daytime hours, and
- enforcing non-idling and non-radio policies.

47. Gransolar estimated that pile installation may continue for four to seven months,[21] and acknowledged that pile driving is a notable construction noise source. However, Gransolar confirmed that it will use driven piles across most of the site and declined to evaluate screw piles for the project site.[22] To reduce construction noise, Gransolar committed to implement the mitigation measures in Section 2.10 of Rule 012, including:[23]

- restricting noise-generating activities to the daytime (i.e., 7 a.m. to 10 p.m.),
- using broadband backup beepers,
- applying non-idling and non-loud music policies, and
- consulting with affected landowners during construction regarding specific concerns, including pile-driving noise, where reasonable.

---

[20] Exhibit 30032-X0096, BHLG Group Submissions_final.
Exhibit 30032-X0113, Appendix L - dBA Consultants Report - non confidential.

[21] Transcript, Volume 1, page 196, lines 21-25, and page 197, line 1.

[22] Transcript, Volume 1, pages 160 to 163.

[23] Exhibit 30032-X0038, AUC Round 1 IR Response - Gransolar-AUC-2025JUL07-001 to 013, PDF page 8; Exhibit 30032-X0131, Gransolar Reply Evidence - Blue Heron, PDF page 23; Exhibit 30032-X0170, Gransolar Commitment List, PDF page 14.

48. The Commission finds that pile driving is the primary noise concern raised in this proceeding. Evidence from the hearing record indicates that pile installation is expected to occur over a multi-month period, with estimated durations ranging from four to seven months, depending on weather and site conditions and that pile installation may continue into the evening on certain days, with 10 p.m. identified as the latest time at which construction activities could occur.[24] The Commission further notes that several residences are located within approximately 500 metres of the project boundary, distances at which high-intensity, impulsive pile-driving noise has a potential to cause sustained disturbance to nearby residents.

49. The Commission is concerned that Gransolar did not demonstrate adequate due diligence in evaluating or incorporating mitigation measures specific to pile-driving noise. Although Gransolar committed to construction mitigation measures under Rule 012, such as restricting construction to daytime hours (7 a.m. to 10 p.m.),[25] using broadband backup alarms, and communicating with landowners, these measures are designed to primarily address general construction noise. Gransolar did not identify measures that can meaningfully and specifically mitigate the high-intensity, impulsive noise produced by driven piles. Further, the Commission finds that Gransolar did not consider the full suite of pile-driving mitigation measures recommended by H. de Haan, including evaluating screw piles, installing noise screens and limiting pile driving to weekdays only to provide predictable quiet periods for residents.

50. While Rule 012 outlines a set of general mitigation measures for managing construction noise, the Commission does not view these measures as an exhaustive list. Rather, the Commission expects applicants to evaluate project-specific construction noise impacts, with particular attention to activities that may generate elevated or impulsive noise, such as pile driving. Applicants are expected to identify and commit to effective, feasible and context-appropriate mitigation measures that meaningfully minimize noise impacts on nearby residents.

51. Based on the above, the Commission concludes that pile-driving noise would result in significant and unacceptable impacts on nearby residents, given the multi-month duration of pile installation, the potential for noise to continue into the evening until 10 p.m., and the short distances between the construction area and residents. In the absence of a detailed, pile-driving-specific mitigation plan, the Commission finds that Gransolar's proposed measures address only general construction noise and are insufficient to meaningfully mitigate the high-intensity, impulsive noise associated with driven piles.

5.3 The Commission is concerned with the use of agricultural land for this project

52. In this proceeding, Gransolar disputed that the project was sited on high-quality agricultural land as defined in the EELUVAR and as a result chose not to submit an agricultural impact assessment. In this section, the Commission concludes that a portion of the project is sited on high-quality Class 2 land and therefore an agricultural impact assessment was required to be submitted. In reaching this conclusion, the Commission first discusses how the EELUVAR applies to this project, the appropriate use-cases for Agricultural Regions of Alberta Soil Inventory Database (AGRASID) LSRS classification as compared to field assessment LSRS

[24] Exhibit 30032-X0170, Gransolar Commitment List, PDF page 14. Gransolar stated that "Gransolar confirms that it will implement the construction noise mitigation measures recommended in Section 2.10 of Rule 012. This includes not conducting construction during the nighttime hours set out in section 2.10."

[25] Rule 012 defines daytime as the hours from 7 a.m. to 10 p.m.

classification, whether the project is sited on Class 2 land, and finally the requirement for an agricultural impact assessment.

5.3.1 Application of the EELUVAR to the project

53. During the proceeding, various interpretive documents regarding the EELUVAR were issued by both the Government of Alberta and the Commission. Some of these documents offered slightly varied interpretations resulting in questions as to how the EELUVAR would be applied to the project.

54. In accordance with the EELUVAR, a person applying for the construction or operation of a renewable power plant on privately owned high-quality agricultural land must submit an agricultural impact assessment as part of the application.[26]

55. High-quality agricultural land is a legislative definition applied to specific classifications of land provided within the *Land Suitability Rating System for Agricultural Crops […].*[27] The LSRS is a standardized method used to assess the suitability of land to support crop production, ranging from Class 1 (no to slight limitations) through Class 7 (unsuitable for crop production) based on soil, climate and landscape limitations. Reductions in suitability are indicated by increasing constraints, such as inadequate moisture, limited organic matter content, restriction to root growth, acidic or alkaline conditions, or slopes.

56. The LSRS does not determine land use decisions on its own. Instead, policymakers decide which land suitability classes are important for land use planning. Consideration of land suitability classes have been used in many municipal land use bylaws to guide development. Furthermore, the LSRS is a reliable tool in documenting the conversion of agricultural land in Alberta, where classes 1 to 3 are considered "prime agricultural lands."[28] For the Commission's adjudication of wind and solar power plants, the relevant classes have been provided through the EELUVAR.

57. The classes that are defined as "high-quality agricultural land" in the EELUVAR include LSRS Class 1 or Class 2 land, or Class 3 land that is listed in Schedule 1 of the regulation.[29] Accordingly, the Commission focuses on LSRS Class 1 to Class 3 lands because these classes represent the highest agricultural suitability, are most relevant to assessing potential effects on agricultural resources, and are explicitly named in the EELUVAR.

58. The Commission's approach to the EELUVAR was communicated in Bulletin 2024-25. The appendix included interim information requirements applicable to power plant applications filed after December 6, 2024. These interim information requirements directed applicants to use AGRASID to determine the LSRS class of the project. It also directed applicants to submit an

---

[26] *Electric Energy Land Use and Visual Assessment Regulation*, sections 2(1), 4 and 5.

[27] *Electric Energy Land Use and Visual Assessment Regulation*, Section 1(h).

[28] Government of Alberta. 2024. Annual Report 2024 – Land Use Changes in Alberta. https://open.alberta.ca/dataset/cb0d63dc-d080-4c54-914d-603d0510468d/resource/d74a9335-0d3b-4e79-84ce-aa97339d3664/download/agi-land-use-change-annual-report-2024.pdf (Accessed March 2026);
Alberta Agriculture and Forestry. 2018. Fragmentation and Conversion of Agricultural Land in Alberta. Land-use Framework Reporting: Background and Methodology. https://open.alberta.ca/dataset/a624c225-1573-4b0c-861f-1f565b91dc2a/resource/4d4e53ac-6bc4-49d6-a4c3-50a097103379/download/fragmentation-conversion2018-07-13.pdf. (Accessed March 2026).

[29] *Electric Energy Land Use and Visual Assessment Regulation*, Section 1(f).

agricultural impact assessment if any Class 1 or Class 2 land, or special cases of Class 3 land (as listed in the EELUVAR) is reported within the project footprint. Given the time of filing, the EELUVAR and the Commission's interim information requirements in Bulletin 2024-25 are applicable.

59. After the EELUVAR was published, complementary Guidelines for the application of this regulation were published.[30] The Guidelines noted that with respect to soil suitability/quality AGRASID LSRS map layers should be used to guide site selection of renewable energy projects and if applicants fail to avoid high-quality lands, it requires an agricultural impact assessment in order to support the co-existence of agricultural activities (i.e., agrivoltaics) on-site with the renewable energy project.

60. The Guidelines also state that renewable energy developers can have a qualified professional conduct a field assessment to validate the primary LSRS classification of each quarter section.[31]

61. After the Guidelines were issued, the Commission issued Bulletin 2025-12 that communicated the Commission's expectations for applications filed after August 26, 2025.[32] This bulletin re-iterated the Commission's direction for applicants to use AGRASID.

62. On November 6, 2025, the Commission issued an updated Rule 007, which incorporated the interim information requirements related to agricultural land and re-iterated the requirement for an agricultural impact assessment where there are high-quality lands. This updated version of Rule 007, while not applicable to the Gransolar project given its effective date is after the applications were filed, directs applicants to use AGRASID for LSRS while stating an option for field assessments to validate the primary LSRS class.[33]

5.3.2 The appropriate use-cases for AGRASID LSRS classification as compared to field assessment LSRS classification; AGRASID should be used for LSRS classification in most cases

63. In accordance with AGRASID, the LSRS classification for the project is predominantly Class 2 land with smaller portions of Class 3 and Class 5 lands. Gransolar submitted that these database results did not properly describe the agricultural suitability of the project lands.[34] To support this position, it relied on a LSRS field assessment of the project conducted by its consultant, Montrose Environmental Solutions Canada Inc. In its original environmental evaluation, Montrose concluded that, following its LSRS calculations, no Class 1 or Class 2 lands were reported within the project footprint, contrary to the results in AGRASID.[35] However,

30 Government of Alberta. 2025. Guidelines to evaluate agricultural land for renewable generation, https://open.alberta.ca/dataset/d6d575b4-5077-4bbb-9256-a14c0464ceed/resource/19db199b-2650-4a57-b009-6f1f032280e7/download/agi-guidelines-evaluate-agricultural-land-renewable-generation-2025.pdf (Accessed March 2026).

31 Government of Alberta. 2025. Guidelines to evaluate agricultural land for renewable generation, https://open.alberta.ca/dataset/d6d575b4-5077-4bbb-9256-a14c0464ceed/resource/19db199b-2650-4a57-b009-6f1f032280e7/download/agi-guidelines-evaluate-agricultural-land-renewable-generation-2025.pdf

32 AUC Bulletin 2025-12, https://media.auc.ab.ca/prd-wp-uploads/News/2025/Bulletin%202025-12.pdf, (Accessed March 2026), page 2.

33 Rule 007: *Facility Applications*, PDF page 38.

34 Exhibit 30032-X0007, Appendix F - 250509_EE Report, PDF page 28.

35 Exhibit 30032-X0007, Appendix F - 250509_EE Report, PDF pages 18 and 96.

Montrose's survey plots indicated that there are Class 2 lands in the area including survey locations KW010, KW024 and KW029.[36]

64. The Commission recognizes that this proceeding is the first to decide how and when a field assessment of the LSRS should be considered. In this case, the field assessment evidence generally supports the conclusions provided by AGRASID, which the Commission found helpful. However, there is an important regulatory efficiency rationale or policy for the Commission and participants in its proceedings to simply rely on the published AGRASID LSRS rating when considering whether a project meets the EELUVAR requirements. The rating is readily available and does not require competing experts with the accompanying expense and time required to determine whether a site is Class 2 or Class 3 or otherwise. The AGRASID LSRS rating provides certainty and consistency for the renewable energy sector as well as for the Commission in adjudicating these applications. Further, its adoption in other areas of land use planning demonstrates its value as an efficient benchmark for decisions on complex quality of soil matters.

65. In the Commission's view, field assessments are a validation tool which should be used sparingly, and parties should rely on the AGRASID LSRS rating for the reasons set out above. There may be circumstances where that rating may be validated by field assessments, for example, where the lands have been physically altered and disturbed to such an extent that the original rating is no longer meaningful. In the present case, when all the evidence on the record is considered, the field assessment showed that while the lands were primarily Class 3, there was up to 15 per cent of Class 2 lands. Given the productive farming observed on the project lands, and the presence of Class 2 lands supported by the field assessment, the Commission does not find that the classification provided by AGRASID is an issue. Use of AGRASID alone would have been more efficient, objective and predictable, and resulted in consistent evidence for all parties involved.

5.3.3 The LSRS classification is consistent between the experts

66. During the hearing, experts from Gransolar and the BHLG ultimately agreed that the extent of Class 2 soils in the project area likely falls between nine and 15 per cent.[37] While the experts disagreed with certain specifics in the analysis, the Commission heard both experts come to a similar conclusion about the project's LSRS classification. For example, the BHLG's expert Dr. Ivan Whitson pointed out that while one of Montrose's sample locations that contained Class 2 lands was part of an aspen grove, Montrose excluded the location from its results as the land is not currently cultivated and therefore should not be considered productive agricultural land.[38] In Dr. Whitson's opinion, the data from these Class 2 sample locations was not adequately communicated in the mapping provided by Montrose. The Commission disagrees with Montrose's rationale for excluding this location from its results, as trees can be removed to create additional productive land. Because Montrose did not map any of the sample locations containing Class 2 land, the Commission is unable to determine the full extent of Class 2 land.

[36] Exhibit 30032-X0007, Appendix F - 250509_EE Report , PDF pages 158, 207 and 227.
[37] Exhibit X0169, 2025-12-18 LT AUC re. Dr. Whitson's Response to Post Hearing Clarifying Questions, PDF page 2; Exhibit 30032-X0174, Attachment - Montrose Response to Dr. Whitson Reply, PDF page 1.
[38] Exhibit 30032-X0174, Attachment - Montrose Response to Dr. Whitson Reply, PDF pages 1 to 2.

67. The Commission finds that in this case there is LSRS Class 2 land in the project area. The Commission emphasizes that the extensive evidence and the resulting use of resources by all parties, would not have been necessary if Gransolar had applied the AGRASID classification for the project at the outset.

68. With respect to the LSRS defined by AGRASID, this classification is also consistent with the reported farm productivity and soil quality of the project lands. The Commission heard that the project land is consistently productive with yields between what is typical for regions north and south of the project area (Risk Area 12 and 9). While Risk Area 12 typically outperforms provincial yields,[39] the project lands themselves have yields closer to provincial averages and aside from barley, are comparable to the neighbouring properties.[40] The Commission also understands that project area yields have been improved by beneficial farming practices, including conservation tillage.[41]

69. Taken together, the Commission is satisfied that the project is located on land that is productive, contains up to 15 per cent of areas that are classified as LSRS Class 2 and the LSRS is generally consistent between the Montrose field assessment and the public AGRASID database. The record supports the application of the agricultural impact assessment requirements of the EELUVAR to this project.

5.3.4 An agricultural impact assessment is required

70. Because the Commission has found that the project is sited on high-quality agricultural land, under the EELUVAR, an agricultural impact assessment is required for the project.

71. Gransolar did not submit an agricultural impact assessment as its view was that the project is not sited on high-quality agricultural land. The Commission considers this a major deficiency in the applications.

72. Gransolar indicated that it is willing to submit an agricultural impact assessment if required by the Commission and in accordance with the EELUVAR.[42] However, the Commission cautions that submission of an agricultural impact assessment alone will not remedy the various other reasons for denial, as it was not the sole deficiency in this application.

[39] Exhibit 30032-X0103, Appendix G - LSRS Validation and Agronomic Implications of BHSP_Oct 8, PDF page 8.

[40] Exhibit 30032-X0133, Appendix A - Montrose Reply Evidence, PDF pages 12 and 13; Exhibit 30032-X0103, Appendix G - LSRS Validation and Agronomic Implications of BHSP_Oct 8, PDF page 9.

[41] Exhibit 30032-X0103, Appendix G - LSRS Validation and Agronomic Implications of BHSP_Oct 8, PDF page 11.

[42] Exhibit 30032-X0038, AUC Round 1 IR Response - Gransolar-AUC-2025JUL07-001 to 013, PDF page 20.

6 Decision

73. Pursuant to sections 11, 14 and 15 of the *Hydro and Electric Energy Act*, the Commission denies applications 30032-A001 to 30032-A003.

Dated on April 1, 2026.

Alberta Utilities Commission

(original signed by)

Douglas A. Larder, KC
Vice-Chair

(original signed by)

Maureen Higgins
Acting Commission Member

Appendix A – Proceeding participants

Name of organization (abbreviation) Company name of counsel or representative
Blake, Cassels & Graydon LLP Terri-Lee Oleniuk Jordan Prestie **Gransolar Alberta One, Inc.** Javier de la Cruz Aguillo
Ackroyd LLP Ifeoma Okoye Chinedu Kema **Blue Heron Landowners Group (BHLG)** Darrell Thomas Emily Hayes Justin Hayes Wayne Thomas Shauna-Lee Thomas Derek Rombough Sheryl Ann Rombough Henry Thomas Brad Nicolson
Alberta Utilities Commission **Commission panel** Douglas A. Larder, KC, Vice-Chair Maureen Higgins, Acting Commission Member **Commission staff** Rob Watson (Commission counsel) Jasleen Dhanoa (Commission counsel) Kloria Wen Derek Rennie Brittney Sammons Joan Yu

Appendix B – Oral hearing – registered appearances

Name of organization (abbreviation) Name of counsel or representative	Witnesses
Gransolar Alberta One, Inc. Terri-Lee Oleniuk, Blake, Cassels & Graydon LLP, counsel Jordan Prestie, Cassels & Graydon LLP, counsel	Javier de la Cruz Aguillo Teresa Drew Bryce Dawson Nick Petrakis David Horrocks Ryan Danks Delanie Player Jilene Sauvé Shilo Brauer
Blue Heron Landowners Group (BHLG) Ifeoma Okoye, Ackroyd LLP, counsel Chinedu Kema, Ackroyd LLP, counsel	Darrell Thomas Emily Hayes Justin Hayes Wayne Thomas Shauna-Lee Thomas Henry Thomas Brad Nicolson Mark Polivka Jason Binding Henk de Haan Ivan Whitson Sheilah Nolan