



Greenlight Electricity Centre GP Ltd.

Greenlight Electricity Centre Project

June 25, 2026

Alberta Utilities Commission

Decision 30261-D02-2026

Greenlight Electricity Centre GP Ltd.

Greenlight Electricity Centre Project

Proceeding 30261

Application 30261-A001

June 25, 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	Application	1
3	Findings.....	3
3.1	Are the project's impacts to the environment acceptable?	3
3.1.1	Has Greenlight identified and committed to all necessary regulatory approvals?	4
3.1.2	Are the project's contributions to fine particulate matter acceptable?	4
3.1.3	Has Greenlight obtained the necessary approval or agreement for the project's water use?.....	5
3.1.4	What are the anticipated environmental impacts due to the project, and can these be mitigated?.....	6
3.2	Will noise impacts from the project comply with Rule 012? How will they be mitigated?.....	6
3.3	What are the cumulative effects from the project?	9
3.4	Will there be a suitable reclamation security program in place?	10
3.5	Is the emergency response plan protective of the public?	12
3.6	What are the project benefits?.....	13
4	Decision	13

List of figures

Figure 1.	Proposed Greenlight Electricity Centre location	2
------------------	--	----------

1 Decision summary

1. The Alberta Utilities Commission approved an application from Greenlight Electricity Centre GP Ltd. to construct and operate a 1,864-megawatt (MW) combined-cycle power generation facility, designated as the Greenlight Electricity Centre, in Decision 30261-D01-2026.¹ In this decision, the Commission provides the reasons for approving the project, along with associated conditions of approval.

2 Application

2. Greenlight Electricity Centre GP Ltd. (Greenlight) applied to the Commission for approval to construct and operate a 1,864-megawatt (MW) combined-cycle power generation facility within Alberta's Industrial Heartland Designated Industrial Zone on 98 hectares of private land. The electricity produced will be exported to the Alberta Interconnected Electric System to supply power to the province, including to supply data centres. The project lands are owned by Pembina Pipeline Corporation, who is also 50 per cent owner of Greenlight Electricity Centre GP Ltd.

3. The power plant consists of four SGT6-8000H gas turbine generators and four Siemens SST steam turbines in single-shaft combined-cycle configuration, split up into two phases. Natural gas will be supplied from a pipeline tied to an existing natural gas distribution network. The pipeline owner/operator will permit and operate the associated pipeline and supporting infrastructure.

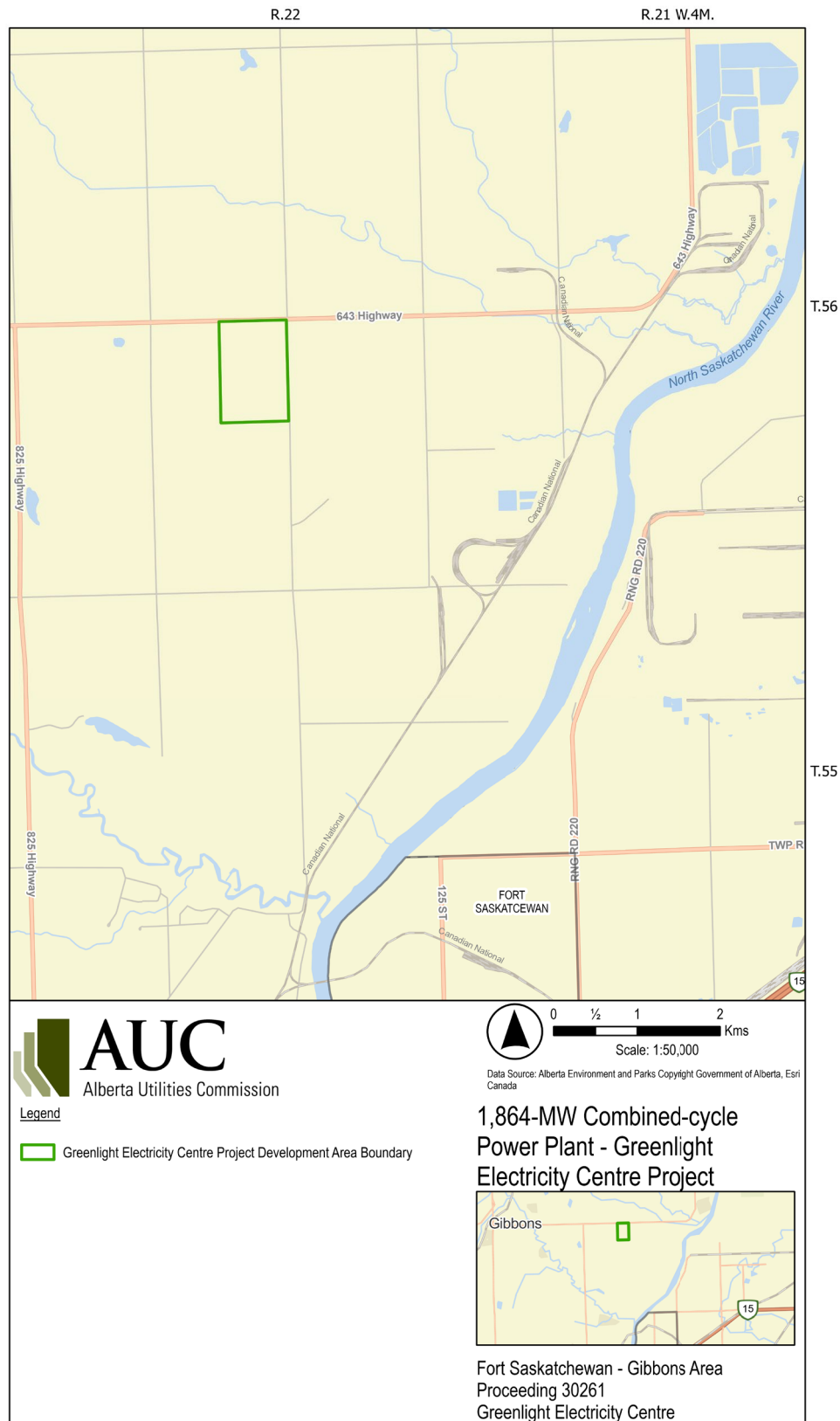
4. The project is approximately 8.5 kilometres east of Gibbons, Alberta. Specifically, the project is in the east half of Section 10, Township 56, Range 22, west of the Fourth Meridian. A map of the project area is included in Figure 1 for reference.

5. Greenlight expects to commence construction in Q3 2026 with an expected in-service date by Q1 2031.

6. The project will connect to the Alberta Interconnected Electric System by facilities to be permitted, constructed and operated by AltaLink Management Ltd. The power plant is proposed to be interconnected to AltaLink's 240-kilovolt transmission system. The project is currently in Stage 3 of the Alberta Electric System Operator's interconnection process. AltaLink is expected to file a separate application with the Commission for the interconnection in 2026.

¹ Decision 30261-D01-2026: Greenlight Electricity Centre GP Ltd. – Greenlight Electricity Centre Project, Proceeding 30261, Application 30261-A001, June 19, 2026.

Figure 1. Proposed Greenlight Electricity Centre location



7. The Commission received statements of intent to participate from Wayne Groot and the Lac Ste. Anne Métis Community Association (LSAMCA) in response to the notice of application. The Commission granted standing to both parties.² W. Groot, a landowner near the project, raised concerns regarding air emissions, noise, light pollution and increased traffic associated with the project. LSAMCA raised concerns regarding its Aboriginal rights and interests within its traditional territory due to potential project-related impacts to air quality, noise, wildlife, and cumulative effects. Both parties later withdrew from participation in the proceeding.

3 Findings

8. The Commission reviewed the application and has determined that the information requirements specified in Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines*³ and Rule 012: *Noise Control* have been met.

9. For the reasons below, the Commission finds that approval of the project is in the public interest having regard to its social, economic, environmental and other effects.

10. Greenlight stated that it will provide a final project update to the Commission at least 90 days before the start of construction. The Commission imposes the following condition on this approval:

- a. Once Greenlight Electricity Centre GP Ltd. has finalized its equipment selection for the power plant, it must file a final project update with the Commission to confirm that the project has stayed within the final project update allowances for thermal power plants specified in Rule 007: *Facility Applications*. The final project update must be filed at least 90 days prior to the start of construction.

11. In the following sections, the Commission first discusses whether the project's environmental impacts, noise impacts and cumulative impacts are acceptable. The Commission then discusses the reclamation security plan and emergency response plan for the project. Lastly, the Commission discusses the benefits of the project.

3.1 Are the project's impacts to the environment acceptable?

12. The Commission finds that overall, the residual effects to the environment due to the project are acceptable. This finding is largely because the project is located within the Industrial Heartland – Designated Industrial Zone (IH-DIZ, also known as the Industrial Heartland), an area zoned for heavy industrial use that includes significant existing industrial developments.

13. Greenlight retained Stantec Consulting Ltd. to prepare all environmental evidence for the project including an environmental evaluation, environmental protection plan, cumulative effects review and air quality assessment. In the following section, the Commission discusses this

² Exhibit 30261-X0057, AUC Ruling – Ruling on standing.

³ On November 6, 2025, a new version of Rule 007 came into effect. Among other changes, the name of the rule was revised to Rule 007: *Facility Applications*.

evidence focusing on specific environmental impacts due to the project, predicted residual effects to the environment and how the Commission formed its decision on these residual effects.

3.1.1 Has Greenlight identified and committed to all necessary regulatory approvals?

14. The Commission considers a proponent's compliance with applicable regulatory requirements to be an important factor in assessing whether a project is in the public interest.

15. The project involves potential impacts related to water, wetlands and air quality, among others. Greenlight has identified federal, provincial and municipal requirements that apply to the project. The Commission considers how these interjurisdictional requirements are addressed below.

16. At the federal level, Greenlight submitted an initial project description to the Impact Assessment Agency of Canada (IAAC). The IAAC conducted an assessment and determined that no further assessment is required for the project.⁴ The IAAC was of the view that the potential adverse effects within federal jurisdiction, or other adverse effects from the project, would be either limited or addressed through existing federal and provincial legislative and regulatory frameworks. The IAAC noted that the federal *Migratory Birds Convention Act, 1994* is in force and mitigations provided by Greenlight are adequate to comply with this legislation. The Commission is satisfied that Greenlight has met or committed to meet all federal requirements.

17. At the provincial level, approvals under the *Environmental Protection and Enhancement Act* and the *Water Act* are important regulatory requirements for the project. The Commission notes that the IAAC determination relies, in part, on the existence and implementation of these provincial regulatory processes.

18. Greenlight has obtained approval under the *Water Act* for the project.⁵ Greenlight has also applied for *Environmental Protection and Enhancement Act* approval, which is currently being considered by Alberta Environment and Protected Areas.⁶ Based on this information, the Commission is satisfied that Greenlight has or will obtain all necessary provincial approvals.

19. At the municipal level, Greenlight engaged with Sturgeon County, the Town of Gibbons and Strathcona County. The project is in Sturgeon County and Greenlight confirmed with Sturgeon County that the project complies with all applicable municipal planning documents and will require certain development permits.⁷ While no municipality participated in this proceeding, the Commission expects Greenlight to adhere to all applicable municipal requirements, including those related to environmental permitting.

3.1.2 Are the project's contributions to fine particulate matter acceptable?

20. The project will result in an incremental increase in air emissions within the Industrial Heartland. The issue before the Commission is whether the residual effects from project emissions are acceptable at the project level and when considered cumulatively with emission sources in the region.

⁴ Exhibit 30261-X0047, Greenlight IR Responses, PDF pages 35-37.

⁵ Exhibit 30261-X0093, Water Act Application.

⁶ Exhibit 30261-X0094, EPEA Correspondence and Application.

⁷ Exhibit 30261-X0020, Greenlight application, PDF pages 28-29.

21. Stantec submitted that exceedance of the provincial air quality objectives is the determining factor in assessing the significance of air quality residual effects. From this perspective, the emissions from the project alone are predicted to comply with the Alberta Ambient Air Quality Objectives (AAAQOs) and in the opinion of Stantec, are not significant.⁸

22. When emissions from local sources are considered, the cumulative scenario (project emissions plus existing and approved emission sources in the region) is predicted to exceed the AAAQOs for fine particulate matter (PM_{2.5}) but comply for all other modelled substances. Under this scenario, while the project's incremental contribution is small, cumulative emissions are significant with or without the project.

23. The Commission understands that the project will contribute to regional emissions, with a 33 per cent increase in fine particulate matter within the study area.⁹ Greenlight submitted that when these emissions are dispersed by wind, the project does not materially change existing air quality conditions.¹⁰ In other words, the 33 per cent only considers the emission rate, while dispersion modelling considers additional factors including stack height, emission parameters, climate and meteorology in the study area.¹¹ The Commission finds this contribution to be acceptable in the context of existing baseline conditions.

24. The Heartland Air Monitoring Partnership operates air quality monitoring within the Industrial Heartland. Monitoring is an important tool for assessing trends in air quality and evaluating project-related effects. The Commission expects Greenlight to participate in this program and support continued monitoring in the vicinity of the project. The Commission imposes the following condition on this approval:

- b. Greenlight Electricity Centre GP Ltd. shall provide an update on its participation in the Heartland Air Monitoring Partnership in the final project update.

3.1.3 Has Greenlight obtained the necessary approval or agreement for the project's water use?

25. Greenlight stated that the project will use a municipal water source to meet all water needs. A water diversion licence for withdrawal from the North Saskatchewan River, or any other waterbody, is not anticipated. Water will be sourced from Sturgeon County and will be delivered through a new pipeline loop installed along Highway 643 by the Capital Region Northeast Water Services Commission. Greenlight stated that the new waterline to service the area will fall under Sturgeon County ownership and jurisdiction. This service will supply the estimated 538,000 cubic metres of water needed for the power plant every year.¹²

26. In this decision, the Commission is not directly approving or authorizing the water use for the project. The Commission understands that Sturgeon County has authority and discretion to enter water use agreements for the project. The Commission expects Greenlight to obtain the necessary approvals or agreements relating to the project's estimated water use. The Commission

⁸ Exhibit 30261-X0020, Greenlight application, PDF page 75.

⁹ Exhibit 30261-X0020, Greenlight application, PDF page 68.

¹⁰ Exhibit 30261-X0020, Greenlight application, PDF page 74.

¹¹ Exhibit 30261-X0089, Greenlight Information Response to Wayne Groot, PDF page 33.

¹² Exhibit 30261-X0089, Information Response, PDF page 24.

is prepared to accept the estimated water requirements for the purpose of this decision, subject to Greenlight obtaining the necessary approvals or agreements for the project's water use.

27. To verify that Greenlight has obtained the necessary approvals or agreements relating to water use, the Commission imposes the following condition on this approval:

- c. Greenlight Electricity Centre GP Ltd. shall confirm and summarize the details of the water use approval or agreement obtained from the municipality in the final project update.

3.1.4 What are the anticipated environmental impacts due to the project, and can these be mitigated?

28. Stantec concluded that given the presence of existing industrial infrastructure, and with implementation of proposed mitigations, the project would have no significant residual effects on the environment.¹³

29. Alberta Environment and Protected Areas considered the project's impacts to wetlands as part of the *Water Act* application and approval. The Commission accepts that receipt of this approval from Alberta Environment and Protected Areas¹⁴ indicates that the project is in alignment with the *Alberta Wetland Mitigation Directive* and Greenlight has met its environmental obligations for wetlands. Residual effects are ameliorated through the compensation offset provided by Greenlight for the loss of wetlands, as set out in the *Alberta Wetland Mitigation Directive*.

30. The Commission accepts the impacts to wetlands and finds the environmental impacts of the project have been appropriately mitigated. These findings are also informed by the project's siting within the Industrial Heartland.

3.2 Will noise impacts from the project comply with Rule 012? How will they be mitigated?

31. Greenlight retained Stantec to prepare a noise impact assessment (NIA) for the project in accordance with Rule 012, which was later updated in response to information requests.¹⁵ The NIA identified two residences within 1.5 kilometres of the project boundary as receptors and predicted that cumulative sound levels would comply with the applicable permissible sound levels of 55 A-weighted decibels (dBA) during the daytime and 45 dBA during the nighttime. For the closest, Receptor R1, the predicted cumulative sound levels are 50.4 dBA during the daytime and 43.1 dBA at nighttime. The baseline assessment relied primarily on the Northeast Capital Industrial Association regional noise model, supplemented by an assessment of the nearby Heathfield Converter Station, which was not expected to materially affect the baseline sound levels at the receptors.

32. Overall, the Commission finds that the project is expected to comply with Rule 012 during normal operations, based on the predicted cumulative sound levels and the mitigation

¹³ Exhibit 30261-X0020, Greenlight Electricity Centre Project Application, PDF page 224.

¹⁴ Exhibit 30261-X0093, Attachment 1 - Water Act Application and Supporting Documents - GECGP-LSAMCA-2026JAN16-001(b).

¹⁵ Exhibit 30261-X0020, Greenlight Electricity Centre Project Application, PDF pages 21 and 373-414; Exhibit 30261-X0089, GECGP responses to IRs, PDF pages 5-6 and 12-15.

measures incorporated into the facility design. However, additional conditions are warranted because of the limited noise compliance margin at the closest receptor, the potential for short-duration elevated noise during commissioning, and the reliance on modelled mitigation measures to demonstrate compliance at full buildout.

33. The Commission finds that the NIA identified a large number of major power plant components requiring substantial acoustic mitigation for both the commissioning and operation phases. Without these mitigation measures, the power plant would exceed the applicable permissible sound levels. Further, the size and complexity of the project, together with the limited predicted compliance margin, underscore the importance of appropriate acoustic mitigation at the application stage. Accordingly, the Commission requires Greenlight to confirm appropriate mitigation measures during the final project design stage, and therefore imposes the following condition of approval:

- d. As part of its final project update, Greenlight Electricity Centre GP Ltd. shall submit a noise impact assessment update that details the mitigation measures required for the final project design to achieve compliance with Rule 012: *Noise Control* for both the commissioning and operation phases, and demonstrates, through modelling, the feasibility and effectiveness of those measures.

34. The Commission also finds that commissioning may result in short-duration elevated noise and that appropriate mitigation and targeted monitoring are warranted. Greenlight acknowledged that commissioning activities, including boiler blowdown and purging, may be short-term but potentially high-noise events, and confirmed that vendor-installed boiler design silencers will be in place, that there are no contemplated commissioning scenarios in which those silencers would not be used, and that the silencers will be installed before commissioning.¹⁶ The Commission is satisfied that mitigation must be in place before commissioning begins, but also considers it necessary to verify actual noise levels during commissioning because these transient events are not fully captured in modelling. Accordingly, the Commission imposes the following conditions of approval:

- e. Greenlight Electricity Centre GP Ltd. shall ensure that all noise mitigation required for commissioning activities, including blowdown silencers or equivalent mitigation, is installed and operational before commissioning begins.
- f. Greenlight Electricity Centre GP Ltd. shall conduct noise monitoring during startup and shutdown activities associated with commissioning of each operational phase, in accordance with measurement procedures set out in Rule 012: *Noise Control*. Monitoring shall be conducted using one of the following approaches:
 - (i) a post-construction comprehensive sound level (CSL) survey under representative conditions to confirm compliance with applicable permissible sound levels at Receptor R1; or
 - (ii) an alternative approach combining near-field measurements to verify source emissions and modelling to predict sound levels at receptors, provided it demonstrates equivalent verification of compliance with Rule 012.

¹⁶ Exhibit 30261-X0089, rpt_greenlight_auc_r3_groot, PDF pages 4-7; Exhibit 30261-X0120, rpt_greenlight_auc_sir3, PDF pages 3-6.

- g. Within 60 days of completing commissioning for each operational phase, Greenlight Electricity Centre GP Ltd. shall file a commissioning noise monitoring report summarizing the monitoring locations, dates and activities measured, measurement methods and instrumentation, results and comparison to applicable Rule 012: *Noise Control* criteria, and any corrective actions implemented or proposed.

35. The Commission further finds that it is important to ensure that the as-built project reflects the mitigation assumed in the NIA, or equivalent measures providing equal or better acoustic performance. Greenlight confirmed that operational compliance depends on implementation of the mitigation assumed in the NIA, including keeping building doors and windows closed during operation, using acoustically rated wall, roof and roll-up door assemblies, installing silencers on combustion air inlets and exhausts, and incorporating noise attenuation measures for the air-cooled condenser.¹⁷ The Commission therefore imposes the following condition of approval:

- h. Greenlight Electricity Centre GP Ltd. shall implement the noise mitigation measures assumed or modelled in the noise impact assessment (NIA) for the final project update, or equivalent mitigation measures that achieve equal or better noise performance. Within 30 days of commencing commercial operation of each operational phase, Greenlight shall file a noise mitigation confirmation identifying the mitigation measures installed in the as-built project and confirming consistency with the assumptions used in the NIA, or explaining how any deviations achieve equivalent or better noise control.

36. The Commission also finds that phase-based verification is warranted. Although the predicted cumulative sound levels comply with Rule 012, the phased buildout relies on modelled source assumptions and the effectiveness of multiple design-based mitigation measures. In these circumstances, early verification of source emissions provides a practical means to confirm that the assumed mitigation is achieved and to enable corrective measures before subsequent phases are completed. The Commission therefore imposes the following condition of approval:

- i. Following commencement of commercial operation of the first operational phase and before completion of the subsequent phase, Greenlight Electricity Centre GP Ltd. shall complete an analytical field study using near-field measurements of operating equipment to verify the source-emission assumptions used in the noise impact assessment (NIA). Based on that study, Greenlight shall file an updated NIA reassessing predicted cumulative sound levels at full buildout and confirming continued compliance with Rule 012: *Noise Control*. The analytical field study and updated NIA shall be filed no later than 90 days after the first operational phase commences commercial operation, unless otherwise directed by the Commission.

37. Based on the above, the Commission finds that a post-construction comprehensive sound level survey at Receptor R1 is required. Unlike the phase-based analytical field study, which verifies individual source emissions, a comprehensive sound level survey provides confirmation of overall compliance at the nearest residence under representative operating conditions, including the combined effects of all project sound sources and other contributing sound in the area. The Commission therefore imposes the following condition of approval:

¹⁷ Exhibit 30261-X0047, rpt_greenlight_auc_r1_ir_20251023_fin, PDF pages 15-19.

- j. Greenlight Electricity Centre GP Ltd. shall conduct a post-construction comprehensive sound level (CSL) survey, including an evaluation of low frequency noise at Receptor R1. The post-construction CSL survey must be conducted under representative conditions and in accordance with Rule 012: *Noise Control*. Within one year of the project commencing operations, Greenlight shall file a report with the Commission presenting measurements and summarizing results of the CSL survey to confirm compliance with Rule 012.

38. With respect to construction, Greenlight stated that construction will include potentially elevated-noise activities, including piling, and that mitigation will be addressed through the environmental protection plan and a complaint response procedure to be developed by the construction contractor.¹⁸ The Commission accepts that construction noise will be temporary, but is not satisfied that general commitments alone fully address the elevated and impulsive noise that may arise from pile driving and similar activities. The Commission therefore expects Greenlight to implement project-specific mitigation measures, provide advance notice of high noise activities to nearby residents, and respond promptly to construction noise complaints. If significant concerns arise, the Commission may require further mitigation or reporting.

39. In summary, the Commission finds that project noise is expected to comply with Rule 012. However, the approval conditions set out above are required to ensure that construction and commissioning noise are properly managed, that as-built mitigation measures are confirmed, and that compliance is verified through both phase-based and final post-construction noise assessment.

3.3 What are the cumulative effects from the project?

40. The Commission accepts that the project's contribution to cumulative effects is limited and acceptable, given the mitigation measures incorporated into the project and required as part of the broader regional frameworks applicable to development in the Industrial Heartland.

41. The project is sited in the Industrial Heartland, an area that is zoned for heavy industrial use, and Greenlight submitted that the project is consistent with this land use. Greenlight submitted that the project's location aligns with Alberta's Land-use Framework and this location includes fewer sensitive receptors and environmental constraints.¹⁹ Greenlight identified several valued components that might experience some cumulative impacts, such as air quality, acoustic environment, vegetation and wetlands. Project mitigation measures, where applicable, were provided in the environmental evaluation²⁰ and environmental protection plan.²¹

42. The Commission considers the project's siting in the Industrial Heartland to be appropriate. Development within the Industrial Heartland supports a coordinated, regional approach to cumulative effects management through established, zone-specific plans designed to manage residual effects at a broader scale. The Commission expects the project to comply with, and contribute to, the objectives and requirements of Industrial Heartland management plans.

¹⁸ Exhibit 30261-X0047, rpt_greenlight_auc_r1_ir_20251023_fin, PDF pages 18-20; Exhibit 30261-X0120, rpt_greenlight_auc_sir3, PDF pages 5-11.

¹⁹ Exhibit 30261-X0047, rpt_greenlight_auc_r1_ir_20251023_fin, PDF pages 21-22.

²⁰ Exhibit 30261-X0051, Greenlight Cumulative Effects Review.

²¹ Exhibit 30261-X0020, Greenlight Electricity Centre Project Application, Appendix E.

43. In supporting regional cumulative effects management, the proponent has demonstrated consideration of relevant legislative frameworks, policies and collaborative initiatives, including:

- Assessment and management of cumulative effects in accordance with the *Environmental Protection and Enhancement Act*.
- Consideration of cumulative effects under the *Alberta Wetland Policy* and *Water Act*.
- Participation in regional air monitoring through the Heartland Air Monitoring Partnership.
- Alignment with Industrial Heartland management plans for air, land and water.
- Use of existing industrial infrastructure and clustering approaches to limit the need for new regional disturbance.

44. The Commission also considered cumulative noise effects. The current NIA assesses cumulative sound from the applied-for power plant using existing baseline conditions. For this proceeding, the Commission finds it reasonable to assess cumulative noise based on the applied-for power plant and existing baseline conditions.

45. The Commission further notes that the project is located within the Industrial Heartland, where the Northeast Capital Industrial Association has developed a regional noise management plan supported by a regional noise model to address the area's complex industrial noise environment. The Commission has previously accepted that framework for establishing baseline noise conditions in the area and indicated that new facilities must comply with Rule 012 permissible sound levels or demonstrate compliance through a no net increase approach. In that context, the Commission is satisfied that the current NIA's reliance on regional baseline conditions is consistent with that framework.

46. Based on the above, the Commission finds that locating the project within the Industrial Heartland, in combination with adherence to applicable frameworks and regional management plans, will minimize its contribution to cumulative effects to an acceptable level.

3.4 Will there be a suitable reclamation security program in place?

47. Greenlight proposed using a letter of credit as the primary security instrument and a structured approach to ensuring that sufficient funds are available at the end of the project's life. The reclamation cost estimate will be updated by a third-party consultant upon finalizing project design and details and will be reassessed periodically.

48. The application provided a third-party demolition and reclamation cost estimate report for the project. The report was prepared as a Class 5 estimate, reflecting the early stage of project design and limited engineering detail. The total estimated cost to complete demolition and reclamation of the project is approximately \$30.54 million (in 2025 dollars), inclusive of demolition, site grading, revegetation, contractor overhead, engineering, and contingency costs.

49. The estimate included a contingency allowance of 30 per cent to account for uncertainty and did not include salvage value in its assessment. Greenlight indicated that salvage values are uncertain and highly variable at this stage of project development.²² The Commission considers that excluding salvage value provides a sufficiently conservative estimate. However, the Commission also acknowledges that the estimate is based on conceptual design information and therefore will vary as detailed engineering progresses.

50. With respect to the security instrument chosen, the Commission considers the use of a letter of credit to be a robust security instrument.

51. Greenlight has proposed that Pembina Pipeline Corporation hold the security, or if required, Alberta Environment and Protected Areas. As the landowner, Pembina is a reasonable choice to hold the security, but in this case, it is both the landowner and has a 50 per cent ownership stake in Greenlight. Where a reclamation security beneficiary is also a project owner, there is a risk that they may not act independently or have sufficient incentive to enforce the security in the event of default. This can reduce the effectiveness of the security as a backstop mechanism and create uncertainty as to whether sufficient funds will be available and accessible to carry out reclamation at the end of the project's life.

52. The Commission considered other parties to hold the security, such as a third party or bank, Alberta Environment and Protected Areas, or Sturgeon County. Alberta Environment and Protected Areas confirmed in response to a question from Greenlight that it would not act as a beneficiary, which may limit available options.²³ Sturgeon County also confirmed it is not prepared to be a reclamation security beneficiary.

53. While a reclamation security beneficiary that is also a project owner may not be fully independent, in this case, Pembina holds only a 50 per cent ownership interest in the project and is not the sole proponent. The Commission finds that this shared ownership structure reduces the risk of misalignment between the beneficiary's interests and the need to ensure reclamation obligations are met. The Commission finds that, in contrast to a structure where both ownership and liability are concentrated in a single entity, the presence of multiple project owners mitigates the risk that a financial failure of one party would impair the availability of reclamation funds. In particular, the separation of ownership interests reduces the likelihood of concurrent insolvency affecting both the project proponent and the security beneficiary. In addition, the Commission has factored in Pembina's status as an established and financially robust entity with a direct interest in the underlying land.

54. With respect to the proposed amount and posting schedule, Greenlight initially submitted that amounts secured under the letter of credit would be increased annually over a 20-year period, beginning one year after the project commissioning and until the entire reclamation amount is fully secured in year 20.²⁴

55. Later, in its reply evidence and argument, Greenlight proposed that on the fifth anniversary of commercial operation it would make the initial security posting, with subsequent postings of equal increments every five years based on updated cost estimates at that time.²⁵ At the project's

²² Exhibit 30261-X0020, rpt_auc_rule007_greenlight_application_20250828_fin, PDF page 371.

²³ Exhibit 30261-X0047, rpt_greenlight_auc_r1_ir_20251023_fin, PDF page 32.

²⁴ Exhibit 30261-X0078, GECGP Response to GECGP-AUC-2025DEC17-002, PDF page 4.

²⁵ Exhibit 30261-X0127, Greenlight Written Argument - April 13, 2026, PDF page 7.

end of life (estimated to be year 30), the letter of credit will be the total value of the updated version of the cost estimate at that time.

56. Given that the beneficiary is a part-owner of the project, that Greenlight did not commit to posting specified amounts at each interval, and the inherent uncertainty around estimating reclamation costs over the course of 30 years, the Commission believes that Greenlight's initial proposal to post the full amount of security by year 20 is appropriate to ensure funds will be available to properly reclaim the site at the project's end of life, but that posting security beginning at year 5 is acceptable. As a result, the Commission imposes the following conditions of approval:

- k. On the fifth anniversary of the date of commercial operation and every five years after that until year 20, Greenlight Electricity Centre GP Ltd. shall file a confirmation with the Commission that reclamation security in the form of one or more irrevocable standby letters of credit with automatic renewal from a qualified institution (as defined in the Alberta Treasury Board and Finance Guidelines for Letters of Credit: Qualified Financial Institutions) has been provided to the registered owner, or registered owners, of the land under the surface lease, in accordance with an updated third-party cost estimate. The letter(s) of credit must remain in place until a reclamation certificate has been issued.
- l. On the 20th anniversary of the date of commercial operation, Greenlight Electricity Centre GP Ltd. shall file confirmation with the Commission that the full amount of reclamation security has been posted, in accordance with an updated third-party cost estimate.

57. Given the Commission's finding and the conditions imposed above, the Commission finds that Greenlight's approach to reclamation is sufficient for the purposes of satisfying the Commission that approval of the power plant is in the public interest.

3.5 Is the emergency response plan protective of the public?

58. Greenlight submitted that it will develop a site-specific emergency response plan utilizing a two-step approach to manage risks throughout the project's life cycle. Under this framework, Greenlight committed to submitting a construction-specific emergency response plan to the Commission 100 days prior to the start of construction, and an operation-specific emergency response plan 100 days before commissioning Phase 1.²⁶ These site-specific plans will outline emergency mitigation measures, monitoring protocols and communication strategies. Greenlight described the scope and content of the plans to include procedures for emergency contacts, reporting, evacuation and mustering, incident response (including fire, hazardous materials, environmental releases and extreme weather), training and drills, and provision of emergency response equipment. Greenlight has not received requirements or feedback from Sturgeon County or the Town of Gibbons regarding emergency response, but has committed to sharing the emergency response plans with applicable authorities, municipalities and agencies prior to construction and operation. As a result, the Commission imposes the following condition of approval:

- m. Greenlight Electricity Centre GP Ltd. shall provide to the Commission the draft site-specific emergency response plans for construction 100 days prior to the start of

²⁶ Exhibit 30261-X0047, rpt_greenlight_auc_r1_ir_20251023_fin, PDF pages 5 and 6.

construction and the draft site-specific emergency response plans for operations 100 days prior to the commissioning of Phase 1 of the project.

59. Based on the foregoing, the Commission is satisfied that Greenlight has demonstrated a reasonable approach to emergency response planning. Although detailed plans will be finalized at later stages, the commitments to develop, consult on, and file site-specific emergency response plans, together with the identification of key risks and mitigation measures, provide sufficient assurance that emergency preparedness for the project will be appropriately addressed.

3.6 What are the project benefits?

60. The project is intended to operate as a baseload source of electricity to the Alberta Interconnected Electric System. Greenlight submitted that that electricity produced by the facility will meet broader provincial system demand, including increasing load associated with data centres.²⁷

61. The Commission finds that the project will provide public benefits through its contribution to the reliability and adequacy of electricity supply in Alberta. The project is a large, combined-cycle natural gas-fired facility that will supply electricity to the Alberta Interconnected Electric System, thereby increasing available generation capacity to meet growing provincial demand, including increasing data centre-related load. The evidence further indicates that the project is intended to operate as an efficient baseload facility and may displace older, less efficient generation in the system.²⁸

62. The Commission also finds that the project will result in economic and regional development benefits. The construction and operation of the project will support employment, contribute to municipal tax revenues, and facilitate continued development within the Industrial Heartland, an area designated for heavy industrial use. Greenlight submitted that the project will generate employment of approximately 1,500 workers at peak construction and create approximately 40 long-term skilled jobs during operation.²⁹ In addition, the project aligns with broader provincial objectives to support economic growth and increased electricity demand associated with emerging industries.

4 Decision

63. The Commission considers the application to be in the public interest in accordance with Section 17 of the *Alberta Utilities Commission Act*.

64. Under sections 11 and 19 of the *Hydro and Electric Energy Act*, the Commission approves Application 30261-A001 and grants Greenlight Electricity Centre GP Ltd. the approval set out in Appendix 1 – Power Plant Approval 30261-D03-2026 to construct and operate the power plant.

²⁷ Exhibit 30261-X0020, rpt_auc_rule007_greenlight_application_20250828_fin, PDF page 8.

²⁸ Exhibit 30261-X0127, Greenlight Written Argument - April 13, 2026, PDF page 13.

²⁹ Exhibit 30261-X0020, rpt_auc_rule007_greenlight_application_20250828_fin, PDF page 8.

65. The appendix will be distributed separately.

Dated on June 25, 2026.

Alberta Utilities Commission

Cairns Price
Panel Chair

Renée Marx
Commission Member