



**Final Report of the Public Consultation
Subgroup
CASA Electricity Project Team**

Prepared by the
Public Consultation Subgroup

October 2003



**Final Report of the Public Consultation
Subgroup
CASA Electricity Project Team**

Copyright © October 2003 Clean Air Strategic Alliance

ISBN -896250-29-7

Download this report from the CASA Web site library at <http://casahome.org>.

Clean Air Strategic Alliance
10035 108 ST NW FLR 10
EDMONTON AB T5J 3E1
CANADA

About this Report

In January 2002, Hon. Lorne Taylor, Alberta's Minister of Environment, asked the Clean Air Strategic Alliance to develop an approach for managing air emissions from the province's electricity generation sector. CASA established a multi-stakeholder Electricity Project Team (EPT) to undertake this task. The EPT subsequently formed several smaller groups to focus on specific issues (or items) and, in some cases, to propose recommendations for the team to consider. One of these smaller groups was the Public Consultation Subgroup, which was responsible for developing and implementing a communications and outreach program for the process. This document is the final report of the Public Consultation Subgroup. The EPT final report and recommendations is available on the CASA website or on request to the CASA Secretariat.

About the Clean Air Strategic Alliance

The Clean Air Strategic Alliance (CASA) is a non-profit association composed of stakeholders from three sectors – government, industry and non-government organizations such as health and environmental groups. All CASA groups and teams, including the board of directors, make decisions and recommendations by consensus. These recommendations are likely to be more innovative and longer lasting than those reached through traditional negotiation processes. CASA's vision is that the air will be odourless, tasteless, look clear and have no measurable short- or long-term adverse effects on people, animals or the environment.

The Electricity Project website (<http://casahome.org/electricity/finalreports.asp>) contains all the documents produced by the team, including materials for the public meetings, as well as presentations made at workshops and seminars sponsored by the team.

Clean Air Strategic Alliance
10035 108 ST NW FLR 10
EDMONTON AB T5J 3E1

Ph (780) 427-9793
Fax (780) 422-3127
E-mail: casa@casahome.org
Web: <http://www.casahome.org>

Contents

- 1 Introduction..... 1**
- 2 Consultation Goals..... 3**
 - 2.1 Phase One..... 3
 - 2.2 Phase Two..... 3
 - 2.3 Phase Three..... 4
- 3 Conclusions..... 8**
- Appendix Members of the Public Consultation Subgroup..... 9**

List of Tables

- Table 1: Public Consultation Program Summary..... 2
- Table 2: Informing the Public About Phase Two..... 4
- Table 3: Informing the Public About Phase Three..... 5
- Table 4: Major Issues Raised at the Phase Three Public Meetings..... 6

1 Introduction

The consensus-based process used by the Clean Air Strategic Alliance (CASA) incorporates consultation in many forms. Public input is embedded in the CASA multi-stakeholder process, and numerous representatives from local communities sat on the Electricity Project Team (EPT) and participated fully. Still, the team believed it was important to implement an open and transparent public consultation program thus ensuring that any person interested in the process and work of the team could participate and provide input. This was especially important in the context of concerns expressed to the Alberta Energy and Utilities Board at public hearings in 2001 on proposed new electricity generation developments in the Wabamun, Edmonton and Calgary areas.

Alberta Environment's statement of opportunity to the CASA Board identified public participation as an important part of the process to develop a new emissions management framework for the electricity generation sector. The development and implementation of a strategy and action plan for communicating and consulting with stakeholders and the public was a key task area in the EPT's terms of reference. An innovative, open and transparent approach to public consultation generated practical and meaningful dialogue between the EPT and concerned general public.

The Public Consultation Subgroup (PCSG) was formed in March 2002 to develop and implement a targeted public consultation and stakeholder communication program. The program emphasized the importance of two-way communication and was executed in three phases. The main objective of Phase One was to promote public awareness of the EPT's existence and its plans, and to emphasize the available opportunities for direct input to the process. Phase Two provided information about the project to the public, presented the management options under consideration, gathered initial input and determined the public's interest in continuing to be involved. Phase Three allowed the EPT to determine if the main issues of concern for Albertans were being addressed in the team's draft recommendations.

Table 1 summarizes the overall public consultation program for the project.

Table 1: Public Consultation Program Summary

Phase	Objectives	Target Audiences	Communication Tools
Phase 1	<ul style="list-style-type: none"> • Increase public awareness of the project • Emphasize opportunities to provide input • Promote the transparency of and accessibility to information compiled through the CASA process 	<ul style="list-style-type: none"> • Interested Albertans • Residents, groups and First Nations, near existing or future facilities • Chambers of Commerce • Consumer associations • Small- and medium-sized enterprises • Participants in other processes (CASA teams, CCME, etc.) • Scientific and technical experts 	<ul style="list-style-type: none"> • CASA electricity Web site • Self-subscribed e-mail list • Information packages • Discussions and meetings with groups on an “as requested” basis • Feature articles in community newspapers, electronic media and stakeholder publications • Public participants at the EPT’s Management Options Seminar
Phase 2	<ul style="list-style-type: none"> • Emphasize opportunities to provide input • Inform potentially affected stakeholders about the team’s progress • Provide an opportunity to comment on the team’s direction and focus • Determine level of public’s interest in staying involved 	<ul style="list-style-type: none"> • Interested Albertans • Residents, groups and First Nations near existing or future facilities • Local municipalities 	<ul style="list-style-type: none"> • Public meetings in nine locations: <ul style="list-style-type: none"> • Brooks • Chestermere • Edmonton • Forestburg • Grande Cache • Hanna • Keephills • Pincher Creek • Stony Plain • CASA electricity Web site • Self-subscribed e-mail list • Discussions and meetings with groups on an “as requested” basis • Public service announcements in community newspapers, electronic media and stakeholder publications • Advertisements in community newspapers and daily newspapers • Phase Two input forwarded to the team • Distribution of a follow-up report to public meeting attendees
Phase 3	<ul style="list-style-type: none"> • Inform potentially affected stakeholders about the EPT’s progress • Provide an opportunity for the targeted audiences to comment on the team’s draft recommendations 	<ul style="list-style-type: none"> • Interested Albertans • Residents, groups and First Nations near existing or future facilities • Attendees of Phase Two meetings • Local municipalities 	<ul style="list-style-type: none"> • Public meetings, one in Chestermere and one in Stony Plain • Public service announcements in community newspapers, electronic media and stakeholder publications • Advertisements in community newspapers and daily newspapers • Phase Three input forwarded to the team • Distribution of a follow-up report to public meeting attendees

2 Consultation Goals

The consultation program was developed to meet the following objectives:

- Create opportunities for members of the public and stakeholder groups to provide feedback and input on a range of management options for controlling air emissions from the electricity sector.
- Gauge public and stakeholder reaction to the options being considered by the team.
- Provide opportunities for the public to present alternative solutions.
- Provide opportunities to identify potential issues and address them, minimizing controversy.
- Promote understanding and acceptance by stakeholders of the selected option.
- Gain helpful information on how best to implement the selected option(s).

The team used various tools and approaches throughout the process to help stakeholders and others interested in the project stay informed. These included regular e-mail updates and articles to Alberta newspapers, stakeholder newsletters and Web sites. Team members also gave nearly 20 presentations in response to requests from community groups, industry, and government.

2.1 Phase One

Phase One began in March 2002, encouraging Albertans to provide the team with their input and thoughts. CASA worked to make it as easy as possible for the public to contact the EPT and stay informed by, among other things, creating a dedicated Web site, an E-mail subscription list, and an information package.

In September 2002, the Management Options Information Seminar was organized for the EPT to learn about experiences and current thinking of experts from across North America on managing emissions from the electricity sector. The seminar was open to stakeholders and interested members of the public.

2.2 Phase Two

In November 2002, an independent consultant was hired to organize Phases Two and Three. The highlight of Phase Two was a series of public meetings to inform members of the public about the project and to give the public an opportunity to provide input on the five selected priority substances and the available management options.

Early in 2003, public meetings were held in the following locations:

- Brooks
- Forestburg
- Keephills
- Chestermere
- Grande Cache
- Pincher Creek
- Edmonton
- Hanna
- Stony Plain

These locations were chosen because of their proximity to existing or proposed power generation facilities. The PCSG felt it was important for residents living near these facilities to have an opportunity to express their views. The public meetings were attended by local residents, stakeholders from environmental and health groups, local industry and representatives of municipal governments. Table 2 lists the methods used to share information about the public meetings and

encourage attendance. Media representatives attended each of the meetings and wrote about the project either before or afterwards.

Table 2: Informing the Public About Phase Two

Invitations	<ul style="list-style-type: none"> • Invitation letters and flyers were distributed by E-mail or post to: <ul style="list-style-type: none"> • CASA's stakeholder list • An electricity project stakeholder list developed from contributions received from the local communities where the public meetings were being held • The electricity E-mail subscription list addresses. • Flyers and posters were circulated by local organizations and put up in community centres.
Co-hosting Opportunities	<ul style="list-style-type: none"> • Local organizations and the town administration were contacted in each community. In most locations, an organization or the town administration helped publicize the meetings by alerting their constituents and posting flyers. • The town councils of Chestermere, Pincher Creek, and Lethbridge committed their support, as well.
Paid Advertising	<ul style="list-style-type: none"> • Print advertisements were inserted in local weekly newspapers and in the <i>Calgary Herald</i> and <i>Edmonton Journal</i> prior to the meetings.
Unpaid Advertising	<ul style="list-style-type: none"> • Public service announcements were sent to local radio stations in advance of the meetings.
Web Site	<ul style="list-style-type: none"> • Information about the meetings was posted on the CASA Web site and the electricity Web site.
Media Relations	<ul style="list-style-type: none"> • A news release was distributed to major Alberta media outlets and community newspapers.

The meeting format provided for casual discussion, a formal presentation, a recorded question and answer period and additional casual discussion. Surveys were distributed after the meeting, 19 of which were completed and returned to CASA.

Approximately 250 people attended the meetings in Phase Two. Attendees at all the meetings identified three common concerns:

- The need to pursue renewable and alternative energy sources;
- The need to promote energy efficiency and conservation; and
- The need for more information, especially studies, on the health effects of air emissions.

At the end of Phase Two, a feedback summary was sent to all meeting attendees who had signed the guest book and the public's input was provided to the EPT.

2.3 Phase Three

Phase Three occurred in September 2003, with the aim of getting input from the public on the EPT's draft recommendations in the following areas:

- Priority emissions, including greenhouse gas reduction targets
- Emission control strategies
- Standards and standard setting
- Transparency and participation
- Monitoring and reporting
- Energy efficiency and conservation

- Renewable energy
- Revisions to the proposed framework

One meeting was held in Chestermere, just east of Calgary, and the other in Stony Plain, west of Edmonton. The two communities were selected because of the high interest level and concern expressed by local residents during the Phase Two meetings. They were also reasonably central locations for residents of other communities to travel to. Table 3 lists the methods used to promote the meetings.

Table 3: Informing the Public About Phase Three

Invitations	<ul style="list-style-type: none"> • Invitation letters and flyers were distributed by E-mail or post to: <ul style="list-style-type: none"> • CASA’s stakeholder list • An electricity project stakeholder list developed from contributions received from the local communities where the public meetings were scheduled to be held • The electricity E-mail subscription list addresses. • Attendees from the Phase Two meetings. • Flyers and posters were circulated by local organizations and put up in community centres..
Phone Calls	<ul style="list-style-type: none"> • Attendees from the Phase Two meetings that indicated a desire to stay involved were phoned and reminded about the meetings.
Paid Advertising	<ul style="list-style-type: none"> • Print advertisements were inserted in local weekly newspapers and in the <i>Calgary Herald</i> and <i>Edmonton Journal</i> prior to the meetings.
Unpaid Advertising	<ul style="list-style-type: none"> • Public service announcements were sent to local radio stations in advance of the meetings • An insert in the environmental periodical <i>Enviroline</i> was distributed to all of its subscribers.
Web Site	<ul style="list-style-type: none"> • Information about the meetings was posted on the CASA Web site and the electricity Web site.

To encourage residents and attendees from the Phase Two meetings to attend one of the Phase Three meetings, expenses were reimbursed for those traveling significant distances. About six people took advantage of this opportunity. Participants were asked to RSVP so that materials could be sent to them ahead of time for their review it and to give them time to become acquainted with the key elements of the complex issues and recommendations.

The meetings were held as half-day workshops. Casual discussion was held over lunch followed by an overview presentation by the EPT co-chairs and a question and answer session. Participants could then move to a round table discussion on a general theme or a specific topic, which allowed them to get actively involved.

The workshop format was ideal, allowing time to delve into issues in a bit more depth and giving participants an opportunity to share information and perspectives. While the Chestermere meeting focused on general issues, a number of participants at the Stony Plain meeting chose to focus their on two topics of concern: renewable and alternative energy sources, and hotspots and grandfathering. A third table was formed for general discussion.

A total of 100 people attended the two meetings, about half of whom had attended one of the Phase Two meetings. Each meeting attracted mainly local residents, but representatives from outlying communities, as well as industry, government, and local municipal representatives also attended.

Input from Phase Three was used to test and fine-tune the team’s draft recommendations. While the EPT heard a range of views from the public during these meetings, concerns identified by many attendees reflected the same issues and concerns that the EPT was working on. Among these were continuous improvement, electricity exports, local hotspots, implementing a baseline and credit or cap and trade system, renewables, grandfathering of plants, and how to reduce mercury emissions. A few attendees also made positive and supportive comments about the draft recommendations, the Electricity Project, and CASA.

The following matrix outlines the major issues and concerns raised at the Phase Three meetings and how the EPT addressed them. Environmental issues raised by the public not related to air quality were referred to other processes.

Table 4: Major Issues Raised at the Phase Three Public Meetings

Topics	What the EPT Heard from Albertans	How the EPT Addressed the Issue	EPT Report Reference
Renewables and alternative energy	<ul style="list-style-type: none"> There are barriers to increasing renewables such as legislative and market-based barriers which make it difficult for small power producers to connect to the grid Encourage renewable and alternative energy, including co-generation, solar, waste, dispersed energy, wind and hydrogen cells The 3.5 % target is too small, up to 5% is more acceptable The target should be voluntary. 	<ul style="list-style-type: none"> The EPT supported the Alberta government’s goal of increasing the renewable and alternative energy portion of total provincial electrical energy capacity by 3.5% by 2008. The EPT made several recommendations to achieve the target for renewable and alternative energy, including some that address existing barriers. Because the team was not able to address this area in great detail, it has recommended that CASA establish a multi-stakeholder Renewable and Alternative Energy Implementation Team to examine these issues more fully. A new implementation team will be tasked with looking at new targets beyond 2008. 	section 10
Energy efficiency and conservation	<ul style="list-style-type: none"> There needs to be more promotion, education and incentives to encourage energy efficiency and conservation. Concern was expressed about programs that would result in extra costs to the consumer. 	<ul style="list-style-type: none"> Because the team was not able to address this area in great detail, the EPT recommended the establishment of a multi-stakeholder Energy Efficiency and Energy Conservation Implementation Team to research and recommend the most effective ways to promote energy efficiency and conservation programs. 	section 11
Emission trading	<ul style="list-style-type: none"> There were diverse views on emission trading with many people indicating that more information and understanding were needed to provide comments on this issue. There was concern that an emission trading model would not reduce emissions in local areas where a concentration of generation occurs. Frustration was expressed that there was a large amount of technical and complex information to learn in a short period of time. 	<ul style="list-style-type: none"> In reviewing management approaches used in other jurisdictions, the EPT found that emission trading generally results in greater reductions sooner and at less cost. The team is proposing that emissions trading for NOx and SO₂ be part of the management approach for these substances. The team’s recommendations emphasize that no matter what type of emissions trading model evolves in Alberta, each facility will continue to be required to meet plant-specific and ambient air quality guidelines and standards. A “hotspot” safeguard has been built into the emissions management framework to monitor environmental or health issues that may arise as a result of emission trading 	section 6.1
Reduction targets for mercury	<ul style="list-style-type: none"> Many participants wanted faster reductions in emissions, i.e., don’t wait until 2009 to implement new mercury standards, and the ultimate goal for mercury reduction should be zero. 	<ul style="list-style-type: none"> Compared to the status quo, mercury reductions achieved through the recommended framework will be significant The EPT has recommended implementation of mercury controls by 2009, which will make Alberta among the North American leaders in this area. 2009 was chosen as a reasonable date for this requirement in large part because a clear technological direction is yet to be established (some technologies are currently being tested) 	section 6.2

Topics	What the EPT Heard from Albertans	How the EPT Addressed the Issue	EPT Report Reference
BATEA	<ul style="list-style-type: none"> Some participants wanted to factor in health and environmental costs when determining Best Available Technology Economically Achievable (BATEA) 	<ul style="list-style-type: none"> BATEA is established based on technological capability and cost factors. In most cases BATEA provides a high degree of health and environmental protection. Where it does not, the “hotspot” safeguard would apply. BATEA is just one component of the five-year review – other components will include health and environmental factors. The first five-year review will be in 2008 and every five years thereafter. 	section 6.6
Greenhouse Gases	<ul style="list-style-type: none"> Some participants were concerned about buying “hot air” from other countries and therefore reducing the investment and benefits for Albertans. 	<ul style="list-style-type: none"> The EPT recognizes the value of reducing greenhouse gas emissions and has made recommendations that should provide both flexibility and options for companies to invest locally in greenhouse gas reduction actions 	section 6.4
Hotspots	<ul style="list-style-type: none"> Some participants were concerned that the EPT’s definition of hotspots would not identify any region in Alberta as a hotspot. Participants went on to say the definition should reflect and include health effects, concentration of sources and weather inversions. 	<ul style="list-style-type: none"> The EPT has recommended a number of criteria that, if met, would trigger actions to further manage emissions at a local level. These triggers include exceedance of ambient air quality guidelines, reaching trigger levels in either the PM/Ozone or Acid Deposition Management Frameworks, or new scientific information indicating the potential for problems at current emission levels 	section 6.8
Grandfathering	<ul style="list-style-type: none"> Grandfathering of existing plants is seen as an impediment to continuous improvement and delay in emission reductions and local benefits. Timelines are not reasonable Genesee 3 and Centennial should not be grandfathered. Some members of the public wanted plants to be shut down at the end of their design life. They suggested that when an approval or license from an existing facility expires, then the BATEA of the day should apply. 	<ul style="list-style-type: none"> The EUB has addressed this issue in its recent approvals for both Genesee 3 and Centennial, expressing the view that grandfathering is not appropriate for either plant. One of the EPT’s objectives was to incorporate into its work the goal of continuous improvement, with the long-term aim of reducing emissions, protecting human health and the environment, and minimizing the potential for hotspots. 	section 4.3.3 and section 6.7
Transition units	<ul style="list-style-type: none"> Concern that they will be grandfathered. 	see above	see above
Monitoring	<ul style="list-style-type: none"> Some participants requested real-time reporting rather than monthly averages Participants wanted exceedances called in and fines made public. 	<ul style="list-style-type: none"> Real time reporting is required now if a violation of an emission limit occurs. Monitoring and reporting requirements associated with emission trading will require some changes to current monitoring programs. Real time monitoring may or may not be part of these changes. 	section 8

3 Conclusions

By and large, consulting the public demonstrated that the EPT was addressing the issues of concern to Albertans. In most cases, the issues brought forward at the public meetings had already been considered in the EPT process. In other cases, public input helped the EPT focus its response and develop its recommendations.

In the end, the EPT believes that the consultation program was worthwhile and that it provided useful feedback and support to the process. While the strict timelines dictated a somewhat hurried response to feedback on the EPT's draft recommendations, the public input was both insightful and invaluable. A greater degree of public confidence in the team's final recommendations is a likely benefit, and there was also a high level of commitment from the public attendees to further involvement in these issues.

Appendix Members of the Public Consultation Subgroup

Keri Barringer	Environmental Law Centre
Marilyn Carpenter*	TransCanada
Matthew Dance	CASA
Shannon Flint	Alberta Environment
Ed Gibbons	Alberta Urban Municipalities Association
Mike Kelly	TransAlta Corporation
Frank Letchford	Environment Canada
Ian Peace*	Residents for Accountability in Power Industry Development
Sari Shernofsky	Public Consultation Consultant
Harry Tyrrell	Mewassin Community Action Council
Sarah Waddington*	Alberta Environment

Former Subgroup Members

Linda Duncan	Lake Wabamun Enhancement and Protection Association
Catherine Hart*	Fording Coal
Bart Guyon	AAMD&C

*Denotes a co-chair.