



GRASSY MOUNTAIN COAL PROJECT PUBLIC HEARING

From: Crowsnest Conservation Society

Regarding: Comments on the Joint Review Panel Public Hearing Procedures applicable to the Grassy Mountain Coal Project.

To: IAAC.GrassyMountain.AEIC@canada.ca

CC: Elaine Arruda, Hearing Coordinator, Hearing Services
Alberta Energy Regulator
elaine.arruda@aer.ca

The Crowsnest Conservation Society (hereafter referred to as CCS) apologizes for our late submission of views on the above but requests that the following be considered and included in the registry record. This delay was unavoidable due to time and other commitments.

Question 1: Procedures for the Hearing

CCS is generally comfortable with the draft procedures circulated for comment. Either format of presenting submissions by party or topic is acceptable in principle with the decision on format being made on the basis of what best accommodates the assumed adoption of the electronic hearing format proposed and ensuring that it facilitates convenience and cost effectiveness for public participants, particularly those based in the affected local communities. Additionally, if the format proposed by the proponent of presenting by topic is adopted, this should be established by consensus of participants through a consultation process and ensure sufficient flexibility to allow as broad a range of potential topics that are locally significant to be accommodated.

Question 2: Concerns about Electronic Hearing

CCS accepts the reality of having to conduct the hearing electronically under current public health constraints but also suggests that the Panel consider at least some symbolic presence in the community in the course of the process. It should be recognized that one impact of an entirely electronic hearing is the lack of any actual exposure of decision makers to the community and its people, something that could detract from the creditability of the institutional process and potentially acceptance within the community of decisions made from afar.

Question 3: Council Concerns about the Electronic Hearing

Not applicable

As a final point respecting timing of participant submission filing, CCS supports the request made by other public interest participants to extend the date for participant filing other than the proponent to at least September 28. By this correspondence we are making the same request for change of participant submission filing date. We believe this is justified on the basis of the fluid nature of decision making on the hearing procedures and uncertainty associated with the actual hearing schedule at this time, something that is also impacted in the event that the format of presenting by topic is adopted and need for consultation on this format being accommodated.

In conclusion, CCS thanks the Joint Review Panel for the opportunity to provide these comments and your accommodation in the unavoidable delay in our providing these comments. If you have any questions or require any further information, please contact me at <contact information removed>

Yours sincerely

Rick Cooke
Board Director, Crowsnest Conservation Society