Public Trust Amid Policy Changes: Diverse Reactions from Different Groups

Juliana Cesar, MSc • Director, Pesca Environment, Canada

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Abstract. *The assessment of policy changes' effects on "public trust" is often limited to one or a few groups. Alberta's 2019–2025 shift in renewable energy policy shows why that framing is incomplete and usually more complex. After a boom in which capacity roughly tripled, the province imposed a six-month approval moratorium in August 2023 and introduced new land-use and reclamation requirements. Drawing on Alberta Electric System Operator (AESO) connection-queue data and a review of Alberta Utilities Commission (AUC) eFiling decisions, this paper argues that the same policy changes produced divergent trust effects across stakeholder groups: they eroded developer confidence sharply while landowner and municipal reception was largely cautious-to-positive. Because the AUC's public-interest mandate does not prescribe how to weigh these competing reactions, a 'trust decline' narrative built around industry sentiment alone misses a more nuanced, stakeholder-specific reality.*

1. Context: Alberta's Renewable Energy Landscape

Alberta has been one of the fastest-moving renewable energy markets in Canada, with installed renewable capacity growing by roughly **221 percent between 2010 and 2023**. That trajectory changed abruptly in **August 2023**, when the provincial government imposed a six-month pause on new wind and solar approvals and launched an AUC inquiry. The regulatory changes since 2023 have required environmental assessment (EA) practitioners to adapt to more complex, uncertain, and politically charged approval processes.

The central question this paper examines is whether "public trust" in the regulatory system rose or fell. The answer depends entirely on which public is asked. Three groups recur in the record: **developers, landowners, and municipalities**, and the same policy changes moved their trust in opposite directions. What read as risk to one group read as reassurance to another: a developer saw decarbonization and investment opportunity replaced by permit delays and tighter rules, while a landowner saw new soil-productivity protections, reclamation guarantees, and fairer lease terms.

2. Timeline of Key Regulatory Changes (2019–2025)

Date	Regulatory change
2019–2022	Boom period: capacity triples, record applications.
August 2023	Six-month approval moratorium imposed; AUC inquiry launched.
November 2023	Module A inquiry begins.
February 2024	Moratorium ends; policy guidance issued by the Minister.
December 2024	New land-use and reclamation regulations in force.
2025	Module B ongoing; Rule 007 review continues.

3. Data Collection Method

Two publicly accessible sources anchor the analysis. To assess trends in **developer engagement**, the study used project-level data from the AESO Connection Project Reporting system, a monthly dataset documenting all generation projects that submitted a System Access Service Request (SASR) to connect to Alberta's transmission grid. Eight monthly project-list files were purposively selected to align with key milestones: the pre-moratorium baseline (March 2023), the moratorium (August 2023), the registration surge (October 2023), its termination (February 2024), and post-stabilization (February, April, and May 2026). Projects were classified as wind or solar; for 2026 files, only "Active" projects were retained, while 2023–2024 files (which lacked a status field) included all registered entries. Counts were tabulated per period and presented as a line chart.

AESO queue data measure developer *intent* projects actively pursuing grid connection not AUC approvals; they serve as a proxy for investor confidence upstream of the formal EA process. Two limitations apply: 2023–2024 figures may be slightly inflated because cancelled projects could not be filtered out, and the October 2023 spike reflects a one-time registration rush rather than renewed confidence.

To examine the influence of public and landowner participation on outcomes, the study reviewed a sample of **AUC decisions issued between 2023 and 2025** for renewable facility applications, retrieved from the AUC eFiling system. Cases were selected where there was (1) evidence of landowner or community participation and (2) relevance to the post-moratorium framework. Nine decisions were reviewed: denied applications (Proceedings 28847, 28587, and 29312) and conditional approvals (Proceedings 28723, 27652, 27885, 28086, 28259, and 28643), alongside the Module A inquiry report (Proceeding 28501) as a policy-level source documenting the public-participation process. This was an illustrative, not systematic, review of how participation shaped outcomes and how they may indicate evolving public trust.

4. Eroded Trust: Developers Pull Back

For developers, the changes read as a sharp loss of predictability, and the AESO queue tracks the result. Active wind projects fell from **56 in March 2023 to about 8 by May 2026 (−86 percent)**, and active solar projects from **122 to roughly 45 (−63 percent)**; the combined queue peaked at 255 in late 2023, the one-time grandfathering rush, before falling to 53 by May 2026 (down about 70 percent from March 2023). Alberta became a markedly less attractive market.

Four factors may explain the decline in trust, among others:

- **Approval moratorium.** A sudden, unexpected halt signalled that the rules could change without warning.
- **Retroactive reclamation security.** New requirements extended to projects planned or approved under the previous framework.
- **Unpredictability for existing operations.** Uncertainty over obligations reached projects already in operation.
- **Reduced available land.** An "agriculture-first" approach restricted Class 1 and 2 land use, and 35 km buffer zones were imposed around pristine viewscapes.

The reaction was driven less by any single rule than by **retroactivity and suddenness**. For investors, predictability might matter more than strictness.

5. Public Trust Before the Policy Changes: Landowners

Landowner trust started from a low base. Before 2023, the public could participate only at the **project level** through the Public Involvement Program (PIP); there was no formal channel to influence policy. Engagement was limited and trust was low, driven by at least four recurring concerns: uncertainty over reclamation and end-of-life liability, agricultural land productivity, unequal negotiating power between individual landowners and developers, and process barriers in the filing system.

This caution might reflect history rather than opposition. Public trust in Alberta's energy regulatory system had been shaped by decades of **Alberta Energy Regulator (AER) failures on oil and gas orphan wells**, a legacy that directly informed how rural communities approached renewable energy regulation and how they read every new reclamation rule.

6. The System Responds to Public Pressure

The moratorium opened a policy-level channel that had not existed before. Within weeks of the August 2023 announcement, the AUC received **more than 600 submissions** from stakeholders, and the resulting Module A inquiry (November 2023) named "fostering public trust" as a main objective. For the first time, the public could influence the framework itself rather than only individual projects ,a direct response to public pressure.

7. Landowner Reactions to the Policy Changes

Several changes addressed long-standing landowner concerns and were received as overdue wins:

- **Mandatory reclamation security (effective on January 1st, 2025).** Security can now be held directly by the landowner; before that, it wasn't government-mandated.
- **Soil protection (Bulletin 2023-05).** Soil-handling and 2025field-verification requirements protect agricultural productivity.
- **Fairer lease terms.** The Farmers' Advocate Office guide (2023) helped landowners negotiate stronger lease agreements.
- **Formalized obligations (December 2024).** A new Code of Practice formalizes operator reclamation duties, though confusion remains over how it applies to existing projects.

8. Public Influence in AUC Decisions Post-2023

The reviewed proceedings show participation visibly shaping outcomes, the mechanism through which cautious landowners potentially came to trust the process more. Some examples are listed below:

Proceeding	Outcome	Significance
Westlock Solar (28587, Oct 2024)	Denied	A single landowner's objection (a sheep-grazing plan cutting farm revenue ~40%) drove the denial. The clearest signal an individual voice can decide an outcome.

Proceeding	Outcome	Significance
Eastervale Solar (28847, Feb 2025)	Denied	Rejected on agricultural and environmental grounds; Municipal District of Provost opposition decisive; reclamation security plan insufficient.
Rising Sun Solar (29312, Jun 2025)	Denied	First denial on visual-impact and property-value grounds rather than agriculture, a broader public-interest test.
Dolcy Solar + Storage (28723, 2024)	20 conditions	Community input produced a communication plan, visual screening, first-responder training, and annually updated emergency protocols, the most condition-heavy decision.
Creekside Solar (27652, Jul 2023)	Redesigned	Setback increased from 57 m to 70.1 m, plus developer-funded dust control; standing granted to the landowners' group and Leduc County.
Peace Butte Solar (28259, Apr 2024)	6 conditions	First decision explicitly applying the new March 2024 reclamation-security regime (820 acres on Class 3 land).
Killam Old Bear Solar (28643, 2025)	Conditions	Reclamation estimate of $2.6M gross / $0.66M net; Town of Killam intervened; AUC weighed agricultural coexistence even on non-agricultural land.

Together, these decisions validate landowner concerns, treat engagement as ongoing rather than one-time, and show that individual landowners matter, as seen in the Westlock and Creekside cases, where those who prevailed expressed positive trust in the AUC as a result. All decisions are public at auc.ab.ca/efiling.

9. From Bystanders to Active Participants: Municipalities

Municipalities experienced the most structural change. **Before 2023**, they had no automatic right to participate in AUC hearings, no intervener funding (only adjacent landowners did), and AUC responsiveness to their concerns varied; the rapid proliferation of projects outpaced municipal land-use planning capacity.

The 2023 moratorium became a channel for these concerns: Cypress County and others publicly opposed rapid expansion, the Alberta Association of Municipalities called for a broader municipal role, and open houses were held in Red Deer, Medicine Hat, and Pincher Creek (November 2023). **After 2024**, the AUC began automatically granting municipalities participation rights in all renewables proceedings, allowing cost-recovery requests, clarifying requirements through the Rule 007 review, and targeting setback consultation at them specifically. For this group, the changes built trust by granting standing they had previously lacked.

10. Did Public Trust Increase? A challenging assessment

Even where reception improved, a harder question remains: **how do we evaluate public trust?** The AUC's public-interest mandate to protect social, economic, and environmental interests does not prescribe how to weigh them against one another. Groups that have their interest protected and concerns considered tend to have their trust in the system increased. However, when regulatory changes produce conflicting reactions, this becomes the central challenge: whose interests count most, and how do we know? In

Alberta, trust is inferred from behaviour (such as queue activity, participation, and reactions in proceedings) not systematically surveyed, which limits how confidently any verdict can be reached.

11. Conflicting Reactions: What They Tell Us

- **Trust is stakeholder-specific.** The same regulatory change can simultaneously erode trust for developers while building it for landowners and municipalities. One-size metrics miss this.
- **Predictability matters most to industry.** Retroactive requirements and sudden moratoria undermine investment confidence more than the substance of any individual rule.
- **Historical context shapes reception.** Landowner caution, not outright opposition, reflects legacy AER and orphan-well liabilities; new reclamation rules are read through that lens.
- **Public process design is key.** The AUC eFiling system and the Module A consultation model enabled the 600-plus submissions and broad participation, a template for future inquiries.

12. Conclusions and Recommendations

Alberta's 2019–2025 policy changes created **divergent trust effects** across stakeholder groups. Developer confidence declined sharply post-2023, while landowner and municipal reception was largely cautious-to-positive, and the AUC eFiling proceedings document these conflicting perspectives over time. A 'trust decline' narrative focused only on industry overlooks a more nuanced, stakeholder-specific reality.

For practitioners, the implication is methodological: trust should be **disaggregated by group**, interpreted against each group's history, and read through the design of the participation process itself, not collapsed into a single rising or falling line.

References

Alberta Electric System Operator. (2023–2026). *Connection project list* [Monthly dataset]. Retrieved from Connection Project Reporting » AESO

Alberta Utilities Commission. (2023). *Bulletin 2023-05: Interim Rule 007 information requirements*. Retrieved from Announcements and bulletins - AUC

Alberta Utilities Commission. (2023). *Creekside Solar Project decision* (Proceeding 27652). Retrieved from eFiling System

Alberta Utilities Commission. (2024, January 31). *AUC inquiry into the ongoing economic, orderly and efficient development of electricity generation in Alberta. Module A Report*. (Proceeding 28501). Retrieved from 28501_Inquiry report

Alberta Utilities Commission. (2024). *Airport City Solar decision* (Proceeding 27885). Retrieved from eFiling System

Alberta Utilities Commission. (2024). *Peace Butte Solar Farm decision* (Proceeding 28259). Retrieved from eFiling System

Alberta Utilities Commission. (2024). *Westlock Solar decision* (Proceeding 28587). Retrieved from eFiling System

Alberta Utilities Commission. (2024). *Dolcy Solar and Energy Storage decision* (Proceeding 28723). Retrieved from eFiling System

Alberta Utilities Commission. (2024). *Three Hills Solar Project decision* (Proceeding 28086). Retrieved from eFiling System

Alberta Utilities Commission. (2025). *Eastervale Solar decision* (Proceeding 28847). Retrieved from eFiling System

Alberta Utilities Commission. (2025). *Killam Old Bear Solar decision* (Proceeding 28643). Retrieved from eFiling System

Alberta Utilities Commission. (2025). *Rising Sun Solar decision* (Proceeding 29312). Retrieved from https://www.auc.ab.ca/efiling

Farmers' Advocate Office. (2023). *Negotiating renewable energy leases: Landowner considerations and common questions*. Edmonton, AB: Government of Alberta, Agriculture and Irrigation. Retrieved from Negotiating renewable energy leases : landowner considerations and common questions - Open Government

Government of Alberta, Environment and Protected Areas. (2025). *Code of Practice for Solar and Wind Renewable Energy Operations*. Edmonton, AB: Alberta King's Printer. Retrieved from Code of Practice for Solar and Wind Renewable Energy Operations - Open Government

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Contact

Juliana Cesar, MSc, Director, Pesca Environment | jcesar@pescaenv.com | www.pescaenv.com