

Statement of Intent to Participate Alberta Utilities Commission

Proceeding 30732 | Application 30732-A001

Applicant: Synapse Real Estate Corp.

May 29, 2026

1. Participant Information

Participant: Town of Olds

Municipal Address: 3501 70 Ave, Olds, Alberta T4H 1L7

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2. Interest in the Proceeding

The Town of Olds (the “Town”) is the host municipality for the proposed Synapse Data Center project (the “Project”), a 1 GW AI data centre co-located with a 1.4 GW natural gas combined cycle power plant proposed for the northeast industrial area of the Town at the intersection of Highway 2A and Highway 27.

The Town participates in the proceeding before the Alberta Utilities Commission (the “AUC”) in its capacity as a municipality whose residents, infrastructure, and services will be directly affected by the construction and long-term operation of the proposed power plant. The Town is also the Development Authority with jurisdiction over two components of the associated data centre (namely the power plant component as well as the computing component). The Town’s regulatory jurisdiction arises primarily but not exclusively under the Municipal Government Act (the “MGA”) and the Town’s Land Use Bylaw (Bylaw 2025-14); the Town maintains an active development permit review process for these two components of the Project.

The Town’s position is one of support in principle; further details must be verified and addressed through the regulatory processes. The Town acknowledges the potential economic benefits of the Project for the community and the alignment of the Project with Alberta’s AI Data Centre Strategy. At the same time, the Town has identified specific issues within the AUC’s jurisdiction where binding approval conditions are necessary to protect the interests of the Town and its residents. These issues are described in Section 4 of this submission.

3. Clarification: Municipal Zoning

The Project is located within the Town’s Light Industrial District (ILD), as designated under Land Use Bylaw 2025-14. The “Data Centre” use is listed as a Discretionary Use in the ILD zone, a classification established through a deliberate public process between May and October 2025 that included bylaw amendments, public hearings, and community engagement.

Power plants are addressed within the listed discretionary use “Accessory Use to a Discretionary Use” (in the ILD zone under Bylaw 2025-14). Therefore, no bylaw amendment is required or contemplated, based on the Proponent’s statements that the power plant component will only be

restricted to self-supply, i.e. consumed solely on the same property by the Proponent. Under the Bylaw, an Accessory Use is defined as a use that is incidental and subordinate to the principal use of the same parcel. The Town's development permit review, and position before the AUC is scoped on that basis.

The Town recognizes that there is dual jurisdiction between the Town and the AUC in relation to the power plant component, with the AUC having paramountcy under section 619 of the Municipal Government Act. The Town is not seeking to replicate the AUC's review through its development permit process, but will work with the proponent to reach as many commitments as possible on issues of municipal concern. The Town's primary focus will be directed at what falls properly within the Town's mandate, including: land use compatibility, impacts at the Town boundary, site design, off site impacts and emergency management planning.

As of the date of this submission, no development permit application has been filed with the Town in respect of the Synapse proposal.

4. Issues for AUC's Consideration

The Town requests that the AUC consider the following issues in its assessment of Proceeding 30732. Ideally, the Town and the Proponent will work towards an agreement on the Town's concerns that will be embedded through the AUC process through formal commitments. To date, the Proponent has demonstrated strong engagement practices with the Town and we are hopeful that these issues can be clarified and addressed through continued collaboration. If commitments cannot be agreed upon (on all points of concern) the Town's detailed submissions on each outstanding issue may be filed separately in accordance with the AUC's process schedule.

4.1 Emergency Generator Air Quality Management

The Project includes 600 diesel emergency generators. Synapse's own air quality assessment confirms that simultaneous operation of all generators would produce exceedances from the site boundary, reaching residential areas within the Town. The Town's independent peer review found the upset condition management plan included in the application to be inadequate, identifying the absence of operational controls, decision trees, shutdown protocols, monitoring and tracking systems, and a verifiable compliance demonstration.

Specific benchmarks for air quality assessment will need to be considered and addressed; at this juncture, the Town views that it would be appropriate for the AUC to require, as a condition of approval, a comprehensive upset condition management plan to be filed with AEPA and the AUC prior to commencement of construction. The plan must include the following features:

- Hard annual runtime limits on full generator fleet deployment.
- Documented shutdown triggers and operational decision trees.
- Real-time monitoring and tracking systems for generator operation duration.
- A public notification protocol to be activated when generator operation approaches defined thresholds.

4.2 Noise

The Town is concerned with respect to the Project's off-site noise impacts. This is a complex issue because:

- a) it is difficult to separate the effects of the computing component and the power plant component;
- b) jurisdiction:
 - a. for the computing component is solely within the Town's authority
 - b. the power plant component is within the authority of both the AUC and the Town, subject to the AUC having paramountcy pursuant to the MGA s 619;
- c) cumulative impacts are a relevant consideration.

The Town will be reviewing the Proponent's evidence further. The Noise Impact Assessment (NIA) filed with the application is acknowledged by the Proponent's own consultants to be a Stage 1 preliminary assessment. Given the scale of the facility and the proximity of residential receivers, the Town will be reviewing whether the Proponent should be tabling additional noise analysis including ambient monitoring and when (as part of the application, or whether this could be a condition of approval, with appropriate parameters).

Noise compatibility is a key issue and the Town will work with the Proponent to determine whether noise issues relevant to the AUC's jurisdiction (the power plant component) can properly be addressed through commitments, or whether further AUC directions will be required.

4.3 Community Benefit Program

The Proponent has referenced a Community Benefits Program (the "CBP") as a material project public benefit in its Rule 007 application and has specifically cited it as both a "commitment" and a justification for selecting a louder, less expensive generator model over quieter alternatives.¹ Having been presented to the AUC as a public interest consideration, the Town submits that the CBP should be defined and binding.

The Town will work with the Proponent to formalize a commitment, failing which the Town will request the AUC to impose requirements for a CBP, including:

- A defined funding amount or formula tied to Project phases or revenues.
- A governance framework that includes municipal representation.
- Eligible uses connected to community infrastructure and health priorities.
- Annual public reporting obligations.

4.4 Emergency Management and Municipal Coordination

The Project, which is adjacent to a rail corridor, involves significant quantities of hazardous materials including ammonia and glycol, and will increase demand on the Olds Fire Department and municipal emergency services. The Proponent has been engaging frequently with the Olds Fire Department on building an Emergency Response Plan and Town will continue discussing with the Proponent the emergency services requirements including:

- Annual emergency management review meetings with the Town and the Olds Fire Department.
- Annual Project-specific emergency response training sessions for the Olds Fire Department and other emergency response services.

¹ See 30732 X0001 PDF page 8/26 and 19/26 and 30732 X0021 PDF page 1.

- A documented public notification protocol for upset and emergency scenarios.
- An Emergency Response Plan to be submitted to the satisfaction of the Town.
- Material updates to the Emergency Response Plan (again to the satisfaction of the Town) to be filed with the Town within 30 days of any revision.

4.5 Dust, Weed, Pest and Soil Management

The construction of the Project will require the movement of large amounts of soil and many different parties and vehicles will be moving in and out of the Project site. This raises serious concerns regarding potential dust, soil, and weed issues. The Town is interested in working with the Proponent to ensure these issues are addressed.

As such, the Town will be discussing with the Proponent requirements to address these issues including:

- That the Proponent commit to and provide (to the satisfaction and approval of the Town) a Weed, Pest, Soil, and Dust Management Plan or Plans that will be addressed as a condition at the development permit stage.

4.6 Landscaping and Screening

The Project is projected to have certain noise and visual impacts on the residents within the Town and especially with those residents who live nearby. In fact, the public has already raised these concerns with the Town. While the Proponent has asserted that these impacts will be minimal, the Town nonetheless has concerns that these issues may not be sufficiently addressed.

As such, the Town will be discussing with the Proponent requirements to address these issues including:

- The Proponent will commit to and provide (to the satisfaction and approval of the Town) a Landscaping and Screening Plan or Plans that will be addressed as a condition at the development permit stage.

4.7 Road Use

Based on the maps and drawings provided in the Project application (specifically “Attachment TP6-Drawings & Maps”), it appears as though the Proponent is proposing the Project site be accessed exclusively from provincial highways. If that is ultimately what occurs, the Town may not need to require any commitments. However, even if access is off provincially controlled highways, Alberta Transportation and Economic Corridors (“ATEC”) may wish to incorporate municipal involvement in relation to specific matters (such as a Roadside Development Permit). As such, the Town will review with the Proponent; the Town reserves its right to raise possible road use issues that should be addressed at the development permit stage. In the meantime, the Town will continue monitoring this issue to determine whether the Proponent and ATEC come to an agreement regarding road accesses. The Town does support access to the Project directly from the provincially controlled highways.

4.8 Construction Phase Reporting

The project would be constructed in phases over multiple years. The scale and duration of the construction program could place significant pressure on highway infrastructure, emergency services, and community quality of life. The Town’s objective in this regard is to enhance

communication with the public for construction phasing. In this regard, the Town requires a structured basis for monitoring construction progress and maintaining public communication.

The Town will be discussing with the Proponent requirements to address these issues including:

- Submission of a construction plan to the Town, prior to the construction of the Project.
- Periodic construction progress reports filed with the Town at defined phase milestones.
- Community communication updates tied to each construction phase.
- Notification to the Town within 30 days of any material change to project scope, phasing, or the emissions profile of the facility.

4.9 End of Life Reclamation Security

Synapse's application includes a third-party decommissioning cost estimate of approximately \$290 million, and proposes a deferred security model where no funds are posted until year 10 of operations, with full funding reached only at year 20. The Town has also been approached by Synapse regarding the possibility of the Town serving as named beneficiary and holder of a reclamation bond, consistent with direction received from the AUC. The Town is considering this request and will engage legal and financial advisors before any agreement is made. The Town recognizes that Reclamation Security for the power plant component is within the AUC's jurisdiction, and there are benefits arising from consistency for reclamation security requirements (when comparing various facility approvals governed by the AUC). The Town asks the AUC:

- To ensure any security posting schedule reduces community exposure to project abandonment.
- To propose a clear framework for identifying the named security beneficiary, including defined access rights and trigger conditions.
- To confirm that the Town will be formally consulted as part of the beneficiary determination process.

4.10 Property Value Considerations

The Town acknowledges that the AUC's overarching mandate, namely to determine whether the Project is in the public interest, will include various factors, including whether incorporating measures appropriately mitigate negative impacts including on other lands, persons and operations. However, the Town notes that there is extensive community concern about the potential effect of the Project to decrease nearby residential property values. This concern has been significant and consistent throughout the public engagement process. The Town raises this matter to inquire whether the AUC has an established practice or would be willing to consider additional measures with respect to this issue in the context of this proceeding.

The Town will be discussing the following with the Proponent and may be requesting the AUC to consider directing the applicant to propose a plan for monitoring and addressing property value impacts on residential properties in proximity to the facility. The Town is not in a position to require such a plan through its development permit process, and is not aware of another regulatory venue in which this concern can be formally addressed for the Project. If the AUC is able to provide guidance on the appropriate forum or mechanism for this issue, the Town would welcome that direction.

4.11 Waste Management

The Town has concerns regarding the disposal of the Project's solid waste. Power plants such as these can generate excessive or unique waste that could put a significant burden on the municipal/regional waste management services during construction. Moreover, significant electronic waste may be produced that cannot be handled by the Town's waste management services. As such, the Town is seeking the Proponent to commit to:

- providing (to the satisfaction and approval of the Town) a waste management and disposal plan that will be addressed as a condition at the development permit stage.

4.12 Other Issues

The Town reserves the right to raise additional issues later in the AUC approval process.

5. Further Process

The Town anticipates filing a full written submission in accordance with the AUC's process schedule, if the Town's concerns are not addressed through the commitment process. The Town intends to retain legal counsel and technical consultants to assist with its participation and reserves the right to expand or refine the issues identified in this statement based on further review of the application record.

The Town does not at this time request an oral hearing but reserves the right to do so depending on the completeness of the application record and the AUC's process decisions. Should the AUC host in-person hearings on this Project, the Town encourages the commission to host those sessions in Olds, given the significant number of intervenors who wish to participate.

The Town supports data centre development in Olds, but only if this can be done safely and responsibly. We respect the AUC's role in helping to ensure this and thank its staff and commissioners for the work they do on behalf of Albertans.

6. Authorization

This Statement of Intent to Participate is filed on behalf of the Town of Olds by the undersigned, duly authorized to act on behalf of the municipality.

Signed:



Brent Williams
Chief Administrative Officer