

Atura Power

Portlands Energy Centre Efficiency Upgrades

Screening Report for Electricity Projects (Revised)

MARCH 2024 (REVISED NOVEMBER 2024)

Note to Reader: This text is a revised copy of the March 2024 Portlands Energy Centre Efficiency Upgrades Screening Report. This revised November 2024 version contains additional information including a new Appendix D: Air Quality Assessment Information.

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Screening Report for Electricity Projects
(Revised)

Atura Power

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Executive Summary

Portlands Energy Centre (PEC) is owned and operated by Portlands Energy Centre LP, which operates under the trade name Atura Power. Atura Power is a subsidiary of Ontario Power Generation (OPG) and is planning to make efficiency upgrades (upgrades) within its existing facility located along the Toronto waterfront. PEC is a combined-cycle natural gas-fuelled electricity generating station (GS) with an average electrical output contract capacity of 550 megawatts (MW). The station is located in the Port Lands industrial area at 470 Unwin Ave., just south of the mainland part of the City of Toronto on approximately 11.4 hectares (ha) of land.

The Independent Electricity System Operator (IESO) quantified the near-term additional energy supply need in Ontario, stating that an additional 4,000 MW of new capacity is required by May 2027. Procurements for projects capable of meeting the increased energy demand in 2027 will need to be completed in the short-term. Atura Power is prepared to help meet that need and support ratepayers in Ontario through upgrades that will optimise and increase energy generation at PEC in Ontario.

Atura Power is planning to make upgrades which will increase the facility generating contract capacity by an average of 50 MW to achieve a total average contract capacity of 600 MW. Atura Power is planning to make these upgrades to its existing facility by replacing internal parts of the natural gas fired combustion turbines with more efficient parts that will result in greater electrical output from the gas turbine generators. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. Better materials are used to manufacture the parts, and these can withstand a higher operating temperature and therefore produce more power. The planned upgrades will be completed as part of a scheduled maintenance period as early as spring 2025 and will take approximately four to five weeks per unit to disassemble, replace parts and reassemble the gas turbines. There are two units, and they will be completed one at a time. The project will take place entirely within the facility; the facility footprint will not change, and no additional external laydown areas will be required.

Since the PEC upgrades will result in an increase in the nameplate capacity of more than 5 MW, the Ontario *Environmental Assessment Act* requires that an environmental assessment (EA) be undertaken in accordance with Ontario Regulation (O.Reg.) 116/01¹, and subsequently, the “*Guide to Environmental Assessment Requirements for Electricity Projects*” (the Guide) as outlined by the Ontario Ministry of the Environment, Conservation, and Parks (MECP). The Guide requires a Screening Criteria Checklist to be applied to the project, to identify potential negative environmental effects resulting from nine different criteria categories based on current knowledge or preliminary investigations. Application of the Screening Criteria for the planned upgrades at PEC determined that the response to all questions is “No”, indicating that there are no potential negative environmental effects resulting from the project.

¹ In February 2024, the Government of Ontario revoked O.Reg. 116/01, replacing it with O.Reg. 50/24. See Note to Readers on page iv for more information.

Engagement with Indigenous communities, the public and agencies is a key component of the EA process and was integrated from the initial development stages of the project planning and throughout the Environmental Screening Process. This included sharing project information on the project's webpage, advertising and distributing notices, hosting a virtual public meeting, responding to project enquiries, hosting meetings with Indigenous communities, and sharing information with municipal representatives and elected officials. It also included sharing a draft Screening Report with Indigenous communities, key agencies, municipal staff and elected officials, and interested members of the public to offer an additional opportunity for those interested to review project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power voluntarily provided this opportunity so that comments could be addressed and incorporated in the final Screening Report where applicable.

Atura Power remains committed to a continuous process of relationship-building and communication with Indigenous communities neighbouring current and future projects.

Land Acknowledgement

Atura Power acknowledges that Portlands Energy Centre is located on the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples, and is now home to many diverse First Nations, Inuit and Métis peoples. We also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit.

Note to Reader

The report details the Environmental Screening Process Atura Power completed for the PEC upgrades project, as per O.Reg. 116/01 under the Ontario *Environmental Assessment Act* and subsequently, the “*Guide to Environmental Assessment Requirements for Electricity Projects*” (the Guide).

Since the draft Screening Report was released in December 2023, the Government of Ontario has revoked O.Reg. 116/01, replacing it with O.Reg. 50/24 (Government of Ontario, 2024). O.Reg. 50/24 applies to a broader classification of projects but still includes the same trigger that requires Atura Power to undertake an Environmental Screening Process according to the directives in the Guide.

To limit confusion, the final version of the Screening Report continues to reference O.Reg. 116/01; however, it is important that readers understand that O.Reg. 50/24 has since replaced O.Reg. 116/01.

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Appendices

- Appendix A.** Letters from General Electric (GE)
- Appendix B.** Engagement Records
- Appendix C.** Comments on the Draft Screening Report
- Appendix D.** Air Quality Assessment Information²

² New appendix in the revised November 2024 Screening Report.

Glossary of Terms

AAR.....	Acoustic Assessment Report
AGP.....	Advanced Gas Path
ANSI.....	Areas of Natural or Scientific Interest
BTU.....	British thermal unit
°C.....	degrees Celsius
CDM.....	Combustion Dynamics Monitoring
CO ₂	carbon dioxide
CWA.....	<i>Clean Water Act</i>
DFO.....	Fisheries and Oceans Canada
E-LT1-RFP.....	Expedited Long-Term Request for Proposal
EA.....	Environmental Assessment
EASR.....	Environmental Activity and Sector Registry
EBA.....	Event-Based Modelling Area
ECA.....	Environmental Compliance Approval
<i>EPA.....</i>	<i>Environmental Protection Act</i>
ESA.....	Environmentally Sensitive Area
ESDM.....	Emission Summary and Dispersion Modelling
ESR.....	Environmental Screening Report
ET.....	Eastern Time
ETS.....	Enhanced Transient Stability
FAQs.....	Frequently Asked Questions
GE.....	General Electric
GJ.....	gigajoule(s)
GS.....	Generating Station
ha.....	hectares
HDI.....	Haudenosaunee Development Institute
HHV.....	higher heating value
HONI.....	Hydro One Networks Inc.
HVA.....	Highly Vulnerable Aquifer
ICA.....	Issues Contributing Area
IESO.....	Independent Electricity System Operator
IPZ.....	Intake Protection Zone
kJ.....	kilojoule(s)
kWh.....	kilowatt(s)-hour
L.....	Litre(s)
LHV.....	Lower Heating Value
m.....	metre(s)
MCFN.....	Mississaugas of the Credit First Nation
MECP.....	Ontario Ministry of the Environment, Conservation and Parks
MNO.....	Métis Nation of Ontario
MNRF.....	Ministry of Natural Resources and Forestry
MPP.....	Minister of Provincial Parliament
MTO.....	Ontario Ministry of Transportation
MW.....	megawatt(s)

O.Reg.Ontario Regulation
OPG.....Ontario Power Generation
OWRA.....*Ontario Water Resources Act*
PEC.....Portlands Energy Centre
PTTW.....Permit to Take Water
Q&A.....Question and Answer
SNGR.....Six Nations of the Grand River
SGRA.....Significant Groundwater Recharge Area
SPA.....Source Protection Area
TERRE.....Toronto East Residents for Renewable Energy
TRCA.....Toronto and Region Conservation Authority
WHPA.....Wellhead Protection Area

1. Introduction

1.1 Background

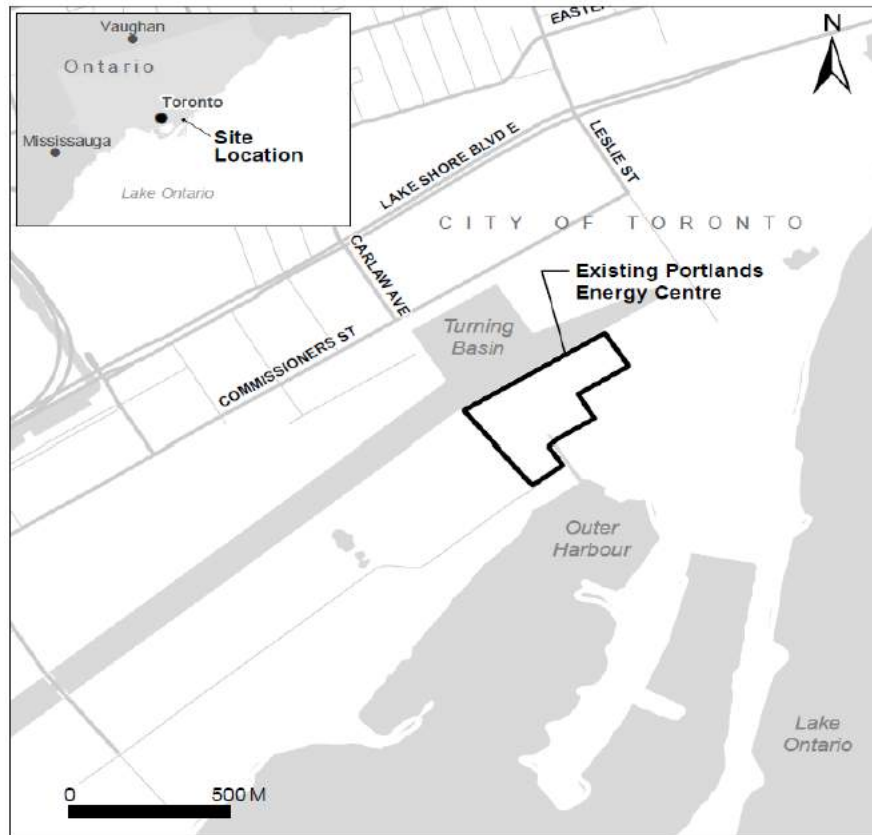
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Figure 1-1 below provides a map of PEC.

Atura Power is planning to make upgrades which will increase the facility generating contract capacity by an average of 50 MW to achieve a total average contract capacity of 600 MW. The winter contract capacity will be increased from 562 MW to 624 MW and the summer contract capacity will be increased from 538 MW to 576 MW.

The original proponents of PEC, a 50/50 limited partnership between TransCanada Energy and OPG, completed an Environmental Review Report in 2003 which concluded that, “the negative net effects of the proposed PEC, which are considered to be temporary or negligible, are on balance more than offset by the positive contributions of the project to redevelopment of the site, the contribution of cleaner generation capacity to the electrical grid, and the economic benefits in terms of jobs, taxes and investment to the City of Toronto.” (SENES Consultants Limited, 2003). PEC began commercial operation in 2009, after meeting the Environmental Screening Process for Electricity Projects requirements under Ontario Regulation (O.Reg.) 116/01³ and obtaining all required construction permits.

³ In February 2024, the Government of Ontario revoked O.Reg. 116/01, replacing it with O.Reg. 50/24. See Note to Readers on page iv for more information.

Figure 1-1: Map of Portlands Energy Centre

1.2 Purpose of the Project

The Independent Electricity System Operator (IESO) quantified the near-term additional energy supply need in Ontario, stating that an additional 4,000 MW of new capacity is required by May 2027. Procurements for projects capable of meeting the increased energy demand in 2027 will need to be completed in the short-term. Atura Power is prepared to help meet that need and support ratepayers in Ontario through upgrades that will optimise and increase energy generation at PEC.

1.3 Environmental Assessment Process

1.3.1 Process

The applicable portions of the Environmental Screening Process for Electricity Projects, per O.Reg. 116/01⁴, which define the type of environmental assessment (EA) to be undertaken under the Ontario *Environmental Assessment Act* (the *Act*) are Section 4 (1) and (3).

⁴ In February 2024, the Government of Ontario revoked O.Reg. 116/01, replacing it with O.Reg. 50/24. See Note to Readers on page iv for more information.

Section 4 (1) states that,

“The planning, designing, establishing, constructing, operating, changing, expanding or retiring of any of the following things is defined as a major commercial or business enterprise or activity and is designated as an undertaking to which the *Act* applies:

[Part] 4. A generation facility that has a name plate capacity of *five megawatts or more* [emphasis added] and that uses biomass or natural gas as its primary power source.” (Government of Ontario, 2021).

Section 4 (3) states that,

“Any expansion of or change in a generation facility, transmission line, transformer station or distribution station that would result in it becoming a thing described in Subsection (1) is defined as a major commercial or business enterprise or activity and is designated as an undertaking to which the *Act* applies” (Government of Ontario, 2021).

Since the PEC upgrades will result in an increase in the nameplate capacity of more than 5 MW, the *Act* requires that an EA be undertaken in accordance with O.Reg.116/01, and subsequently, the “*Guide to Environmental Assessment Requirements for Electricity Projects*” (Government of Ontario, 2023) (the Guide) as outlined by the Ontario Ministry of the Environment, Conservation, and Parks (MECP). As such, the EA for the project follows the Environmental Screening Process as described in the Guide, which states that natural gas projects in Ontario are classified into one of three categories based on their generation capacity and anticipated environmental effects:

- **Category A:** Generates less than 5 MW of electricity and has minimal environmental effects. These projects do not require approval under the *Act*.
- **Category B:** Generates 5 MW of electricity or more and has potential environmental effects that can be mitigated. These projects require an Environmental Screening Process or a Class EA.
- **Category C:** Major projects with known environmental effects. These projects require an Individual EA.

Given that the upgrades will increase the nameplate capacity of PEC (i.e., the average contract capacity) by 50 MW (to 600 MW from 550 MW), generating an increase greater than 5 MW, the project is classified as a Category B project and triggers an Environmental Screening Process which is a proponent-driven, self-assessment process.

Under the Environmental Screening Process, there are two possible stages of review depending on the environmental effects of a project:

- **Screening stage**, and
- **Environmental Review stage**.

The difference between the two stages of review is the level of detail included in the assessment. The Environmental Review stage involves more detailed study and is typically undertaken based

on the environmental effects of a project and the proponent's ability to address potential concerns. The limited scale and nature of the undertaking (i.e., all activities to complete the upgrades will occur within the existing facility), determined that the PEC upgrades will be undertaken as a Screening stage assessment.

The Screening stage involves the following steps (refer to Figure 2 of the Guide for more detail):

- Publish a Notice of Commencement of a Screening
- Prepare a project description
- Apply Screening Criteria to identify potential negative environmental effects
- Engage Indigenous communities, agencies and the public to identify any issues or concerns
- Assess potential negative environmental effects, develop mitigation and impact management, engage and address issues and concerns
- Prepare a Screening Report
- Publish Notice of Completion of Screening Report and commence a 30-day review period
- Submit a Statement of Completion

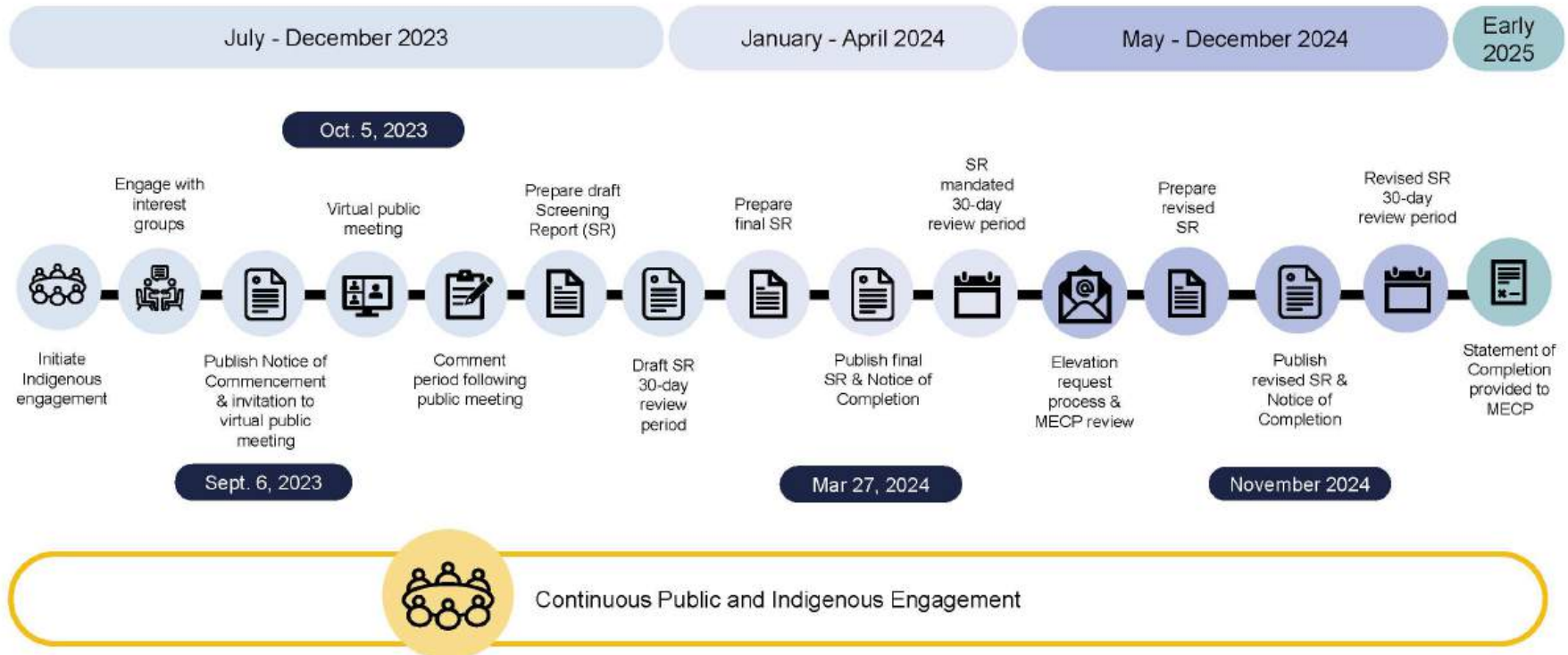
1.3.2 Timelines

Atura Power commenced the Environmental Screening Process by initiating Indigenous engagement in June 2023, prior to distributing the Notice of Commencement. This included sharing preliminary project details with Indigenous communities during meetings regarding a separate project being undertaken by Atura Power. The Notice of Commencement was published on September 6, 2023, to notify the general public about the project, and a virtual public meeting was held on October 5, 2023. Further details on engagement activities for the project are provided in **Section 4**. The draft Screening Report was shared with Indigenous communities, select key agencies, municipal staff and elected officials, and interested members of the public for review from December 5, 2023 to January 7, 2024. Comments received on the draft screening report were responded to and incorporated where applicable into the final Screening Report, which was prepared and released in March 2024. As stipulated in the Guide, a Notice of Completion was prepared and released alongside the final Screening Report in March 2024, commencing the 30-day mandatory review period⁵.

Figure 1-2 provides a summary of the key project milestones undertaken to fulfill the requirements of the Environmental Screening Process.

⁵ Since the release of the final Screening Report in March 2024, Atura Power has prepared and released a revised November 2024 Screening Report that contains additional information including a new Appendix D: Air Quality Assessment Information. The revised November 2024 Screening Report will be available for a 30-day review period.

Figure 1-2: Key Project Milestones



1.4 Project Description

Atura Power is planning to make upgrades to its existing facility by replacing internal parts of the natural gas fired combustion turbines with more efficient parts that will result in greater electrical output from the gas turbine generators. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. Better materials are used to manufacture the parts, and these can withstand a higher operating temperature and therefore produce more power. The advanced materials and the optimised cooling flows enable the engine to run at higher operating temperatures and use fuel more effectively, allowing for a higher power output per gigajoule (GJ) of fuel consumed. In addition, the control system will be upgraded to further enhance the performance. The steam turbine generator is not being modified but the steam turbine output will increase because the upgrades to the gas turbines will also increase the exhaust energy from the gas turbines which will result more steam input to the steam turbine. No modifications are required to any electrical interconnection equipment.

The planned upgrades will be completed as part of a scheduled maintenance period as early as spring 2025 and will take approximately four to five weeks per unit to disassemble, replace parts and reassemble the gas turbines. There are two units, and they will be completed one at a time. The project will take place entirely within the facility (see **Figure 1-3**). The facility footprint will not change, and no additional external laydown areas will be required.

Figure 1-3: Aerial Image of Portlands Energy Centre



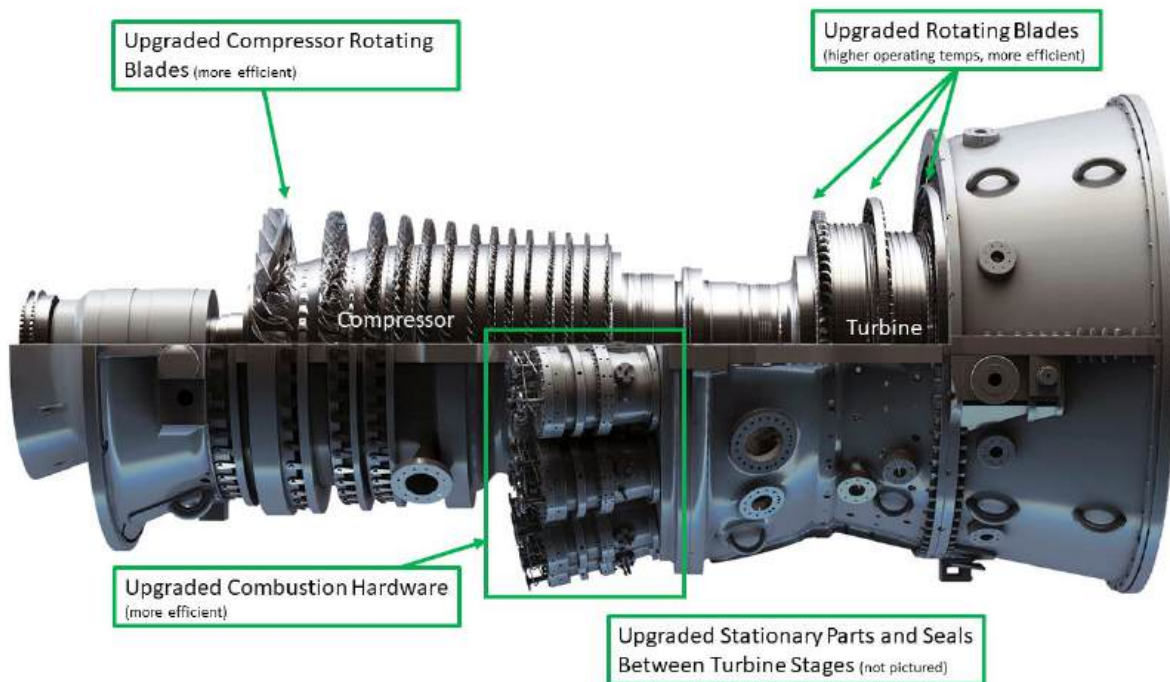
1.5 Project Parts and Activities

1.5.1 Project Parts

The planned project consists of replacing the existing parts within the turbines with new, improved parts made of materials with optimised cooling characteristics that will allow operation at a higher temperature. This will increase the output of the gas turbine and therefore increase the electrical output of PEC by an average electrical output contract capacity of 50 MW.

Figure 1-4 illustrates the parts which will be replaced on both gas turbines currently located within PEC:

Figure 1-4: Parts to be Upgraded



The upgrades, including both the replaced parts of the turbine detailed in **Figure 1-4** as well as the parts being installed in the compressor extraction lines and the control system upgrade, will include the following:

AGP Tech Package – Advanced Gas Path (AGP)

- AGP Stage 1 Nozzle Kit and Support Ring
- AGP Stage 2 and 3 Nozzle Kits
- AGP Stage 1, 2, and 3 Bucket Kits
- AGP Stage 1, 2, and 3 Shroud Kits
- Cooling and sealing air orifice modification
- Installation and modification documents
- Firing temperature increase and revised Model Based Control software changes (formerly known as control curve change)
- 7FA.04 length 1AO, 2FO, 2AO wheelspace thermocouples
- 7F AGP Tech Stage 2 and 3 Bucket Kits

DLN 2.6+ GO Combustion System

- ML A033 Major Disassembly Tool Kit
- ML 0513 Gas-Only Fuel Nozzle Assembly
- ML 0572 Fuel Gas Emergency Stop Valve

- ML 0701 Combustion Chamber Arrangement
- ML 0702 Transition Piece Assembly
- ML 0703 Combustion Liner Arrangement
- ML 0717 Transition Piece Arrangement Combustion
- ML 0719 Aft Combustion Case Arrangement
- ML 0726 Combustion Tuning Piping
- ML 1214 Spark Plug Assembly

7FA.04 Extended Turndown Valves

Control System Upgrades

- OpFlex Balanced Enhanced Transient Stability (ETS)
- OpFlex Auto-Tune
- OpFlex Cold Day Performance
- Variable IGV Angle Optimisation
- Combustion Dynamics Monitoring (CDM) – Dual

1.5.2 Construction, Operation, and Decommissioning Phases of the Project

The upgrades project is limited to replacing internal parts of the natural gas fired combustion turbines with more efficient parts within the existing facility. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls. Project activities are anticipated to include site preparation, transportation of equipment and parts, replacement of parts, and returning the used parts back to the original equipment manufacturer.

The part replacement (construction) phase of the project will be completed as part of a scheduled maintenance period as early as spring 2025. Specialised crews of skilled trades staff will take approximately four to five weeks per unit to disassemble the gas turbines, replace existing parts with new ones and reassemble the gas turbines. The facility will be temporarily shut down for this work. The project will not increase site traffic, will take place entirely within the PEC facility and no additional external laydown areas will be required. The planned project will not require works outdoors and no dust or noise control measures are required during installation.

As for the operations and decommissioning phases, the replacement parts installed will be fully integrated into the existing facility. The operations phase of the project will include no changes to current operations other than improved thermal efficiency. The decommissioning phase will be completed either through a subsequent regular maintenance overhaul or through the final decommissioning of the PEC facility. No specific construction, operations or decommissioning considerations are required for this project.

Table 1-1 summarises the anticipated schedule to complete the planned upgrades.

Table 1-1: Project Schedule

Activity	Timeline
IESO Contract Award	Announced May 16, 2023
Environmental Compliance Approval Amendment	Submitted June 23, 2023
Environmental Screening Process	Fall 2023 to spring 2025
Turbine Upgrades	As early as spring 2025
Commissioning & Testing	As early as spring 2025
Operations	As early as spring 2025 onwards

1.6 Report Organisation

This Screening Report documents the Environmental Screening Process undertaken for the project and is organised as follows:

- **Section 1** – Introduction
- **Section 2** – Permits and Approvals
- **Section 3** – Environmental Screening
- **Section 4** – Engagement
- **Section 5** – Environmental Advantages and Disadvantages
- **Section 6** – References

The report also includes the following appendices which provide supplemental detail:

- **Appendix A** – Letters from General Electric (GE)
- **Appendix B** – Engagement Records
- **Appendix C** – Comments on the Draft Screening Report
- **Appendix D** – Air Quality Assessment Information⁶

⁶ New appendix in the revised November 2024 Screening Report.

2. Permits and Approvals

2.1 Environmental Compliance Approval (Air/Noise)

An Environmental Compliance Approval (ECA) is required for air and noise emissions from the facility as required under Section 9 of Ontario's *Environmental Protection Act*. PEC currently operates under ECA (air and noise) number 3557-BUJKWR issued October 29, 2020. Given that the facility upgrades will increase the output capacity of the facility an amendment to the ECA is required.

Atura Power submitted an application for an amendment to the existing ECA to the MECP on June 23, 2023. As noted in the application, the manufacturer of the equipment being installed for the upgrades, provided a letter stating that the upgrades to the turbine generator “will maintain [air] emissions levels at or below site permit levels.” Similarly, the manufacturer stated that the upgrades are “not expected to increase noise levels from the facility” (copies of these letters are provided in **Appendix A**).

The ECA amendment application included the facility's current Emission Summary and Dispersion Modelling (ESDM) report and Acoustic Assessment Report (AAR) as well as updated Guideline A-5 calculations based on proposed facility and equipment parameters (i.e., nominal rating of combined-cycle combustion turbine facility, nominal rating of natural gas fired combustion turbines, nominal heat input of natural gas fired duct burners, and nominal rating of the steam generator).

2.2 Ontario Environmental Assessment Act

As noted in **Section 1.3** of this report, the planned upgrades at PEC are subject to the Environmental Screening Process for Electricity Projects pursuant to O.Reg.116/01⁷ under the *Act*. The upgrades will result in an increase in the nameplate capacity of more than 5 MW (to an output of 600 MW from the current 550 MW), classifying it as a Category B project under the Environmental Screening Process. This Screening Report addresses the requirements, and documents the results, of the Environmental Screening Process.

2.3 Other Permits and Approvals

Given that the upgrades will occur within the existing facility and no ground disturbance is required, no additional environmental permits and approvals will be required.

⁷ In February 2024, the Government of Ontario revoked O.Reg.116/01, replacing it with O.Reg. 50/24. See Note to Readers on page iv for more information.

3. Environmental Screening

3.1 Existing Conditions

PEC is an industrial facility and the activities to complete the upgrades will take place entirely within the existing facility, on previously developed land, and will require no physical changes to the PEC footprint. According to the City of Toronto Official Plan (consolidated June 2023), the project is planned on lands designated as a “regeneration area” which “is applied to areas with significant vacant lands and/or buildings and in need of revitalisation as a means of fostering growth and physical change” (City of Toronto, 2023). Each regeneration area has a framework for new development set out in a Secondary Plan. The Central Waterfront Secondary Plan provides the planning framework and policies for new development in the area where the project site is located. A wide variety of mixed-use development ranging from industries to housing to community services and parks are permissible in regeneration areas. According to the Central Waterfront Secondary Plan the project is located within the Port Lands. New waterfront transit, a Natural Heritage corridor, open space, and urban development are planned for the Port Lands; however, existing business operations will continue (City of Toronto, 2015).

Given its proximity to Lake Ontario’s water’s edge, the project site falls within an area overseen by Waterfront Toronto which was established in 2001 through the backing of federal, provincial, and municipal governments to revitalise the Toronto waterfront. The designated waterfront area extends from Dowling Avenue in the west to Coxwell Avenue in the east (Waterfront Toronto, 2023).

The project site is located on lands subject to the *Provincial Policy Statement* (Government of Ontario, 2020a) and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (hereafter referred to as the Growth Plan) (Government of Ontario, 2020b).

The *Provincial Policy Statement* provides policy direction on matters of provincial interest related to land use and development (Government of Ontario, 2020a). Section 1.6.11.1 of the *Provincial Policy Statement* provides a policy specifically related to energy supply and electricity generation:

“Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, district energy, and renewable energy systems and alternative energy systems, to accommodate current and projected needs.”

(Government of Ontario, 2020a)

The Growth Plan outlines the *Greater Golden Horseshoe’s* plan for growth and development. According to the Growth Plan, the project site is located within a built-up area near an urban growth area. Though electricity generating facilities are not specifically discussed in the Growth Plan, there are policies for infrastructure to support growth. Section 3.2.1 (3) of the Growth Plan states:

“Infrastructure investment and other implementation tools and mechanisms will be used to facilitate intensification and higher density development in strategic growth areas. Priority will be given to infrastructure investments made by the province that support the policies and schedules of this Plan.”

(Government of Ontario, 2020b)

The definition of “infrastructure” in the Growth Plan includes electricity generation facilities and electricity transmission and distribution systems.

The project is located within the watershed managed by the Toronto and Region Conservation Authority (TRCA).

The project site is not located on lands subject to the *Oak Ridges Moraine Conservation Plan* (2017), *Lake Simcoe Protection Plan* (2009), *Niagara Escarpment Plan* (2017), *Greenbelt Plan* (2023) or *Growth Plan for Northern Ontario* (2011).

3.2 Rationale for Effects Assessment

Appendix B of the Guide includes a Screening Criteria Checklist that needs to be applied to every project subject to the Environmental Screening Process (see **Section 3.4**). As the proponent, Atura Power is required to identify potential negative environmental effects resulting from the project as it relates to each screening criterion based on current knowledge or preliminary investigations.

The Screening Criteria used to identify potential negative effects of the project are listed under the following categories:

1. Surface and ground water
2. Land
3. Air and noise
4. Natural environment
5. Resources
6. Socio-economics
7. Heritage and culture
8. Indigenous communities
9. Other (including wastes)

As demonstrated in **Sections 3.3 and 3.4** Atura Power is confident that there will be no potential for negative effects associated with the Screening Criteria under the nine categories listed above and no further studies are needed.

3.3 Environmental Effects Assessments

The Guide states that, in cases where there is uncertainty about the project's potential for negative effects pertaining to a select criterion within any of the nine categories, further studies may be undertaken to accurately identify and understand the potential for effects. As mentioned above, no further studies are needed as there are no identified negative environmental effects from the project related to the Screening Criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, stated that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels" and that the upgrades are "not expected to increase noise levels from the facility." As such, air and noise assessments are not needed and have not been undertaken for the project. Copies of the GE Gas Power Services letters are provided in **Appendix A**. In correspondence to the project team in January 2024, MECP confirmed that, "MECP's technical staff have reviewed **Table 3-1** and Section 3.4.3 of the draft Environmental Screening Report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".

In a letter to Atura Power dated October 16, 2023, the MECP requested consideration of the ministry's "Areas of Interest" (v. Aug. 2022) with respect to the environmental effects associated with the project and consequent Environmental Screening Process. Although no additional studies are required, **Table 3-1** provides Atura Power's consideration of these MECP Areas of Interest as they relate to the project.

Table 3-1: Consideration of MECP’s Areas of Interest

MECP’s Area of Interest	Consideration in Relation to the Project
Planning and Policy	
<p>Applicable plans and policies should be identified in the report, and the proponent should describe how the proposed project adheres to the relevant policies in these plans.</p> <ul style="list-style-type: none"> • Projects located in MECP Central, Eastern or West Central Region may be subject to <i>A Place to Grow: Growth Plan for the Greater Golden Horseshoe</i> (2020). • Projects located in MECP Central or Eastern Region may be subject to the <i>Oak Ridges Moraine Conservation Plan</i> (2017) or the <i>Lake Simcoe Protection Plan</i> (2014). • Projects located in MECP Central, Southwest or West Central Region may be subject to the <i>Niagara Escarpment Plan</i> (2017). • Projects located in MECP Central, Eastern, Southwest or West Central Region may be subject to the <i>Greenbelt Plan</i> (2017). • Projects located in MECP Northern Region may be subject to the <i>Growth Plan for Northern Ontario</i> (2011). <p>The <i>Provincial Policy Statement</i> (Government of Ontario, 2020a) contains policies that protect Ontario’s natural heritage and water resources. Applicable policies should be referenced in the report, and the proponent should describe how the proposed project is consistent with these policies.</p> <p>In addition to the provincial planning and policy level, the report should also discuss the planning context at the municipal and federal levels, as appropriate.</p>	<p>The project complies with existing provincial, municipal and federal plans and policies. See Section 3.1 for additional details.</p>
Source Water Protection	
<p>The <i>Clean Water Act</i> (2006) (CWA) aims to protect existing and future sources of drinking water. To achieve this, several types of vulnerable areas have been delineated around surface water intakes and wellheads for every municipal residential drinking water system that is located in a source protection area. These vulnerable areas are known as a Wellhead Protection Areas (WHPAs) and surface water Intake Protection Zones (IPZs). Other vulnerable areas that have been delineated under the CWA include Highly Vulnerable Aquifers (HVAs), Significant Groundwater Recharge Areas (SGRAs), Event-Based</p>	<p>According to the Source Protection Information Atlas (MECP, 2023b), the project site is located within the Toronto Source Protection Area (SPA) and is not located in a vulnerable area.</p> <p>The planned project will not require works beyond the footprint of the existing facility and as such poses no risk to drinking water supplies.</p>

MECP's Area of Interest	Consideration in Relation to the Project
<p>Modelling Areas (EBAs), and Issues Contributing Areas (ICAs). Source protection plans have been developed that include policies to address existing and future risks to sources of municipal drinking water within these vulnerable areas.</p> <p>Projects that are subject to the <i>Environmental Assessment Act</i> that fall under a Class EA, or one of the Regulations, have the potential to impact sources of drinking water if they occur in designated vulnerable areas or in the vicinity of other at-risk drinking water systems (i.e., systems that are not municipal residential systems). Projects may include activities that, if located in a vulnerable area, could be a threat to sources of drinking water (i.e., have the potential to adversely affect the quality or quantity of drinking water sources) and the activity could therefore be subject to policies in a source protection plan. Where an activity poses a risk to drinking water, policies in the local source protection plan may impact how or where that activity is undertaken. Policies may prohibit certain activities, or they may require risk management measures for these activities. Municipal Official Plans, planning decisions, Class EA projects (where the project includes an activity that is a threat to drinking water) and prescribed instruments must conform with policies that address significant risks to drinking water and must have regard for policies that address moderate or low risks.</p> <ul style="list-style-type: none"> • The proponent should identify the source protection area and should clearly document how the proximity of the project to sources of drinking water (municipal or other) and any delineated vulnerable areas was considered and assessed. Specifically, the report should discuss whether or not the project is located in a vulnerable area and provide applicable details about the area. • If located in a vulnerable area, proponents should document whether any project activities are prescribed drinking water threats and thus pose a risk to drinking water (this should be consulted on with the appropriate Source Protection Authority). Where an activity poses a risk to drinking water, the proponent must document and discuss in the report how the project adheres to or has regard to applicable policies in the local source protection plan. This section should then be used to inform and be reflected in other sections of the report, such as the identification of net positive/negative effects of alternatives, mitigation measures, evaluation of alternatives etc. 	

MECP's Area of Interest	Consideration in Relation to the Project
<ul style="list-style-type: none"> While most source protection plans focused on including policies for significant drinking water threats in the WHPAs and IPZs it should be noted that even though source protection plan policies may not apply in HVAs, these are areas where aquifers are sensitive and at risk to impacts and within these areas, activities may impact the quality of sources of drinking water for systems other than municipal residential systems. In order to determine if this project is occurring within a vulnerable area, proponents can use Source Protection Information Atlas, which is an online mapping tool available to the public. Note that various layers (including WHPAs, WHPA-Q1 and WHPA-Q2, IPZs, HVAs, SGRAs, EBAs, ICAs) can be turned on through the "Map Legend" bar on the left. The mapping tool will also provide a link to the appropriate source protection plan in order to identify what policies may be applicable in the vulnerable area. For further information on the maps or source protection plan policies which may relate to their project, proponents must contact the appropriate source protection authority. Please consult with the local source protection authority to discuss potential impacts on drinking water. Please document the results of that consultation within the report and include all communication documents/correspondence. <p><u>More Information</u> For more information on the <i>Clean Water Act</i>, source protection areas and plans, including specific information on the vulnerable areas and drinking water threats, please refer to Conservation Ontario's website where you will also find links to the local source protection plan/assessment report.</p> <p>A list of the prescribed drinking water threats can be found in Section 1.1 of Ontario Regulation 287/07 made under the <i>Clean Water Act</i>. In addition to prescribed drinking water threats, some source protection plans may include policies to address additional "local" threat activities, as approved by the MECP.</p>	
<p>Climate Change</p> <p>The document "Considering Climate Change in the Environmental Assessment Process" (Guide) is now a part of the Environmental Assessment program's Guides and Codes of Practice. The Guide sets out the MECP's expectation for considering climate change in the preparation, execution and</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to</p>

MECP's Area of Interest	Consideration in Relation to the Project
<p>documentation of environmental assessment studies and processes. The guide provides examples, approaches, resources, and references to assist proponents with consideration of climate change in their study. Proponents should review this Guide in detail.</p> <ul style="list-style-type: none"> • The MECP expects proponents of projects under a Class EA or <i>Environmental Assessment Act</i> Regulation to: <ol style="list-style-type: none"> 1. Consider during the assessment of alternative solutions and alternative designs, the following: <ol style="list-style-type: none"> a. the project's expected production of greenhouse gas emissions and impacts on carbon sinks (climate change mitigation); and b. resilience or vulnerability of the undertaking to changing climatic conditions (climate change adaptation). 2. Include a discrete section in the report detailing how climate change was considered in the EA. <p>How climate change is considered can be qualitative or quantitative in nature and should be scaled to the project's level of environmental effect. In all instances, both a project's impacts on climate change (mitigation) and impacts of climate change on a project (adaptation) should be considered. Please ensure climate change is considered in the report.</p> <ul style="list-style-type: none"> • The MECP has also prepared another guide to support provincial land use planning direction related to the completion of energy and emission plans. The "Community Emissions Reduction Planning: A Guide for Municipalities" document is designed to educate stakeholders on the municipal opportunities to reduce energy and greenhouse gas emissions, and to provide guidance on methods and techniques to incorporate consideration of energy and greenhouse gas emissions into municipal activities of all types. We encourage you to review the Guide for information. 	<p>this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023. Given the recommendations of the IESO and government initiatives, other alternatives were not considered as part of the project, nor are they required as part of the Screening Process being followed for the project.</p> <p>The upgrades involve replacing rotating and non-rotating parts within the gas turbines (blades, seals, nozzles, etc.). These upgraded parts are more efficient due to the advanced materials used to allow the turbines to run hotter and more fuel efficiently, extracting the maximum amount of power possible. After the upgrade, the plant's thermal efficiency will increase due to a reduced heat rate (British thermal unit/kilowatt-hour (BTU/kWh)). This means that the same amount of fuel used will produce more power after the upgrades.</p> <p>The net heat rate of the gas turbine generators (i.e., kilojoules/kilowatt-hours (kJ/kWh) higher heating value (HHV)) is expected to reduce by 2% at baseload and 15 degrees Celsius (°C) ambient temperature, following the upgrades. The greenhouse gas intensity (i.e., the ratio of carbon dioxide (CO₂) equivalent emissions to total electricity generation) of the facility is also expected to reduce by 2%.</p>
<p>Air Quality, Dust and Noise</p>	
<p>If there are sensitive receptors in the surrounding area of this project, a quantitative air quality/odour impact assessment will be useful to evaluate alternatives, determine impacts and identify appropriate mitigation measures. The scope of the assessment can be determined based on the potential</p>	<p>GE Gas Power Services, the manufacturer of the equipment being installed for the upgrades, provided a letter dated May 26, 2023, stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels." Similarly, GE Gas Power Services further stated in a letter dated March</p>

MECP's Area of Interest	Consideration in Relation to the Project
<p>effects of the proposed alternatives, and typically includes source and receptor characterisation and a quantification of local air quality impacts on the sensitive receptors and the environment in the study area. The assessment will compare to all applicable standards or guidelines for all contaminants of concern. Please contact this office for further consultation on the level of Air Quality Impact Assessment required for this project if not already advised.</p> <p>If a quantitative Air Quality Impact Assessment is not required for the project, the MECP expects that the report contain a qualitative assessment which includes:</p> <ul style="list-style-type: none"> • A discussion of local air quality including existing activities/sources that significantly impact local air quality and how the project may impact existing conditions; • A discussion of the nearby sensitive receptors and the project's potential air quality impacts on present and future sensitive receptors; • A discussion of local air quality impacts that could arise from this project during both construction and operation; and • A discussion of potential mitigation measures. <p>As a common practice, "air quality" should be used an evaluation criterion for all road projects.</p> <p>Dust and noise control measures should be addressed and included in the construction plans to ensure that nearby residential and other sensitive land uses within the study area are not adversely affected during construction activities.</p> <p>The MECP recommends that non-chloride dust-suppressants be applied. For a comprehensive list of fugitive dust prevention and control measures that could be applied, refer to <i>Cheminfo Services Inc. Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities</i> report prepared for Environment Canada (March 2005).</p>	<p>30, 2023, that the upgrades are "not expected to increase noise levels from the facility."</p> <p>Copies of the GE Gas Power Services letters are provided in Appendix A.</p> <p>The facility will continue to operate within all environmental permitting requirements.</p> <p>The planned project will not require works outdoors and no dust or noise control measures are required during installation.</p> <p>Qualitative air quality assessment information is provided in Appendix D⁸ and includes the following discussion <u>on local air quality</u>:</p> <p>The PEC facility operates in the Toronto Port Lands. The existing air quality in the Port Lands is influenced by local and long-range (cross-border) contaminants generated in upwind urban and industrial areas. Local air quality is primarily affected by vehicle emissions from nearby transportation links (the Gardiner Expressway and Don Valley Parkway, and Lakeshore Boulevard), which consist primarily of nitrogen oxides (NO_x), sulphur dioxide (SO₂), carbon monoxide (CO), and particulate matter, including TSP (total suspended particulates), PM10 (particulate matter smaller than 10 microns), and PM2.5 (particulate matter smaller than 2.5 microns). There are also a number of aggregate handling and other industrial facilities in the Port Lands, which are sources of fugitive dust. Natural gas combustion at the PEC facility is also a local source of emissions, with NO_x being the significant contaminant. As noted above, the manufacturer has confirmed that the upgrades will maintain air emissions at or below site permit levels; therefore, the project will not affect local air quality.</p> <p>Since the completion of the original Air Quality Assessment in 2003 and commencement of the PEC facility's commercial operation in 2009, trends in common air pollutants in Ontario show that air quality has improved over time. Ambient concentrations of NO₂ in Ontario are reported to have decreased by 43% from 2003 to 2012 (Ministry of the Environment and Climate Change 2012 Report, published 2014) and an additional 28% from 2012 to 2021 (Ministry of</p>

⁸ New appendix in the revised November 2024 Screening Report. MECP reviewed the draft Appendix D in 2024 and in correspondence to the project team in September 2024, MECP confirmed, "Based on CR TSS's [Central Region, Technical Support Section's] review of the Supplemental Air quality Assessment Information (Appendix D), the proponent has clarified the proposed upgrades for this undertaking. In addition to the ESR documentation, the supplemental information has addressed the ministry's recommendations for a qualitative screening air quality assessment".

MECP’s Area of Interest	Consideration in Relation to the Project
<p>The report should consider the potential impacts of increased noise levels during the operation of the completed project. The proponent should explore all potential measures to mitigate significant noise impacts during the assessment of alternatives.</p>	<p>the Environment, Conservation and Parks, 2023a). The trend of ambient concentrations of NO₂ is not as significant at the closest air monitoring station (Toronto Downtown) to the PEC facility as it is for all of Ontario however the trend is still favourable with a decrease of 42% from 2003 to 2012 and an additional decrease of 5% from 2012 to 2021 (Ontario Ministry of the Environment, 2004) (Ministry of the Environment and Climate Change 2012 Report, published 2014) (Ministry of the Environment, Conservation and Parks, 2023a).</p> <p>Qualitative air quality assessment information provided in Appendix D⁹ also includes the following discussion <u>on land use and nearby sensitive receptors</u>:</p> <p>Land use within a three-kilometer (km) radius of the PEC facility consists of water, greenspace, and employment areas, with residential areas located nearby. The Port Lands are currently zoned for Employment Use, Industrial use, or Open Space and the nearest residential lands are located approximately 950 meter (m) north-west and 1,225 m north of the PEC facility, between Lake Shore Boulevard East and Eastern Avenue. As described in Section 3.1 of the Final PEC Upgrades Screening Report, the Port Lands are the subject of city planning efforts aimed at revitalization (e.g., the proposed Villiers Island precinct development). New waterfront transit, a Natural Heritage corridor, open space, and urban development are planned for the Port Lands; however, existing business operations will continue. Future development of the Toronto Port Lands was in discussion at the time of the original planning of the PEC facility and therefore taken into consideration in the original Air Quality Assessment for the proposed PEC facility. Given that the PEC Upgrades project “will maintain [air] emissions levels at or below site permit levels”, the proposed upgrades have no bearing on future developments proposed in the Port Lands. Furthermore, land use compatibility studies are required for all proposed developments to determine whether new development or land uses are appropriate to protect people and the environment. If a land use compatibility study determines that a proposed new development with sensitive land use is not compatible with existing facilities, the new development shall not be permitted. Atura Power regularly works with neighbours – both current and future – related to compatibility with other nearby land uses and will continue to do so, however, the onus is on the proposed developer and not on Atura Power to ensure new developments are compatible with the PEC facility.</p>

⁹ New appendix in the revised November 2024 Screening Report.

MECP's Area of Interest	Consideration in Relation to the Project
	<p>Qualitative air quality assessment information provided in Appendix D¹⁰ also includes the following discussion on <u>construction, operation, and decommissioning phases of the project</u>:</p> <p>The upgrades project is limited to replacing internal parts of the natural gas fired combustion turbines with more efficient parts within the existing facility. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls. The part replacement phase of the project will be completed as part of a scheduled maintenance period as early as spring 2025 and will take approximately four to five weeks per unit to disassemble, replace parts and reassemble the gas turbines. The project will not increase site traffic, will take place entirely within the PEC facility and no additional external laydown areas will be required. The planned project will not require works outdoors and no dust or noise control measures are required during installation.</p> <p>As for the operations and decommissioning phases, the replacement parts installed will be fully integrated into the existing facility. The operations phase of the project will include no changes to current operations other than improved thermal efficiency. The decommissioning phase will be completed either through a subsequent regular maintenance overhaul or through the final decommissioning of the PEC facility. No specific construction, operations or decommissioning considerations are required for this project.</p>
<p>Ecosystem Protection and Restoration</p>	
<p>Any impacts to ecosystem form and function must be avoided where possible. The report should describe any proposed mitigation measures and how project planning will protect and enhance the local ecosystem.</p> <p>Natural heritage and hydrologic features should be identified and described in detail to assess potential impacts and to develop appropriate mitigation measures. The following sensitive environmental features may be located within or adjacent to the study area:</p> <ul style="list-style-type: none"> • Key Natural Heritage Features: Habitat of endangered species and threatened species, fish habitat, wetlands, Areas of Natural and Scientific Interest (ANSIs), significant valleylands, significant woodlands; significant wildlife habitat (including habitat of special 	<p>The planned project is located on reclaimed land in an industrial site and will not require works beyond the footprint of the existing facility. Therefore, the planned project is not expected to have any negative effects on ecosystem forms and functions.</p>

¹⁰ New appendix in the revised November 2024 Screening Report.

MECP's Area of Interest	Consideration in Relation to the Project
<p>concern species); sand barrens, savannahs, and tallgrass prairies; and alvars.</p> <ul style="list-style-type: none"> • Key Hydrologic Features: Permanent streams, intermittent streams, inland lakes and their littoral zones, seepage areas and springs, and wetlands. • Other natural heritage features and areas such as: vegetation communities, rare species of flora or fauna, Environmentally Sensitive Areas (ESAs), Environmentally Sensitive Policy Areas, federal and provincial parks and conservation reserves, Greenland systems etc. <p>We recommend consulting with the Ministry of Natural Resources and Forestry (MNR), Fisheries and Oceans Canada (DFO) and your local conservation authority to determine if special measures or additional studies will be necessary to preserve and protect these sensitive features. In addition, for projects located in Central Region you may consider the provisions of the Rouge Park Management Plan if applicable.</p>	
<p>Species at Risk</p>	
<p>The Ministry of the Environment, Conservation and Parks has now assumed responsibility of Ontario's Species at Risk program. Information, standards, guidelines, reference materials and technical resources to assist you are found at https://www.ontario.ca/page/species-risk.</p> <p>The Client's Guide to Preliminary Screening for Species at Risk (Draft May 2019) has been attached to the covering email for your reference and use. Please review this document for next steps.</p> <p>For any questions related to subsequent permit requirements, please contact SAROntario@ontario.ca.</p>	<p>The planned project is located on reclaimed land in an industrial site and will not require works beyond the footprint of the existing facility. Therefore, the planned project is not expected to have any negative effects on Species at Risk.</p>
<p>Surface Water</p>	
<p>The report must include enough information to demonstrate that there will be no negative impacts on the natural features or ecological functions of any watercourses within the study area. Measures should be included in the planning and design process to ensure that any impacts to watercourses from construction or operational activities (e.g., spills, erosion, pollution) are mitigated as part of the proposed undertaking.</p> <p>Additional stormwater runoff from new pavement can impact receiving watercourses and flood conditions. Quality and quantity control measures to</p>	<p>The planned project will not affect the permeability or gradient of existing surfaces, as the project will not require works beyond the footprint of the existing facility. Therefore, potential negative effects to surface water from stormwater runoff due to the project are no different from the existing situation.</p>

MECP's Area of Interest	Consideration in Relation to the Project
<p>treat stormwater runoff should be considered for all new impervious areas and, where possible, existing surfaces. The ministry's Stormwater Management Planning and Design Manual (2003) should be referenced in the report and utilised when designing stormwater control methods. A Stormwater Management Plan should be prepared as part of the Environmental Screening Process that includes:</p> <ul style="list-style-type: none"> • Strategies to address potential water quantity and erosion impacts related to stormwater draining into streams or other sensitive environmental features, and to ensure that adequate (enhanced) water quality is maintained • Watershed information, drainage conditions, and other relevant background information • Future drainage conditions, stormwater management options, information on erosion and sediment control during construction, and other details of the proposed works • Information on maintenance and monitoring commitments. <p>Any potential approval requirements for surface water taking or discharge should be identified in the report. A Permit to Take Water (PTTW) under the <i>Ontario Water Resources Act</i> (OWRA) will be required for any water takings that exceed 50,000 L/day, except for certain water taking activities that have been prescribed by the Water Taking Environmental Activity and Sector Registry (EASR) Regulation – <i>O. Reg. 63/16</i>. These prescribed water-taking activities require registration in the EASR instead of a PTTW. Please review the Water Taking User Guide for EASR for more information. Additionally, an ECA under the OWRA is required for municipal stormwater management works.</p>	
Groundwater	
<p>The status of, and potential impacts to any well water supplies should be addressed. If the project involves groundwater takings or changes to drainage patterns, the quantity and quality of groundwater may be affected due to drawdown effects or the redirection of existing contamination flows. In addition, project activities may infringe on existing wells such that they must be reconstructed or sealed and abandoned. Appropriate information to define existing groundwater conditions should be included in the report.</p>	<p>The planned project does not involve groundwater takings or changes to drainage patterns. The project will not require works beyond the footprint of the existing facility, and as such potential negative effects on groundwater are no different than the existing situation.</p>

MECP's Area of Interest	Consideration in Relation to the Project
<p>If the potential construction or decommissioning of water wells is identified as an issue, the report should refer to Ontario Regulation 903, Wells, under the OWRA.</p> <p>Potential impacts to groundwater-dependent natural features should be addressed. Any changes to groundwater flow or quality from groundwater taking may interfere with the ecological processes of streams, wetlands or other surficial features. In addition, discharging contaminated or high volumes of groundwater to these features may have direct impacts on their function. Any potential effects should be identified, and appropriate mitigation measures should be recommended. The level of detail required will be dependent on the significance of the potential impacts.</p> <p>Any potential approval requirements for groundwater taking or discharge should be identified in the report. A PTTW under the OWRA will be required for any water takings that exceed 50,000 Litres(L)/day, with the exception of certain water taking activities that have been prescribed by the Water Taking EASR Regulation – <i>O. Reg. 63/16</i>. These prescribed water-taking activities require registration in the EASR instead of a PTTW. Please review the Water Taking User Guide for EASR for more information.</p> <p>Consultation with the railroad authorities is necessary wherever there is a plan to use construction dewatering in the vicinity of railroad lines or where the zone of influence of the construction dewatering potentially intercepts railroad lines.</p>	
<p>Excess Materials Management</p>	
<p>In December 2019, MECP released a new regulation under the Environmental Protection Act, titled “On-Site and Excess Soil Management” (O. Reg. 406/19) to support improved management of excess construction soil. This regulation is a key step to support proper management of excess soils, ensuring valuable resources don't go to waste and to provide clear rules on managing and reusing excess soil. New risk-based standards referenced by this regulation help to facilitate local beneficial reuse which in turn will reduce greenhouse gas emissions from soil transportation, while ensuring strong protection of human health and the environment. The new regulation is being phased in over time, with the first phase in effect on January 1, 2021. For more information, please visit https://www.ontario.ca/page/handling-excess-soil.</p>	<p>The planned project will not require works beyond the footprint of the existing facility, and as such will not produce excess soil.</p> <p>Regarding waste, the replaced parts will become the property of the original equipment manufacturer and will be refurbished or recycled.</p>

MECP's Area of Interest	Consideration in Relation to the Project
<p>The report should reference that activities involving the management of excess soil should be completed in accordance with O. Reg. 406/19 and the MECP's current guidance document titled "Management of Excess Soil – A Guide for Best Management Practices" (2014).</p> <p>All waste generated during construction must be disposed of in accordance with ministry requirements.</p>	
Contaminated Sites	
<p>Any current or historical waste disposal sites should be identified in the report. The status of these sites should be determined to confirm whether approval pursuant to Section 46 of the <i>Environmental Protection Act (EPA)</i> may be required for land uses on former disposal sites. We recommend referring to the MECP's D-4 guideline for land use considerations near landfills and dumps.</p> <ul style="list-style-type: none"> Resources available may include regional/local municipal official plans and data; provincial data on large landfill sites and small landfill sites; ECA information for waste disposal sites on Access Environment. <p>Other known contaminated sites (local, provincial, federal) in the study area should also be identified in the report (Note – information on federal contaminated sites is found on the Government of Canada's website).</p> <p>The location of any underground storage tanks should be investigated in the report. Measures should be identified to ensure the integrity of these tanks and to ensure an appropriate response in the event of a spill. The ministry's Spills Action Centre must be contacted in such an event.</p> <p>Since the removal or movement of soils may be required, appropriate tests to determine contaminant levels from previous land uses or dumping should be undertaken. If the soils are contaminated, you must determine how and where they are to be disposed of, consistent with Part XV.1 of the <i>EPA</i> and Ontario Regulation 153/04, Records of Site Condition, which details the new requirements related to site assessment and clean up. Please contact the appropriate MECP District Office for further consultation if contaminated sites are present.</p>	<p>There are no known current or historical waste disposal sites within the vicinity of the project site according to the MECP landfill sites map (MECP, 2023c). Further the project site is not located within a known contaminated site according to Federal Contaminated Sites Inventory (Treasury Board of Canada Secretariat, n.d.).</p> <p>The planned project will not disturb soils as the project will not require works beyond the footprint of the existing facility. Therefore, the project will not interact with contaminated sites.</p>
Servicing, Utilities and Facilities	

MECP's Area of Interest	Consideration in Relation to the Project
<p>The report should identify any above or underground utilities in the study area such as transmission lines, telephone/internet, oil/gas etc. The owners should be consulted to discuss impacts to this infrastructure, including potential spills.</p> <p>The report should identify any servicing infrastructure in the study area such as wastewater, water, stormwater that may potentially be impacted by the project.</p> <p>Any facility that releases emissions to the atmosphere, discharges contaminants to ground or surface water, provides potable water supplies, or stores, transports or disposes of waste must have an ECA before it can operate lawfully. Please consult with MECP's Environmental Permissions Branch to determine whether a new or amended ECA will be required for any proposed infrastructure.</p> <p>We recommend referring to the ministry's environmental land use planning guides to ensure that any potential land use conflicts are considered when planning for any infrastructure or facilities related to wastewater, pipelines, landfills or industrial uses.</p>	<p>The planned project will not interfere with existing servicing, utilities or facilities as the project will not require works beyond the footprint of the existing facility or require additional servicing. The existing transmission system will be able to manage the additional electrical load produced by the project.</p>
<p>Mitigation and Monitoring</p>	
<p>Contractors must be made aware of all environmental considerations so that all environmental standards and commitments for both construction and operation are met. Mitigation measures should be clearly referenced in the report and regularly monitored during the construction stage of the project. In addition, we encourage proponents to conduct post-construction monitoring to ensure all mitigation measures have been effective and are functioning properly.</p> <p>Design and construction reports and plans should be based on a best management approach that centres on the prevention of impacts, protection of the existing environment, and opportunities for rehabilitation and enhancement of any impacted areas.</p> <p>The proponent's construction and post-construction monitoring plans must be documented in the report.</p>	<p>No changes to environmental features are expected given that the upgrades will take place within the existing facility and the existing facility footprint will not change. As such, the screening exercise in Section 3.4 identified that, without any mitigation, all regulatory requirements will be met, and no other impact management commitments will be required. Atura Power will continue to manage air emissions from PEC through ongoing continuous emissions monitoring per the terms and conditions of their ECA.</p>
<p>Consultation</p>	
<p>The report must demonstrate how the consultation provisions of the Environmental Screening Process have been fulfilled, including documentation</p>	<p>A description of engagement undertaken with Indigenous communities, members of the public, the municipal staff and elected officials, and agencies is provided</p>

MECP's Area of Interest	Consideration in Relation to the Project
<p>of all stakeholder consultation efforts undertaken during the planning process. This includes a discussion in the report that identifies concerns that were raised and describes how they have been addressed by the proponent throughout the planning process. The report should also include copies of comments submitted on the project by interested stakeholders, and the proponent's responses to these comments (as directed by the Guide to Environmental Assessment Requirements for Electricity Projects to include full documentation).</p> <p>Please include the full stakeholder distribution/consultation list in the documentation.</p>	<p>Section 4. Correspondence records are provided in Appendix B4 to B6, except for records capturing engagement between the project team and Indigenous communities, which have been shared directly with each Indigenous community engaged during the Environmental Screening Process.</p>
<p>Environmental Screening Process</p>	
<p>The purpose of the Environmental Screening report is to document the process followed and the conclusions reached. It should provide clear and complete documentation of the planning process in order to allow for transparency in decision-making and to allow for its timely review by government agencies, and interested persons, including Indigenous communities.</p> <p>The Environmental Screening Process requires the consideration of the effects of the project on all aspects of the environment (including planning, natural, social, cultural, economic, technical). The report should include a level of detail (e.g. hydrogeological investigations, terrestrial and aquatic assessments, cultural heritage assessments) such that all potential impacts can be identified, and appropriate mitigation measures can be developed. Any supporting studies conducted during the Environmental Screening Process should be referenced and included as part of the report.</p> <p>There are two possible stages of review required under the Environmental Screening Process, depending on the environmental effects of a project: a Screening stage and an Environmental Review stage.</p> <ul style="list-style-type: none"> All projects that are subject to the process are required to go through the Screening stage, which requires proponents to apply a series of screening criteria to identify the potential environmental effects of the project. 	<p>The requirements of the Environmental Screening Process are documented in Section 1.3 of this report. In addition to the requirements of the Environmental Screening Process, Atura Power voluntarily shared a draft Screening Report with Indigenous communities, key agencies, municipal staff and elected officials, and interested members of the public to offer an additional opportunity for those interested to review the project details, the Environmental Screening Process undertaken for the project, and the assessment findings. Comments received on the draft Screening Report were responded to and incorporated into the final Screening Report, where applicable; these comments and responses are available in Appendix C.</p> <p>Requirements associated with other permits and approvals are documented in Section 2.</p>

MECP's Area of Interest	Consideration in Relation to the Project
<ul style="list-style-type: none"> A more detailed study (an Environmental Review) is required if potential concerns are raised during the Screening stage that could not be readily addressed. <p>Please include in the report a list of all subsequent permits or approvals that may be required for the implementation of the project, including but not limited to, MECP's PTTW, EASR Registrations and ECAs, conservation authority permits, species at risk permits, Ministry of Transportation (MTO) permits and approvals under the <i>Impact Assessment Act</i>, 2019.</p> <p>Proponents are encouraged to circulate a draft of the Environmental Review Report, or relevant sections of the report, to the appropriate agencies and key stakeholders for comment prior to the formal review periods.</p> <p>Ministry guidelines and other information related to the issues above are available at http://www.ontario.ca/environment-and-energy/environment-and-energy. We encourage you to review all the available guides and to reference any relevant information in the report.</p>	

3.4 Review of Screening Criteria

The Screening Criteria Checklist as presented in Appendix B of the Guide provides the following questions that must be answered with ‘Yes’ or ‘No’ based on whether the project has potential for negative effects on these criteria prior to any mitigation being applied. Additional information is also provided to support the selected response. Each criterion is based on a question which is prefaced with the phrase: “Will the project...”

1. Surface and Ground Water

Criterion	Yes	No	Additional Information
1.1 have negative effects on surface water quality, quantities or flow?		X	The planned project will not have any effects on Lake Ontario. Surface water quality, quantities or flow will not be affected by project activities.
1.2 have negative effects on ground water quality, quantity or movement?		X	The planned project will not have any effects on ground water quality or quantity as project activities will not require water taking or changing water drainage at the existing PEC facility.
1.3 cause significant sedimentation, soil erosion or shoreline or riverbank erosion on or off site?		X	All planned project activities will occur within the existing PEC footprint and will not require soil movement.
1.4 cause potential negative effects on surface or ground water from accidental spills or releases to the environment?		X	All planned project activities will occur within the existing PEC footprint within an industrial area and away from water resources. If an accidental spill occurred it would be within the plant and existing spills management protocols will be undertaken to report and clean the spill.

2. Land

Criterion	Yes	No	Additional Information
2.1 have negative effects on residential, commercial or institutional land uses within 500 metres (m) of the site?		X	All planned project activities will occur within the existing PEC footprint.
2.2 be inconsistent with the <i>Provincial Policy Statement</i> , provincial land use or resource management plans?		X	The planned project is consistent with Section 1.6.11.1 of the <i>Provincial Policy Statement</i> . Provincial land use will not change as a result of the project. The project is being undertaken in response to the IESO’s plan to meet Ontario’s energy needs.

Criterion	Yes	No	Additional Information
2.3 be inconsistent with municipal land use policies, plans and zoning by-laws?		X	The planned project is consistent with municipal land use policies and zoning amendments will not be required as a result of the project. The project is located on lands designated as regeneration area and subject to the Central Waterfront Secondary Plan.
2.4 use hazard lands or unstable lands subject to erosion?		X	All planned project activities will occur within the existing PEC footprint and will not affect hazard or unstable lands.
2.5 have potential negative effects related to the remediation of contaminated land?		X	The planned project works will not require remediation of contaminated land.

3. Air and Noise

Criterion	Yes	No	Additional Information
3.1 have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants?		X	GE Gas Power Services, the manufacturer of the equipment being installed for the upgrades, provided a letter dated May 26, 2023, stating that the upgrades to the turbine generator “will maintain [air] emissions levels at or below site permit levels.” A copy of the GE Gas Power Services letter can be found in Appendix A . The facility will continue to operate within all environmental permitting requirements. See Appendix D ¹¹ for more information.
3.2 cause negative effects from the emission of greenhouse gases (carbon dioxide (CO ₂), methane)?		X	Planned project works will improve the efficiency of the gas turbines and as a result will reduce the greenhouse gas intensity (i.e., the ratio of CO ₂ equivalent emissions to total electricity generation) of the facility.
3.3 cause negative effects from the emission of dust or odour?		X	The project will not have effects from the emissions of dust or odour. See Appendix D ¹¹ for more information.
3.4 cause negative effects from the emission of noise?		X	GE Gas Power Services, the manufacturer of the equipment being installed for the upgrades, provided a letter dated March 30, 2023, stating that the upgrades are “not expected to increase noise levels from the facility.” A copy of the GE Gas Power Services letter can be found in Appendix A . The facility will continue to operate within all environmental permitting requirements.

¹¹ New appendix in the revised November 2024 Screening Report.

4. Natural Environment

Criterion	Yes	No	Additional Information
4.1 cause negative effects on rare, threatened or endangered species of flora or fauna or their habitat?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. Atura Power has procedures in place if rare, threatened or endangered species are encountered.
4.2 cause negative effects on protected natural areas such as ANSIs, ESAs or other significant natural areas?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on protected natural areas such as ANSIs, ESAs or other significant natural areas will occur.
4.3 cause negative effects on wetlands?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on wetlands will occur.
4.4 have negative effects on wildlife habitat; populations, corridors or movement?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on wildlife habitat, populations, corridors or movement will occur.
4.5 have negative effects on fish or their habitat, spawning, movement or environmental conditions (e.g., water temperature, turbidity, etc.)?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on fish or their habitat, spawning, movement or environmental conditions will occur.
4.6 have negative effects on migratory birds, including effects on their habitat or staging areas?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. Atura Power has procedures in place if migratory birds are encountered.
4.7 have negative effects on locally important or valued ecosystems or vegetation?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on locally important or valued ecosystems or vegetation will occur.

5. Resources

Criterion	Yes	No	Additional Information
5.1 result in inefficient (below 40%) use of a non-renewable resource (efficiency is defined as the ratio of output energy to input energy, where output energy includes electricity produced plus useful heat captured)?		X	There will be a decrease in 177.9 BTU/kWh Lower Heating Value (LHV) per unit. Improved thermal efficiency will occur. The overall plant efficiency will remain above the ECA thermal efficiency requirement.
5.2 have negative effects on the use of Canada Land Inventory Class 1-3, specialty crop or locally significant agricultural lands?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on agricultural lands will occur.
5.3 have negative effects on existing agricultural production?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on agricultural lands will occur.

Criterion	Yes	No	Additional Information
5.4 have negative effects on the availability of mineral, aggregate or petroleum resources?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on mineral, aggregate or petroleum resources will occur.
5.5 have negative effects on the availability of forest resources?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on forest resources will occur.
5.6 have negative effects on game and fishery resources, including negative effects caused by creating access to previously inaccessible areas?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on game and fishery resources will occur.

6. Socio-economic

Criterion	Yes	No	Additional Information
6.1 have negative effects on neighbourhood or community character?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on neighbourhood or community character will occur.
6.2 have negative effects on local businesses, institutions or public facilities?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on local businesses, institutions or public facilities will occur.
6.3 have negative effects on recreation, cottaging or tourism?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. No effects on neighbourhood or community recreation, cottaging or tourism are anticipated.
6.4 have negative effects related to increases in the demands on community services and infrastructure?		X	The planned project will not increase demands on community services and infrastructure.
6.5 have negative effects on the economic base of a municipality or community?		X	The planned project will not have negative effects on the economic base of a municipality or community.
6.6 have negative effects on local employment and labour supply?		X	The planned project will not have negative effects on local employment and labour supply.
6.7 have negative effects related to traffic?		X	The planned project will not have negative effects related to traffic as all the necessary parts will likely be delivered in one vehicle, similar to current maintenance activities.
6.8 cause public concerns related to public health and safety?		X	The planned project will not affect public health or safety.

7. Heritage and Culture

Criterion	Yes	No	Additional Information
7.1 have negative effects on heritage buildings, structures or sites, archaeological resources, or cultural heritage landscapes?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. The planned project will not affect heritage buildings, structures or sites, archaeological resources, or cultural heritage landscapes.
7.2 have negative effects on scenic or aesthetically pleasing landscapes or views?		X	Planned project works will take place entirely within lands that have been built-up and industrialised and will not result in taller structures. No effects on scenic or aesthetically pleasing landscapes or views will occur.

8. Indigenous

Criterion	Yes	No	Additional Information
8.1 cause negative effects on Indigenous communities?		X	Planned project works will take place entirely within lands that have been built-up and industrialised. Engagement activities with Indigenous communities from the date the project commenced on September 6, 2023, to the March 8, 2024, when the final Screening Report was prepared, are documented in Section 4 . Engagement with these communities is ongoing and will continue beyond the Environmental Screening Process.

9. Other

Criterion	Yes	No	Additional Information
9.1 result in the creation of waste materials requiring disposal?		X	Waste disposal will not be required as replaced parts will become the property of the original equipment manufacturer and will be refurbished or recycled. See Section 1.5.2 for more information.
9.2 cause any other negative environmental effects not covered by the criteria outlined above?		X	No other environmental effects have been identified as a result of the planned project.

The above review of the PEC Efficiency Upgrades project against the Screening Criteria in Appendix B of the Guide has determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the project.

3.5 Mitigation Measures, Residual Net Effects, and Impact Management Commitments

The Screening identified that, without any mitigation, all regulatory requirements will be met, and no other impact management commitments will be required. Atura Power will continue to manage air emissions from PEC through ongoing continuous emissions monitoring per the terms and conditions of the facility's ECA.

4. Engagement

Engagement with Indigenous communities, the public and agencies is a key component of the EA process and was integrated from the initial development stages of the project planning and throughout the Environmental Screening Process.

This section describes the engagement activities that were undertaken and demonstrates how Atura Power meets and exceeds the engagement requirements of the Environmental Screening Process. This section is organised as follows:

- **Section 4.1** – Engagement Program
- **Section 4.2** – Notice of Commencement
- **Section 4.3** – Public Engagement
- **Section 4.4** – Engagement with Municipal Staff and Elected Officials
- **Section 4.5** – Agency Engagement
- **Section 4.6** – Indigenous Engagement
- **Section 4.7** – Other Engagement
- **Section 4.8** – Draft Screening Report
- **Section 4.9** – Notice of Completion & Final Screening Report (March 2024)
- **Section 4.10** – Notice of Completion & Final Screening Report (November 2024)

4.1 Engagement Program

According to the Guide, proponents are required to prepare a Notice of Commencement at the beginning of the Environmental Screening Process and a Notice of Completion upon the completion of the Environmental Screening Process. Proponents are also required to document the engagement program and engagement activities, agencies contacted, a summary of concerns or issues, and how concerns and issues have been addressed. Further, the public engagement program should:

- “identify potentially affected stakeholders;
- describe how the project may affect the environment;
- provide appropriate notification to identified stakeholders as prescribed in the Environmental Screening/Review Process;
- inform the public where, when and how they can be involved;
- identify public concerns and issues related to the project;
- address public concerns and issues raised during the program; and
- document how public input is taken into account in the screening process and in the project planning and development” (Government of Ontario, 2023).

The goal of the PEC upgrades engagement program is to facilitate information sharing and provide an opportunity for concerns and issues to be raised and responded to as part of the Environmental Screening Process. Furthermore, it serves to build a positive relationship between Atura Power, the local community, Indigenous communities and any members of the public who may be interested in the project. To achieve this goal and meet the above EA engagement requirements, several communication tools and engagement activities were applied as described in **Section 4.1.1. Sections 4.2 to 4.9** provide a description of engagement with the public, municipal staff and elected officials, agencies and Indigenous communities from the date the project commenced on September 6, 2023 to March 8, 2024, when the final Screening Report was prepared.

4.1.1 Communication Tools and Engagement Activities

Below is an overview of the communication tools and engagement activities that were undertaken for the PEC upgrades.

- **Project contact list** – a project contact list was developed by researching the area around PEC to identify potentially interested groups, including elected officials and municipal staff. Agencies were identified using the “Environmental Assessment Government Review Team Master Distribution List” (MECP, 2023d). Indigenous communities were identified based upon proximity to, and potential interest in, the project and confirmed through correspondence with the MECP. Copies of this correspondence are provided in **Appendix B1**.
- **Comment tracking tool** – a database was developed to track comments that were received on the project. The database includes details such as who provided comments and when and how comments were received, as well as responses provided by the project team, and when and how the responses were provided.
- **Project webpage** – a project webpage (<https://aturapower.com/portlandsupgrade>) was developed and maintained throughout the duration of the project. The webpage contains information on the project, the Environmental Screening Process, project timeline, project documents, public meeting materials, and a contact form for sending questions and comments to the project team.
- **Newspaper advertisements, emails and direct mailouts of notices and accompanying letters** – several methods were used to distribute project notices. These methods were selected based on either identified preference or previous project experience as the most appropriate and effective way of communicating with the public, agencies and Indigenous communities. **Sections 4.2 to 4.6** note the distribution methods for each notice.
- **Project email address** – a project-specific email address was established to help interested members of the public contact the project team with any questions and comments regarding the project and associated Environmental Screening Process. The email address was included on project notices, advertisements, etc. and was available for the duration of the Environmental Screening Process. The email was

monitored frequently and comments/questions received were responded to by a member of the project team.

- **Public meeting** – a virtual public meeting was hosted to share information about the project and provide an opportunity for attendees to ask questions and provide feedback. More information on the meeting is provided in **Section 4.3.1**.
- **Frequently Asked Questions (FAQs)** – a FAQs document was developed and provided on the project webpage, including general project information as well as responses to commonly asked questions and comments received on the project.
- **Draft Screening Report** – a *draft* Screening Report was distributed to Indigenous communities, key agencies, municipal staff and elected officials, and interested members of the public to offer an additional opportunity for those interested to review project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power voluntarily provided this opportunity so that comments could be incorporated where applicable, prior to preparing the final Screening Report. Comments on the draft Screening Report and how they were addressed are provided in **Appendix C**.
- **Final Screening Report** – the final Screening Report was distributed to Indigenous communities, key agencies, municipal staff and elected officials, and the public in March 2024, along with an accompanying Notice of Completion. The final Screening Report will be available for a 30-day mandated review period, during which time Indigenous communities, agencies, municipal staff and elected officials, and interested members of the public can review and provide comments on the report. More information on the mandatory 30-day review period is provided in **Section 4.9**.¹²
- **Final Screening Report (Revised)** – this final Screening Report (revised) was distributed to Indigenous communities, key agencies, municipal staff and elected officials, and the public in November 2024, along with an accompanying Notice of Completion. The final Screening Report (revised) will be available for a 30-day review period, during which time Indigenous communities, agencies, municipal staff and elected officials, and interested members of the public can review and provide comments on the report. More information on the 30-day review period is provided in **Section 4.10**.

4.1.2 Documentation and Record of Engagement

Sections 4.3 to 4.8 document the comments received from the public, municipal staff and elected officials, agencies and Indigenous communities from the date the project commenced on September 6, 2023, to March 8, 2024, when the final Screening Report was prepared. Copies of correspondence are provided in the following appendices:

¹² Atura Power posted the draft Screening Report on the project webpage, aturapower.com/portlandsupgrade, and shared a copy of the draft Screening Report via email with interested parties in early December 2023. See **Section 4.8** for details.

- **Appendix B4b:** Correspondence Records with Members of the Public
- **Appendix B5:** Correspondence Records with Municipal Staff and Elected Officials
- **Appendix B6:** Correspondence Records with Agencies

Additionally, **Appendix C** captures comments and responses provided on the draft Screening Report.

Note, any personal information for members of the public has been redacted from these records to maintain privacy. Correspondence records capturing engagement between Atura Power and each Indigenous community were shared directly with each respective Indigenous community engaged during the Environmental Screening Process.

4.2 Notice of Commencement

The project commenced with the publication of the Notice of Commencement on September 6, 2023, in several local and regional newspapers including the *Toronto Star*, *Toronto Sun*, and *Beach Metro*. Copies of the publications are provided in **Appendix B2**. The notice included a project description stating the nature of the project, location, details, and purpose. The notice also communicated the start of the Environmental Screening Process and concluded by providing project contacts and details of an upcoming virtual meeting. This notice can be found in **Appendix B2**.

The notice was distributed to recipients potentially interested in the project via a variety of methods as shown in **Table 4-1**. Covering letters, when provided, included details on the project and explained the planned engagement process, including the virtual public meeting (see **Appendix B2**).

Table 4-1: Notice of Commencement Recipients

Type	Recipient	Method	Date
Provincial and Federal Ministries	Member of Parliament for Toronto-Danforth	Mail / email of covering letter and notice	Mail – Sept 5, 2023 Email – Sept 6, 2023
	Conseil scolaire Viamonde (Association des conseils scolaires des écoles publiques de l'Ontario)		
	Independent Electricity System Operator (IESO)		
	Ministry of Citizenship and Multiculturalism		
	Ministry of Energy		
	Ministry of Environment, Conservation and Parks		
	Ministry of Infrastructure		
	Ministry of Mines		
	Ministry of Natural Resources and Forestry		
	Ministry of Transportation		
Ministry of Tourism, Culture and Sport			

Indigenous communities were contacted through an early engagement process (**Section 4.6**). The Notice of Commencement and an accompanying covering letter to contacts were shared on September 6, 2023.

A separate letter was emailed on September 6, 2023, to three contacts from the MECP. This letter contained information about the project, including a completed copy of the MECP's Project Information Form, as well as a request for any Indigenous communities to be engaged as part of the planned project. This MECP covering letter can be found in **Appendix B2**.

4.3 Public Engagement

Atura Power facilitated public engagement opportunities and processes throughout the project. Public engagement began with the distribution of the Notice of Commencement on September 6, 2023. Through the notice, members of the public were encouraged to share their questions or feedback with the project team through the project email address. Additionally, the notice directed members of the public to additional project information and resources accessible on the project webpage. The notice also invited members of the public to a virtual public meeting where they would have the opportunity to learn more about the project and share their questions during a moderated question and answer period (see **Section 4.3.1**).

Both the project email and webpage have been available to the public throughout the life of the project. A summary of public comments received over the course of the project is also provided, from the date the project commenced on September 6, 2023, to March 8, 2024, when the final Screening Report was prepared (see **Section 4.3.2**).

4.3.1 Virtual Public Meeting

An invitation to the virtual public meeting was provided in the Notice of Commencement. Along with the initial distribution of the Notice of Commencement on September 6, 2023, Atura Power sent an email to remind participants of the upcoming virtual public meeting on October 3, 2023.

The virtual public meeting was scheduled for 6:30 to 7:30 p.m. Eastern Time (ET) on October 5, 2023. The meeting began at 6:30 p.m. ET with a PowerPoint presentation on the upgrades project description and associated Environmental Screening Process. The presentation was followed by a moderated Question & Answer (Q&A) session during which time members of the public submitted their questions to Atura Power via a chat function. To address as many questions as possible, Atura Power prioritised questions relevant to the PEC upgrades project and the associated Environmental Screening Process. The meeting was extended to 7:40 p.m. ET to accommodate the interest that was noted during the Q&A period and answer as many project-specific questions as possible.

More than 100 people attended the virtual public meeting. Approximately 190 comments and questions were submitted during the meeting. A list of questions and comments organised by category, and Atura Power's response to them, is provided in **Appendix B4**. A record of all comments and questions that were received verbatim via the chat function during the public meeting are provided in **Appendix B3**.

4.3.2 Summary of Public Comments

Members of the public shared questions, comments and feedback with Atura Power via two main communication methods including the project email address, portlandupgrade@aturapower.com, and the moderated Q&A session during the virtual public meeting on October 5, 2023. Atura Power received approximately 200 questions and/or comments during the virtual public meeting and approximately 280 emails via the project email address between September 6, 2023 and March 8, 2024, many of which were duplicative in nature. Through these two methods of communication, members of the public voiced questions and comments on topics shown in **Table 4-2**. The complete list of questions and comments, and Atura Power’s responses to them, is provided in **Appendix B4**.

Questions or comments from members of the public specific to the draft Screening Report that was published for review between December 5, 2023, and January 7, 2024, are provided in **Appendix C**, along with Atura Power’s responses.

Table 4-2: Summary of Public Comment Categories and Sub-Categories ¹³

Category	Sub-Category
Atura Power	Atura’s Future Plans
	Battery Storage Systems
	Conservation Initiatives
	Future Plans
	Hydrogen
	Renewable Energy Portfolio
Comment/Opinion	Contact List Request
Costs	General
	Capacity vs. Generation
	Other
Air & Noise	Air Quality
	Emissions of Greenhouse Gases (GHGs)
	Emissions Reporting
	Other
Environmental Screening Process	Engagement Process
	Indigenous Engagement
	Public Meeting Format
	Screening Report and Public Review Period
Exemption Request	n/a
Facility Operations	Operating Capacity
	Operating Frequency
	Operations Contract
	Portlands Energy Centre

¹³ A small number of questions related to the PEC upgrades project were also submitted to Atura Power via other means, such as Atura Power’s media inquiries email inbox. Those questions are also reflected in **Table 4-2** as well as included in the project records of engagement in **Appendix B4**.

Category	Sub-Category
	Waste Heat
	Water Use
	Other
Out of Scope	General
Project Description	General
	Efficiency Upgrades
	Hydrogen
	Schedule
Project Need	Consideration of Alternatives
	Requirements for Municipal Support
	Independent Electricity System Operator (IESO)
	IESO Procurement Process
	Role of Gas in Ontario Energy Supply
	Upgrades vs. Expansion
Request for Project/Meeting Materials	Project Documentation
Other	n/a

4.4 Engagement with Municipal Staff and Elected Officials

Throughout the operation of PEC, Atura Power has endeavoured to build strong relationships with the City of Toronto leadership and elected officials and continues to do so. To support that effort, communication between the project team and municipal staff and elected officials has been ongoing to ensure that the City of Toronto and its representatives are aware of the project’s status and activities. As mentioned in **Section 4.2**, the City of Toronto was provided a Notice of Commencement. The notice was sent via email to municipal staff, the mayor and relevant city councillors, and the relevant provincial and federal Members of Parliament on September 6, 2023. In cases where responses to the Notice of Commencement were not received, follow-up phone calls were made to extend an invitation to meet and further discuss the project and explain how Atura Power and PEC can help meet the City of Toronto’s growing energy needs. Voicemails summarising the project details, offering opportunities to meet to discuss project details, and sharing contact information were left in instances where the project team was unable to reach contacts over the phone. Municipal contacts also received a copy of the draft Screening Report in December 2023 via email, along with details explaining the opportunity to review the report and provide comments. Details associated with sharing the draft Screening Report are available in **Section 4.8**.

Table 4-3 below documents the correspondence between the municipal representatives and the project team following the distribution of the Notice of Commencement on September 6, 2023, to March 8, 2024, when the final Screening Report was prepared. All other correspondence with municipal staff and elected officials following the distribution of the notice occurred via email; copies of the emails are provided in **Appendix B5**.

Table 4-3: Correspondence with Municipal Representatives

Organisation	Title and/or Department	Communication Method	Communication Summary
City of Toronto, Office of the Mayor	Mayor, City of Toronto	Email	On September 6, 2023, the City of Toronto, Office of the Mayor was contacted via email to share a summary of the PEC upgrades project. A covering letter and copy of the Notice of Commencement were attached. An opportunity to meet, at the Mayor's convenience, to further discuss the project was also offered.
		Phone Call	On September 19, 2023, a follow up call was made to the Office of the Mayor regarding the Notice of Commencement and invitation to meet to further discuss the project. The Mayor was not available but a voicemail was left.
		Email	On September 19, 2023, a follow up email was sent to the Office of the Mayor noting previous outreach, reiterating the offer to meet to review the project and answer any questions.
		Email	On October 3, 2023, an email was sent to the Office of the Mayor reminding the Mayor of the upcoming virtual public meeting scheduled for October 5, 2023.
		Email	On December 14, 2023, Atura Power provided a copy of the draft Screening Report and noted any feedback or comments on the report could be shared with the project team via the project email by January 7, 2024.
City of Toronto	City of Toronto, Toronto-Danforth	Email	On September 6, 2023, a City of Toronto Councillor was contacted via email to share a summary of the PEC upgrades project along with a covering letter and copy of the Notice of Commencement. An opportunity to meet, at the Councillor's convenience, to further discuss the project was also offered.
		Phone Call	On September 19, 2023, a follow up call was made to the City of Toronto Councillor regarding the Notice of Commencement and invitation to meet to further discuss the project. The Toronto Councillor was not available but a voicemail was left.
		Email	On September 19, 2023, a follow up email to the City of Toronto Councillor was made, as directed, noting previous outreach and extending an offer to meet to review the project and answer any questions.
		Email	On October 3, 2023, an email was sent to the City of Toronto Councillor reminding the City of Toronto Councillor of the upcoming virtual public meeting scheduled for October 5, 2023.
		Email	On December 14, 2023, Atura Power provided a copy of the draft Screening Report and noted any feedback or comments on the report could be shared with the project team via the project email by January 7, 2024.
City of Toronto	Member of Parliament, Toronto-Danforth	Email	On September 6, 2023, a City of Toronto, Member of Parliament was contacted via email to share a summary of the PEC upgrades project. A covering letter and copy of the Notice of Commencement were attached.

Organisation	Title and/or Department	Communication Method	Communication Summary
		Email	On October 3, 2023, an email was sent to the City of Toronto, Member of Parliament reminding the City of Toronto, Member of Parliament of the upcoming virtual public meeting scheduled for October 5, 2023.
		Email	On December 14, 2023, Atura Power provided a copy of the draft Screening Report and noted any feedback or comments on the report could be shared with the project team via the project email by January 7, 2024.
City of Toronto	Member of Provincial Parliament, Toronto-Danforth	Email	On September 6, 2023, a City of Toronto, Member of Provincial Parliament (MPP) was contacted via email to share a summary of the PEC upgrades project. A covering letter and copy of the Notice of Commencement were attached.

4.5 Agency Engagement

As discussed in **Section 4.2**, several agencies were sent a Notice of Commencement for the project. A full list of agency contacts can be found in **Appendix B1**.

Table 4-4 below notes the correspondence between agencies and the project team following the distribution of the Notice of Commencement on September 6, 2023, to March 8, 2024, when the final Screening Report was prepared.

Correspondence records with agencies are provided in **Appendix B6**.

Table 4-4: Correspondence with Agencies

Organisation	Title and/or Department	Communication Method	Communication Summary
Hydro One Networks Inc. (HONI)	Secondary Land Use Asset Optimisation Strategy & Integrated Planning	Email	On September 6, 2023, Atura Power shared a covering letter and copy of the Notice of Commencement.
			On September 11, 2023, a representative from HONI shared an attachment, describing it as HONI's response to the Notice of Commencement. In the attached response, HONI confirmed that there are no existing HONI Transmission assets in the subject area. The response closed with the request for Atura Power to contact HONI if plans for the undertaking change or the study area expands beyond that shown in the project materials. No other comments were raised. A copy of the attachment is provided in Appendix B6 . No response was required.
			On October 3, 2023, an email was sent to HONI notifying them of the upcoming virtual public meeting scheduled for October 5, 2023.
Ministry of Natural Resources and Forestry (MNRF)	Regional Planner Land Use Planning and Strategic Issues Section Southern Region	Email	On September 6, 2023, Atura Power shared a covering letter and copy of the Notice of Commencement.
			On September 14, 2023, a representative from the MNRF confirmed receipt of the Notice of Commencement and shared documentation to guide Atura Power in identifying ministry interests and engaging the ministry for advice, as needed, during the Environmental Screening Process. Copies of the attachments are provided in Appendix B6 .
			On September 27, 2023, the project team responded to MNRF, acknowledging receipt of the materials and guidance provided by MNRF.
			On October 3, 2023, an email was sent to MNRF notifying them of the upcoming virtual public meeting scheduled for October 5, 2023.
			On December 5, 2023, Atura Power provided a copy of the draft Screening Report and noted any feedback or comments on the report could be shared with the project team via the project email by January 7, 2024.
			On December 11, 2023, a representative from the MNRF thanked Atura Power for sharing the draft Screening Report, noted they had no concerns or further comments, and requested Atura Power continue to circulate information regarding key project stages and milestones.
Toronto Fire Services, Office of the Fire Chief	Administrative Assistant for Matthew Pegg, Fire Chief and General Manager	Email	On September 6, 2023, Atura Power shared a covering letter and copy of the Notice of Commencement.

Organisation	Title and/or Department	Communication Method	Communication Summary
			<p>On September 14, 2023, a representative from the Office of the Fire Chief confirmed receipt of the Notice of Commencement and indicated they had shared it with the appropriate division who would contact Atura Power for further information, if needed. No additional information or response was received.</p> <p>On October 3, 2023, an email was sent to the Office of the Fire Chief notifying them of the upcoming virtual public meeting scheduled for October 5, 2023.</p>
<p>Toronto and Region Conservation Authority (TRCA)</p>	<p>Planner Infrastructure Planning and Permits Development and Engineering Services</p>	<p>Email</p>	<p>On September 6, 2023, Atura Power shared a covering letter and copy of the Notice of Commencement.</p> <p>On September 19, 2023, a representative from TRCA confirmed receipt of the Notice of Commencement, indicated TRCA would be preparing a formal response, and requested project materials following the public meeting scheduled for October 5, 2023. Atura Power and TRCA representative corresponded from September 19, 2023, to October 31, 2023, when the TRCA representative shared a formal response.</p> <p>On October 3, 2023, an email was sent to TRCA notifying them of the upcoming virtual public meeting scheduled for October 5, 2023.</p> <p>On December 5, 2023, Atura Power provided a copy of the draft Screening Report and noted any feedback or comments on the report could be shared with the project team via the project email by January 7, 2024.</p> <p>On December 6, 2023, a representative from TRCA inquired about Atura Power’s response to TRCA comments shared on October 31, 2023 and shared details regarding application review fees. A copy of the attachment is provided in Appendix B6.</p> <p>On December 11, 2023, Atura Power provided a response to the TRCA’s comments and acknowledged details regarding application review fees. A copy of the attachment is provided in Appendix B6.</p> <p>On December 12, 2023, a representative from TRCA confirmed receipt of the response to TRCA’s comments and noted they would be in touch following their review.</p> <p>On December 12, 2023, Atura Power thanked TRCA for confirming receipt of the comments.</p> <p>On December 21, 2023, a representative from TRCA indicated TRCA staff would be unable to meet the January 7, 2024 draft Screening report review deadline and requested a 2-week extension in the review schedule.</p> <p>On December 22, 2023, Atura Power confirmed TRCA’s request for a two-week extension and indicated they would look forward to receiving TRCA’s comments by January 19, 2024.</p>

Organisation	Title and/or Department	Communication Method	Communication Summary
			<p>On January 17, 2024, a representative from TRCA confirmed TRCA staff completed their review of the draft Screening Report and attached a letter with their comments. A copy of the attachment is provided in Appendix B6.</p> <p>On January 22, 2024, Atura Power thanked TRCA for their review of the draft Screening Report and shared a letter responding to TRCA’s comments. A copy of the attachment is provided in Appendix B6.</p>
<p>Ministry of Environment, Conservation and Parks (MECP)</p>	<p>Regional Environmental Planner</p> <p>Environmental Assessments Branch</p>	<p>Email</p>	<p>On September 6, 2023, Atura Power shared a covering letter and copy of the Notice of Commencement.</p> <p>On October 3, 2023, an email was sent to MECP notifying them of the upcoming virtual public meeting scheduled for October 5, 2023.</p> <p>On October 16, 2023, a representative from the MECP confirmed receipt of the Notice of Commencement and shared guidance for consideration over the course of the Environmental Screening Process. A copy of the attachment is provided in Appendix B6.</p> <p>On November 24, 2023, Atura Power provided a letter responding to the MECP’s guidance for consideration over the course of the Environmental Screening Process. A copy of the attachment is provided in Appendix B6.</p> <p>On November 27, 2023, a representative from the MECP confirmed receipt of Atura Power’s letter and indicated they would follow up with the project team with any questions or concerns.</p> <p>On November 30, 2023, a representative from the MECP contacted Atura Power with recommendations regarding the Environmental Screening Process.</p> <p>On December 5, 2023, Atura Power provided a copy of the draft Screening Report and noted any feedback or comments on the report could be shared with the project team via the project email by January 7, 2024.</p> <p>On December 8, 2023, Atura Power followed up with MECP regarding their recommendations regarding the Environmental Screening Process, sharing the rationale for Atura Power’s approach to the Environmental Screening Process and directing the MECP to the appropriate sections of the draft Screening Report for more information.</p> <p>On December 11, 2023, a representative from the MECP noted the MECP would be requesting the full record of Indigenous engagement information either to support the review of the draft Screening Report or with the Notice of Completion and final Screening Report.</p> <p>On January 5, 2024, a representative from the MECP confirmed they had reviewed Atura Power’s rationale associated with their approach to the Environmental Screening Process and confirmed the MECP concurs with Atura Power’s approach. MECP also reiterated their request</p>

Organisation	Title and/or Department	Communication Method	Communication Summary
			<p>for the full record of Indigenous engagement information either to support the review of the draft Screening Report or with the Notice of Completion and final Screening Report. A copy of the attachment is provided in Appendix B6.</p> <p>On January 12, 2024, Atura Power thanked MECP for confirming their rationale for the Environmental Assessment Process and confirmed they would share the Indigenous engagement records with the Notice of Completion and final Screening Report.</p>

4.6 Indigenous Engagement

Atura Power engaged with Haudenosaunee Development Institute (HDI), Mississaugas of the Credit First Nation (MCFN), as well as Six Nations of the Grand River (SNGR) and Métis Nation of Ontario (MNO), prior to publicly issuing the Notice of Commencement, and has since worked to foster continuous dialogue with these communities. The following **Sections 4.6.1 to 4.6.4** provide a narrative of the engagement that was undertaken with these communities from the pre-engagement phase in June 2023 to March 2024, when the final Screening Report was prepared.

Correspondence records capturing engagement between Atura Power and each Indigenous community have been shared directly with each Indigenous community engaged during the Environmental Screening Process.

4.6.1 Summary of Engagement with HDI

Atura Power and HDI have been engaging in a series of communications and meetings as part of the ongoing discussions about Atura Power's energy projects and their impacts on the communities represented by HDI. The dialogue has included Atura Power's planned upgrades at PEC to enhance efficiency and build Ontario's resilient electricity grid. Before the public announcement of the Notice of Commencement for these projects, Atura Power provided information about various projects to HDI, outlining project details and the avenues for feedback and further information.

The exchanges between the two entities have also encompassed operational matters such as documentation requests. HDI has sought clarity and requested detailed records on environmental, regulatory, and federal approvals for Atura Power's assets. HDI has raised concerns regarding the potential impacts on Haudenosaunee rights and interests with respect to Atura Power's broader operations regarding land claims, inadequacy of engagement activities, and respect for treaties and treaty rights. HDI has expressed opposition to the project and their inability to provide meaningful comment without additional support. These issues raised by HDI underline the broader context of historical challenges and the need for continued transparent and honest communication.

The discussions will continue with the intention that the Haudenosaunee Confederacy Chiefs and Clan Mothers can attend and contribute to the conversation, as per HDI's request. Atura Power has initiated correspondence and future meetings to discuss various projects, including the PEC upgrades. These meetings aim to inform and involve HDI in the decision-making process, address environmental concerns, and ensure that the terms of reference for the Joint Liaison Committee meetings foster effective and respectful dialogue.

4.6.2 Summary of Engagement with MNO

Atura Power has been engaged in a series of communications with the MNO relating to various energy projects. The discussions have been focused on sharing information and soliciting feedback on planned upgrades to key energy-generating stations within Ontario, including PEC. The correspondence has involved coordination for future discussions to ensure that the MNO is

adequately informed and has the opportunity to provide input on the developments that may affect their traditional territories.

Notably, Atura Power has conveyed its intentions to proceed with upgrades to PEC, which will involve installing more efficient components to enhance the facility's performance. To maintain a transparent relationship with the MNO, Atura Power has provided advanced notice of the Notice of Commencement for the public, which detailed the project's scope and expected enhancements. They have also extended invitations for feedback and further discussion on the proposed upgrades, emphasising their availability for additional clarification and support. Atura Power held a virtual public meeting to discuss the project's details, reiterating their approach to open communication and engagement with the MNO and other stakeholders.

4.6.3 Summary of Engagement with SNGR

The communications between Atura Power and the Lands and Resources Department of SNGR have centred around various energy projects and their potential environmental impacts. In particular, these discussions covered the subject of long-term procurement with the IESO.

The dialogue has been constructive, with Atura Power engaging in follow-up post-meetings to ensure a clear understanding and address concerns from the Six Nations community. The community has also expressed interest in the details of water permits, Species at Risk, and tree removal and replacement associated with the project. In response, Atura Power has committed to sharing, and has shared, draft agreements, such as a Framework Agreement/Memorandum of Understanding, and to issuing notices, such as the Notice of Commencement for the project. As with all engaged Indigenous communities, they have also committed to provide feedback opportunities for the Screening Report and Notice of Completion concerning the PEC Efficiency Upgrades project, ensuring the community's input is considered in the project.

4.6.4 Summary of Engagement with MCFN

Atura Power and the MCFN have engaged in communications regarding Atura Power's planned upgrades at various energy facilities, including PEC located in Toronto, Ontario. Atura Power initiated the dialogue by informing MCFN's leadership about the Notice of Commencement for the PEC upgrades and offered to provide detailed materials and respond to inquiries. MCFN responded with a preference for direct consultation with Atura Power, highlighting their Unextinguished Aboriginal Title Claim to the waters used by PEC, and underscoring the importance of direct engagement on the project, which falls within MCFN's treaty territory. A subsequent virtual meeting took place to discuss the PEC upgrades project.

Atura Power is seeking to coordinate further meetings with MCFN to continue to provide updates on the PEC upgrades project and has shared detailed plans, including replacing natural gas fired combustion turbines with more efficient components, which are expected to increase the facility's output. Moreover, Atura Power has been transparent about upcoming communications regarding additional projects in MCFN's treaty and traditional territory, maintaining a commitment to sharing information and engaging with the First Nation community.

Follow-up communications from Atura Power have reiterated the ongoing discussions about energy projects, including hosting a virtual public meeting for the PEC project. These steps demonstrate Atura Power's proactive approach to keeping MCFN informed and involved in the projects affecting their territory, emphasising environmental considerations and respect for MCFN's claims and governance.

4.7 Other Engagement

In addition to the correspondence summarised above, Atura Power also received enquiries from several members of the local media between the date the project commenced on September 6, 2023, and March 8, 2024, when the final Screening Report was prepared¹⁴. Correspondence between Atura Power and members of the media included providing statements related to project need and the project description, confirming project and PEC operations details, and addressing a request to be added to the project contact list to receive future project updates and notifications. Atura Power also participated in a virtual interview with one media outlet; discussions covered general questions related to the PEC Upgrades project. Correspondence with members of the media that took place via email are captured in **Appendix B7**.

4.8 Draft Screening Report

To further support engagement during the Environmental Screening Process, Atura Power has voluntarily shared a *draft* Screening Report with key agencies and municipal staff/elected officials, Indigenous communities and interested members of the public in early December 2023. The purpose of preparing and releasing the draft Screening Report was to provide an additional opportunity for anyone wishing to share comments, questions or concerns regarding the PEC upgrades and the associated Environmental Screening Process prior to Atura Power preparing the final Screening Report. The draft Screening Report was shared with key agencies, municipal staff and elected officials, Indigenous communities and interested members of the public¹⁵ via a variety of methods as shown in **Table 4-5**. Emails noting the release of the draft Screening Report, associated Environmental Screening Process, and details about the review period were shared with each recipient. Copies of the emails are provided in **Appendix B4, B5 and B6**.

Through this process, feedback and comments received about the draft Screening Report were responded to and incorporated in the final Screening Report, where applicable (see **Appendix C**).

¹⁴ Most enquiries from the local media were submitted via Atura Power's other communications channels. However, relevant media enquiries specific to the PEC Upgrades project received via both the project email address and Atura Power's other communications channels are summarized here.

¹⁵ Atura Power defined interested members of the public as individuals who requested to be added to the project contact list as well as any member of the public who contacted the project email inbox (portlandsupgrade@aturapower.com) during the Environmental Screening Process.

Table 4-5: Draft Screening Report Distribution

Type	Recipient	Method	Date
Key Agencies	Ministry of the Environment, Conversation & Parks	Email with attached copy of draft Screening Report	December 5, 2023
	Ministry of Natural Resources & Forestry		
	Toronto and Region Conservation Authority		
	Waterfront Toronto		
	Ministry of Citizenship and Multiculturalism		January 9, 2024
Regional and Municipal Contacts	City of Toronto Councillors	Email with attached copy of draft Screening Report	December 14, 2023
	City of Toronto Mayor		
	City of Toronto Planning Department		
Other Key Organisations	PortsToronto (previously the Toronto Port Authority)	Contact form on PortsToronto website	December 14, 2023
	CreateTO (previously the Toronto Port Lands Company)	Email with link to project webpage (which includes a link to the draft Screening Report)	December 14, 2023
	Ontario Clean Air Alliance		December 6, 2023
Indigenous Communities	HDI	Email with attached copy of draft Screening Report	December 6, 2023
	MNO		
	MCFN		
	SNGR		
Interested Members of the Public	N/A	Email with link to project webpage (which includes a link to the draft Screening Report)	December 6, 2023

Atura Power received many questions and comments on the draft Screening Report during the comment period from members of the public, municipal staff and agencies. These included:

- City of Toronto, City Planning Division (Heritage Planning department)
- City of Toronto, Environment and Climate Division
- MCM
- MECP
- Ontario Clean Air Alliance (OCAA)
- Toronto East Residents for Renewable Energy (TERRE)
- TRCA
- Waterfront Toronto, and

- Several from individual members of the public (many of which were submitted as an identical comment form submitted by approximately 130 members of the public)

Generally, comments on the draft Screening Report related to the following key themes:

- Emissions and Air Quality
- Engagement Process and Requirements
- IESO Procurement Process, Project Need, and Consideration of Alternatives
- Frequency and Schedule of Operations
- Health Impacts
- Heritage and Culture
- Municipal Support
- Project Costs
- Project Documentation, Resources and Materials
- Project Notification and Contact List
- Scope of Assessment
- Screening Criteria
- Upgrades vs. Expansion

All inquiries specific to the draft Screening Report and Atura Power's response to them, can be found in **Appendices B4, B5 and B6**. **Appendix C** also indicates where and how comments received were considered and incorporated in the final Screening Report, where applicable. Additional changes made to the draft Screening Report include revisions to the language regarding O.Reg. 116/01, now O.Reg. 50/24, and updates to engagement chapter to reflect communication that occurred since publishing the draft in December 2023.

4.9 Notice of Completion & Final Screening Report (March 2024)

Following the comment period for the *draft* Screening Report, Atura Power took steps to respond to the comments and incorporate the comments into the final Screening Report, where applicable (see **Appendix C**). Per the Guide, a Notice of Completion was prepared and released to the public. The Notice of Completion informs all interested parties when the Environmental Screening Process for the project is complete and provides details regarding the 30-day review and comment period for the final Screening Report. As required, the notice includes: a map identifying the project location; the proponent and contact information; a description of the project; the results of the Environmental Screening Process; details regarding the review period; the location where the final Screening Report may be reviewed; and instructions for making an elevation request in accordance with the provisions of the Guide. The Notice of Completion was distributed to the same project contacts who received the Notice of Commencement via the same methods on September 6, 2023, as well as project contacts who received the draft Screening Report. Additionally, it was advertised in the same publications used to share the Notice of Commencement in September 2023, which include the *Toronto Sun*, *Toronto Star*, and *Beach Metro* newspapers. As noted in **Section 4.6**, a copy of the final Screening Report was shared with the four Indigenous

communities that were engaged during the Environmental Screening Process, prior to the public release of the report.

According to the Guide, and as described in the Notice of Completion, if a concerned party has outstanding environmental concerns about the project, they should raise these concerns with Atura Power. If Atura Power and the interested party are unable to resolve the matter, the concerned party may make a written request to the Minister, copying the Director of the Environmental Assessment Branch, MECP, and Atura Power, to elevate the project to either an Environmental Review or to a Comprehensive EA. Elevation requests must be submitted within the 30-day review period must be made in accordance with the provisions set out in the MECP's Environmental Screening Process for Electricity Projects.

4.9.1 Comments on the Final Screening Report (March 2024)

The 30-day review and comment period extended from March 27 to April 27, 2024. During this time, Atura Power received comments, questions and was copied on five elevation requests submitted to the MECP. Atura Power responded to all five elevation requests submitted to Atura Power and MECP within the 30-day review period. In addition, the MECP received 191 elevation requests that Atura Power was not copied on but which the MECP provided to Atura Power after the 30-day review and comment period. Copies of the comments, questions, and elevation requests and related correspondence are available in **Appendix B9a**. Note, any personal information shared by members of the public has been redacted from these records to maintain privacy.

The majority of the elevation requests were submitted by members of the public, with a couple also received from municipal staff and elected officials. No elevation requests were received from agencies. Further, there were no elevation requests received from Indigenous communities. Many of the elevation requests did not specify a specific reason for the request, rather, these requests expressed the individual's desire that the project be elevated to a higher form of assessment. For the few who shared a reason for their elevation requests, they mostly identified issues and concerns related to:

- Project Need
- PEC Operations
- Municipal Support
- Health Effects
- GHG Emissions / Climate Change
- ESDM / Modelling
- Environmental Screening Process and Assessment of Screening Criteria
- Engagement for the Environmental Screening Process
- IESO Process
- Air Quality

4.9.2 Other Correspondence Since the 30-Day Comment Period

This section summarizes other communications that have occurred between Atura Power and members of the public, municipal staff and elected officials, Indigenous communities and agencies since the 30-day review and comment period in spring 2024.

The project email was accessible throughout this period, with regular monitoring. A member of the project team promptly responded to all comments and questions received.

Engagement with the Public

Public engagement between Atura Power and the public after the 30-day review and comment period was limited to email correspondence. This included responses to a few project-related questions, requests for information, requests to join the project contact list, and one request for a tour of the PEC facility.

Copies of the email correspondence are available in **Appendix B9b**.

Engagement with Municipal Staff and Elected Officials

After the 30-day review and comment period, Atura Power engaged with municipal staff and elected officials through email exchanges. This included correspondence with a member of the Legislative Assembly of Ontario regarding an information request, for which Atura Power provided the requested documents.

Copies of the email correspondence are available in **Appendix B9b**.

Engagement with Indigenous Communities

Atura Power is committed to engaging with HDI, MNO, SNGR, and MCFN, and will continue this engagement beyond the environmental assessment process. Since the 30-day review and comment period, Atura Power has held meetings with communities about other projects. The company is ready to address any questions or comments regarding the planned upgrades at PEC, based on community needs.

Since the release of the March 2024 Screening Report, Indigenous communities have not raised any questions related to the PEC Upgrades project. In October 2024, Atura Power provided a project update to these communities, noting that a revised Screening Report would be prepared and released soon. Two communities acknowledged receipt of the update, but no questions, comments, or concerns have been raised so far.

Updated correspondence records documenting the engagement between Atura Power and each Indigenous community involved in the PEC Upgrades project have been shared directly with those communities.

Engagement with Agencies

Engagement between Atura Power and agencies, excluding the MECP, following the 30-day review and comment period is limited to correspondence with TRCA, who contacted the project team to acknowledge the opportunity to review the March 2024 Notice of Completion and final Screening Report and confirm they had no comments or objections to the PEC Upgrades project.

Copies of the email correspondence are available in **Appendix B9b**.

Engagement with the MECP

MECP and Atura Power have corresponded frequently since the 30-day review and comment period. Correspondence in spring 2024 included the MECP providing copies of elevation requests that were submitted to the MECP exclusively, as well as to request that Atura Power provide additional information to support the Minister's review of the elevation requests. Atura Power provided the requested materials within the specified time frame and corresponded with Atura Power intermittently over the summer months to provide additional information to support the review process. As part of these discussions, in September 2024, the Minister provided a letter requesting that Atura Power prepare and release a revised Screening Report along with a Notice of Completion.

A copy of the September 2024 Minister's letter to Atura Power is available in **Appendix D2**.

4.10 Notice of Completion & Final Screening Report (November 2024)

Since the release of the final Screening Report in March 2024, Atura Power has prepared and released a revised November 2024 Screening Report that contains additional information including a new **Appendix D: Air Quality Assessment Information**. Per the Guide, Atura Power prepared and released a Notice of Completion to announce the revised November 2024 Screening Report and provide details regarding the 30-day review and comment period for the revised Screening Report. The Notice of Completion was distributed to the same project contacts who received the Notice of Commencement via the same methods on September 6, 2023, as well as project contacts who received the draft and final Screening Reports. Additionally, it was advertised in the same publications used to share the Notice of Commencement in September 2023, which include the *Toronto Sun*, *Toronto Star*, and *Beach Metro* newspapers. A copy of the revised November 2024 Screening Report was also shared with the four Indigenous communities that were engaged during the Environmental Screening Process, prior to the public release of the report.

5. Environmental Advantages and Disadvantages

In concluding the Environmental Screening, the overall advantages and disadvantages of the PEC upgrades are presented in **Table 5-1**. This section provides an overall conclusion as to whether the negative net environmental effects of the project are acceptable, based on a balanced assessment against the positive benefits.

Table 5-1: Environmental Advantages and Disadvantages of the Project

Advantages	Disadvantages
<ul style="list-style-type: none"> • As part of the replacement of equipment at the end of their service life that would normally occur at this time, the existing equipment would be upgraded with more efficient equipment but resulting in more electrical output. • Helps to address energy supply gap in Ontario by providing additional power generation capacity to meet the growing demand (through increased efficiency without expanding the facility). • Close proximity to existing transmission facilities and natural gas supply. • Allows PEC to continue to provide electricity system reliability by operating on demand in times when intermittent energy sources (e.g., wind and solar) alone cannot meet energy demand. • After the upgrade, the plant's thermal efficiency will increase due to a reduced heat rate (BTU/kWh). This means that the same amount of fuel used will produce more power after the upgrades. • Provides a cost-effective and timely solution to secure operational flexibility in the Ontario electricity grid. • Brings economic benefits through procurement of local labour and materials. 	<ul style="list-style-type: none"> • None

As shown in **Table 5-1**, a consideration of the overall advantages and disadvantages of the project indicate that the project advantages outweigh the disadvantages. Further, the Environmental Screening determined that all Screening Criteria scored 'No' as a result of the PEC upgrades project, and without any mitigation, all regulatory requirements will be met.

Atura Power remains committed to continuing to build relationships with Indigenous communities and the local community throughout the EA process.

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Atura Power

Appendix A

Letters from General Electric (GE)



GE Gas Power - Services

Richard Loud

Consulting Engineer – Acoustics
Building 40-411K
1 River Road

Schenectady, NY 12345

(518) 385-7275
Richard.loud@ge.com

March 30, 2023

Andrea Coutu
Gas Turbine Specialist
1415 Joshuas Creek Drive Unit #101,
Oakville, ON
L6H 7G4

Atura Power – Portlands Energy Centre & Brighton Beach Power - AGP, DLN2.6+ and High Output S0/R0 Upgrades - Noise

Dear Andrea:

We have reviewed proposed changes to the gas turbines and have concluded that the Advanced Gas Path Upgrades, DLN2.6+ combustion system additions and High Output R0/S0 Upgrades to the gas turbine generator are not expected to increase noise levels from the Facility. This conclusion is based on the following aspects of the upgrade.

- The inlet guide vanes will be opened slightly increasing the airflow by 1% resulting in an immeasurable increase in the inlet noise of 0.04 dB*.
- Changes to the combustor will improve efficiency but do not affect noise. The combustion system is located within the gas turbine enclosure which itself is located within the turbine building. The enclosures and building work together to mitigate noise from the combustion system.
- The exhaust gas flow will increase by less than 1% resulting in an immeasurable increase in the exhaust noise of 0.04 dB*.

* For IEC 61672-1 Class 1 sound level meters, acceptance limits are generally +/- 1.0 dB.

In its experience installing the Advanced Gas Path upgrades and High Output R0/S0 upgrades on the 7F fleet, GE is not aware of any instance in which the upgrades resulted in a material increase in noise emissions from a facility. GE has no evidence indicating that the upgrades resulted in extra turbulence in the exhaust that could result in damage to the stack silencer.

Sincerely,

Richard Loud
Consulting Engineer - Acoustics



GE Gas Power - Services

Mark Brache
Account Manager

1919 Minnesota Court, Suite 100, Mississauga,
Ontario L5N 0C9

(403) 585-2799
Mark.Brache@ge.com

May 26th, 2023

Andrea Coutu
Gas Turbine Specialist
1415 Joshuas Creek Drive Unit #101,
Oakville, ON
L6H 7G4

Atura Power – Portlands Energy Centre & Brighton Beach Power - AGP, DLN2.6+ and High Output S0/R0 Uprates - Noise

Dear Andrea,

We have reviewed proposed changes to the gas turbines and have concluded that the Advanced Gas Path Upgrades, DLN2.6+ combustion system additions and High Output R0/S0 Upgrades to the gas turbine generator will Maintain emissions levels at or below site permit levels. This is also stated in proposal, “The proposed AGP Tech, DLN2.6+ upgrade will maintain NOx emission at 9 ppm.”

This conclusion is based on the following aspects of the upgrade.

- The 7FA DLN2.6+ Combustor is a common architecture across the 7FA.03, 7FA.04 and 7FA.05 gas turbine models. The combustor can deliver lower NOx and equal CO emissions guaranteed levels as compared with the DLN 2.6e system. It also provides improved Combustion Inspection (CI) intervals, higher ethane and H2 tolerance, and improved flexibility with lower turndown levels with increased Modified Wobbe Index (MWI) range.
- DLN tuning is required following installation of the uprate to ensure emission estimates contained here-in.
- Start-up emissions are NOT addressed in this letter as they are dependent on the given site specific start-up profile.

GE’s 2.6+ combustor was designed originally to offer lower emissions. GE’s expectation is that the emissions of the gas turbine in minimum emission mode and above will maintain the 9 PPM.

Sincerely,

Mark Brache
Account Manager

Appendix B

Engagement Records

- **Appendix B1: Project Contact List**
- **Appendix B2: Distribution of Notice of Commencement**
- **Appendix B3: Virtual Public Meeting Materials**
- **Appendix B4: Summary of Public Engagement**
- **Appendix B5: Correspondence Records with Municipal Staff and Elected Officials**
- **Appendix B6: Correspondence Records with Agencies**
- **Appendix B7: Other Correspondence**
- **Appendix B8: Notice of Completion (March 2024)**
- **Appendix B9: Correspondence Since the Release of the Screening Report (March 2024)**
- **Appendix B10: Notice of Completion (November 2024)**

Since the draft Screening Report was released in December 2023, the Government of Ontario has revoked O. Reg. 116/01, replacing it with O. Reg. 50/24. O. Reg. 50/24 applies to a broader classification of projects but still requires Atura Power to undertake an Environmental Screening Process according to the directives in the Guide.

As the project commenced under O. Reg. 116/01, many of the early project materials referenced in the following appendices reference O. Reg. 116/01, however it is important that readers understand O. Reg. 50/24 has since replaced O. Reg. 116/01, as of February 2024. See Note to Readers on page iv of the Screening Report for more information.

Appendix B1: Project Contact List

Portlands Energy Centre Efficiency Upgrades: Agency Contact List

Category	Subcategory	Organization	Contact Name & Title	Email	Phone Number	Address
MECP Contacts						
Agency	Provincial	Ministry of Environment, Conservation and Parks	General Contact	ClassEAnotices@ontario.ca	-	-
Agency	Provincial	Ministry of Environment, Conservation and Parks	Naz Kiriliak	Nazariy.Kiriliak@ontario.ca	416-843-8764	5775 Yonge St Toronto, ON M2M 4J1
Agency	Provincial	Ministry of Environment, Conservation and Parks	Gavin Battarino	Gavin.Battarino@ontario.ca	437-248-5232	135 St Clair Ave W Toronto, ON M4V 1P5
Agency	Provincial	Ministry of Environment, Conservation and Parks	Jimena Caicedo	Jimena.Caicedo@ontario.ca	416-709-1636	5775 Yonge St Toronto, ON M2M 4J1
Agency	Provincial	Ministry of Environment, Conservation and Parks	Paul D. Martin	Paul.D.Martin@ontario.ca	647-688-8395	5775 Yonge St Toronto, ON M2M 4J1
Agency	Provincial	Ministry of Environment, Conservation and Parks	Marinha Antunes	Marinha.Antunes@ontario.ca	437-214-4256	5775 Yonge St Toronto, ON M2M 4J1
Agency	Provincial	Ministry of Environment, Conservation and Parks	Nick Colella	Nick.Colella@ontario.ca	-	-
Agency	Provincial	Ministry of Environment, Conservation and Parks	Jon Averill	Jon.Averill@ontario.ca	705-761-7306	135 St Clair Ave W Toronto, ON M4V 1P5
Agency	Provincial	Ministry of Environment, Conservation and Parks	Clinton Randolph	Clinton.Randolph@ontario.ca	416-347-7706	135 St Clair Ave W Toronto, ON M4V 1P5
Agency	Provincial	Ministry of Environment, Conservation and Parks	Josephine Yumbla	Josephine.Yumbla@ontario.ca ;	437-331-2248	438 University Ave Toronto, ON M7A 1N3
Agency	Provincial	Ministry of Environment, Conservation and Parks	Marco Mazzuca	Marco.Mazzuca@ontario.ca	647-641-1743	135 St Clair Ave W Toronto, ON M4V 1P5
Agency	Provincial	Ministry of Environment, Conservation and Parks	Simon Zhao	Simon.Zhao@ontario.ca	437-225-5790	135 St Clair Ave W Toronto, ON M4V 1P5
Agency	Provincial	Ministry of Environment, Conservation and Parks – Central Region	General contact	eanotification.cregion@ontario.ca	-	-
Agency	Provincial	Ministry of Environment, Conservation and Parks	Kathleen O'Neill, Director	Kathleen.Oneill@ontario.ca	647-287-5664	135 St Clair Ave W Toronto, ON M4V 1P5
Agency	Provincial	Ministry of Environment, Conservation and Parks	Chunmei Liu	Chunmei.Liu@ontario.ca	437-249-3102	135 St Clair Ave W Toronto, ON M4V 1P5
Elected Officials & Associated Support						

*Contact list revised to reflect the MECP's Government Review Team List issued July 2024 and other updates as required.

Category	Subcategory	Organization	Contact Name & Title	Email	Phone Number	Address
Elected Official	Federal	Member of Parliament for Toronto-Danforth	Julie Dabrusin	julie.dabrusin@parl.gc.ca	416-405-8914	1028 Queen Street East Toronto, Ontario M4M 1K4
Elected Official	Provincial	Member of Provincial Parliament for Toronto-Danforth	Peter Tabuns	tabunsp-qp@ndp.on.ca	416-325-3250	111 Wellesley St W, Room 465 Toronto, ON M7A 1A5
Elected Official	Regional	York Region	Wayne Emmerson, York Region Chairman and CEO	wayne.emmerson@york.ca ; regional.chair@york.ca	1-877-464-9675 x 71100	Attn: Wayne Emmerson 17250 Yonge Street Newmarket, ON L3Y 6Z1
Elected Official	Municipal	City of Toronto	Olivia Chow, Mayor	mayor_chow@toronto.ca	416-397-2489	Office of the Mayor 100 Queen St W City Hall, 2 nd Floor Toronto, ON M5H 2N2
Elected Official	Municipal	City of Toronto	Michal Hay, Mayor's Chief of Staff	mayor_chow@toronto.ca	416-397-2489	Office of the Mayor 100 Queen St W City Hall, 2 nd Floor Toronto, ON M5H 2N2
Elected Official	Municipal	City of Toronto	Asuma Malik, Deputy Mayor (South)	Councillor_Malik@toronto.ca	416-397-2489	Office of the Mayor 100 Queen St W City Hall, 2 nd Floor Toronto, ON M5H 2N2
Elected Official	Municipal	City of Toronto	Paula Fletcher, Toronto-Danforth Ward	councillor_fletcher@toronto.ca	416-392-4060	Office of the Mayor 100 Queen St W City Hall, 2 nd Floor Toronto, ON M5H 2N2
	Municipal	Legislative Assembly of Ontario	Amanda Boyce, Research Officer	ABoyce@ola.org	416-325-3697	Whitney Block, Rm 2520 99 Wellesley St W Toronto, ON M7A 1A9
Agencies - Provincial						
Agency	Provincial	Conseil scolaire Viamonde (Association des conseils scolaires des écoles publiques de l'Ontario)	Michel Laverdière, Director of Education	laverdierem@csviamonde.ca	416-614-0844	116 Cornelius Parkway Toronto, ON M6L 2K5
Agency	Provincial	Independent Electricity System Operator (IESO)	General Contact	contract.management@ieso.ca	905-403-6900	1600-120 Adelaide Street W Toronto, ON M5H 1T1
Agency	Provincial	Ministry of Citizenship and Multiculturalism – Heritage, Tourism and Culture Division	Karla Barboza, Team Lead,	karla.barboza@ontario.ca	416-660-1027	c/o Heritage Planning Unit 400 University Ave 5th Floor Toronto, ON M7A 2R9

*Contact list revised to reflect the MECP's Government Review Team List issued July 2024 and other updates as required.

Category	Subcategory	Organization	Contact Name & Title	Email	Phone Number	Address
Agency	Provincial	Ministry of Citizenship and Multiculturalism – Heritage, Tourism and Culture Division	Liam Smythe, Heritage Planner	Liam.Smythe2@ontario.ca	416-301-4797	Ministry of Citizenship and Multiculturalism 400 University Ave. 5th Floor Toronto, ON M7A 2R9
Agency	Provincial	Ministry of Citizenship and Multiculturalism – Heritage, Tourism and Culture Division	Dan Minkin, Heritage Planner	Dan.minkin@ontario.ca	416-786-7553	Ministry of Citizenship and Multiculturalism 400 University Ave. 5th Floor Toronto, ON M7A 2R9
Agency	Provincial	Ministry of Energy and Electrification	Michael Di Cosmo, Coordinator (A)	michael.dicosmo@ontario.ca	437-770-7960	Ministry of Energy and Electrification 77 Grenville St 6th Floor, Toronto, ON M7A 1B3
Agency	Provincial	Ministry of Energy and Electrification	Hillary Armstrong, Manager of Policy	hillary.armstrong@ontario.ca	416-818-0740	Ministry of Energy and Electrification 77 Grenville St 6th Floor, Toronto, ON M7A 1B3
Agency	Provincial	Ministry of Infrastructure – Infrastructure Ontario	Katherine Hotrum, Director of Environmental Projects	katherine.hotrum@infrastructureontario.ca	647-264-4573	1 Dundas St W Suite 2000 Toronto, ON M5G 1Z3
Agency	Provincial	Ministry of Infrastructure – Infrastructure Ontario	Erica Anderson, Environmental Manager	erica.anderson@infrastructureontario.ca	226-314-0893	1 Dundas St W Suite 2000Toronto, ON M5G 1Z3
Agency	Provincial	Ministry of Infrastructure – Infrastructure Ontario	David Macey, Vice President: Portfolio Planning and Development	david.macey@infrastructureontario.ca cc: noticereview@infrastructureontario.ca	647-264-3861	1 Dundas St W Suite 2000Toronto, ON M5G 1Z3
Agency	Provincial	Ministry of Infrastructure – Infrastructure Ontario	Rahim Baird, Planning Analyst	rahim.baird@infrastructureontario.ca cc: environmentalmanagement@infrastructureontario.ca	647-294-6152	1 Dundas St W Suite 2000 Toronto, ON M5G 1Z3
Agency	Provincial	Ministry of Mines	Tracey Burton, Manager (A) – Strategic Support Unit	tracey.burton@ontario.ca	705-918-1609	Willet Green Miller Centre 933 Ramsey Lake Rd, 2nd Floor Sudbury, ON P3E 6B5
Agency	Provincial	Ministry of Mines	Melanie Johnson, Senior Strategic Initiatives Lead	melanie.johnson@ontario.ca	705-698-5041	Willet Green Miller Centre 933 Ramsey Lake Rd, 2nd Floor Sudbury, ON P3E 6B5

*Contact list revised to reflect the MECP’s Government Review Team List issued July 2024 and other updates as required.

Category	Subcategory	Organization	Contact Name & Title	Email	Phone Number	Address
Agency	Provincial	Ministry of Natural Resources	Keith Johnston, Environmental Planning Team Lead (A)	Environmental.Planning.Team@ontario.ca cc: keith.johnston@ontario.ca	-	99 Wellesley St W Whitney Block Room 5520 Toronto, ON M7A 1W3
Agency	Provincial	Ministry of Natural Resources	Jessica Post, Land Use Planning and Strategic Issues Section Administrative Assistant	SR.Planning@ontario.ca	705-761-4839	300 Water Street Box 7000, 4th Floor, South Tower Peterborough ON K9J 8MS
Agency	Provincial	Ministry of Natural Resources	Sarah Bale, Regional Planner	sarah.bale@ontario.ca	613-504-2254	-
Agency	Provincial	Ministry of Transportation	Cheryl Davis, Manager of Environmental Policy Office	cheryl.davis@ontario.ca	416-573-8548	438 University Ave. 12th floor Toronto, ON M5G 2K8
Agency	Provincial	Ministry of Transportation	Rina Kulathinal, Manager (Engineering Program Delivery Central)	rina.kulathinal@ontario.ca	416-454-1573	Ministry of Transportation 159 Sir William Hearst Ave 5th Floor, Building D Toronto ON M3M 0B7
Agency	Provincial	Ministry of Tourism, Culture and Gaming	Darja Ros, Manager	darja.ros@ontario.ca	647-283-8621	777 Bay Street 18th Floor Toronto, ON M7A 1S5
Agency	Provincial	Ministry of Tourism, Culture and Gaming	Laurie Brownlee, Coordinator	laurie.brownlee@ontario.ca	705-561-4554	Ministry of Tourism, Culture and Gaming 159 Cedar Street Suite 405 Sudbury ON P3E 6A5
Agency	Provincial	Ministry of Tourism, Culture and Gaming	Josh Wilson, Senior Policy Advisor (A)	josh.wilson@ontario.ca	705-255-4069	Ministry of Tourism, Culture and Gaming 70 Foster Drive 2nd Floor Sault Ste. Marie ON P6A 6V4
Agency	Provincial	Toronto Catholic School Board	Brendan Browne, Director of Education	brendan.browne@tcdsb.org	416-222-8282 Main Switchboard	Catholic Education Centre 80 Sheppard Ave E Toronto, ON M2N 6E8
Agency	Provincial	Toronto District School Board	Colleen Russell-Rawlins, Director of Education	directorsoffice@tdsb.on.ca	416-397-3180	Director's Office 5050 Yonge Street, Toronto, ON M2N 5N8
Agencies – Regional						
Agency	Regional	Toronto and Region Conservation Authority (TRCA)	Councillor Paul Ainslie, TRCA Board Chair	councillor_ainslie@toronto.ca	416-392-4008	c/o TRCA, 101 Exchange Avenue Vaughan, ON L4K 5R6

*Contact list revised to reflect the MECP's Government Review Team List issued July 2024 and other updates as required.

Category	Subcategory	Organization	Contact Name & Title	Email	Phone Number	Address
Agency	Regional	Toronto and Region Conservation Authority (TRCA)	General Contact (Clerk's Office)	clerk@trca.ca	437-880-2328	c/o TRCA, 101 Exchange Avenue Vaughan, ON L4K 5R6
Agency	Regional	Toronto and Region Conservation Authority (TRCA)	Jackie Ho, Planner	Jackie.Ho@trca.ca	437-880-2147	c/o TRCA, 101 Exchange Avenue Vaughan, ON L4K 5R6
Agency	Regional	Toronto and Region Conservation Authority (TRCA)	Corinna Thomassen-Darby	Corinna.Thomassen-Darby@trca.ca	416-661-6600 x 5625	c/o TRCA, 101 Exchange Avenue Vaughan, ON L4K 5R6
Agency	Regional	Toronto Economic Development Corporation	Richard Saunders	richard.saunders@ontario.ca	416-990-2661	5775 Yonge Street 8 th Floor Toronto, ON M2M 4J1
Agency	Regional	PortsToronto (previously known as Toronto Ports Authority)	General Contact	-	416-863-2000, 416-462-3937	207 Queen's Quay W Suite 500 Toronto, ON M5J 1A7
Agencies - Municipal						
Agency	Municipal	Ashbridges Bay WW Treatment	General Contact	-	416-392-5150	9 Leslie St Toronto, ON M4M 3M9
Agency	Municipal	Cherry Beach Park	General Contact	-	416-392-0239	1 Cherry St Toronto, ON M5A 0B7
Agency	Municipal	Cherry Beach Sports Fields	General Contact	-	416-367-4359	275 Unwin Ave Toronto, ON M5A 3K8
Agency	Municipal	Toronto Fire Services	Matthew Pegg, Fire Chief & General Manager	OfficeoftheFireChief@toronto.ca	416-338-9061	4330 Dufferin St Toronto, ON M3H 5R9
Agency	Municipal	Toronto Police Service	General Contact	Officeofthechief@torontopolice.on.ca	416-808-8000	40 College St Toronto, ON M5G 2J3
Agency	Municipal	City of Toronto	John Elvidge, City Clerk	clerk@toronto.ca	416-392-8641	Toronto City Hall 100 Queen St W 13 th Floor W Toronto, ON M5H 2N2
Agency	Municipal	City of Toronto- City Council	Michal Hay, Mayor's Chief of Staff	mayor_chow@toronto.ca	416-397-2489	Office of the Mayor 100 Queen St W City Hall, 2 nd Floor Toronto, ON M5H 2N2
Agency	Municipal	City of Toronto – Environment and Climate Department: Public Energy Initiatives – Existing Buildings	Rae-Anne Miller, Manager	eed@toronto.ca	416-455-3251	c/o Metro Hall mailroom 55 John St Union Station East Wing, 2 nd Floor Toronto, ON M5V 3C6

*Contact list revised to reflect the MECP's Government Review Team List issued July 2024 and other updates as required.

Category	Subcategory	Organization	Contact Name & Title	Email	Phone Number	Address
Agency	Municipal	City of Toronto – Environment and Climate Department: Public Energy Initiatives – New Developments	Fernando Carou, Manager	eed@toronto.ca	416-455-3251	c/o Metro Hall mailroom 55 John St Union Station East Wing, 2 nd Floor Toronto, ON M5V 3C6
Agency	Municipal	City of Toronto – Environment and Climate Division	James Nowlan, Executive Director	James.Nowlan@toronto.ca	-	c/o Metro Hall mailroom 55 John St Union Station East Wing, 2 nd Floor Toronto, ON M5V 3C6
Agency	Municipal	City of Toronto – Parks, Forestry and Recreation	Janie Romoff, General Manager	parks@toronto.ca	416-392-8182	Toronto City Hall 100 Queen St W 4 th Floor W Toronto, ON M5H 2N2
Agency	Municipal	City of Toronto – Toronto Water	Lou Di Gironimo, General Manager	TWCustomerCare@toronto.ca	416-392-8200	Metro Hall, 55 John Street 18 th Floor Toronto, ON M5V 0C4
Agency	Municipal	City of Toronto – City Planning	Gregg Lintern, Chief Planner & Executive Director	cityplanning@toronto.ca	416-392-8772	Toronto City Hall 100 Queen St W 12 th Floor E Toronto, ON M5H 2N2
Agency	Municipal	Commissioners St Transfer Station	General Contact	-	416-392-2292	400 Commissioners St Toronto, ON M4M 3K2
Agency	Municipal	City of Toronto – City Planning Division – Urban Design, Heritage	Amir Nissan, Assistant Heritage Planner	Amir.Nissan@toronto.ca	416-338-4805	Toronto City Hall 100 Queen St W 12 th Floor E Toronto, ON M5H 2N2
Utilities						
Agency	Utility	Hydro One Networks Inc.	General Contact	SecondaryLandUse@HydroOne.com	-	-
Agency	Utility	Hydro One Networks Inc.	Susan Sun	Susan.SUN@HydroOne.com	-	-
Agency	Utility	Ontario Power Generation (OPG)	Barbara Medeiros, Senior Manager EH&S	barbara.medeiros@opg.com	647-462-8487	700 University Avenue Toronto, ON M5G 1X6
Agency	Utility	Toronto Hydro	General Contact	-	416-542-8000	14 Carlton Street Toronto, ON M5B 1K5
Utilities	Utility	CN Rail	General Contact	Proximity@cn.ca	-	1 Administration Road Concord, ON L4K 1B9
Utilities	Utility	CP Rail	Tom Twigge, Director	tom_twigge@cpr.ca	905-803-5986	1290 Central Parkway W Mississauga, ON L5C 4R3
Utilities	Utility	CP Rail	Liam Roney	liam_roney@cpkcr.ca		1290 Central Parkway W

*Contact list revised to reflect the MECP's Government Review Team List issued July 2024 and other updates as required.

Category	Subcategory	Organization	Contact Name & Title	Email	Phone Number	Address
						Mississauga, ON L5C 4R3
Utilities	Utility	CP Rail	Andreas Grammenz	andreas_grammenz@cpkcr.ca		1290 Central Parkway W Mississauga, ON L5C 4R3

*Contact list revised to reflect the MECP's Government Review Team List issued July 2024 and other updates as required.

Appendix B2: Distribution of Notice of Commencement

Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

Portlands Energy Centre Upgrades

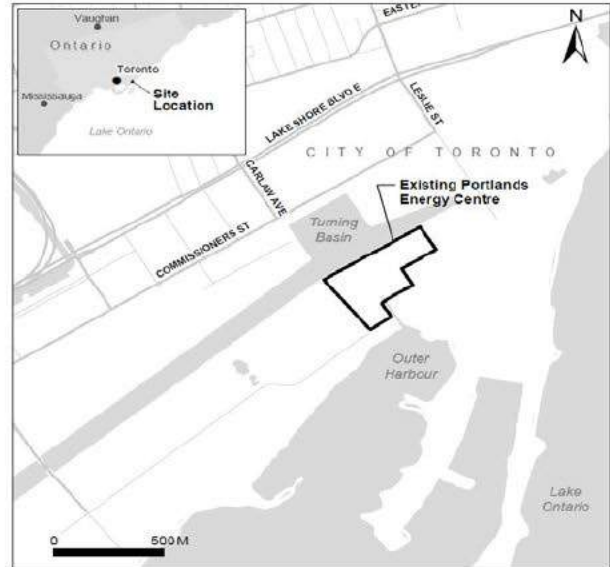
Atura Power is planning to make efficiency upgrades at its Portlands Energy Centre (PEC).

Project Description

PEC has operated since 2009 in the City of Toronto on the site of the former Richard L. Hearn Generating Station on Villiers Island. It's capable of outputting 550 megawatts (MW) to Ontario's electricity grid.

The upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts during a regular maintenance cycle and will result in an increase in output capacity to 600 MW. All upgrades will take place within the existing facility and **there will be no changes or expansion beyond the existing PEC footprint.**

Atura Power



Atura Power is committed to building a resilient electricity grid in Ontario and is working to address the energy supply shortfall, identified by the Independent Electricity System Operator, that Ontario will experience in the near future. The planned efficiency upgrades to PEC are part of Atura Power's efforts to address this supply gap and to make energy production more efficient and affordable.

Environmental Screening Process

Since the project will result in a 50 MW increase in output capacity of PEC, it's subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. This Notice is issued to communicate the start of the Environmental Screening Process.

Virtual Public Meeting

Atura Power is committed to engaging with Indigenous communities, the public and other interested parties on all our

projects. We invite you to attend an upcoming virtual public meeting to learn more and provide feedback. **You can access the link to join the public meeting on the project webpage.** If you are unable to participate, meeting materials will be posted on the project webpage for review following the meeting.

How to Join	Date:	Thursday, October 5, 2023
	Time:	6:30 to 7:30 p.m. Eastern Time
	Project webpage:	aturapower.com/portlandsupgrade

Project Contacts

Please email your questions or comments to portlandsupgrade@aturapower.com.

For more information: aturapower.com/portlandsupgrade

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

MARKETPLACE

REAL ESTATE	BUSINESS	RENTALS
Real Estate Services	Investment Properties	Apts. Unfurn. Central
YONGE /Finch, furn. 1 bdrm. Bsmt. 2bath, side split, sep. entr., \$2000+. 416-779-9985.	INVESTORS WANTED Real Estate opportunities in GTA Development, single/multifamily, lending and more. (647) 686-8506	FOR RENT Bloor/Sherbourne. New bachelor apartment, long or short term. 1 min to Sherbourne Station. This is not to be missed! \$1650/mo. Call (647) 983-2589
		ROOMS (Furn.)
		PHARMACY - Danforth - clean, quiet house, shared kit/bath., no smoke. 647-515-8595

SERVICES

Legal

Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

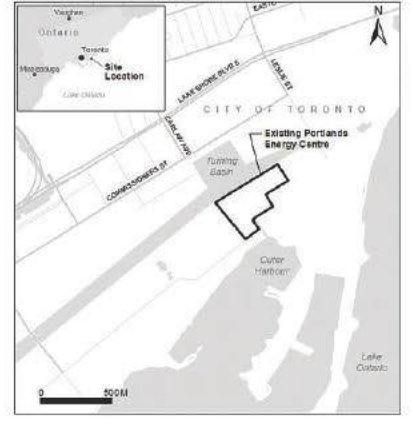
Portlands Energy Centre Upgrades

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Project Description
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Atura Power



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Project Contacts
Please email your questions or comments to portlandsupgrade@aturapower.com.
For more information: aturapower.com/portlandsupgrade

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

Groups & Clubs	Missing Persons	Instruction-Dancing/Educational/Musical
MAKE NEW FRIENDS! Join a fall social bowling club. At Parkway Bowl, 67 Ellesmere Road, Lower Level, Parkway Mall. Call 416-447-1761	MISSING PERSON DICKERSON, Benjamin, DOB: January 2, 1983, or anyone knowing his whereabouts, please call Kaela at 416-969-8510.	MISSING PERSON TOWEGEJICK, Whitney, DOB: January 4, 1990, or anyone knowing her whereabouts, please call Kaela at 416-969-8510.
		PROFESSIONAL Recording Studio avail. in Toronto. \$85 per hr. 416-266-3079

MERCHANDISE

Antiques & Art

WANTED

All antiques, Silver plate, sterling, Asian & European fine objects, porcelain, paintings, and bronzes. Gold and costume jewellery, watches, coins, medals, fancy cups and saucers, Doultons, teak furniture, estates, etc.

40 years experience professional and courteous.

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GREAT PYRENEES & COCKPOOS
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Photography

DURST LABORATOR
Large Format Darkroom 8x10 and 4x5 Cameras Wanted 647-891-0777

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***AI MATTRESS FACTORY.** DIRECT Delivery available. All sizes including customer split boxsprings. Orthopedic 20 year sets starting \$240. "New Gel foam beds" from \$500. Deluxe no-flip Pillowtop & "Crown" series, Eurotop sets from \$390. New Waterbeds, end-of-line/discontinued items available. 905-681-9496, 905-338-0803, 905-563-6903.

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SCAN FOR MORE INFORMATION

'Control, influence'

Trial for Freedom Convoy organizers about actions, not beliefs: Crown

OTTAWA — Tamara Lich and Chris Barber are not on trial for their political beliefs against COVID-19 public health orders, but for the means the two Freedom Convoy organizers used in trying to end them, a Crown prosecutor argued Tuesday.

Tim Radcliffe used his opening remarks at the start of the 16-day trial to paint a picture of Lich and Barber as the heart of the protest that gridlocked downtown Ottawa near Parliament Hill for three weeks in January and February 2022, until police moved in to clear the streets.

"This occupation was anything but peaceful," he told the court.

Lich, who hails from Medicine Hat, Alta., and Barber, who is from Swift Current, Sask., were part of the original group that mobilized a convoy of big rigs and other vehicles to drive to Ottawa to protest COVID-related restrictions and, more broadly, the federal Liberal government.

Together they are charged with mischief, counselling others to commit mischief, intimidation and

obstructing police. Barber, who owns a trucking company in Saskatchewan, is also charged with counselling others to disobey a court order that banned loud honking in the city's downtown core.

In a signed admission to the court, Lich and Barber acknowledged the actions of "certain individuals" interfered with the lawful use, enjoyment and operation of property and businesses in Ottawa during the protest.

In a separate document signed by

Lich and Barber, Lich admitted she was a leader, organizer and authorized spokesman for the Freedom Convoy.

Radcliffe told the court that Lich and Barber not only counselled people to come to Ottawa but to remain there, using what the lawyer called their "infamous 'hold the line' rallying call."

The pair "pressured decision-makers" and exerted "control and influence," all in the name of achieving the political purpose of ending pandemic health orders such as vaccine mandates, Radcliffe said.

About 50 people, including roughly 20 who were there to support Lich and Barber, filled the Ottawa courtroom on Tuesday.

Judge Heather Perkins-McVey said she requested the largest courtroom to allow as many people as possible to watch, given the public interest in the case.

Lawrence Greenspon, who is representing Lich, disputed the Crown's use of the word "occupation," calling it "inflammatory, inaccurate and



Chris Barber leaves the courthouse yesterday in Ottawa. Inset, Tamara Lich takes a hug break. ADRIAN WYLD/CANADIAN PRESS PHOTOS

insensitive."

The word has far more serious connotations for people around the world who are truly victims of an occupation, he said.

— The Canadian Press



Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

Portlands Energy Centre Upgrades

Atura Power is planning to make efficiency upgrades at its Portlands Energy Centre (PEC).

Project Description

PEC has operated since 2009 in the City of Toronto on the site of the former Richard L. Hearn Generating Station on Villiers Island. It's capable of outputting 550 megawatts (MW) to Ontario's electricity grid.

The upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts during a regular maintenance cycle and will result in an increase in output capacity to 600 MW. All upgrades will take place within the existing facility and **there will be no changes or expansion beyond the existing PEC footprint.**

Atura Power is committed to building a resilient electricity grid in Ontario and is working to address the energy supply shortfall, identified by the Independent Electricity System Operator, that Ontario will experience in the near future. The planned efficiency upgrades to PEC are part of Atura Power's efforts to address this supply gap and to make energy production more efficient and affordable.

Environmental Screening Process

Since the project will result in a 50 MW increase in output capacity of PEC, it's subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. This Notice is issued to communicate the start of the Environmental Screening Process.

Virtual Public Meeting

Atura Power is committed to engaging with Indigenous communities, the public and other interested parties on all our projects. We invite you to attend an upcoming virtual public meeting to learn more and provide feedback.

You can access the link to join the public meeting on the project webpage. If you are unable to participate, meeting materials will be posted on the project webpage for review following the meeting.

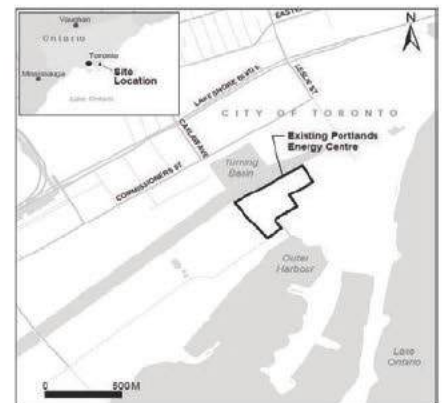
Project Contacts

Please email your questions or comments to portlandsupgrade@aturapower.com.

For more information: aturapower.com/portlandsupgrade

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

Atura Power



How to Join	Date:	Thursday, October 5, 2023
	Time:	6:30 to 7:30 p.m. Eastern Time
	Project webpage:	aturapower.com/portlandsupgrade

Fun at the Danforth East Arts Fair



Youngsters create crafts while attending the Danforth East Arts Fair at East Lynn Park on Saturday. The annual fair took place on both Saturday and Sunday at the park. PHOTO: ALAN SHACKLETON



To celebrate his 90th birthday in 2019, the East Toronto Women's Fastpitch Association presented Peter Cripps with this framed photo honouring his decades of being the announcer for games at Dieppe Park. PHOTO SUBMITTED

Women's fastball championship game set for tonight at Dieppe Park

'Peter' from Page 19
Thursday nights. "There were lots of teams and lots of fans," he remembered.

The same held true for the men's fastball games that would be played on Mondays, Wednesdays and Fridays at the park. It was very popular and there were some very good players among the ladies and the men," said Cripps.

"I was the announcer up in the booth and there would be good crowds out. Some nights the place was just packed," he remembered.

Looking far younger than his age, Cripps has lived not too far from Dieppe Park for the past 29 years and often walks over to watch the games.

On the night he met with Beach Metro, though, he had taken the bus since there was a possibility of rain later that night.

"I got to the gym four days

a week. I've been doing so for 40 years. That helps keep me in good shape," he said.

An East Ender through and through, Cripps grew up in the Jones and Danforth area and attended Earl Grey Public School. He didn't go to high school afterwards but later took a correspondence course to earn his diploma.

"I got 40 As and one B-plus over the five years of the course. The B-plus was on the last course. I can't complain about that. It was pretty darn good," he said at the high school courses he took by correspondence.

Cripps worked for years at a local paint company before he retired.

Along with his involvement with women's softball, Cripps also enjoys watching other sports including hockey and football.

"I cut out the TV at my apartment, but I will come

times go to a restaurant or bar to watch sports, especially hockey and football," he said. "I always watch the Super Bowl and the Gray Cup."

Sports and recreation has always been a big part of life for Cripps in the East Toronto community.

Along with the fastball, he would also take part in freestyle bowling and play pool along the Danforth.

"Years ago on the Danforth there was a big pool hall and I would go there every once in a while to pick up some money," he said.

Local sports fans are invited to say hello to Cripps at tonight's (Tuesday, Sept. 19 at 8 p.m.) ETWFA play-off championship game at Dieppe Park on Coburn Avenue. He'll be there cheering on The Cannons and the Mavericks; as they compete for the title. Currently the ETWFA has five teams and 70 players.

Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

Portland's Energy Centre Upgrades

Atura Power is planning to make efficiency upgrades at its Portland Energy Centre (PEC).

Project Description

PEC has operated since 2005 in the City of Toronto on the site of the former Richard L. Heam Generating Station on Villiers Island. It's capable of outputting 550 megawatts (MW) to Ontario's electricity grid.

The upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts during a regular maintenance cycle and will result in an increase in output capacity to 600 MW. All upgrades will take place within the existing facility and there will be no changes or expansion beyond the existing PEC footprint.

Atura Power is committed to building a resilient electricity grid in Ontario and is working to address the energy supply shortfall, identified by the Independent Electricity System Operator, that Ontario will experience in the near future. The planned efficiency upgrades to PEC are part of Atura Power's efforts to address this supply gap and to make energy production more efficient and affordable.

Environmental Screening Process

Since the project will result in a 50 MW increase in output capacity of PEC, it's subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario Environmental Assessment Act. This Notice is issued to communicate the start of the Environmental Screening Process.

Virtual Public Meeting

Atura Power is committed to engaging with Indigenous communities, the public and other interested parties on all our projects. We invite you to attend an upcoming virtual public meeting to learn more and provide feedback. You can access the link to join the public meeting on the project webpage. If you are unable to participate, meeting materials will be posted on the project webpage for review following the meeting.

How to Join	Date	Time
	Thursday, October 5, 2023	6:30 to 7:30 p.m. Eastern Time
	https://www.atura.com/locations/updates	

Project Contacts
Please email your questions or comments to portlandaturagrade@aturapower.com

For more information, espp@aturapower.com

Comments and information regarding the project are being collected in accordance with the Freedom of Information and Protection of Privacy Act for the purpose of meeting environmental assessment requirements.

Atura Power



Pet Memorials

Honouring Beloved Companions

Ferris 2008-2023



Ferris came into our lives on August 29, 2008 and he left August 31, 2023. My precious little baby boy. My sugar pule. My ramp roast. Mr. Stinky. The most beautiful cat I ever saw with my own two eyes.

Conceived in Scarborough, raised on Hammer-smith Avenue in The Beaches and Westlake Avenue in East York, Ferris made an impression on everyone he met because in many ways he was not a nice cat. He despised meeting new people.

We were invited not to return to several veterinary clinics in the East End. The only note on his file at the vet who had the guts to take him on was "Difficult".

It took him five years to sleep on our laps. It took about ten years to truly be able to call him affectionate. We loved him, pet him, kissed him, brushed him, snuggled him, and rubbed his velvety paws for every second he would let us.

He loved stealing a taste of old fashion plain donuts, butter tart pastry, potato chips, popcorn, Budweiser, and the first few sips of water you just poured for yourself. He would also yell at you to get out of the shower so he could have a slurp in the tub.

He was an indoor cat most of his life but as of this Spring he loved sitting outside on our little porch for hours at a time.

He had a rough summer. On the morning of August 31, he made his way to the door as quick as he could and died with purpose on our little porch shortly thereafter. We loved him, pet him, kissed him, snuggled him, and rubbed his velvety paws for every second.

Wednesday, September 6, 2023

[Cover Letter sent to Agency Contacts](#)

To whom it may concern,

This letter is to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), on the site of the former Richard L. Hearn Generating Station on Villiers Island at 470 Unwin Ave., Toronto, Ont. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. These upgrades will occur during a regular maintenance cycle and, due to improved technology, will result in better performance. All activities to complete the upgrades will take place within the footprint of the existing facility. This project is part of Atura Power's effort to build a more efficient and resilient electricity grid in Ontario.

Currently, PEC is capable of outputting 550 megawatts (MW) to Ontario's electricity grid with proposed upgrades increasing its capacity to 600 MW. This planned increase of 50 MW results in the upgrades being subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. The attached Notice is issued to communicate the start of the Environmental Screening Process. A copy of the Notice was published in the *Toronto Star* and *Toronto Sun* on Wednesday, September 6, 2023, and will also be published in the *Beach Metro* newspaper in the coming days. A copy is also available on the project webpage at aturapower.com/portlandsupgrade.

Atura Power is committed to engaging with Indigenous communities, agencies, the public and other interested parties on all our projects. A virtual public meeting will be hosted on **Thursday, October 5, 2023, from 6:30 to 7:30 p.m.** to share more about the planned upgrades and collect feedback from members of the public. The attached Notice includes details on how to join. Outreach to Indigenous communities is also underway to learn how they wish to be engaged about the project.

For more information about the project, please visit our project webpage (see link above). If you have any other questions or inquiries, please do not hesitate to contact us at portlandsupgrade@aturapower.com.

Sincerely,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power

Wednesday, September 6, 2023

Cover Letter sent to MECP Contacts

To whom it may concern,

This letter is to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), on the site of the former Richard L. Hearn Generating Station on Villiers Island at 470 Unwin Ave., Toronto, Ont. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. These upgrades will occur during a regular maintenance cycle and, due to improved technology, will result in better performance. All activities to complete the upgrades will take place within the footprint of the existing facility. This project is part of Atura Power's effort to build a more efficient and resilient electricity grid in Ontario.

Currently, PEC is capable of outputting 550 megawatts (MW) to Ontario's electricity grid with proposed upgrades increasing its capacity to 600 MW. This planned increase of 50 MW results in the upgrades being subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. The attached Notice is issued to communicate the start of the Environmental Screening Process. A copy of the Notice was published in the *Toronto Star* and *Toronto Sun* on Wednesday, September 6, 2023, and will also be published in the *Beach Metro* newspaper in the coming days. A copy is also available on the project webpage at aturapower.com/portlandsupgrade.

Atura Power is committed to engaging Indigenous communities, agencies, the public and other interested parties on all projects. A virtual public meeting will be hosted on **Thursday, October 5, 2023, from 6:30 to 7:30 p.m.** to share more about the planned upgrades and collect feedback from members of the public. The attached Notice includes details on how to join.

Atura Power is seeking input from the Ministry of Environment, Conservation and Parks (MECP) regarding the Indigenous communities that should be engaged as part of the Environmental Screening Process. The attached Notice includes a map of the project location. We would appreciate if the MECP would provide us with a list of communities with whom we should engage on this project. Given that the planned upgrades to PEC are minor, similar to routine maintenance activities and will be contained entirely within the footprint of PEC, Atura Power will be in contact with Mr. Nick Colella, Manager (Acting) of Environmental Assessment Services with the MECP, to pursue an exemption to the Ontario *Environmental Assessment Act* for this project.

For more information about the project, please visit our project webpage (see link above). If you have any other questions or inquiries, please do not hesitate to contact us at portlandsupgrade@aturapower.com.

Sincerely,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power

Wednesday, September 6, 2023

Cover Letter sent to Adjacent Properties

To whom it may concern,

This letter is to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), on the site of the former Richard L. Hearn Generating Station on Villiers Island at 470 Unwin Ave., Toronto, Ont. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. These upgrades will occur during a regular maintenance cycle and, due to improved technology, will result in better performance. All activities to complete the upgrades will take place within the footprint of the existing facility. This project is part of Atura Power's effort to build a more efficient and resilient electricity grid in Ontario.

Currently, PEC is capable of outputting 550 megawatts (MW) to Ontario's electricity grid with proposed upgrades increasing its capacity to 600 MW. This planned increase of 50 MW results in the upgrades being subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. The attached Notice is issued to communicate the start of the Environmental Screening Process. A copy of the Notice was published in the *Toronto Star* and *Toronto Sun* on Wednesday, September 6, 2023, and will also be published in the *Beach Metro* newspaper in the coming days. A copy is also available on the project webpage at aturapower.com/portlandsupgrade.

Atura Power is committed to engaging all interested parties on all our projects. This includes you, our valued neighbours. We want to hear from you and would like to **invite you to attend a virtual public meeting on Thursday, October 5, 2023, from 6:30 to 7:30 p.m.** to learn more about the planned upgrades and give us your feedback. The attached Notice includes details on how to join.

For more information about the project, please visit our project webpage (see link above). If you have any other questions or inquiries, please do not hesitate to contact us at portlandsupgrade@aturapower.com.

Sincerely,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power

Wednesday, September 6, 2023

Cover Letter sent to Indigenous Communities

To whom it may concern,

This letter is to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), on the site of the former Richard L. Hearn Generating Station on Villiers Island at 470 Unwin Ave., Toronto, Ont. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. These upgrades will occur during a regular maintenance cycle and, due to improved technology, will result in better performance. All activities to complete the upgrades will take place within the footprint of the existing facility. This project is part of Atura Power's effort to build a more efficient and resilient electricity grid in Ontario.

Currently, PEC is capable of outputting 550 megawatts (MW) to Ontario's electricity grid with proposed upgrades increasing its capacity to 600 MW. Since the upgrades will result in a 50 MW increase in the electrical output of PEC, it is subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. The attached Notice is issued to communicate the start of the Environmental Screening Process. A copy of the Notice was published in the *Toronto Star* and *Toronto Sun* on Wednesday, September 6, 2023, and will also be published in the *Beach Metro* newspaper in the coming days. A copy is also available on the project webpage at aturapower.com/portlandsupgrade.

Atura Power is committed to engaging with interested Indigenous communities on all projects. In addition to reaching out through this letter, we have been reaching out to your offices to share information about the project and learn how you wish to participate in this process. A virtual public meeting will be hosted on **Thursday, October 5, 2023, from 6:30 to 7:30 p.m.** where members of the public can learn more about the planned upgrades and provide feedback, and we are also planning separate engagement sessions with interested Indigenous communities such as yourselves. We look forward to connecting with you further to continue learning how you might wish to participate.

For more information about the project, please visit our project webpage (see link above). If you have any other questions or inquiries, please do not hesitate to contact Kelly Grieves at kelly.grieves@aturapower.com.

Sincerely,



Shelley Babin
President and CEO
Atura Power

Appendix B3: Virtual Public Meeting Materials

- **B3a: Virtual Public Meeting Presentation**
- **B3b: Virtual Public Meeting Frequently Asked Questions (FAQs)**
- **B3c: Virtual Public Meeting Q&A Session Question/Comments**

Appendix B3a: Virtual Public Meeting Presentation

Atura Power

Portland's Energy Centre Efficiency Upgrades

Public Meeting

An opportunity to learn about the proposed efficiency upgrades and share your feedback.

October 5, 2023



Order of Events

Agenda

1. Introduction and Land Acknowledgement
2. Project and Proponent Information
3. Environmental Assessment Process
4. Next Steps
5. Question Period
6. Closing Comments



Presentation is being recorded



Materials will be available online



Moderator will mute participants; chat function is available for questions



Comments or questions can be sent to: portlandsupgrade@aturapower.com

Land Acknowledgement

Atura Power acknowledges that Portlands Energy Centre is on the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and is now home to many diverse First Nations, Inuit and Métis peoples. We also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit.



Comments or questions can be sent to: portlandsupgrade@aturapower.com

Project Information

Name of Project

- Portlands Energy Centre (PEC) Efficiency Upgrades

Location

- 470 Unwin Ave., Toronto, Ont.
- Site of the former Richard L. Hearn Generating Station on Villiers Island

Proposed Activity

- Replacing parts of the combustion turbines with upgraded parts that will result in a 50 megawatt (MW) increase in output capacity



Proponent Information

Atura Power's Fleet of Generation Assets

A subsidiary of Ontario Power Generation, Atura Power owns and operates Ontario's largest fleet of combined-cycle gas turbine power plants



1. Brighton Beach Generating Station
Capacity 570 MW



2. Halton Hills Generating Station
Capacity 683 MW



4. Napanee Generating Station
Capacity 900 MW



3. Portlands Energy Centre
Capacity 550 MW



5. Oakville Head Office



Comments or questions can be sent to: portlandsupgrade@aturapower.com

Community Outreach and Support

Strong Local Partner for 24 Years

In addition to participating in Doors Open Toronto, PEC annually donates more than \$20,000 to local charities and organizations including:

- Food and toy drives
- Nellie's Shelter
- Red Door Family Shelter
- Toronto Nature Stewards



Comments or questions can be sent to: portlandsupgrade@aturapower.com

Project Need

- The Independent Electricity System Operator (IESO) is the Crown corporation responsible for operating the electricity market in Ontario
- The IESO predicts Ontario will face an energy shortage as a result of growing demand and nuclear refurbishments; an additional 4,000 MW are needed by the end of the decade to maintain the system's reliability
- The PEC upgrades are part of Atura Power's efforts to address this supply gap, providing a cost-effective and timely solution to secure operational flexibility in the Ontario electricity grid
- Upgrading the two turbines with more efficient parts will increase output capacity by 50 MW



Comments or questions can be sent to: portlandsupgrade@aturapower.com

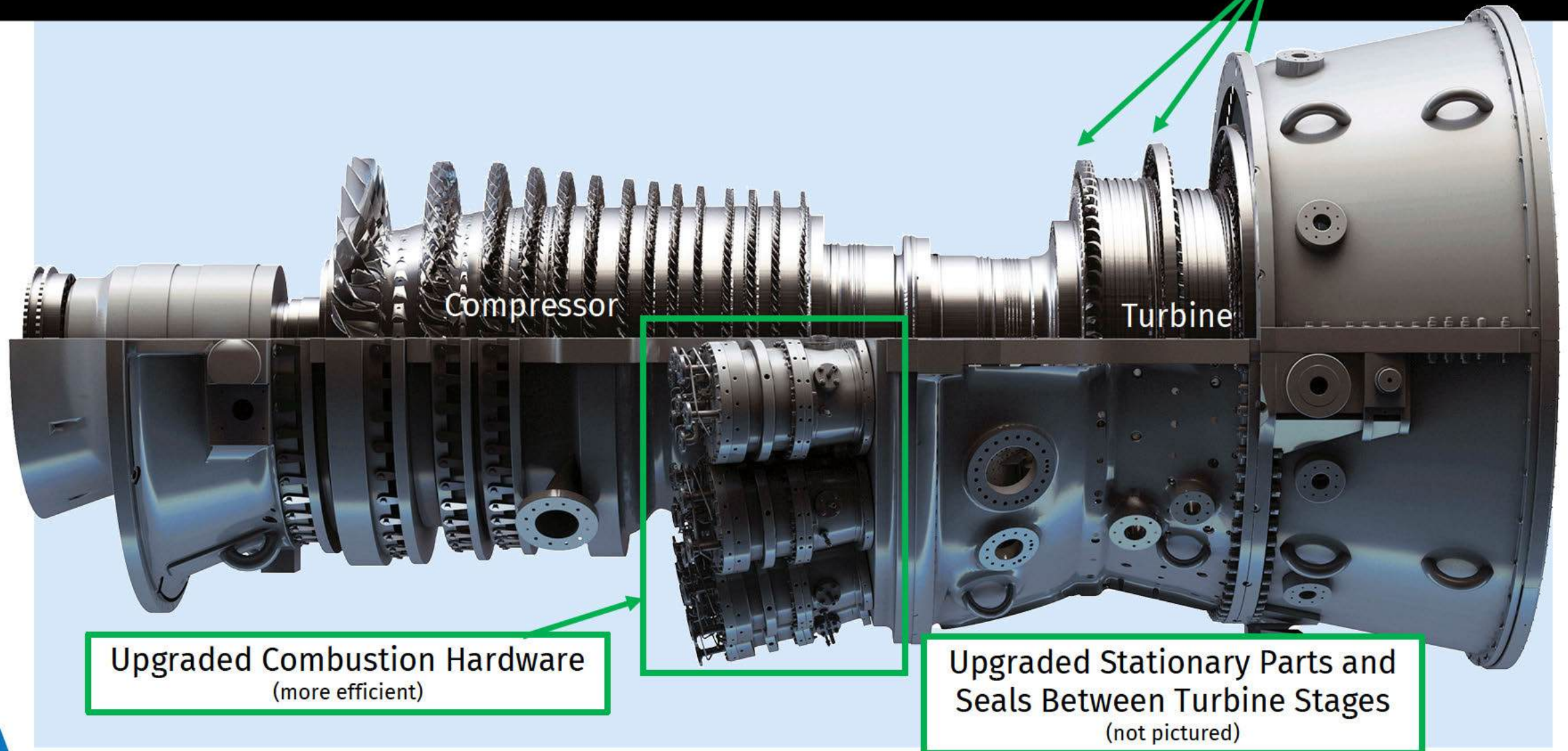
Project Description

- Replacing parts of the existing turbines with parts made of materials with optimized cooling characteristics
- Will allow PEC to generate more electricity using a similar amount of natural gas
- All activities will be within the existing facility; **no changes or expansion of existing footprint**



Comments or questions can be sent to: portlandsupgrade@aturapower.com

Project Description

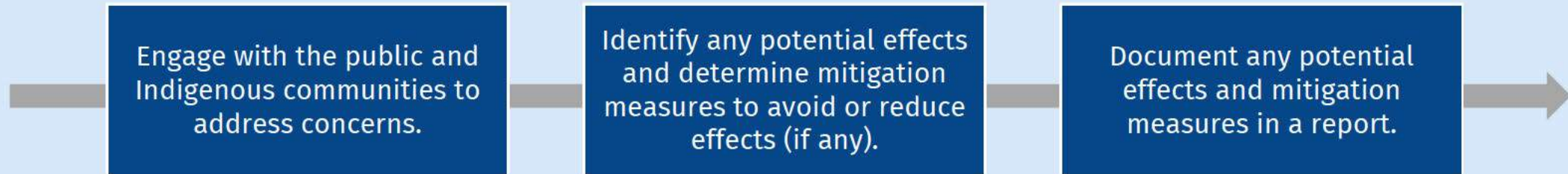


Comments or questions can be sent to: portlandsupgrade@aturapower.com

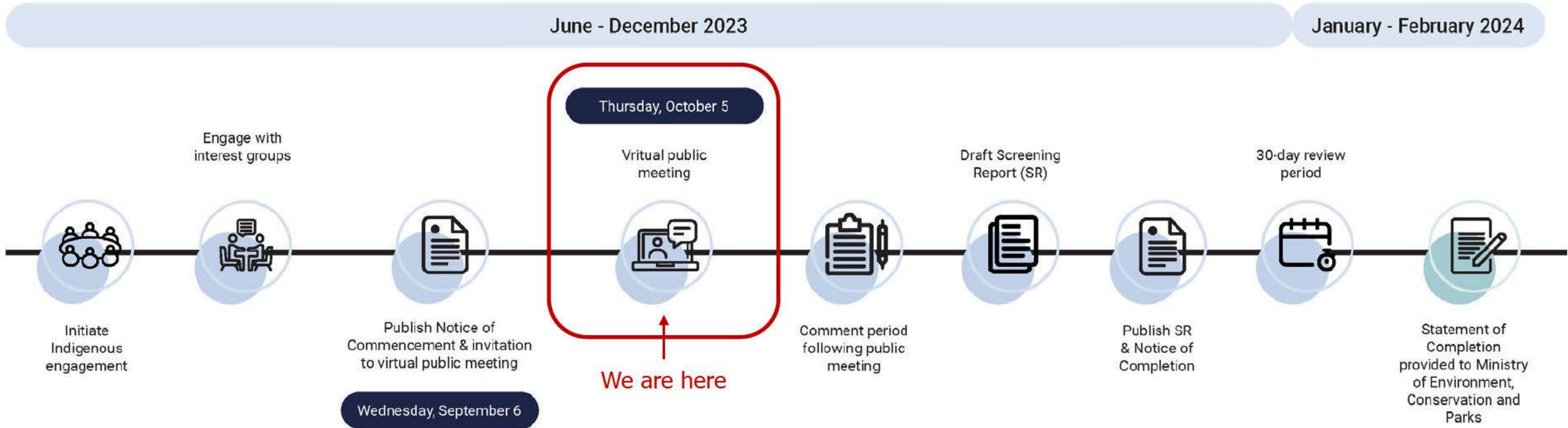
Environmental Assessment (EA) Process

- The project will result in a > 5 MW increase in the output capacity of PEC
- The capacity increase of 50 MW triggers the Environmental Screening Process for Electricity Projects subject to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*
- The project is classified as a Category B project under the Environmental Screening Process
- Atura Power is proceeding with a **Screening Stage assessment**

Purpose of the Screening Stage Assessment



Public and Indigenous Engagement



Continuous Public and Indigenous Engagement



Comments or questions can be sent to: portlandsupgrade@aturapower.com

Environmental Effects

- The Screening criteria in Ontario Regulation 116/01 require the project to be reviewed against the following criteria:
 1. Surface and groundwater
 2. Land
 3. Air and noise
 4. The natural environment
 5. Resources
 6. Socio-economic
 7. Heritage and culture
 8. Other environmental features
- Engagement with Indigenous communities and the public is also an important part of the Screening Process. Engagement will continue throughout the life of the project.



Environmental Effects

- No changes to features listed in the Screening Criteria Checklist are anticipated given that the upgrade activities are limited to the footprint and will occur within the existing facility.
- Emission concentrations (NO, NO₂, and CO) will remain the same following the upgrades according to General Electric (GE) Gas Power, the manufacturer of the equipment being installed for the upgrades.
- Further, PEC will continue to meet relevant air quality regulations required by the Ministry of Environment, Conservation and Parks (MECP) and will continue to operate in accordance with the emissions permit requirements.



Next Steps and Timeline

Next steps and timelines associated with completing the upgrades are:

Activity	Timeline
IESO Contract Award	Announced May 16, 2023
Permits and Approvals: Environmental Compliance Approval Amendment	Submitted June 23, 2023
Turbine Upgrades	Fall 2024
Commissioning and Testing	Fall 2024
Operations	Fall 2024 onwards



Comments or questions can be sent to: portlandsupgrade@aturapower.com

Thank You

Questions?

Please email further comments and feedback to:
portlandsupgrade@aturapower.com



Appendix B3b: Virtual Public Meeting Frequently Asked Questions (FAQs)

Portlands Energy Centre Efficiency Upgrades Frequently Asked Questions

Below are some frequently asked questions and answers about the Portlands Energy Centre (PEC) efficiency upgrades (upgrades). If you have a question that is not shown below, please send us an email at portlandsupgrade@aturapower.com and a project representative will respond to your enquiry.

Why is Atura Power making these efficiency upgrades?

After years of strong energy supply, Ontario is entering a period of growing electricity system demand (a predicted energy supply gap) and actions are needed to ensure the continued reliability of the electricity grid.

To close this gap and meet the projected demand, the Independent Electricity System Operator (IESO) is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. The upgrades to PEC are part of Atura Power's efforts to address this supply gap. After the upgrade, the plant's thermal efficiency will increase due to a reduced heat rate (British thermal unit/kilowatt-hour (BTU/kWh)). This means that the same amount of fuel used will produce more power after the upgrades.

What is causing the energy supply gap in Ontario?

Ontario's electricity sector is undergoing a period of major transformation. New decarbonization policies coupled with rapid growth in the mining, greenhouse and industrial sectors are accelerating electricity demand growth across the province and heightening needs in certain regions.

The IESO's most recent Annual Planning Outlook (APO) reflects these trends. It projects a steady rise in electricity demand that highlights the strengths of Ontario's communities and economy to navigate the challenges of the pandemic, pursue electrification and support economic growth.

I thought we wanted to stay away from coal and/or natural gas. Why are we still burning fossil fuels? Why are we upgrading a natural gas power plant?

Wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.

The IESO established the Resource Adequacy Framework in 2021 to provide a flexible and cost-effective approach for competitively securing the resources necessary to meet demand and ensure system reliability. These upgrades are part of the plan IESO put in place to meet Ontario's energy needs.

What kind of power plant is PEC?

PEC is a combined-cycle natural gas electricity generating power plant. It can be operated as needed, during periods of peak demand when intermittent energy sources like wind and solar might not be available or might not be enough to meet demand.

What will the upgrades include? What changes will be made?

We will be replacing rotating and non-rotating parts within the gas turbines (blades, seals, nozzles, etc.). These upgraded parts are more efficient due to the advanced materials used to allow the turbines to run hotter and more fuel efficiently, extracting the maximum amount of power possible. The upgrades will take place on our two gas turbines within the existing facility, and there will no change to the physical size or footprint of the station.

How long will the upgrades take?

The upgrades are scheduled to take place in Fall 2024. The upgrade specific work will take approximately four to five weeks per unit to disassemble, replace parts and reassemble the gas turbines. There are two units, and they will be completed one at a time.

By how much will PEC's capacity increase, after the upgrades are complete?

PEC is currently capable of outputting 550 megawatts (MW) to Ontario's electricity grid. Replacing parts of the existing natural gas fired combustion turbines with more efficient parts will increase the output capacity to 600 MW. This means the upgrades will increase the output capacity by 50 MW.

Will there be more upgrades in the future?

These are the only current upgrade plans for PEC, as this is the latest technology available. Atura Power always strives to be on the leading edge of technology and will be open to future advancements that make the engines more fuel efficient.

How many more years is PEC expected to operate?

PEC is contracted to operate until April 2034.

Who will be undertaking the upgrades?

General Electric (GE) Gas Power – Services will be providing the new parts and performing the work using local skilled trades from Ontario.

Once the upgrades are complete, will the plant run more frequently?

PEC operations are dictated by the IESO based on the supply and demand balance. The frequency at which the plant operates will not change going forward; the plant will continue to operate as directed by the IESO.

How often does PEC run now?

PEC operations are dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year. Historically, the plant has operated between 1750 to 4500 hours per year, always at the direction of the IESO.

What environmental effects will the upgrades have?

No changes to environmental features are expected given that the upgrades will take place within the existing facility and the existing facility footprint will not change. GE Gas Power – Services, the manufacturer of the equipment being installed for the upgrades, has provided a letter stating that the upgrades to the turbine generator ‘will maintain [air] emissions levels at or below site permit levels’. GE Gas Power - Services further stated that the upgrades are ‘not expected to increase noise levels from the facility.’

The facility will continue to operate within all environmental permitting requirements.

What can you say about the anticipated difference in particulate matter (air emissions) after the upgrades are complete?

GE Gas Power – Services, the manufacturer of the equipment being installed for the upgrades, provided a letter stating that the upgrades to the turbine generator ‘will maintain [air] emissions levels at or below site permit levels’. Emissions concentrations are not expected to change following the upgrades.

How are the air emissions from PEC measured?

PEC operates under an environmental permit called an Environmental Compliance Approval, which dictates nitrogen oxides and carbon monoxide emission limits for the facility. PEC uses a Continuous Emission Monitoring System (CEMS) to monitor emissions in the undiluted gases leaving the exhaust stacks. The CEMS is audited annually by the Ministry of Environment, Conservation and Parks (MECP) and submitted to the MECP annually for assessment.

Where can I find past emission reports for PEC?

All PEC emissions reports are publicly available on the provincial and federal government websites.

Will the upgrades increase the noise at the plant?

GE Gas Power – Services, the manufacturer of the equipment being installed for the upgrades, has provided a letter stating that the upgrades are ‘not expected to increase noise levels from the facility.’

What are Atura Power’s plans for the waste heat? Has Atura Power looked into supplying it as district heating to new Portlands developments?

PEC uses waste heat from the plant to generate steam, which is used to create additional electricity. Exhaust heat from the gas turbines is passed through a heat recovery steam generator which turns water to steam that is then used to power a steam turbine and generate additional electricity. This occurs in a closed loop where the remaining condensation from the steam is captured and reused over and over again.

What is public and Indigenous engagement and how does it involve me?

Public and Indigenous engagement describes the continuous, two-way communication of project information and feedback between the proponent (Atura Power) and members of the public and Indigenous communities. It includes specific communication opportunities like public meetings, comment periods and project notices. It also includes ongoing communication opportunities available

throughout the duration of the project via tools such as the project email address (portlandsupgrade@aturapower.com) and project webpage (aturapower.com/portlandsupgrade).

What is a Screening Stage assessment?

A Screening Stage assessment is a specific environmental assessment process that certain projects that fall under the Ontario Electricity Project Regulation must complete to meet the environmental assessment requirements under the Ontario *Environmental Assessment Act*.

What is the Screening Report?

The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. As part of the Environmental Screening Process, Atura Power is required to prepare a Screening Report that documents the results of the Environmental Screening Process, including determining the potential for environmental effects of the project.

Will I get to review the Screening Report?

Yes, the assessment process includes a 30-day mandatory review period during which time anyone, including members of the public, can review the Screening Report. Information on the availability of the Screening Report will be published in the same publications used to announce the project in September 2023: the *Toronto Star*, *Toronto Sun*, and *Beach Metro* newspapers. Information will also be posted on the project webpage at aturapower.com/portlandsupgrade.

Is Atura Power asking the Ministry of Environment, Conservation and Parks (MEPC) to exempt the PEC Upgrades from the Ontario *Environmental Assessment Act*?

Atura Power will not be pursuing an exemption from the Ontario *Environmental Assessment Act* for the Portlands Energy Centre efficiency upgrades project.

I have more comments and questions. Who can I speak to about this project?

Comments and questions about the project can be sent to portlandsupgrade@aturapower.com at any time. A project representative will respond to your enquiry.

Appendix B3c: Virtual Public Meeting Q&A Session Question/Comments

Note: Participants had the option to share their name with their comment/question during the public meeting, or to submit their comment/question anonymously. Names shared during the meeting are omitted from the record, to protect participant's privacy. Questions/comments are listed in the order they were submitted via the chat.

Question/Comment
We just had the hottest summer & the hottest September on record, globally. There are cheaper, healthier, and safer alternatives to gas plants. Portlands Gas Plants was originally built despite local protests, under promises it would only be a "peak supplier" yet it in fact has been running 21 hours a day. Plus, Toronto City council voted against the expansion of this plant. Despite all these facts and more, why does OPG still want to expand the gas plant, against the wishes of local Torontonians and Ontarians alike?
How much will this cost?
will there be an increase in particulate and CO2.
Will the amount of CO2 emitted increase as a result of this upgrade
Will the upgraded parts allow the plant to operate more hours per day
How many hours a day is the Portlands Facility operating?
Will there be any other public meeting opportunities in this process?
What will the expansion mean for greenhouse gases and air pollution from the plant? Surely more MW means more GHGs and more air pollution. Why would we choose to increase GHGs and air pollution when we're in the middle of a climate crisis, and when we have lower cost and lower emission alternatives available to us, like wind, solar, conservation, QC power and storage?
What plans does OPG/Atura Power have to invest in wind and solar energy instead of fossil fuels?
How many hours per year is the plant expected to operate, please?
How long will the "comment period following public meeting" last?
What pollution abatement is in place?
What additional 1) greenhouse gas emissions and 2) local air pollution are associated with this
Can the supply gap should be filled by non-fossil fuel sources given we are in the middle of a climate crisis: Renewables, including wind, solar plus purchases from Quebec?
why isn't the excess capacity of Quebec Hydro not an option? It's cheap, renewable, and available. And by far the cheapest. We're in the midst of a climate crisis and more gas plants are part of the problem.
On May 10th Toronto City Council passed a resolution opposing the expansion of the Portlands gas plant. Why is OPG not respecting the wishes of Toronto City Council?
After the upgrade will PEC be operating for more hours
What is that 30 day review period at the end of the screening process? Is that a period of consultation for the public?

Question/Comment

On May 10th Toronto City Council passed a resolution opposing the expansion of the Portlands gas plant. Why is OPG not respecting the wishes of Toronto City Council?

How much is the project costing?

Thanks for this info. I would like to know why we are continuing to invest in fossil fuels vs the cheaper options of conservation and renewable energy options. Thanks.

What is the total cost of this efficiency upgrade and who pays for it?

This plant was intended to be a "peaker plant" that operates for only a few hours a week at most, but Portlands has been running as much as 21 hours a day all summer. Does Atura power have plans to reduce operations?

Is the increased capacity 5 MW or 50 MW? I saw and heard two figures.

why are questions being asked (and by whom) on material that was just presented?

What alternatives were considered before deciding to go ahead with the project?

What is the cost of this upgrade project?

Why is OPG not respecting the wishes of Toronto City Council?

The presentation says that there will be more power generated with a similar amount of gas burned before. How similar - 10% increase or more?

Will an energy conservation program aimed at consumers be part of this efficiency upgrade?

Why aren't you looking at renewable, non-polluting energy? It doesn't matter that you are not changing the 'footprint of the plant. The fact that you are using polluting fossil fuels is UNACCEPTABLE!

Why does our publicly owned utility think more fossil gas burning is a good idea in the middle of a climate crisis?

Why spend millions expanding a fossil fuel plant instead of spending that money on energy conservation programs that can help residents and businesses save money?

What are your plans for the waste heat? Have you looked into suppling it as district heating to new Portlands developments?

What alternatives to this option to increase capacity have been considered?

Can you please share the total cost of this renewal/upgrade? Thanks.

The federal draft Clean Electricity Regulations set a performance standard of 30 t CO2/MWh for generation facilities. Without an upgrade, PEC would need to meet the standard in 2035 (since PEC was commissioned in 2009). Will the upgrade postpone the requirement for PEC to meet 30 t/MWh standard?

What plans does OPG have to invest in wind and solar energy instead of fossil fuels?

In view of the global climate crisis, which a major cause of which is burning fossil fuels, why is the "efficiency upgrade" not addressing and lowering the emissions?

What is the total cost to tax payers on this upgrade?

Question/Comment

Does the company plan to continue burning fossil fuels after 2035?

Why is OPG asking Ontario's Ministry of the Environment to exempt its proposal to increase Portland's gas-fired generating capacity by 50 MW from the Environmental Assessment Act?

Do you expect that the frequency of use of the plant will increase as a result of this upgrade? What is the current frequency of use?

On the Environmental Effects slide, I noticed CO2 was not listed (just NO, NO2, and CO) under the emissions that were not supposed to increase as per GE. Was that a mistake, or is there reason to expect CO2 emissions will increase?

How did Atura Power notify local residents of this public consultation meeting?

Atura's gas plants are contributing to the climate crisis. Why doesn't Atura Power put pressure on the government to invest in green alternatives instead of these efficiency upgrades?

What level of NOx are you permitted to emit?

How is expanding a gas plant in 2023 aligned with Canada

Even though the emissions intensity is not expected to increase, what are the hours of operations per year that are expected, please?

With the global climate crisis, why are renewable energy sources not being used?

Hello, I am reporter for the French CBC in Toronto. Could you address the reporting in the Toronto Star that the Portlands Energy Centre ran for nearly 21 hours a day all summer long in 2023? Why has the plant been used this much?

Why are you only addressing safe questions likely submitted by your own employees?

Are you saying there will be more power generated without an increase in emissions? please clarify

Has the city of Toronto approved this expansion?

Will the environmental assessment include an assessment of the health impacts of increased emissions from the plant?

Is this a peaker plant or baseload power?

How is expanding a gas plant in 2023 aligned with Canada's greenhouse gas emission reduction commitments? How is a gas plant expansion aligned with the federal government's proposed Clean Electricity Regulations?

You have not answered the question if the amount of GreenHouse gas emissions will increase?

What is the point of comments from the public when it seems that Atura has already been contracted to do this upgrade?

Thanks for this info. I would like to know why we are continuing to invest in fossil fuels vs the cheaper options of conservation and renewable energy options. Thanks.

How much is this upgrade expected to cost, and where does that money come from?

It has been scientifically shown that the Portlands Gas Plant is the single largest source of Greenhouse Gases in Toronto.

Also, Please explain the "screening reports"?

Question/Comment

What are your plans for the waste heat? Have you looked into suppling it as district heating to new Portlands developments?

Will the upgrade allow the plant to operate more hours per day

Will the actual greenhouse gas emissions increase in quantity? (ie not relative to increased output)

Has OPG considered renewable energy options as an alternative?

Why is OPG asking Ontario's Ministry of the Environment to exempt its proposal to increase Portland's gas-fired generating capacity by 50 MW from the Environmental Assessment Act?

The Minister of Energy directed that gas projects would need municipal approval - Toronto has voted against this expansion. Why won't the IESO respect Toronto's wishes?

As this seems to be a transition time and a perfect time to consider different options. What plans does OPG have to invest in wind and solar energy instead of fossil fuels?

you mention that "similar" levels of natural gas will be burned in order increase the energy output, can you define similar?

Sorry I forgot the question. The UN has said that all new fossil fuel development is moral and economic madness! How can you justify this expansion when the climate and health affects are disastrous?

I am sorry but it seems my questions are going in as "private", so they are not coming through. not sure how to change that... ??

At full capacity wil it burn more fossil fuel than currently?

Why not use the land for energy storage instead of more gas?

wow. what a joke. do you seriously think people are taking your question period seriously with these fluff questions? Unfortunately for you you aren't hoodwinking the public.

I'm concerned about greenhouse gases. Is there any plan by Atura or OPG to reduce them rather than simply maintaining the current level?

Why is this project going forward when Toronto City Council passed a resolution opposing the project.

How does this upgrade help reach net-zero emissions by 2035?

On May 10th Toronto City Council passed a resolution opposing the expansion of the Portlands gas plant. Why is OPG not respecting the wishes of Toronto City Council?

You mentioned that additional power will be generated without increasing the amount of gas burned. Also you mentioned particulate and c02 are a ratio of the input. Does this mean that for a given output there will be fewer particulates and c02.

such deep questions. can you convert the hours operating to minutes? I'm fascinated

Were green eneergy options considered inststead of these upgrades

how might concern over overall increased CO2 emissions and air quality expressed through public consultation effect the project's development?

Question/Comment

Is the natural gas used by the plant be subject to the price of carbon?

How does this upgrade impact PEC's requirement and timing to meet the proposed federal Clean Electricity Regulation emission standard of 30 tonnes CO2.MWh? Thank you.

What is the total cost to tax payers on this upgrade?

Thanks for this info. I would like to know why we are continuing to invest in fossil fuels vs the cheaper options of conservation and renewable energy options. Thanks.

What is the cost of the upgrade?

What plan does OPG have for wind and solar?

Does Atura Mgmt acknowledge that we are facing a climate emergency and, if so, how does reality inform its decision to enhance and continue operating this fossil fuel energy plant?

What's the current greenhouse gas emissions level for the site and what will it become post-alteration?

Are you able to share information on the current carbon and air pollutant (PM 2.5's, NOx) emissions generated by PEC and anticipated changes post upgrades?

Thanks.

these plants were designed and approved to be supplemental to the existing power generation grid, up to 14hrs a day does not seem in-keeping with the original plan, is there an explanation as to why this has occurred?

How will the upgrade the air pollution coming from the plant? Particularly for NOx

I'm aware of how combined system plants work. After using steam to generate additional electricity there will still be steam. The Portlands area, as far as I know, will use district heating and cooling. Steam does not need to be superheated to be useful for district heating. Have you contacted the city about to see if they can use your steam?

If council opposed this expansion why is going ahead?

Can your upgrade also include energy storage?

What happens if the upgrades are not done?

Why is an expansion happening in the middle of a climate crisis?

How is the exhaust of the natural gas combustion in your plant measured?

Will these upgrades increase the cost of electricity to the consumer? What is the overall cost of this upgrade?

You mentioned that the facility will be more efficient. Can you be specific? How much more efficient? Thanks!

I came late because can't find the link. Will talk be recorded to be available laterally

Since you did a land acknowledgment and hopefully respect Indigenous rights, are we to assume that if Indigenous communities are opposed to this upgrade, then you will not proceed with the upgrade?

Question/Comment

What is the projected cost of this upgrade project?

What plans does OPG have to invest in wind and solar energy instead of fossil fuels?

How much is this upgrade expected to cost, and where does that money come from?

Do you test for methane leaks in the ambient air in and around your facility? If so, do you include these fugitive emissions in your GHG emissions reporting?

What is the cost of this upgrade?

what are the health risks associated with the upgrades to such a large population of people living so close by?

Why is OPG Atura expanding gas generation instead of building clean wind, solar and waterpower projects to meet demand growth?

How many more years is Portland expected to operate?

Will your company be allowed to burn fossil fuels after 2035?

Another report available to the public is the most recent IPCC report, which states, unequivocally, that we must reduce ff output, and you are expanding your facilities to support an additional 50 megawatts (MW) of output.

Is Atura going to use natural gas to create hydrogen?

How do you justify this?

How is expanding a gas plant in 2023 aligned with Canada's greenhouse gas emission reduction commitments? How is a gas plant expansion aligned with the federal government's proposed Clean Electricity Regulations?

When Don says "green hydrogen", does he mean produced from renewable power?

Why spend millions expanding a fossil fuel plant instead of spending that money on energy conservation programs that can help residents and businesses save money?

How do you justify ff expansion in an age of spiralling environmental disaster? As human beings, how can you even entertain this?

Will you also be spending money to educate the public about energy conservation?

How can the public obtain the emissions reports you produce?

Does the Atura Power plan to continue burning fossil fuels at PEC after 2035?

Do you test for methane leaks in the ambient air in and around your facility? If so, do you include these fugitive emissions in your GHG emissions reporting?

Can't hear

Can you clarify what you mean by "uses the water from the Niagara river" to generate hydrogen? Is the process completely powered by hydro power?

Does the company plan to continue burning fossil fuels after 2035?

What is the cost of this upgrade?

The Government of Canada estimates that the PEC emitted 1000 tonnes of NOx a year. What - if any - NOx abatement technologies do you have in place?

Question/Comment

Not much of a time horizon.

Thank you. I didn't realize that you capture the heat from the steam and use it again.

Does Atura intend to renew its contract for PEC beyond 2034?

What happens when contract ends in 2024?

Why aren't my questions going through?

Actually, the only thing right now that is critical is stopping all fossil fuel expansion and drastically cutting emissions as fast as possible

Can we expect to see an energy conservation incentive aimed at consumers?

For clarification - you won't be using more fuel with the expansion?

Is there a plan for the people who work there to find jobs in the green economy after the plant's life is over?

These types of expansions - or whatever greenwashing nonsense you peddle them as - as a way to stall true action toward a livable future for humanity

Data available on the IESO website describe PEC operations for "G1, G2, and G3". Are you able to talk a little about PEC operations from the three turbines please? For instance, which label applies to which turbine? Thank you.

that is meaningless nonsense

I am a longtime resident of the area and have appreciated the significant improvement in air quality since the closing of the coal-plant. Please shape your answers about increases in emissions in terms of our experience in the environment, and not your compliance with regulations and directives. We need to know about the impact. What can you say about the anticipated difference in particulate matter etc. post-upgrade? Please also address the discrepancy between the 21 hours a day the Toronto Star reported this summer and the 8 to 14 or 15 hours in your response about the hours of operation.

What happens at the conclusion of PEC's contract in 2034?

There is growing medical literature on the health impacts of gas-fired electricity including asthma, lost days of work, premature deaths, and more. Does Atura follow these impacts and do you have any commentary on these concerns?

nobody who has ever had a critical thought in their brain would accept that nonsense

Portlands is a peaking plant?

Did Atura initiate this project or was it called for from another organization?

I get that the plant's operational algorithm will not change, but the fact that it is being made to be more efficient suggests that the \$/MWH threshold price will decrease. Doesn't this mean that the run-time of the plant should increase?

Could you clarify what public and indigenous engagement means?

as a peaking plant, how frequently was portlands plant intended to operate, how much does it currently operate, and what is the projection for future use?

If IESO asks you use hydrogen produced from natural gas would Atura be forced to do so?

Thank you!

Question/Comment

Does PEC still count as a "peaking plant"? I believe you said it can run 8-14 hours per day.

You mentioned where we can find data on your carbon emissions. Where can we find similar data for air pollutants?

For clarification - the questions that I am asking that are not being Featured - I should send them to your e-mail address for a response?

will you increase the output?

not efficiency. they're different

Do these efficiency upgrades apply to hydrogen power as well?

Where is the funding for this project coming from?

I understand PEC produced power on average 21 hours per day this summer. How can this be considered a peaker plant?

As residents we need to know about the impact on emissions in terms of our experience in the environment, and not only your compliance with regulations and directives. What can you say about the anticipated difference in particulate matter etc. post-upgrade?

Please also address the discrepancy between the 21 hours a day the Toronto Star reported this summer and the 8 to 14 or 15 hours in your response about the hours of operation.

Does Atura Mgmt acknowledge that we are facing a climate emergency and, if so, how does reality inform its decision to enhance and continue operating this fossil fuel energy plant? Should Atura, for example, be investing in solar and wind instead?

So the engagement is multiple forms of answering questions?

Where can we find more information about your engagement with indigenous communities? Which communities did you consult?

But I don't see my question in the list

What were the concerns of those communities, and how were they addressed?

As residents we need to know about the impact on emissions in terms of our experience in the environment, and not only your compliance with regulations and directives. What can you say about the anticipated difference in particulate matter etc. post-upgrade?

The IESO has also identified that wind and solar could meet demands

Can you make available hourly air pollution emission and fuel-consumption from the Portlands facility?

What does "engage" mean?

Can the community make actionable demands through engagement?

Will Atura be pursuing additional capacity increases as part of the 1500 MW increase in natural gas electricity generation?

Wouldn't the fastest way to reduce GHG emissions in Toronto be to shut down the Portlands plant as soon as feasible?

What will be the difference in total output, not concentrations?

one is an amount, the other is a rate. two different mathematical concepts

Can you give an example of how you addressed concerns, beyond just answering questions?

Question/Comment

Clarification. So if you produce 9% more electricity with the same amount of gas, then will you emit less if you do not need to operate at full power?

You told us to see your website for summary. Under which heading w I'll it be posted?

So engagement doesn't mean we have a say in how the project operates, just that we can get information about it?

What would emissions per hour be at proposed max capacity vs current max capacity?

If the upgrade is for efficiency then why is it necessary to increase the plant capacity?

Did Atura Power lobby for the plant? How was Atura chosen as the contractor for this and other projects in Ontario?

Is further expansion of generating capacity at PEC anticipated?

There is a discrepancy between the 21 hours a day the Toronto Star reported this summer and the 8 to 14 or 15 hours in your response about the hours of operation. Please comment.

at what capacity of full power is PEC running in 2023

What is the cost of the upgrades?

As you are classifying the proposed work as an upgrade rather than expansion, does this exempt the project from the IESO mandate that municipalities must approve gas-plant expansions? Toronto City Council has twice opposed gas expansion. Will this be considered?

IESO projections show that gas plant use will go up to more than 19 hours a day by 2026. Does that mean that even if the PEC is more efficient, it will still be fired up more and produce more emissions?

this question is entirely within scope

Appendix B4: Summary of Public Engagement

- **B4a: Summary of Public Questions/Comments by Category, and Atura Power's Response**
- **B4b: Correspondence Records with Members of the Public**

**Appendix B4a: Summary of Public
Questions/Comments by Category, and
Atura Power's Responses**

Category	Sub-Category	Source	Question/Comment	Response
Atura Power	Atura's Future Plans	Portlands Email Inbox	Does the company plan to continue burning fossil fuels after 2035?	In addition to pursuing efficiency upgrades at PEC, Atura Power is also playing a leadership role in establishing the supply of low-carbon hydrogen and developing energy storage systems and potentially other clean energy projects in Ontario to help the province move towards a net-zero carbon future. As Atura Power responds to Ontario energy needs as directed by the IESO, plans beyond PEC's contract period (which extends to April 2034) are not certain at this time.
		Portlands Email Inbox	How can we be sure Portlands Energy Centre won't expand?	
		Virtual Public Meeting	Does the company plan to continue burning fossil fuels after 2035?	
		Virtual Public Meeting	Will your company be allowed to burn fossil fuels after 2035?	
		Virtual Public Meeting	Is there a plan for the people who work there to find jobs in the green economy after the plant's life is over?	
		Virtual Public Meeting	Is further expansion of the generating capacity of PEC anticipated?	
		Virtual Public Meeting	Will Atura be pursuing additional capacity increases as part of the 1500 MW increase in natural gas electricity generation?	
	Battery Storage Systems	Virtual Public Meeting	Why not use the land for energy storage instead of more gas?	Atura Power is currently proposing battery energy storage systems at several other locations in Ontario. Atura Power is not considering battery energy storage systems at PEC.
		Virtual Public Meeting	Can your upgrade also include energy storage?	
	Conservation Initiatives	Virtual Public Meeting	Will an energy conservation program aimed at consumers be part of this efficiency upgrade?	Energy conservation and education programs and incentives are part of the IESO's responsibilities.
		Virtual Public Meeting	Will you also be spending money to educate the public about energy conservation?	
		Virtual Public Meeting	Can we expect to see an energy conservation incentive aimed at consumers?	
	Hydrogen	Portlands Email Inbox	Are you considering using green hydrogen to fuel existing turbines at some point in the future?	Atura Power does not have plans to produce nor consume hydrogen at PEC at this time. Atura Power has selected the Niagara region as its first Ontario site for large-scale hydrogen production. The Niagara Hydrogen Centre (NHC) will be Ontario's largest green hydrogen production facility and will help industries across the province adopt low carbon energy solutions. The facility will use electrolysis technology to split water into hydrogen and oxygen molecules and be powered by renewable electricity directly from the nearby Sir Adam Beck II Generating Station.
		Portlands Email Inbox	What upgrades will be needed to convert Atura's plants to hydrogen, and how much are these upgrades expected to cost?	
		Portlands Email Inbox	If Atura's plants are upgraded to hydrogen, would they use hydrogen created from fossil fuels if there wasn't enough hydrogen created from carbon-neutral sources?	
		Portlands Email Inbox	I was hoping that some serious attention was being paid to the potential for hydrogen to displace natural gas in fuelling the fleet. I think more publicity should be given to the hydrogen potential especially in light of the strong opposition to gas generation that I have been hearing at the municipal level recently.	
		Virtual Public Meeting	When you reference "green hydrogen", does it mean it is produced from renewable power?	
		Virtual Public Meeting	Can you clarify what you mean by "uses the water from the Niagara river" to generate hydrogen? Is the process completely powered by hydro power?	
		Virtual Public Meeting	Is Atura going to use natural gas to create hydrogen?	

Category	Sub-Category	Source	Question/Comment	Response
		Virtual Public Meeting	If IESO asks you use hydrogen produced from natural gas would Atura be forced to do so?	
	Renewable Energy Portfolio	Portlands Email Inbox	I understand OPG has an important role to fulfill in keeping energy production at the level needed by consumption. This is certainly challenging in this era of climate chaos and push back from the fossil fuel industry. However, I feel OPG could be taking a better leadership position in the energy transition than it is currently doing. <ul style="list-style-type: none"> - A 'fair and just transition' applies to the clean energy sector as well. What plans does OPG have to invest in wind and solar energy as well as energy storage solutions instead of fossil fuels? - Does the company plan to continue burning fossil fuels after 2035 and how does a proposed 10% increase in production translate to a reported operation of over 21 hours a day that was happening over the summer? - What will OPG be doing to capture, contain and reduce methane emissions from its existing plants and to ensure it is carbon neutral by 2035? 	<p>In addition to pursuing efficiency upgrades at PEC, Atura Power is also playing a leadership role in establishing the supply of low-carbon hydrogen and developing energy storage systems and potentially other clean energy projects in Ontario to help the province move towards a net-zero carbon future.</p> <p>As Atura Power responds to Ontario energy needs as directed by the IESO, plans beyond PEC's contract period (which extends to April 2034) are not certain at this time.</p>
		Portlands Email Inbox	I am concerned about the continued investment in fossil fuel energy generation, the public health impacts and the urgent call by the IPCC to wind down fossil fuel burning. What plans does Atura have to expand wind, solar, geothermal and hydro?	
		Portlands Email Inbox	What plans does OPG have to invest in wind and solar energy instead of fossil fuels?	
		Virtual Public Meeting	What plans does OPG/Atura Power have to invest in wind and solar energy instead of fossil fuels?	
		Virtual Public Meeting	Has OPG considered renewable energy options as an alternative?	
		Virtual Public Meeting	As this seems to be a transition time and a perfect time to consider different options. What plans does OPG have to invest in wind and solar energy instead of fossil fuels?	
		Virtual Public Meeting	I'm concerned about greenhouse gases. Is there any plan by Atura or OPG to reduce them rather than simply maintaining the current level?	
		Virtual Public Meeting	What plan does OPG have for wind and solar?	
		Virtual Public Meeting		
Comment / Opinion	Contact List Request	Portlands Email Inbox	Please place me on the list for access to the October 5 public consultation on the PEC Upgrade.	Thank you for your interest in the PEC Efficiency Upgrades project. You will be added to the project contact list and will receive future communications and notices about the project, as they become available.
		Portlands Email Inbox	Please keep me up to date on developments with this project.	
		Portlands Email Inbox	Would you please add me to the Portlands Energy Centre information distribution list?	
		Portlands Email Inbox	Just want to stay updated on the project.	
		Portlands Email Inbox	Further to the Public meeting on Oct 5, please send me any follow-up information and updates.	
		Portlands Email Inbox	I would like to be in the consultation.	
		Portlands Email Inbox	Interested in the project details.	

Category	Sub-Category	Source	Question/Comment	Response
		Portlands Email Inbox	Can you kindly provide notice to me of the following events in relation to the Portlands Energy Centre upgrade: - publication of the draft Screening Report, and - publication of the Screening Report and Notice of Completion	
		Portlands Email Inbox	Please add me to the email list for project updates.	
		Portlands Email Inbox	Can you please include me on the list?	
		Portlands Email Inbox	May I please be added to your notification distribution list?	
Costs	General	Portlands Email Inbox	I suspect the cost of the upgrade will be substantially lower than adding an independent 50 MW generator elsewhere. Is that so?	At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.
		Portlands Email Inbox	How much does the upgrade to PEC cost?	
		Virtual Public Meeting	How much will this cost?	
		Virtual Public Meeting	How much is the project costing?	
		Virtual Public Meeting	What is the total cost of this efficiency upgrade and who pays for it?	
		Virtual Public Meeting	What is the cost of this upgrade project?	
		Virtual Public Meeting	Can you please share the total cost of this renewal/upgrade? Thanks.	
		Virtual Public Meeting	What is the total cost to tax payers on this upgrade?	
		Virtual Public Meeting	How much is this upgrade expected to cost, and where does that money come from?	
		Virtual Public Meeting	Is the natural gas used by the plant be subject to the price of carbon?	
		Virtual Public Meeting	What is the cost of the upgrade?	
		Virtual Public Meeting	Will these upgrades increase the cost of electricity to the consumer? What is the overall cost of this upgrade?	
		Virtual Public Meeting	What is the projected cost of this upgrade project?	
		Virtual Public Meeting	What is the cost of this upgrade?	
Virtual Public Meeting	Where is the funding for this project coming from?			

Category	Sub-Category	Source	Question/Comment	Response
		Virtual Public Meeting	What is the cost of the upgrades?	
	Capacity vs. Generation	Portlands Email Inbox	How much are you paid per year for capacity, and how much are you paid for generation?	Please visit the IESO's website at ieso.ca for electricity system pricing details.
	Other	Portlands Email Inbox	<p>I would like to know how this 'upgrade' is being paid for and what cost valuation you used for the greenhouse gas (carbon/methane) pollution this 'upgrade' will result in for your environmental evaluation of this project? Is this valuation in line with the U.S. directive? The President's Day One Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis re-established an Interagency Working Group (IWG) and tasked it with identifying areas of budgeting, purchasing, and other key decisions where agencies should consider the Social Cost of Greenhouse Gases (SC-GHG) — a well-established metric for the known damages that greenhouse gas emissions cause across society. https://www.whitehouse.gov/briefing-room/statements-releases/2023/09/21/fact-sheet-biden-harris-administration-announces-new-actions-to-reduce-greenhouse-gas-emissions-and-combat-the-climate-crisis/ Are these hidden costs included?</p> <p>THE HIDDEN COST OF NATURAL GAS Accounting for the price of carbon in fossil-fuel-based energy generation is key to ensuring that natural gas facilities aren't being unfairly favoured. Every tonne of carbon dioxide emitted from a natural gas plant has a cost to society in Canada and elsewhere. A recent report from the U.S.'s Environmental Protection Agency estimates that a tonne of carbon emitted in 2020 costs the economy between C\$160 and C\$450. The Canadian government has referenced a range of between \$135 and \$440 a tonne. -from Clean Energy Canada: A Renewables Powerhouse - February 2023 https://cleanenergycanada.org/wpcontent/uploads/2023/01/RenewableCost_Report_CleaEnergyCanada_Feb2023.pdf</p>	<p>Thank you for your email and your interest in the PEC Efficiency Upgrades project.</p> <p>Atura Power is not pursuing an exemption from the Ontario <i>Environmental Assessment Act</i> for the PEC Efficiency Upgrades project. We would also like to note that after the upgrades, the plant's thermal efficiency will increase due to a reduced heat rate (BTU/kWh) which means that the same amount of fuel used can produce more power after the upgrade.</p> <p>The upgrades to the turbine generator 'will maintain [air] emissions levels at or below site permit levels', as stated by the manufacturer of the equipment being installed for the upgrades, GE Gas Power – Services. The facility will continue to operate in accordance with all environmental permitting requirements.</p> <p>Should you require any more information, materials from the public meeting and updates are available on the project webpage at aturapower.com/portlandsupgrade.</p>
Air & Noise	Air Quality	Virtual Public Meeting	As residents we need to know about the impact on emissions in terms of our experience in the environment, and not only your compliance with regulations and directives. What can you say about the anticipated difference in particulate matter etc. post-upgrade?	GE Gas Power – Services, the manufacturer of the equipment being installed for the upgrades, has provided a letter stating that the upgrades to the turbine generator 'will maintain [air] emissions levels at or below site permit levels'.
		Virtual Public Meeting	Can you make available hourly air pollution emission and fuel-consumption from the Portlands facility?	
		Portlands Email Inbox	Do you monitor the emissions of NOx, PM-12 and ozone from your plants? Would you share this data with us?	PEC operates under an environmental permit called an Environmental Compliance Approval (ECA). The ECA approves the operation of the combined cycle combustion turbine facility inclusive of but not limited to two natural gas fired combustion turbines, each equipped with dry low-NOx burners. The ECA dictates nitrogen oxides and carbon monoxide emission limits for the facility. PEC uses a Continuous Emission Monitoring System (CEMS) to monitor emissions in the undiluted gases leaving the exhaust stacks and must investigate and report any exceedance during normal operation to the Ministry of Environment, Conservation and Parks (MECP).
		Virtual Public Meeting	How is the exhaust of the natural gas combustion in your plant measured?	
		Virtual Public Meeting	How will the upgrade change the air pollution coming from the plant? Particularly for NOx?	
		Virtual Public Meeting	I am a longtime resident of the area and have appreciated the significant improvement in air quality since the closing of the coal-plant. Please shape your answers about increases in emissions in terms of our experience in the environment, and not your compliance with regulations and directives. We need to know about the impact. What can you say about the anticipated difference in particulate matter etc. post-upgrade?	

Category	Sub-Category	Source	Question/Comment	Response
		Portlands Email Inbox	I object to any further expansion of the Portlands Energy Centre. The city already had air quality issues that this plant and any upgrades will make worse, increasing the health risks of the people of Toronto, especially in the city's east end.	<p>PEC is classified as a Schedule 4 facility and therefore must update their Emission Summary and Dispersion Modelling Report on an annual basis and demonstrate continued compliance with O. Reg. 419/05.</p> <p>The facility will continue to operate within all environmental permitting requirements.</p> <p>The response can be expanded by noting that air standards under O. Reg. 419/05 are set by the MECP's Standards Development Branch to protect against health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP currently requires to be assessed for contaminants released to the air, 5,099 are health based. PEC's Emission Summary and Dispersion Modelling (ESDM) report must be updated on an annual basis to reflect changes such as sources no longer in operation, updates to MECP's <i>Air Contaminants Benchmarks List: standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants</i>, as well as updates to the MECP approved air dispersion model versions.</p> <p>The contaminants listed on the Environmental Effects slide for the virtual public meeting was limited to NOx and CO as these are the contaminants which have facility-specific emission concentration limits noted in the ECA based on MECP's <i>Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines</i>. As noted in Section 2.1 of the draft Screening Report, the ECA amendment application for the project submitted Jun. 23, 2023, included updated Guideline A-5 calculations based on proposed facility and equipment parameters (i.e., nominal rating of combined-cycle combustion turbine facility, nominal rating of natural gas fired combustion turbines, nominal heat input of natural gas fired duct burners, and nominal rating of the steam generator). The PEC combustion turbines following the efficiency upgrades do not meet the trigger set in the Guideline A-5 (2021) definition of a modified combustion turbine and therefore, as verified by the MECP, Guideline A-5 (1994) applies. As per Guideline A-5 (2021), "this approach is meant to encourage upgrades in thermal efficiency and technology modernization of Existing SCTs [Stationary Combustion Turbines] that are intended to increase efficiency or reduce</p>
		Portlands Email Inbox	I will be attending the zoom meeting to better understand how routine maintenance can improve efficiencies to produce the additional 50MW and what increase in CO2 emissions (methane) and other pollutants are anticipated.	
		Virtual Public Meeting	The Government of Canada estimates that the PEC emitted 1000 tonnes of NOx a year. What - if any - NOx abatement technologies do you have in place?	
		Virtual Public Meeting	What are the health risks associated with the upgrades to such a large population of people living so close by?	
		Virtual Public Meeting	What level of NOx are you permitted to emit?	
		Virtual Public Meeting	What would emissions per hour be at proposed max capacity vs current max capacity?	
		Virtual Public Meeting	Will the environmental assessment include an assessment of the health impacts of increased emissions from the plant?	
		Virtual Public Meeting	Will there be an increase in particulate and CO2?	
		Virtual Public Meeting	Will you increase the output of emissions?	
		Virtual Public Meeting	You mentioned that additional power will be generated without increasing the amount of gas burned. You mentioned particulate and CO2 are a ratio of the input. Does this mean that for a given output there will be fewer particulates and CO2.	
		Portlands Email Inbox	What are the climate impacts of this development?	

Category	Sub-Category	Source	Question/Comment	Response
				emissions but without expecting the more stringent emission limits of New SCTs to be met.”
	Emissions of Greenhouse Gases (GHGs)	Virtual Public Meeting	Are you able to share information on the current carbon and air pollutant (PM 2.5's, NOx) emissions generated by PEC and anticipated changes post-upgrades?	Planned project works will improve the efficiency of the gas turbines and as a result reduce the greenhouse gas intensity (i.e., the ratio of CO ₂ equivalent emissions to total electricity generation) of the facility. Atura Power has projected that, following the efficiency upgrades, the net heat rate of the gas turbine generators (i.e., kJ/kWh HHV) is expected to reduce by 2% (at baseload and 15°C ambient temperature). The overall heat rate is expected to improve further as the facility will be able to fire the duct burners less as a result of the efficiency upgrades. The greenhouse gas intensity (i.e., the ratio of CO ₂ equivalent emissions to total electricity generation) of the facility is also expected to reduce by 2%. Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the Environmental Protection Act. Furthermore, information on GHG emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i> . Reviewed 2021 greenhouse gas data is currently available through the Greenhouse Gas Reporting Program data search. PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual greenhouse gas emissions under the provincial and federal reporting programs. Emission rates per Gigawatt hour (GWh) is not a reportable measure and therefore has not been quantified.
		Portlands Email Inbox	Do you monitor the GHG emissions from your plants? Would you share this data with us?	
		Virtual Public Meeting	Do you test for methane leaks in the ambient air in and around your facility? If so, do you include these fugitive emissions in your GHG emissions reporting?	
		Portlands Email Inbox	Is it true that the upgrades to the Portlands Energy Centre will not increase the plant's greenhouse gas emissions?	
		Virtual Public Meeting	It has been scientifically shown that the Portlands Gas Plant is the single largest source of Greenhouse Gases in Toronto.	
		Virtual Public Meeting	On the Environmental Effects slide, I noticed CO ₂ was not listed (just NO, NO ₂ , and CO) under the emissions that were not supposed to increase as per GE. Was that a mistake, or is there reason to expect CO ₂ emissions will increase?	
		Virtual Public Meeting	What additional greenhouse gas emissions and local air pollution are associated with this?	
		Virtual Public Meeting	What's the current greenhouse gas emissions level for the site and what will it become post-alteration?	
		Virtual Public Meeting	Will the amount of CO ₂ emitted increase as a result of this upgrade?	
		Virtual Public Meeting	You have not answered the question if the amount of greenhouse gas emissions will increase?	
	Emissions Reporting	Portlands Email Inbox	Could you please provide me with the following data about the Portlands Generating Station for each year from 2017 to 2022 inclusive: - Total GHG emissions; - Total nitrogen oxides emissions; - Total fine particulate emissions (PM 2.5); - GHG emission rate per GWh; - Nitrogen oxides emission rate per GWh; and - Fine particulate (PM 2.5) emission rate per GWh?	Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the Canadian Environmental Protection Act (CEPA). Reviewed 2021 NPRI data and preliminary 2022 NPRI data is currently available through the NPRI data search. PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to the NPRI.
		Portlands Email Inbox	Could you please share your forecast of Portland's GHG emission rate per GWh; nitrogen oxides emission rate per GWh; and fine particulate (PM 2.5) emission rate per GWh if your proposed "efficiency upgrades" are made?	

Category	Sub-Category	Source	Question/Comment	Response
		Virtual Public Meeting	How can the public obtain the emissions reports you produce?	Emission rates per Gigawatt hour (GWh) is not a reportable measure and therefore has not been quantified.
		Portlands Email Inbox	It's not ratio of emissions, it's total emissions that matter. Will I have to choose between my home and being able to breathe?	
		Portlands Email Inbox	On a Per Mw basis what will be the emission increase (also absolute number) after the refit?	
		Portlands Email Inbox	Please provide a full detailing of all the emissions profile of the plant now and after the proposed expansion.	
		Portlands Email Inbox	What will be the difference in total output, not concentrations?	
		Virtual Public Meeting	You mentioned where we can find data on your carbon emissions. Where can we find similar data for air pollutants?	
	Other	Portlands Email Inbox	The Halton Hills Generating Station is a sister plant to PEC. Is there some reason the Halton Hills Screening report includes an Emissions Summary and Modelling results and PEC does not?	<p>Of the nine screening criteria categories, one category (i.e., air and noise) was associated with some uncertainty in determining the potential for effects on air quality for the HHGS Efficiency Upgrades project. To provide further details on the Screening Criteria related to air quality, an assessment was undertaken and is outlined in Sections 3.3.1 to 3.3.3 of the HHGS Efficiency Upgrades Screening Report. The assessment determined that without mitigation, the project will produce emissions that meet the applicable AAQC set by the MECP.</p> <p>For the PEC Efficiency Upgrades project, there was no uncertainty associated in determining the potential for effects on air quality as the efficiency upgrades equipment manufacturer provided a letter to Atura Power stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels".</p>
Environmental Screening Process	Engagement Process	Portlands Email Inbox	Have you informed the people and businesses located near your plants about the health hazards of air pollution produced by them?	Public and Indigenous engagement describes the continuous, two-way communication of project information and feedback between the proponent (Atura Power) and members of the public and Indigenous communities. It includes specific communication opportunities like public meetings, comment periods and project notices. It also includes ongoing communication opportunities available throughout the duration of the project via tools such as the project email address (portlandsupgrade@aturapower.com) and project webpage (aturapower.com/portlandsupgrade). The purpose of public and Indigenous engagement in the Environmental Screening Process is to allow the proponent to identify and address public concerns and issues and to provide the public
		Portlands Email Inbox	We have reviewed the project documents and the website. How can we submit comments to be included in the public consultation? What is the email to submit to and when do you need them by?	
		Virtual Public Meeting	Will there be any other public meeting opportunities in this process?	
		Virtual Public Meeting	Could you clarify what public and Indigenous engagement means?	
		Virtual Public Meeting	So engagement is multiple forms of answering questions?	
		Virtual Public Meeting	What does "engage" mean?	

Category	Sub-Category	Source	Question/Comment	Response
		Virtual Public Meeting	How did Atura Power notify local residents of this public consultation meeting?	<p>with an opportunity to receive information about and make meaningful input into the project review and development. Public and Indigenous engagement is required for all projects that are subject to the Environmental Screening Process.</p> <p>Thursday, October 5th was the only public meeting opportunity for this project (outside of individual meetings with Indigenous communities, for those interested), however, the project email address (portlandsupgrade@aturapower.com) and project webpage (aturapower.com/portlandsupgrade) will continue to be available for the duration of the project.</p> <p>Information on the availability of the Screening Report will be published in the same publications used to announce the project in September 2023: the <i>Toronto Star</i>, <i>Toronto Sun</i>, and <i>Beach Metro</i> newspapers. Information will also be posted on the project webpage at aturapower.com/portlandsupgrade.</p>
		Virtual Public Meeting	What is the point of comments from the public when it seems that Atura has already been contracted to do this upgrade?	
		Virtual Public Meeting	How might concern over overall increased CO2 emissions and air quality expressed through public consultation effect the project's development?	
		Virtual Public Meeting	So engagement doesn't mean we have a say in how the project operates, just that we can get information about it?	
	Indigenous Engagement	Virtual Public Meeting	Since you did a land acknowledgment and hopefully respect Indigenous rights, are we to assume that if Indigenous communities are opposed to this upgrade, then you will not proceed with the upgrade?	<p>Atura Power is preparing a Screening Report that documents the results of the Environmental Screening Process and engagement undertaken as part of the project, which includes engagement with Indigenous communities.</p> <p>Information on the availability of the Screening Report will be published in the same publications used to announce the project in September 2023: the <i>Toronto Star</i>, <i>Toronto Sun</i>, and <i>Beach Metro</i> newspapers. Information will also be posted on the project webpage at aturapower.com/portlandsupgrade.</p>
		Virtual Public Meeting	Where can we find more information about your engagement with indigenous communities? Which communities did you consult?	
		Virtual Public Meeting	What were the concerns of those communities, and how were they addressed?	
		Virtual Public Meeting	Can the community make actionable demands through engagement?	
		Virtual Public Meeting	Can you give an example of how you addressed concerns, beyond just answering questions?	
	Public Meeting Format	Portlands Email Inbox	Since the live questions have been handpicked and completely irrelevant, I'm hoping you'll address real questions on real issues that are pressing and upon us such as wild fires and floods and emissions. There's a climate crisis!!!	<p>The virtual public meeting was scheduled from 6:30 – 7:30 p.m. Eastern. The meeting began at 6:30 p.m. with a PowerPoint presentation on the efficiency upgrades project description and associated Environmental Screening Process. The presentation was followed by a moderated Question & Answer (Q&A) session during which time members of the public submitted their questions to Atura Power via a chat function. In order to address as many questions as possible, Atura Power prioritized questions relevant to the PEC Efficiency Upgrades project and the associated Environmental Screening Process. The meeting was extended to 7:40 p.m. to accommodate the interest that was noted during the Q&A period and answer as many project-specific questions as possible but Atura Power was not able to address all of the questions during the meeting.</p>
		Portlands Email Inbox	We did not hear about this meeting until this evening and now the meeting is over. We live near to the facility - is there an opportunity for us to comment & review the project documents?	
		Portlands Email Inbox	We did not hear about this meeting until this evening and now the meeting is over. Why was this not better publicized to residents in the area?	
		Portlands Email Inbox	I was terribly disappointed and angry as I tuned in at 6:45pm and it was closing. This presentation was supposed to go from 6:30pm-7:30pm. What happened!!	
		Virtual Public Meeting	Why are questions being asked (and by whom) on material that was just presented?	
		Virtual Public Meeting	Why are you only addressing safe questions likely submitted by your own employees?	
		Virtual Public Meeting	I am sorry but it seems my questions are going in as "private", so they are not coming through. not sure how to change that... ??	

Category	Sub-Category	Source	Question/Comment	Response
		Virtual Public Meeting	wow. what a joke. do you seriously think people are taking your question period seriously with these fluff questions? Unfortunately for you aren't hoodwinking the public.	<p>Meeting participants were reminded that the presentation and a summary of the Q&As would be posted on the project webpage following the meeting. Participants were also encouraged to visit the project webpage for project details at aturapower.com/portlandsupgrade or to contact Atura Power via the project email address (portlandsupgrade@aturapower.com) with any additional questions.</p> <p>This table also recaps questions that have been received to date¹, including those received during the virtual meeting (both answered and unanswered during the event), along with Atura Power's responses.</p>
		Virtual Public Meeting	Why aren't my questions going through?	
		Virtual Public Meeting	For clarification - the questions that I am asking that are not being featured - I should send them to your e-mail address for a response?	
		Virtual Public Meeting	I don't see my question in the list	
	Screening Report and Public Review Period	Virtual Public Meeting	How long will the "comment period following the public meeting" last?	<p>The PEC efficiency upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario <i>Environmental Assessment Act</i>. As part of the Environmental Screening Process, Atura Power is required to prepare a Screening Report that documents the results of the Environmental Screening Process, including determining the potential for environmental effects of the project.</p> <p>The screening process includes a 30-day mandatory review period during which time anyone, including members of the public and Indigenous communities, can review the Screening Report. Information on the availability of the Screening Report will be published in the same publications used to announce the project in September 2023: the <i>Toronto Star</i>, <i>Toronto Sun</i>, and <i>Beach Metro</i> newspapers. Information will also be posted on the project webpage at aturapower.com/portlandsupgrade and distributed to anyone who has sent an email to the project inbox (portlandsupgrade@aturapower.com) and/or requested to be added to the project contact list to receive project updates and notifications.</p> <p>The project email will be available throughout the duration of the project.</p>
		Virtual Public Meeting	What is the 30-day review period at the end of the screening process? Is that a period of consultation for the public?	
		Virtual Public Meeting	How long will the comment period following the public meeting last?	
		Virtual Public Meeting	Please explain the screening reports.	
Exemption Request	n/a	Portlands Email Inbox	Could you please send me a copy of your letter to the Ontario Ministry of Environment, Conservation and Parks seeking an exemption to the <i>Environmental Assessment Act</i> for your proposed 50 MW upgrade for Portlands?	<p>Atura Power will not be pursuing an exemption from the Ontario <i>Environmental Assessment Act</i> for the PEC Efficiency Upgrades project.</p>
		Portlands Email Inbox	Your web site says Atura is requesting an exemption. Have you just made the request orally?	

Category	Sub-Category	Source	Question/Comment	Response
		Portlands Email Inbox	Considering that the 'upgrade' will greatly increase generating capacity and consequently the amount of greenhouse gas emissions, how can you justify a request for exemption to the Ontario <i>Environmental Assessment Act</i> ?	
		Portlands Email Inbox	OPG is asking Ontario's Ministry of the Environment to exempt its proposal to increase Portland's gas-fired generating capacity by 50 MW from the <i>Environmental Assessment Act</i> . Why? How will OPG know what mitigations to put in place for wildlife, biodiversity, water and air quality if it doesn't do a full Environmental assessment?	
		Portlands Email Inbox	Why is OPG asking Ontario's Ministry of Environment, Conservation and Parks to exempt its proposal to increase Portlands gas-fired generating capacity by 50 MW from the <i>Environmental Assessment Act</i> ?	
		Portlands Email Inbox	Can you please tell me when you expect to submit your environmental screening report to the Ministry of the Environment?	
		Portlands Email Inbox	I noted on the project webpage that Atura Power has applied for an exemption with MECP. Is there an expected timeline for when it will be known whether the EA proceeds?	
		Virtual Public Meeting	Why is OPG asking Ontario's Ministry of Environment, Conservation and Parks to exempt its proposal to increase Portlands gas-fired generating capacity by 50 MW from the <i>Environmental Assessment Act</i> ?	
Facility Operations	Operating Capacity	Virtual Public Meeting	For clarification, if you produce 9% more electricity with the same amount of gas then you omit less if you don't need to operate at full power, correct?	PEC operations are dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year. Historically, the plant has operated between 1750 to 4500 hours per year, always at the direction of the IESO. The frequency at which the plant operates will <u>not</u> change going forward; the plant will continue to operate as directed by the IESO.
		Virtual Public Meeting	At what capacity of full power is PEC running in 2023?	
	Operating Frequency	Portlands Email Inbox	Using the IESO's hour-by-hour generation data, we were able to determine how many hours every gas plant in the province operates every day. The results show that far from the 2-5% of the time that was cited at the recent municipal hearings concerning new gas plant proposals, Ontario's gas plant fleet operates far more. The investigation found: <ul style="list-style-type: none"> - Nine of the province's biggest gas plants operated more than 12 and a half hours a day, on average, everyday this year. - The three GTA gas plants were turned on even more. The Portlands Energy Centre in Toronto, the Goreway Power Station in Brampton and the Halton Hills Generating Station have been in production for an average of at least 13 hours and 30 minutes a day in 2023. - This summer, the GTA plants were fired up at least 18 hours and 20 minutes, on average, a day. The Portlands plant ran the most: 21 hours a day. - Contrary to historical trends, which show more peaking plant usage in summer, the Halton Hills plant ran more in the winter (21 hours/day) than it did in the summer (18 hours/day), last year. I'm reaching out to request comment from Atura, as owners of the Portlands and Halton Hills Plants.	PEC operations are dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year. Historically, the plant has operated between 1750 to 4500 hours per year, always at the direction of the IESO. The frequency at which the plant operates will <u>not</u> change going forward; the plant will continue to operate as directed by the IESO.
		Portlands Email Inbox	I've lived in Leslieville since 1997. We were promised limited use of the plant as backup power only - now it is operating 21 hours daily!	
Virtual Public Meeting		After the upgrade will PEC be operating for more hours?		
	Virtual Public Meeting	Virtual Public Meeting	This plant was intended to be a "peaker plant" that operates for only a few hours a week at most, but Portlands has been running as much as 21 hours a day all summer. Does Atura power have plans to reduce operations?	

Category	Sub-Category	Source	Question/Comment	Response
		Virtual Public Meeting	How many hours per year is the plant expected to operate, please?	
		Virtual Public Meeting	How many hours a day is the Portlands facility operating?	
		Virtual Public Meeting	Will the upgraded parts allow the plant to operate more hours per day?	
		Virtual Public Meeting	Do you expect that the frequency of use of the plant will increase as a result of this upgrade? What is the current frequency of use?	
		Virtual Public Meeting	Even though the emissions intensity is not expected to increase, what are the hours of operations per year that are expected, please?	
		Virtual Public Meeting	Could you address the reporting in the Toronto Star that the Portlands Energy Centre ran for nearly 21 hours a day all summer long in 2023? Why has the plant been used this much?	
		Virtual Public Meeting	These plants were designed and approved to be supplemental to the existing power generation grid, up to 14hrs a day does not seem in-keeping with the original plan, is there an explanation as to why this has occurred?	
		Virtual Public Meeting	I get that the plant's operational algorithm will not change, but the fact that it is being made to be more efficient suggests that the \$/MWH threshold price will decrease. Doesn't this mean that the run-time of the plant should increase?	
		Virtual Public Meeting	As a peaker plant, how frequently was the Portlands plant intended to operate, how much does it currently operate, and what is the projection for future use?	
		Virtual Public Meeting	I understand PEC produced power on average 21 hours per day this summer. How can this be considered a peaker plant?	
		Virtual Public Meeting	There is a discrepancy between the 21 hours a day the Toronto Star reported this summer and the 8 to 14 or 15 hours in your response about the hours of operation. Please comment.	
		Virtual Public Meeting	Can you convert the hours operating to minutes?	
		Virtual Public Meeting	IESO projections show that gas plant use will go up to more than 19 hours a day by 2026. Does that mean that even if the PEC is more efficient, it will still be fired up more and produce more emissions?	
	Operations Contract	Portlands Email Inbox	Was the plant originally scheduled to close in 2029 but now will stay open until 2034?	PEC is contracted to operate until April 2034, meaning it is expected to operate for approximately 10 more years.
		Virtual Public Meeting	How many more years is Portlands expected to operate?	Atura Power does not know if PEC will continue to operate beyond 2034.
		Virtual Public Meeting	Does Atura Power plan to continue burning fossil fuels at PEC after 2035?	
		Virtual Public Meeting	Does Atura intend to renew its contract for PEC beyond 2034?	
		Virtual Public Meeting	Not much of a time horizon. <i>[Meeting participant was commenting on the discussion about how Portlands Energy Centre is contracted to operate until April 2034].</i>	
		Virtual Public Meeting	What happens when contract ends in 2024?	

Category	Sub-Category	Source	Question/Comment	Response
		Virtual Public Meeting	What happens at the conclusion of PEC's contract in 2034?	
Portlands Energy Centre	Portlands Email Inbox		Is it accurate to say that PEC is a natural gas electrical generating station?	PEC is a combined-cycle natural gas electricity generating power plant. It can be operated as needed, during periods of peak demand when intermittent energy sources like wind and solar might not be available or might not be enough to meet demand. This is often described as a peaker plant. PEC has three turbines; G1 and G2 refer to the two gas turbines while G3 refers to the steam turbine.
	Virtual Public Meeting		Is this a peaker plant or baseload power plant?	
	Virtual Public Meeting		Data available on the IESO website describe PEC operations for "G1, G2, and G3". Are you able to talk a little about PEC operations from the three turbines please? For instance, which label applies to which turbine? Thank you.	
	Virtual Public Meeting		Does PEC still count as a "peaking plant"? I believe you said it can run 8-14 hours per day.	
	Virtual Public Meeting			
Waste Heat	Virtual Public Meeting		What are your plans for the waste heat? Have you looked into suppling it as district heating to new Portlands developments?	PEC uses waste heat from the plant to generate steam, which is used to create additional electricity. Exhaust heat from the gas turbines is passed through a heat recovery steam generator which turns water to steam that is then used to power a steam turbine and generate additional electricity. This occurs in a closed loop where the remaining condensation from the steam is captured and reused over and over again.
	Virtual Public Meeting		I'm aware of how combined system plants work. After using steam to generate additional electricity there will still be steam. The Portlands area, as far as I know, will use district heating and cooling. Steam does not need to be superheated to be useful for district heating. Have you contacted the city about to see if they can use your steam?	
	Virtual Public Meeting		I didn't realize that you capture the heat from the steam and use it again.	
Water Use	Portlands Email Inbox		"When the former Ontario Hydro established the Lennox Generating Station in Bath, they also had plans to mitigate the effects of warm water being discharged from the plant, which was then designed to burn oil -and has since been converted to natural gas. It was projected that the warmer water discharged into the North Channel would make the ice unsafe. To compensate for this, a bubble system was installed to enable the Amherst Island Ferry to operate year-round. Does the Portland's electricity generation plant use water from Lake Ontario for cooling purposes? Is so, how much water is used daily, and what is the projected effect on Lake Ontario from the Portlands plant? What is the temperature of the water as it is taken from Lake Ontario, and what is the temperature of the water being discharged into Lake Ontario?"	PEC uses water from Lake Ontario to cool and condense the steam exiting from the steam turbine which allows the facility to reuse that condensate in the steam generation process, thereby raising the station's efficiency. Approximately 300 m ³ of water passes through the station per day on average when the facility is operating. The average increase in water temperature from intake to discharge is in the range of 5 to 8 °C. PEC also provides a service in the summer months where it sterilizes the water of E-coli bacteria through a chlorination/dichlorination process, thereby improving the quality of the water to nearby beaches. Yes, 300 m ³ is 300 cubic meters of water is used daily to cool and condense the steam exiting from the steam turbine.
	Portlands Email Inbox		Is 300 m ³ translated into my simple English 300 cubic metres of water that is used as a coolant daily?	
	Portlands Email Inbox		I'm surprised by how little water is used, and re-used, for cooling purposes.	
	Portlands Email Inbox			
Other	Virtual Public Meeting		What pollution abatement is in place?	Atura Power complies with and will continue to comply with all applicable provincial and federal emissions regulations. Publicly-available supply and emissions data related to PEC are available via the following links:
	Virtual Public Meeting		How does this upgrade impact PEC's requirement and timing to meet the proposed federal Clean Electricity Regulation emission standard of 30 tonnes CO ₂ /MWh? Thank you.	
	Virtual Public Meeting		The federal draft Clean Electricity Regulations set a performance standard of 30 t CO ₂ /MWh for generation facilities. Without an upgrade, PEC would need to meet the standard in 2035 (since PEC was commissioned in 2009). Will the upgrade postpone the requirement for PEC to meet 30 t/MWh standard?	
	Portlands Email Inbox		Could you please provide me with the GWh supplied to the IESO-controlled grid for the Portlands Generating Station for each year from 2017 to 2022 inclusive?	

Category	Sub-Category	Source	Question/Comment	Response
				<ol style="list-style-type: none"> 1. GWh supplied to the IESO-controlled grid http://reports.ieso.ca/public/ & Data Directory (ieso.ca) 2. Total GHG emissions; https://climate-change.canada.ca/facility-emissions/ 3. Total nitrogen oxides emissions; https://climate-change.canada.ca/facility-emissions/ 4. Total fine particulate emissions (PM 2.5); https://pollution-waste.canada.ca/national-release-inventory/ <p>After the upgrades, the station's thermal efficiency will increase due to a reduced heat rate (BTU/kWh). This means that the same amount of fuel used will produce more power after the upgrades. The upgrades to the turbine generators 'will maintain [air] emissions levels at or below site permit levels', as stated by the manufacturer of the equipment being installed for the upgrades, GE Gas Power – Services. The facility will continue to operate in accordance with all environmental permitting requirements.</p>
Out of Scope	General	Portlands Email Inbox	I have some additional concerns based on my readings on dispersion modelling. Do you have any information which addresses the following: <ul style="list-style-type: none"> - Dispersion modelling does not identify the chemical reactions or transformations that may result when the pollutants released from the stacks mix with elements already in the atmosphere 	This question is beyond the scope of the PEC Efficiency Upgrades project. Atura Power cannot comment on a project belonging to another proponent.
		Portlands Email Inbox	<ul style="list-style-type: none"> - If the metrological data input to the model does not heavily favour inversion layers then the results will not show what happens when there is an inversion. Did the modelling conducted include a scenario where there is an extended inversion event? 	
		Portlands Email Inbox	<ul style="list-style-type: none"> - The terrain down-wind of the stacks influences dispersion - did the modelling done for PEC take into account the slope to the north rising from the lake? 	
		Portlands Email Inbox	<ul style="list-style-type: none"> - I gather that the impacts on tall buildings - of which there are a growing number in the neighbourhood - are not accurately portrayed in the results 	
		Portlands Email Inbox	<ul style="list-style-type: none"> - Third party review of modelling results increases confidence in results 	
		Portlands Email Inbox	<ul style="list-style-type: none"> - Given that the modelling done for PEC is now more than 20 years old, would Atura consider re-running the modelling with more recent metrological data? Since the study was done we have gone from "heat waves" and introduced the new term "heat domes". 	
		Portlands Email Inbox	The Goreway Power Station Environmental Review report included a forecast of the lifetime emissions of the plant. Is there some reason that the Goreway ER was able to calculate lifetime emissions and PEC does not?	
		Portlands Email Inbox	The Goreway Power Station ER flags GHG emissions as one of the reasons for raising the review to an ER. The St. Clair Energy Station ER flags some emissions being close to the limit for raising the review to an ER. Given that PEC has been flagged as having the highest GHG emissions in Toronto (with an expectation that they will increase even more) and, from media and other reports from PEC's 2003 ER, that local NOx and particulate matter were high - is there some reason Atura did not upgrade the PEC EA to an Environmental Review?	

Category	Sub-Category	Source	Question/Comment	Response
		Portlands Email Inbox	I appreciate that Atura is not obliged to send the full Air Dispersion Modelling study. Would you answer these questions: - Was "Shoreline fumigation" ruled out as a possibility?	
		Portlands Email Inbox	- Were there any additional components used in the AERMON model, other than standard components (e.g. BPIP PRIME)?	
		Portlands Email Inbox	- Was "Calms Processing" invoked during the execution of the model?	
		Portlands Email Inbox	- What station's ground and atmospheric observations were used in the execution of the model?	
		Portlands Email Inbox	- What years were the ground and atmospheric observations from?	
		Portlands Email Inbox	- What are the characteristics of the 'receptors' used in the model?	
		Portlands Email Inbox	- The "Procedure for Preparing an Emissions Summary and Dispersion Modelling" indicates that it is to be updated annually. Is there some reason the Executive Summary that Atura provided references an EDSM from December 31, 2020 rather than December 31, 2023?	
		Portlands Email Inbox	- What is the reason that the Executive Summary only lists NOx in the Emissions Summary Table and not CO (indicated in the ECA 3557-BUJKWR)?	
		Portlands Email Inbox	- Media reports from the 2003 ER suggested that PM10 and PM2.5 were also concerns - what did the modelling show for them and in comparison to the current air shed levels?	
		Portlands Email Inbox	- What area did the modelling cover and how was the local terrain described?	
		Portlands Email Inbox	- The "Procedure for Preparing an Emissions Summary and Dispersion Modelling" indicates "The assessment of all contaminants that are discharged from the facility regardless of whether or not a ministry POI Limit is available." Given that PEC is the largest source of GHG in Toronto, why isn't CO2e listed in the table?	
Project Description	General	Virtual Public Meeting	What will the upgrades include? What changes will be made?	Atura Power is planning to make efficiency upgrades at PEC. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. Better materials are used to manufacture the parts, and these can withstand a higher operating temperature and therefore produce more power. The advanced materials and the optimized cooling flows enable the engine to run at higher operating temperatures and use fuel more effectively, allowing for a higher power output per gigajoule (GJ) of fuel consumed. PEC is currently capable of outputting 550 megawatts (MW) to Ontario's electricity grid. Upgrading the equipment at PEC will increase its generating capacity by 50 MW to an output of 600 MW. All upgrade activities will take place within the
		Virtual Public Meeting	Is the increased capacity 5 MW or 50 MW? I saw and heard two figures.	

Category	Sub-Category	Source	Question/Comment	Response
				existing facility and there will be no changes or expansion beyond the existing PEC footprint.
	Efficiency Upgrade	Virtual Public Meeting	For clarification - you won't be using more fuel with the expansion?	The upgrades will involve replacing rotating and non-rotating parts within the gas turbines (blades, seals, nozzles, etc.). These upgraded parts will be more efficient due to the advanced materials used to allow the turbines to run hotter and more fuel efficiently, extracting the maximum amount of power possible. The upgrades will take place on the two gas turbines within the existing facility, and there will no change to the physical size or footprint of the station. After the upgrade, the plant's thermal efficiency will increase due to a reduced heat rate (British thermal unit/kilowatt-hour (BTU/kWh)). This means that the same amount of fuel used will produce more power after the upgrades. Atura Power has projected that, following the efficiency upgrades, the net heat rate of the gas turbine generators (i.e., kJ/kWh HHV) is expected to reduce by 2% (at baseload and 15°C ambient temperature). The overall heat rate is expected to improve further as the facility will be able to fire the duct burners less as a result of the efficiency upgrades.
		Virtual Public Meeting	The presentation says that there will be more power generated with a similar amount of gas burned before. How similar - 10% increase or more?	
		Virtual Public Meeting	Are you saying there will be more power generated without an increase in emissions? Please clarify.	
		Virtual Public Meeting	You mentioned that the facility will be more efficient. Can you be specific? How much more efficient? Thanks!	
		Virtual Public Meeting	At full capacity will it burn more fossil fuel than currently?	
		Virtual Public Meeting	You mention that "similar" levels of natural gas will be burned in order increase the energy output; can you define similar?	
	Hydrogen	Virtual Public Meeting	Do these efficiency upgrades apply to hydrogen power as well?	Atura Power is not considering hydrogen at PEC at this time.
	Schedule	Virtual Public Meeting	How long will it take to complete the installation of the upgrades?	The upgrades are scheduled to take place in fall 2024. The upgrade specific work will take approximately four to five weeks per unit to disassemble, replace parts and reassemble the gas turbines. There are two units, and they will be completed one at a time.
Project Need	Consideration of Alternatives	Virtual Public Meeting	What alternatives were considered before deciding to go ahead with the project?	The IESO is moving forward with a procurement process to meet near, medium and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.
		Virtual Public Meeting	What alternatives to this option to increase capacity have been considered?	
		Virtual Public Meeting	What happens if the upgrades are not done?	
	Independent Electricity System Operator (IESO)	Portlands Email Inbox	I understand OPG has an important role to fulfill in keeping energy production at the level needed by consumption. This is certainly challenging in this era of climate chaos and push back from the fossil fuel industry. However, I feel OPG could be taking a better leadership position in the energy transition than it is currently doing. <ul style="list-style-type: none"> - Why is OPG not respecting the wishes of Toronto City Council who voted against this expansion on May 10th and whereby the Ontario Minister of Energy previously indicated the wishes of municipalities would be respected? - With the increases in GHG emissions expected to increase by 700% by 2041 if the current policies and plans are maintained, why does our publicly owned utility think more fossil gas burning is a good idea in the middle of a climate crisis? 	After years of strong energy supply, Ontario is entering a period of growing electricity system demand (a predicted energy supply gap) and actions are needed to ensure the continued reliability of the electricity grid. New decarbonization policies coupled with rapid growth in the mining, greenhouse and industrial sectors are accelerating electricity demand growth across the province and heightening needs in certain regions.

Category	Sub-Category	Source	Question/Comment	Response	
			- RBC, environmental organizations and even IESO have provided other options to address future energy demands. Enbridge is already making money out of federally supported consumer energy efficiency programs. Why are these other options not being considered by OPG as a more immediate option while transition from fossil fuels takes place or until Small Modular Reactors are in a position to be regulated?	The IESO's most recent Annual Planning Outlook (APO) reflects these trends. It projects a steady rise in electricity demand that highlights the strengths of Ontario's communities and economy to navigate the challenges of the pandemic, pursue electrification and support economic growth.	
		Portlands Email Inbox	I am not in favour of any expansion or increase of natural gas output. Improving efficiency so that an increase of 50MW can be facilitated is not about sustainability carbon reduction or resiliency. It is simply continuing the use of fossil fuels.	The IESO established the Resource Adequacy Framework in 2021 to provide a flexible and cost-effective approach for competitively securing the resources necessary to meet demand and ensure system reliability. These upgrades are part of the plan IESO put in place to meet Ontario's energy needs; Atura is responding to the plan the IESO put in place to address the supply gap.	
		Portlands Email Inbox	On May 10th Toronto City Council passed a resolution opposing the expansion of the Portlands gas plant. Why is OPG not respecting the wishes of Toronto City Council?		
		Virtual Public Meeting	On May 10th Toronto City Council passed a resolution opposing the expansion of the Portlands gas plant. Why is OPG not respecting the wishes of Toronto City Council?		
		Virtual Public Meeting	In view of the global climate crisis, which a major cause of which is burning fossil fuels, why is the "efficiency upgrade" not addressing and lowering the emissions?		
		Virtual Public Meeting	Why is OPG not respecting the wishes of Toronto City Council?		
		Virtual Public Meeting	How does this upgrade help reach net-zero emissions by 2035?		
		Virtual Public Meeting	Why is this project going forward when Toronto City Council passed a resolution opposing the project?		
		Virtual Public Meeting	Does Atura management acknowledge that we are facing a climate emergency and, if so, how does reality inform its decision to enhance and continue operating this fossil fuel energy plant?		
		Virtual Public Meeting	How do you justify this? [Meeting participant asking about Atura Power's reason for pursuing the Portlands Energy Centre efficiency upgrades project].		
		Virtual Public Meeting	Why does our publicly owned utility think more fossil gas burning is a good idea in the middle of a climate crisis?		
		Virtual Public Meeting	Wouldn't the fastest way to reduce GHG emissions in Toronto be to shut down the Portlands plant as soon as feasible?		
	Independent Electricity System Operator (IESO) Procurement Process	Virtual Public Meeting	Did Atura initiate this project or was it called for from another organization?		After years of strong energy supply, Ontario is entering a period of growing electricity system demand (a predicted energy supply gap) and actions are needed to ensure the continued reliability of the electricity grid. To close this gap and meet the projected demand, the Independent Electricity System Operator (IESO) is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. The upgrades to PEC are part of Atura Power's efforts to address this supply gap.
		Virtual Public Meeting	Did Atura Power lobby for the plant? How was Atura chosen as the contractor for this and other projects in Ontario?		
	Role of Gas in Ontario Energy Supply	Portlands Email Inbox	Expanding your plant sends more carbon upward and NO pollution downwind to us. Why spend millions expanding a fossil fuel plant instead of spending that money on energy conservation programs to help residents and businesses save money & renewables?	Wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain	

Category	Sub-Category	Source	Question/Comment	Response
		Portlands Email Inbox	We should be working towards closing this project, or at least reducing its footprint. Switching anything from fossil fuel powered to electric is meaningless if in fact the electricity is generated using fossil fuels.	system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.
		Portlands Email Inbox	Even the major fossil fuel companies are recognizing the threat to life as we know it on planet earth that is climate change. According to the IPCC we only have until 2030 to roll back carbon emissions. We need to get off gas. Ramp up green energy!	
		Portlands Email Inbox	I don't support expanding the burning of fossil fuels for power. While some fossil fuels may be needed while we transition to cleaner sources of energy and storage options, more should be done on that front instead of investing more in gas plants.	
		Portlands Email Inbox	I want it known that I am very opposed to the Portland's increase in capacity. This is the wrong direction to be going in. Any government money and/or private capital spent on this could be much better spent on off shore wind and solar - much cheaper and emissions-free. Also Toronto has great plans in the Net-Zero Emissions by 2040 strategy that passed in council recently. We need industry that will help us get there. Expanding gas in our city will not do so. Our council doesn't want it and nor do a majority of Torontonians. People are becoming increasingly aware of the climate crisis and the role of fossil fuels in having created the crisis. We will not sit by and let our present and future be hijacked by ill conceived notions of the need for anymore gas.	
		Portlands Email Inbox	With the excess power available from Quebec Hydro why is this natural, renewable hydro not the first and only option?	
		Portlands Email Inbox	There are many, many Canadians who want natural energy to be the focus. We want to fund only natural energy alternatives. Why does our publicly owned utility think more fossil gas burning is a good idea in the middle of a climate crisis? Why is there no effort to go natural?	
		Virtual Public Meeting	Can the supply gap should be filled by non-fossil fuel sources given we are in the middle of a climate crisis: Renewables, including wind, solar plus purchases from Quebec?	
		Virtual Public Meeting	Why isn't the excess capacity of Quebec Hydro not an option? It's cheap, renewable, and available. And by far the cheapest. We're in the midst of a climate crisis and more gas plants are part of the problem.	
		Virtual Public Meeting	I would like to know why we are continuing to invest in fossil fuels vs the cheaper options of conservation and renewable energy options. Thanks.	
		Virtual Public Meeting	Why aren't you looking at renewable, non-polluting energy? It doesn't matter that you are not changing the 'footprint of the plant. The fact that you are using polluting fossil fuels is UNACCEPTABLE!	
		Virtual Public Meeting	Atura's gas plants are contributing to the climate crisis. Why doesn't Atura Power put pressure on the government to invest in green alternatives instead of these efficiency upgrades?	
		Virtual Public Meeting	With the global climate crisis, why are renewable energy sources not being used?	
		Virtual Public Meeting	Were green energy options considered instead of these upgrades?	
		Virtual Public Meeting	Does Atura management acknowledge that we are facing a climate emergency and, if so, how does reality inform its decision to enhance and continue operating this fossil fuel energy plant? Should Atura, for example, be investing in solar and wind instead?	
		Virtual Public Meeting	The IESO has also identified that wind and solar could meet demands.	

Category	Sub-Category	Source	Question/Comment	Response
		Portlands Email Inbox	I cannot support an increase in capacity as requested. It is better to put money into developing sustainable energy solutions, rather than to increase the current greenhouse gas emissions. Thank you.	
		Portlands Email Inbox	I agree we need to keep natural gas power for a while yet, we have no alternative. But I really don't think we should increase the capacity of what we have now. I would personally prefer rolling blackouts--with advance notice. We all have to suffer a bit in order to make the world liveable for our children and grandchildren.	
		Portlands Email Inbox	Just regarding the variability in renewable energy from wind and solar we are now in the advanced stages of energy storage technology so that old argument is outdated and frankly misleading. We are also engaged n Ontario in behaving like spoiled children and ignoring the abundant green energy available from Quebec At this stage please be aware that as a citizen in Toronto I will protest and do everything legal to block any expansion of the gas burning plant . As you know I am not alone	
	Upgrades vs. Expansion	Virtual Public Meeting	As you are classifying the proposed work as an upgrade rather than expansion, does this exempt the project from the IESO mandate that municipalities must approve gas-plant expansions? Toronto City Council has twice opposed gas expansion. Will this be considered?	Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. Better materials are used to manufacture the parts, and these can withstand a higher operating temperature and therefore produce more power. The advanced materials and the optimized cooling flows enable the engine to run at higher operating temperatures and use fuel more effectively, allowing for a higher power output per gigajoule (GJ) of fuel consumed. All upgrade activities will take place within the existing facility and there will be no changes or expansion beyond the existing PEC footprint.
	Virtual Public Meeting	Why spend millions expanding a fossil fuel plant instead of spending that money on energy conservation programs that can help residents and businesses save money?		
	Portlands Email Inbox	By expanding Gas powered plants, Atura Power and the province of Ontario is shooting itself in the foot environmentally and financially. Fossil fuels are being phased out as we speak as there are healthier and cheaper alternatives for the taxpayer.		
	Virtual Public Meeting	We just had the hottest summer & the hottest September on record, globally. There are cheaper, healthier, and safer alternatives to gas plants. Portlands Gas Plants was originally built despite local protests, under promises it would only be a "peak supplier" yet it in fact has been running 21 hours a day. Plus, Toronto City council voted against the expansion of this plant. Despite all these facts and more, why does OPG still want to expand the gas plant, against the wishes of local Torontonians and Ontarians alike?		
	Virtual Public Meeting	How is expanding a gas plant in 2023 aligned with Canada?		
	Virtual Public Meeting	Has the city of Toronto approved this expansion?		
	Virtual Public Meeting	How is expanding a gas plant in 2023 aligned with Canada's greenhouse gas emission reduction commitments? How is a gas plant expansion aligned with the federal government's proposed Clean Electricity Regulations?		
	Virtual Public Meeting	The Minister of Energy directed that gas projects would need municipal approval - Toronto has voted against this expansion. Why won't the IESO respect Toronto's wishes?		
	Virtual Public Meeting	Sorry I forgot the question. The UN has said that all new fossil fuel development is moral and economic madness! How can you justify this expansion when the climate and health affects are disastrous?		
	Virtual Public Meeting	If council opposed this expansion, why is it going ahead?		
	Virtual Public Meeting	Why is an expansion happening in the middle of a climate crisis?		

Category	Sub-Category	Source	Question/Comment	Response
		Virtual Public Meeting	Why is OPG Atura expanding gas generation instead of building clean wind, solar and waterpower projects to meet demand growth?	
		Virtual Public Meeting	Another report available to the public is the most recent IPCC report, which states, unequivocally, that we must reduce fossil fuel output, and you are expanding your facilities to support an additional 50 megawatts (MW) of output.	
		Virtual Public Meeting	How do you justify an expansion in an age of spiralling environmental disaster? As human beings, how can you even entertain this?	
		Virtual Public Meeting	The only thing right now that is critical is stopping all fossil fuel expansion and drastically cutting emissions as fast as possible.	
		Virtual Public Meeting	These types of expansions - or whatever greenwashing nonsense you peddle them as - as a way to stall true action toward a livable future for humanity.	
Request for Project/Meeting Materials	Project Documentation	Portlands Email Inbox	Can you please send me a copy of the Q&A promised during the meeting, or a link to where it is posted?	Materials from the public meeting, including a copy of the presentation and a document summarizing the Question and Answer period, are available on the project webpage at aturapower.com/portlandsupgrade , under the Project Documents heading.
		Portlands Email Inbox	Can you advise if the Q&A resulting from the Oct 5 public consultation meeting has been published and where it is available for review.	
		Portlands Email Inbox	Do you have any idea when the Q&A's will be posted?	
		Portlands Email Inbox	Would you please share the materials with us after the meeting for TRCA staff to review?	
		Virtual Public Meeting	You told us to see your website for summary. Under which heading will it be posted?	
		Virtual Public Meeting	Will the meeting be recorded and available later?	
		Portlands Email Inbox	Would you also send me the - Emissions Summary - Guideline A-5 calculations based on proposed facility and equipment parameters	
Other	n/a	Portlands Email Inbox	Any news on when you will be able to respond to my other requests and when the final Screening report will be out?	Atura Power is responding to your enquiries as quickly as possible and anticipate releasing the final Screening Report in the coming weeks.

Appendix B4b: Correspondence Records with Members of the Public

From: [REDACTED]

Sent: Wednesday, September 6, 2023 12:53 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades

Hello,

Thank you for contacting Waterfront Toronto. We appreciate you taking the time to email us. We will make every effort to get back to you as soon as we can.

If you are looking for general information on waterfront revitalization please visit our website at <https://www.waterfronttoronto.ca/>

Here are some helpful links where you can find additional information.

- [News](#) – *Read our latest news and blogs*
- [Quayside](#) – *visit the project page for the latest information about the Quayside project.*
- [Port Lands Flood Protection Project](#) – *For more information about the planning and future development of the Port Lands and the Don Mouth Naturalization project.*
- [Online Calendar](#) – *here you will find Waterfront Toronto related meetings and events – including public engagements, Board & Committee meetings and Design Review Panel meetings.*
- **Social Media** - You can learn more and get our latest updates online via [Facebook](#), [Twitter](#), [LinkedIn](#), [Instagram](#), and [YouTube](#).

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From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Tuesday, December 5, 2023 3:21 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good afternoon.

As you know, Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC). The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01 under the Ontario *Environmental Assessment Act*. Atura Power has prepared a *draft* copy of the Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is 'No', indicating that there would not be potential negative environmental effects resulting from the project.

Attached to this email is a draft of the Screening Report. We are sharing this draft with Indigenous communities, key agencies such as yourselves, and interested members of the public to offer an additional opportunity to review the project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power is voluntarily providing this opportunity so comments can be incorporated in the final Screening Report. We invite you to review the draft report and share any comments on the report via our project email address, portlandupgrade@aturapower.com. We will **accept comments until Jan. 7, 2024**, after which time we will prepare and release the final version of the Screening Report in winter 2024.

Thank you very much, and please send your project-related questions to portlandupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

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From: [REDACTED]

Sent: Wednesday, December 6, 2023 1:07 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Hi Darius,

This report states that the PEC is on Villiers Island, which is incorrect. Villiers Island is the small island we are creating as part of the Port Lands Flood Protection project. It is bound by the Keating Channel to the north, the future river valley (just west of Don Roadway) to the east, the new river valley (north of the Ship Channel) to the south, and the inner harbour to the west.

page i and repeated on page 1 - PEC is a combined-cycle natural gas-fuelled electricity generating station (GS) with an average electrical output contract capacity of 550 megawatts (MW). The station is located on Villiers Island just south of the mainland part of the City of Toronto on approximately 11.4 hectares (ha) of land.

*Please let us know if you have any questions. Warm regards,
Waterfront Toronto*

From: Darius Sokal <Darius.Sokal@aturapower.com>

Sent: Monday, December 11, 2023 12:58 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good afternoon.

Thank you for your email and the information within it.

We appreciate your outreach and interest in our project.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-657

From: [REDACTED]

Sent: Monday, December 11, 2023 1:42 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>; [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Thanks Darius,

One other question/comment raised by one of our colleagues was whether the upgrades proposed will result in an increase in discharge water temperature conditions, or whether the thermal impacts will remain relatively consistent with current operations.

There is some discussion about that in the screening, but nothing about whether there will be a change over existing thermal impacts.

Thanks,
Waterfront Toronto

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Tuesday, December 12, 2023 6:41 PM

To: [REDACTED] Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good afternoon.

The PEC efficiency upgrades to the gas turbines will have no impact on the cooling water discharged by the facility. Cooling water temperatures will remain within compliance of the existing ECA and thus no change to the Industrial Sewage Works ECA or limits are required.

I hope this answers your colleague's questions.

Thanks,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-657

From: [REDACTED]

Sent: Thursday, September 21, 2023 1:18 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Exemption request

Hi Atura Power,

Could you please send me a copy of your letter to the Ontario Ministry of Environment, Conservation and Parks seeking an exemption to the Environmental Assessment Act for your proposed 50 MW upgrade for Portlands.

Please also send me any response(s) to this request that you have received from the Ministry.

Thank you.

[REDACTED]

[REDACTED]

Chair, Ontario Clean Air Alliance

160 John Street, #300

Toronto, ON M5V 2E5

[REDACTED]

From: Upgrade project for PEC

Sent: Tuesday, September 26, 2023 11:40 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Exemption request

Good day, [REDACTED]

Thank you for reaching out to us and for your requests regarding the Portlands Energy Centre Efficiency Upgrades project.

Please note that a letter has not been sent to the Ministry of the Environment, Conservation and Parks regarding an exemption to the Ontario *Environmental Assessment Act*.

Kindest regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Tuesday, September 26, 2023 11:53 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Exemption request

Hi Darius,

But your web site says Atura is requesting an exemption. Have you just made the request orally?

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, October 5, 2023 7:50 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Exemption request

Good morning, [REDACTED]

Thanks again for reaching out to us.

Please be advised that Atura Power is not seeking an exemption to the Ontario *Environmental Assessment Act* from the Ontario Ministry of the Environment, Conservation and Parks related to the Portlands Energy Centre Efficiency Upgrades project.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Friday, October 6, 2023 2:32 PM

To: 'Upgrade project for PEC' <portlandsupgrade@aturapower.com>

Cc: [REDACTED] 'tabunsp-qp@ndp.on.ca' <tabunsp-qp@ndp.on.ca>; 'sarah.gingrich@toronto.ca' <sarah.gingrich@toronto.ca>

Subject: Production and emissions data request

Hi Darius,

Could you please provide me with the following data about the Portlands Generating Station for each year from 2017 to 2022 inclusive:

1. GWh supplied to the IESO-controlled grid;
2. Total GHG emissions;
3. Total nitrogen oxides emissions;
4. Total fine particulate emissions (PM 2.5);
5. GHG emission rate per GWh;
6. Nitrogen oxides emission rate per GWh; and
7. Fine particulate (PM 2.5) emission rate per GWh.

Could you please also provide me with your forecast of Portland's GHG emission rate per GWh;

nitrogen oxides emission rate per GWh; and fine particulate (PM 2.5) emission rate per GWh if your proposed "efficiency upgrades" are made.

Thank you.

[REDACTED]

From: [REDACTED]

Sent: Tuesday, October 17, 2023 7:48 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: FW: Production and emissions data request

Hi Darius,

Could you please let me know when you will be able to provide me with responses to my questions below.

And can you please also tell me when you expect to submit your environmental screening report to the Ministry of the Environment.

Thank you.

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, October 30, 2023 2:27 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Production and emissions data request

Hello again, [REDACTED]

I just sent my responses to your earlier email. Sorry again for the delay.

We expect to publish the PEC Efficiency Upgrades Screening Report and Notice of Completion in November or December 2023, and provide them to the MECP in January or February, 2024.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, October 30, 2023 2:18 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: [REDACTED] tabunsp-qp@ndp.on.ca <tabunsp-qp@ndp.on.ca>; sarah.gingrich@toronto.ca <sarah.gingrich@toronto.ca>

Subject: RE: Production and emissions data request

Good evening, [REDACTED]

Sorry for my late reply and thank you for your patience.

Public-available supply and emissions data related to PEC are available via the following links:

1. GWh supplied to the IESO-controlled grid <http://reports.ieso.ca/public/> & [Data Directory \(ieso.ca\)](http://reports.ieso.ca/public/DataDirectory(ieso.ca))
2. Total GHG emissions; <https://climate-change.canada.ca/facility-emissions/>
3. Total nitrogen oxides emissions; <https://climate-change.canada.ca/facility-emissions/>
4. Total fine particulate emissions (PM 2.5); <https://pollution-waste.canada.ca/national-release-inventory/>

After the upgrades, the station's thermal efficiency will increase due to a reduced heat rate (BTU/kWh). This means that the same amount of fuel used will produce more power after the upgrades. And, the upgrades to the turbine generators 'will maintain [air] emissions levels at or below site permit levels', as stated by the manufacturer of the equipment being installed for the upgrades, GE Gas Power – Services. The facility will continue to operate in accordance with all environmental permitting requirements.

Thank you again,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, December 6, 2023 8:33 AM

To: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good morning.

As you know, Atura Power is planning efficiency upgrades at the Portlands Energy Centre (PEC). The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01 under the Ontario *Environmental Assessment Act*. Atura Power prepared a draft copy of the Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is 'No', indicating that there will be no potential negative environmental effects resulting from the project.

The draft Screening Report is now available on our project webpage at aturapower.com/portlandsupgrade. We are sharing this draft copy to offer an additional opportunity to review the project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power is voluntarily providing this opportunity so that comments can be incorporated in the final Screening Report. We will be collecting comments on the draft Screening Report through our project email address, portlandupgrade@aturapower.com, **until Jan. 7, 2024**. After that date, we will prepare and release the final version of the Screening Report in the Winter 2024.

Thank you for your interest in the PEC Efficiency Upgrades project.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Thursday, December 14, 2023 9:17 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Cc: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 'Sarah Gingrich' <Sarah.Gingrich@toronto.ca>;
Councillor_Fletcher@toronto.ca <Councillor_Fletcher@toronto.ca>; tabunsp-qp@ndp.on.ca
<tabunsp-qp@ndp.on.ca>; 'McMahon, Mary-Margaret' <mmcmahon.mpp@liberal.ola.org>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Hi Darius,

Please find attached the OCAA's comments on Atura's Draft Screening Report regarding its proposal to increase the capacity of the Portlands Energy Centre by 50 MW.

All the best,

[REDACTED]



December 14, 2023

BY EMAIL: portlandsupgrade@aturapower.com

Mr. Darius Sokal
Senior Communications Advisor
Atura Power
Oakville, Ontario

Dear Mr. Sokal

Re: Atura Power's Draft Screening Report with respect to its proposal to increase the capacity of the Portlands Energy Centre by 50 megawatts (MW)

Introduction

Further to your email of December 6, 2023, I am writing to provide you with the Ontario Clean Air Alliance's (OCAA) comments and recommendations with respect to Atura Power's December 2023 *Draft Screening Report* (DSR) regarding its proposal to increase the gas-fired electricity generating capacity of its Portlands Energy Centre (PEC) by 50 MW.

Concerns

The OCAA has the following concerns about Atura Power's DSR.

1. The DSR fails to acknowledge that Atura Power has **not** obtained a municipal support resolution from the City of Toronto for its proposed project.

According to Ontario's Minister of Energy, Todd Smith, municipal support resolutions from the host municipalities are a prerequisite for electricity generation and storage projects.

Specifically, according to the Minister’s December 23, 2022 letter to the Independent Electricity System Operator (IESO):

“In recent months, as project proponents look for sites to develop approximately 4,000 megawatts of generation and energy storage, I have heard from multiple municipal councils and other stakeholders that they would like the IESO to be explicit that municipal council support is required for the approval of projects proposed on sites that are located within their boundaries...

Recognizing that... it is the IESO which is responsible for implementing the [October 6, 2022] Directive, it is my expectation that the IESO will be clear about the requirement for a resolution from municipal council supporting a proponent or counterparty with a proposed project located in that municipality, separate and apart from that municipality’s permitting and regulatory requirements.

I believe that the submission of a council resolution by a proponent or counterparty to the IESO demonstrating support for the project would be the only basis from which to conclude that an elected council’s support on behalf of the municipality has been obtained.”¹

As the above quote makes clear, Minister Smith’s letter is with respect to the IESO’s procurement of 4,000 MW of generation and energy storage. Atura Power’s contract with the IESO to expand the capacity of its PEC by 50 MW is one component of the IESO’s plan to acquire an additional 4,000 MW of generation and energy storage. Therefore it requires a municipal support resolution from the City of Toronto to proceed.

2. The DSR fails to note that on May 12, 2023 and June 15, 2023 the City of Toronto passed resolutions opposing Atura Power’s proposal to increase the capacity of PEC by 50 MW.
3. The DSR fails to explain why Atura believes that the Minister of Energy, Conservation and Parks should approve its proposed PEC project despite the fact that that it does not have the support of Toronto City Council as required by the Minister of Energy.
4. Atura has not quantified PEC’s carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide *emission rates per kWh* in 2022.
5. Atura has not quantified the *changes* in PEC’s carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide *emission rates per kWh* which will occur if the project proceeds.

¹ <https://www.ieso.ca/en/Corporate-IESO/Ministerial-Directives>

6. Atura has not provided PEC's *total* emissions of nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), sulphur dioxide in 2022.
7. Atura has not provided a forecast of PEC's total emissions of carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.
8. Atura has not quantified adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature deaths) of proceeding with its proposed project.
9. Atura has not provided PEC's total greenhouse gas (GHG) emissions in 2022.
10. Atura has not provided a forecast of PEC's total GHG emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.
11. Atura's DSR does not examine *alternatives* to its proposed project. Specifically, there is no analysis with respect to the existence of cleaner and lower cost options to meet Ontario's electricity needs even though there are many commercially available alternatives.

For example, according to the Royal Bank of Canada, Ontario could completely avoid the need for new gas-fired generation and save \$500 million per year by investing in energy efficiency and demand management.²

Ontario's demand for electricity peaks on hot summer days when our air-conditioners are running full out. On the other hand, Quebec's demand for electricity peaks on cold winter nights since most of its homes have electric resistance (baseboard) heating. As a result, Quebec has a huge surplus of hydro-electricity capacity available for export to Ontario during our summer peak demand hours.³ By increasing our imports of Quebec waterpower, Ontario can avoid the need for new gas-fired generation to power our air conditioners.

² <https://thoughtleadership.rbc.com/power-shift-how-ontario-can-cut-its-450b-electricity-bill/>

³ <https://news.ontario.ca/en/release/1003444/the-governments-of-ontario-and-quebec-support-new-electricity-trade-agreement>

In addition, the DSR provides no analysis of the potential for wind⁴ and solar energy (including solar PV on Toronto roofs) combined with energy storage (including EV batteries) to avoid the need to increase the generation capacity of PEC.

In this context, it is also important to note that that Hydro Quebec is proposing to meet 100% of its future electricity needs by investing in energy efficiency and renewables (wind, solar, waterpower and biogas).

12. The DSR does not propose any mitigation measures to ensure that the project will **not** have a negative net impact on public health and our climate.

Conclusion

Atura's DSR has failed to demonstrate that its proposal to increase PEC's capacity by 50 MW is in the public interest.

Therefore, OCAA recommends that Atura's DSR be revised and expanded to:

- a) explain why Atura believes the Minister of the Environment, Conservation and Parks should approve its proposed power project which does not have a municipal support resolution from the City of Toronto;
- b) quantify PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide *emission rates per kWh* of electricity generation in 2022;
- c) quantify PEC's *total* carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide emissions in 2022;
- d) quantify PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide *emission rates per kWh* of electricity generation in each year from 2024 to 2035 inclusive if the proposed project proceeds;
- e) quantify PEC's *total* forecast carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.
- f) quantify PEC's greenhouse gas emission rate per kWh of electricity generation in 2022;
- g) quantify PEC's greenhouse gas emission rate per kWh of electricity generation if the proposed project proceeds;
- h) quantify PEC's total greenhouse gas emissions in 2022;
- i) quantify PEC's *total* forecast greenhouse gas emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved;
- j) quantify PEC's *total* adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature deaths) in each year from 2024 to 2035 inclusive if the proposed project proceeds;

⁴ https://www.cleanairalliance.org/wp-content/uploads/2023/04/Great-Lakes-Wind-Report-apr-17-v_01.pdf

- k) evaluate alternatives to the proposed project (e.g., energy efficiency and demand management, Quebec waterpower, Made-in-Ontario wind and solar energy, storage projects including the use of Hydro Quebec’s reservoirs and electric vehicle batteries as storage options for Ontario wind and solar energy); and
- l) evaluate the benefits and costs of measures to mitigate the adverse health and climate impacts of the proposed project.

Yours sincerely,



Chair

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, December 22, 2023 1:30 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Cc: [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] 'Sarah Gingrich' <Sarah.Gingrich@toronto.ca>;
Councillor_Fletcher@toronto.ca <Councillor_Fletcher@toronto.ca>; tabunsp-qp@ndp.on.ca
<tabunsp-qp@ndp.on.ca>; 'McMahon, Mary-Margaret' <mmcmahon.mpp@liberal.ola.org>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good morning,

We appreciate you providing the OCAA's comments on our PEC Efficiency Upgrade Draft Screening Report, please see Atura Powers response in the attached PDF.

Thank you,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

December 21, 2023

[REDACTED]

Ontario Clean Air Alliance (OCAA)
160 John St., Suite 300
Toronto, ON M5V 2E5

[REDACTED]

Re: Atura Power’s Draft Screening Report with respect to its proposal to increase the capacity of Portlands Energy Centre by 50 megawatts (MW)

This letter is a response to your letter on behalf of the Ontario Clean Air Alliance (OCAA) dated December 14, 2023, regarding comments about Atura Power’s Portlands Energy Centre (PEC) Efficiency Upgrades project draft Screening Report released to the public for review on December 6, 2023.

Below are responses to each of the questions and comments raised in your letter. We note these comments are very similar to the questions and comments raised in your letter regarding Atura Power’s Halton Hills Generating Station (HHGS) Efficiency Upgrades project earlier this Fall. As a result, you will note many of our responses regarding the PEC Efficiency Upgrades project below are similar to the responses we provided to your letter regarding the HHGS Efficiency Upgrades project. Nonetheless, we are providing our responses here for your convenience.

In response to each of the comments raised in your letter, we offer the following responses:

OCAA Letter Section (page #)	OCAA Comment	Atura Power’s Response
OCAA Letter - Concerns		
#1 (p1, p2)	Atura Power has not obtained a municipal support resolution from the City of Toronto for its proposed project.	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy’s quote provided on page 2 of the OCAA letter refers to Independent Electricity System Operator’s (IESO’s) current Long-Term (LT1) Request for Proposals (RFP) process. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including
#2 (p2)	The draft Screening Report fails to note that on May 12, 2023 and June 15, 2023 the City of Toronto passed resolutions opposing Atura Power’s proposal to increase the capacity of PEC by 50 MW.	
#3 (p2)	The draft Screening Report fails to explain why Atura believes that the Minister of Energy, Conservation and Parks should approve its proposed PEC	

OCAA Letter Section (page #)	OCAA Comment	Atura Power's Response
	project despite the fact that it does not have the support of Toronto City Council as required by the Minister of Energy.	contracts for natural gas electricity generation facility upgrades.
#4 (p2)	Atura has not quantified PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide <i>emission rates per kWh</i> in 2022.	As demonstrated in Section 3.3 and 3.4 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.
#5 (p2)	Atura has not quantified the <i>changes</i> in the PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide <i>emission rates per kWh</i> which will occur if the project proceeds.	See response to #4 above.
#6 (p3)	Atura has not provided PEC's <i>total</i> emissions of nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), sulphur dioxide in 2022.	Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the <i>Canadian Environmental Protection Act</i> (CEPA). Reviewed NPRI data is now available up to 2022.
#7 (p3)	Atura has not provided a forecast of PEC's total emissions of carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.	PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to the NPRI.
#8 (p3)	Atura has not quantified adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature deaths) of proceeding with its proposed project.	See response to #4 above.

OCAA Letter Section (page #)	OCAA Comment	Atura Power's Response
#9 (p3)	Atura has not provided PEC's total greenhouse gas (GHG) emissions in 2022.	Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i> . Furthermore, information on GHG emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i> . Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements; it is currently under review.
#10 (p3)	Atura has not provided a forecast of PEC's total GHG emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) if the project is not approved.	See response to #7 above.
#11 (p3, p4)	Atura's SR does not examine <i>alternatives</i> to its proposed project. Specifically, there is no analysis with respect to the existence of cleaner and lower cost options to meet Ontario's electricity needs even though there are many commercially available alternatives.	The IESO is moving forward with a procurement process to meet near, medium and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.
#12 (p4)	The draft SR does not propose any mitigation measures to ensure that the project will not have a negative net impact on public health and our climate.	See response to #4 above.

As described in the draft PEC Efficiency Upgrades Screening Report released to the public for review on December 6, 2023, PEC is an industrialised facility and its activities are heavily regulated under many existing permits, standards, approvals and reporting requirements. Activities to complete the upgrades will occur within the existing PEC facility. The process will improve operational efficiency, improve grid resiliency in Ontario, and bring economic benefits to the area through the procurement of local labour and materials. Atura Power is in the process of obtaining an amended Environmental Compliance Approval (ECA) from the MECP for the upgrades.

As additionally described in the draft Screening Report, the application of the Screening Criteria for the planned upgrades at PEC resulted in a score of 'No' for potential negative environmental effects resulting from the project (see Section 3.4 of the Screening Report for more details). As such, the Environmental Screening determined that, without any mitigation, all regulatory requirements will be met, and no other impact management commitments will be required.

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please contact us through our project email address at portlandsupgrade@aturapower.com.



Stephen Smith
Environmental Specialist
Atura Power

From: [REDACTED]

Sent: Friday, December 22, 2023 1:31 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Thank you for your email. I am away from the office today. I will respond to you when I return.

Best regards,

[REDACTED]

Senior Climate Policy Manager

From: [REDACTED]

Sent: Friday, December 22, 2023 1:31 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Happy Holidays! I'm away from Dec 22 - Jan 2.

All the best,

[REDACTED]

From: [REDACTED]

Sent: Friday, December 22, 2023 1:31 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Out of Office RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Hello,

Thank you for getting in touch. I will be out of office until January 2nd. I will get back to you promptly when I return.

Best,

[REDACTED]

Reminder email sent by Atura Power to public interest groups on October 3, 2023

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Tuesday, October 3, 2023 5:22 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades

Good day.

A reminder that Atura Power will be hosting a virtual public meeting on Thursday, October 5th, from 6:30 to 7:30 p.m. ET about the planned efficiency upgrades at Portlands Energy Centre.

A link to access the meeting will be available on the project webpage here: aturapower.com/portlandsupgrade.

If you are unable to participate, meeting materials will be posted on the project webpage following the meeting.

Thank you, and please email any questions or comments to portlandsupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 4:57 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: I would like to attend the virtual meeting.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 4, 2023 1:06 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for reaching out to us.

A link to the upcoming PEC Efficiency Upgrades public meeting will be available on our project website, aturapower.com/portlandsupgrade, on Oct. 5th.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 4:31 PM

To: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre –

Toronto

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: Portlands Energy Centre – Toronto

Email Address: [REDACTED]

Enter Your Message Here: Looking to receive link for Oct 5 virtual public meeting re Portlands Gas Plant

I accept the privacy policy: Checked

From: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Sent: Wednesday, October 4, 2023 8:34 AM

To: [REDACTED]

Cc: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

Good Morning [REDACTED]

Thank you for your interest in the virtual public meeting happening tomorrow, Oct 5th.

The link will appear on the project's web site early on in the day prior to the meeting starting time of 6:30pm. The link will be located here:

<https://aturapower.com/portlands-energy-centre-upgrade>

Regards,

[REDACTED]
Plant Manager | Portlands Energy Centre

Atura Power

[REDACTED]
470 Unwin Avenue, Toronto, ON, M4M 3B9

From: [REDACTED]

Sent: Tuesday, October 3, 2023 11:04 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Please send me the link to Oct 5th virtual meeting thx

Sent from my Galaxy

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 4, 2023 1:04 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Please send me the link to Oct 5th virtual meeting thx

Hello.

Thank you for reaching out to us.

A link to the upcoming PEC Efficiency Upgrades public meeting will be available on our project website, aturapower.com/portlandsupgrade, on Oct. 5th.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 1:19 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: I would like the zoom link for the meeting.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 4, 2023 1:07 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for reaching out to us.

A link to the upcoming PEC Efficiency Upgrades public meeting will be available on our project website, aturapower.com/portlandsupgrade, on Oct. 5th.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 5:46 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: I would like to be in the consultation.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 4, 2023 1:09 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for reaching out to us.

A link to the upcoming PEC Efficiency Upgrades public meeting will be available on our project website, aturapower.com/portlandsupgrade, on Oct. 5th.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 2:50 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: I would like to attend the Oct. 5th meeting.

I accept the privacy policy: Checked

On Wednesday, October 4, 2023 at 09:07:42 a.m. EDT, Upgrade project for PEC
<portlandsupgrade@aturapower.com> wrote:

Hello [REDACTED]

Thank you for reaching out to us.

A link to the upcoming PEC Efficiency Upgrades public meeting will be available on our project website,
aturapower.com/portlandsupgrade, on Oct. 5th.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Friday, October 6, 2023 9:04 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

I was terribly disappointed and angry as I tuned in at 6:45pm and it was closing. This presentation was supposed to go from 6:30pm-7:30pm. What happened!!

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 2:46 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi [REDACTED]

Our public community meeting about the proposed PEC efficiency upgrades ended at approximately 7:45 p.m., 15 minutes beyond the assigned time.

The meeting presentation is available for your review on the project webpage here:

<https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 5:00 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: I support the proposed upgrading of the equipment at PEC that will increase its generating capacity.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:46 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi [REDACTED]

Thank you for your message. You can get updates about the project by visiting
aturapower.com/portlandsupgrade.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 3:10 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: I am concerned about the continued investment in fossil fuel energy generation, the public health impacts and the urgent call by the IPCC to wind down fossil fuel burning. What plans does Atura have to expand wind, solar, geothermal and hydro?

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:48 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity. However, other resources are required to maintain system reliability. It is common to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.

The IESO established the Resource Adequacy Framework in 2021 to provide a flexible and cost-effective approach for competitively securing the resources necessary to meet demand and ensure system reliability. These upgrades are part of the plan IESO put in place to meet Ontario's energy needs.

Thank you for your question.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 11:34 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: I live within a 2 km radius of the plant. Please provide a full detailing of all the emissions profile of the plant now and after the proposed expansion. Thank you.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:53 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi [REDACTED]

All PEC emissions reports are publicly available on the provincial and federal government websites.

No changes to environmental features are expected given that the upgrades will take place within the existing facility and the existing facility footprint will not change. GE Gas Power – Services, the manufacturer of the equipment being installed for the upgrades, has provided a letter stating that the upgrades to the turbine generator ‘will maintain [air] emissions levels at or below site permit levels’.

The facility will continue to operate in accordance with all environmental permitting requirements.

Thank you for your question.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 11:08 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: Please place me on the list for access to the October 5 public consultation on the PEC Upgrade.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:54 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi [REDACTED]

We will add your information to the project database and email you with updates.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 3:22 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: Thank you for the opportunity to learn more about the proposal.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, October 27, 2023 1:39 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your email and your interest in the Portlands Energy Centre Efficiency Upgrades project. Should you require any more information, please note that materials from the public meeting will be posted on the project webpage available at aturapower.com/portlandsupgrade.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 3:23 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: Can't attend but the response is:
'NO THANKS!'

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, October 27, 2023 1:40 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your email. Materials from the public meeting will be posted on the project webpage available at aturapower.com/portlandsupgrade should you wish to review them at a time that is more convenient for you.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | [Atura Power](#)

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 3, 2023 8:37 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email

Address: [REDACTED]

Enter Your Message Here: I will be attending the zoom meeting to better understand how routine maintenance can improve efficiencies to produce the additional 50MW and what increase in CO2 emissions (methane) and other pollutants are anticipated.

I accept the privacy policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, October 27, 2023 1:45 AM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your email and your interest in the Portlands Energy Centre Efficiency Upgrades project. We hope you received the information you were looking for during the public meeting. Should you require any more information, please note that materials from the public meeting will be posted on the project webpage available at aturapower.com/portlandsupgrade.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Tuesday, October 3, 2023 5:26 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Public meeting Oct 5

To whom it may concern,

I understand OPG has an important role to fulfill in keeping energy production at the level needed by consumption. This is certainly challenging in this era of climate chaos and push back from the fossil fuel industry. However, I feel OPG could be taking a better leadership position in the energy transition than it is currently doing.

I am unable to attend the planned public meeting on October 5th 6:30-7:30 pm but I would like to be on the mailing list about this project.

Additionally, here are some initial questions for response that I have about this project:

1. Why is OPG not respecting the wishes of Toronto City Council who voted against this expansion on May 10th and whereby the Ontario Minister of Energy previously indicated the wishes of municipalities would be respected?
2. With the increases in GHG emissions expected to increase by 700% by 2041 if the current policies and plans are maintained, why does our publicly owned utility think more fossil gas burning is a good idea in the middle of a climate crisis?
3. RBC, environmental organizations and even IESO have provided other options to address future energy demands. Enbridge is already making money out of federally supported consumer energy efficiency programs. Why are these other options not being considered by OPG as a more immediate option while transition from fossil fuels takes place or until SMRs are in a position to be regulated?
4. A 'fair and just transition' applies to the clean energy sector as well. What plans does OPG have to invest in wind and solar energy as well as energy storage solutions instead of fossil fuels?
5. Does the company plan to continue burning fossil fuels after 2035 and how does a proposed 10% increase in production translate to a reported operation of over 21 hours a day that was happening over the summer?
6. OPG is asking Ontario's Ministry of the Environment to exempt its proposal to increase Portland's gas-fired generating capacity by 50 MW from the Environmental Assessment Act. Why? How will OPG know what mitigations to put in place for wildlife, biodiversity, water and air quality if it doesn't do a full Environmental assessment?
7. What will OPG be doing to capture, contain and reduce methane emissions from its existing plants and to ensure it is carbon neutral by 2035?

Thank you in advance for your time and efforts to address these questions of concern.

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, October 30, 2023 1:39 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Public meeting Oct 5

Hello, [REDACTED]

Thank you for your email and interest in the proposed efficiency upgrades at our Portlands Energy Centre (PEC).

I'm sorry that you were not able to participate in the public meeting. However, we will add you to our email list and note that project details and updates are also available on the project webpage at www.aturapower.com/portlandsupgrade.

Atura Power is an OPG subsidiary, but we do not and cannot speak on OPG's behalf. I suggest you direct your questions numbered 1, 2, 3, 4, 6 and 7 to OPG via the methods outlined on their website here: <https://www.opg.com/contact-us/>.

Regarding the future of the company after 2035, PEC is expected to operate until the contract term end date which is in April 2034. PEC operations are dictated by the Independent Electricity System Operator (IESO) based on the supply and demand balance. The frequency at which the plant operates will not change going forward and the plant will continue to operate as directed by the IESO.

Finally, Atura Power is not pursuing an exemption from the Ontario *Environmental Assessment Act* for the PEC Efficiency Upgrades project.

Thank you once again,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Friday, December 8, 2023 3:15 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic: PEC Upgrade

Email

Address:

[REDACTED]

Enter Your
Message
Here:

This project improves the electricity output from the plant, yet I am greatly concerned about the climate emergency, meeting emissions reduction targets. Atura must be a greater leader transitioning away from fossil gas. Please advise when you will.

I accept the
privacy
policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, December 11, 2023 2:19 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good morning, [REDACTED]

Thank you for your email and interest in our project.

As you may know, Ontario is entering a period of growing electricity system demand and actions are needed to ensure the continued reliability of the electricity grid and supply. To close this gap and meet the projected demand, the Independent Electricity System Operator (IESO) is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. The efficiency upgrades to Portlands Energy Centre (PEC) are part of Atura Power's efforts to address this supply gap.

The upgrades to PEC also play a role in Ontario's ability to rely on renewable energy sources. Wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity. However, other resources are required to maintain system reliability. It is common to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.

Thank you again, and please visit our project webpage at www.aturapower.com/portlandupgrade for more information.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]
Sent: Monday, December 11, 2023 4:23 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Re: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Dear Senior Communications Advisor Darius Sokal,

Thank you for your timely email response to my brief comment about the gas plans. While I appreciate that transitions are a needed component, the rate and degree of that transition is key. I would like to take this opportunity to respond in more detail with supporting sources to be included in my feedback about the project:

\$287 billion invested across Canada in wind and solar, in addition to energy efficiency management programs and back up storage units would mean no need for expanding fossil gas usage. The days of 'what if it isn't windy or sunny' are gone. The technology exists now to store energy for those days and other countries are well ahead of the curve on that. OPG and Atura are already investigating this, they just need to spend the dollars in that area rather than gas expansions. Many studies, reports and scientific as well as economic agencies attest to this.

Frankly, this is simply the decision making of a certain number of people who either are looking for the path of least resistance, have personal gains from maintaining the energy status quo, or who aren't informed well enough about what is now possible and what is needed for climate goals so that there is a future beyond 2050 and 2100.

Furthermore, investing in fossil gas is harmful to the economy on the world stage - even RBC gets this; investors and buyers are moving away from fossil fuel producing countries, countries that are deforesting and those supporting the dirtier hydrogen productions. Canada is doing all three, though now we have some traction with methane emissions and start to caps on fossil fuel production.

As noted previously, and by OPG, Atura Power is in a position to be a leader. Hopefully one day, while it's still not too late, it will be.

Sincerely,

[REDACTED]

a member of Climate Action Newmarket Aurora

Sources:

<https://policyalternatives.ca/sites/default/files/uploads/publications/BC%20Office/2023/02/Spending%20What%20It%20Takes.pdf>

<https://www.iisd.org/articles/deep-dive/canada-energy-future-guided-by-credible-scenarios>

https://www.opg.com/projects-services/projects/energy-storage/?gclid=EAIAIqObChMIw5_Si92HgwMVNRmtBh2EQQhcEAAYAiAAEgKy-_D_BwE

https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive_en

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, December 20, 2023 2:26 PM

To: [REDACTED]

Cc: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Your comment is noted and will be included in the record of engagement for the PEC efficiency upgrades project. In response to your comment, I'd just offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

Thank you again for your continued interest in the project. Please feel free to share further questions or comments here or visit the project webpage (<https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>) for more information.

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: [REDACTED]
Sent: Tuesday, October 3, 2023 6:03 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Portlands Energy Centre Upgrades - Questions

Hello,

I would like to know how this 'upgrade' is being paid for and what cost valuation you used for the greenhouse gas (carbon/methane) pollution this 'upgrade' will result in for your environmental evaluation of this project?

Is this valuation in line with the U.S. directive?

The President's Day One Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis re-established an Interagency Working Group (IWG) and tasked it with identifying areas of budgeting, purchasing, and other key decisions where agencies should consider the Social Cost of Greenhouse Gases (SC-GHG) — a well-established metric for the known damages that greenhouse gas emissions cause across society.

<https://www.whitehouse.gov/briefing-room/statements-releases/2023/09/21/fact-sheet-biden-harris-administration-announces-new-actions-to-reduce-greenhouse-gas-emissions-and-combat-the-climate-crisis/>

Are these hidden costs included?

THE HIDDEN COST OF NATURAL GAS

Accounting for the price of carbon in fossil-fuel-based energy generation is key to ensuring that natural gas facilities aren't being unfairly favoured. Every tonne of carbon dioxide emitted from a natural gas plant has a cost to society in Canada and elsewhere. A recent report from the U.S.'s Environmental Protection Agency estimates that a tonne of carbon emitted in 2020 costs the economy between C\$160 and C\$450. The Canadian government has referenced a range of between \$135 and \$440 a tonne.

-from Clean Energy Canada: A Renewables Powerhouse - February 2023

https://cleanenergycanada.org/wp-content/uploads/2023/01/RenewableCost_Report_CleaEnergyCanada_Feb2023.pdf

"Upgrading the equipment at PEC will increase its generating capacity by 50 MW to an output of 600 MW."

Considering that the 'upgrade' will greatly increase generating capacity and consequently the amount of greenhouse gas emissions, how can you justify a request for exemption to the *Ontario Environmental Assessment Act*?

Regards,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, October 30, 2023 1:45 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Upgrades - Questions

Hello [REDACTED]

Thank you for your email and your interest in the Portlands Energy Centre (PEC) Efficiency Upgrades project.

Atura Power is not pursuing an exemption from the Ontario *Environmental Assessment Act* for the PEC Efficiency Upgrades project. We would also like to note that after the upgrades, the plant's thermal efficiency will increase due to a reduced heat rate (BTU/kWh) which means that the same amount of fuel used can produce more power after the upgrade.

The upgrades to the turbine generator 'will maintain [air] emissions levels at or below site permit levels', as stated by the manufacturer of the equipment being installed for the upgrades, GE Gas Power – Services. The facility will continue to operate in accordance with all environmental permitting requirements.

Should you require any more information, materials from the public meeting and updates are available on the project webpage at aturapower.com/portlandsupgrade.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, October 4, 2023 8:58 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: Please give me a link to the meeting on Thursday at 6:30. Thank you. [REDACTED]

[REDACTED]

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 4, 2023 1:09 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for reaching out to us.

A link to the upcoming PEC Efficiency Upgrades public meeting will be available on our project website, aturapower.com/portlandsupgrade, on Oct. 5th.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | [Atura Power](#)

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, October 4, 2023 1:43 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: Interested in the project details.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 4, 2023 5:47 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good day, [REDACTED]

Thank you for reaching out to us.

Details about the PEC Efficiency Upgrades project are available on our project webpage at aturapower.com/portlandsupgrade.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, October 4, 2023 2:04 PM

To: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: Portlands Energy Centre – Toronto

Email Address: [REDACTED]

Enter Your Message Here: I would like to come to the meeting on Thursday Oct 5th about increasing production at the Portlands Gas Plant.

I accept the privacy policy: Checked

From: Station Manager @ Portlands

Sent: Wednesday, October 4, 2023 2:57 PM

To: [REDACTED] Station Manager @ Portlands

<stationmgr.portlands@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

Good Afternoon [REDACTED]

Thank you for your interest in the virtual public meeting happening tomorrow, Oct 5th. The meeting is virtual so attendance is via a web based link.

The link will appear on the project's web site early on in the day prior to the meeting starting time of 6:30pm. The link will be located here:

<https://aturapower.com/portlands-energy-centre-upgrade>

Regards,

[REDACTED]
Plant Manager | Portlands Energy Centre

Atura Power

[REDACTED]
470 Unwin Avenue, Toronto, ON, M4M 3B9

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, October 4, 2023 3:15 PM

To: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: Portlands Energy Centre – Toronto

Email Address: [REDACTED]

Enter Your Message Here: What are the climate impacts of this development?

I accept the privacy policy: Checked

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From: [REDACTED]
Sent: Monday, October 30, 2023 10:21 AM
To: [REDACTED]
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

Hello [REDACTED]

Thank you for your email and your interest in the Portlands Energy Centre Efficiency Upgrades project and I apologize for the delay in this response.

The upgrades to the turbine generators ‘will maintain [air] emissions levels at or below site permit levels’, as stated by the manufacturer of the equipment being installed for the upgrades, GE Gas Power – Services. The facility will continue to operate in accordance with all environmental permitting requirements.

Should you require any more information, materials from the public meeting and project updates are available on the project webpage at <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Thank you

Regards,

[REDACTED]
Plant Manager |
Atura Power

[REDACTED]
470 Unwin Avenue, Toronto, ON, M4M 3B9

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 6:41 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: Trying to connect through MSTeams and/or Web -nothing works.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:34 AM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi [REDACTED]

I'm sorry that you were not able to participate in the meeting. Project documents, including the meeting presentation, are available on the project webpage here: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, October 4, 2023 3:46 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email [REDACTED]

Address:

Enter Your Message Here: Expanding your plant sends more carbon upward and NO pollution downwind to us. Why spend millions expanding a fossil fuel plant instead of spending that money on energy conservation programs to help residents and businesses save money & renewables?

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:40 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

We are not proposing an expansion of PEC, only efficiency upgrades of the existing turbines during a scheduled maintenance period.

Thank you for your question.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, October 4, 2023 1:32 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email [REDACTED]

Address: [REDACTED]

Enter Your Message Here: We should be working towards closing this project, or at least reducing its footprint. Switching anything from fossil fuel powered to electric is meaningless if in fact the electricity is generated using fossil fuels.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:45 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello, [REDACTED]

Thank you for your message. You can get updates about the project by visiting
aturapower.com/portlandsupgrade.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 10:25 AM

To: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: Portlands Energy Centre – Toronto

Email Address: [REDACTED]

Enter Your Message Here: Attend seminar

I accept the privacy policy: Checked

From: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Sent: Thursday, October 5, 2023 10:55 AM

To: [REDACTED]

Cc: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

Good Morning [REDACTED]

I believe you are inquiring about our public meeting with regards to our efficiency upgrades at Portlands Energy Centre?

Thank you for your interest in the virtual public meeting happening today, Oct 5th. The meeting is virtual so attendance is via a web based link.

The link will appear on the project's web site today prior to the meeting starting time of 6:30pm. The link will be located here:

<https://aturapower.com/portlands-energy-centre-upgrade>

Regards,

[REDACTED]

Plant Manager | Portlands Energy Centre

Atura Power

[REDACTED]
470 Unwin Avenue, Toronto, ON, M4M 3B9

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 8:44 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: Please provide the information for virtual participation in the PEC upgrade public town hall

I accept the privacy policy: Checked

From: Darius Sokal <Darius.Sokal@aturapower.com>

Sent: Thursday, October 5, 2023 3:00 PM

To: [REDACTED]

Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

The participation link for tonight's Portlands Energy Centre Efficiency Upgrade public meeting is available on the project webpage here: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Thank you for your message and interest in our project.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]
Sent: Thursday, October 5, 2023 7:23 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Supportive Comment

I attended the public meeting tonight. The explanation of the upgrade was well done. It sounds like the improvement in efficiency will pay for itself and add needed reliable capacity. I suspect the cost of the upgrade will be substantially lower than adding an independent 50 MW generator elsewhere. Is that so?

Are you considering using green hydrogen to fuel existing turbines at some point in the future?

[REDACTED]

Sent from my iPad

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:13 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Supportive Comment

Hi [REDACTED]

Thank you for your comment.

Yes, the efficiency upgrades are a very cost-effective way to increase the output capacity at the station to help meet the province's growing energy needs as they will occur during a scheduled maintenance period.

Atura Power is indeed planning to blend green hydrogen into the fuel stream at our Halton Hills Generating Station. You can find more about our hydrogen plans from these links:

<https://aturapower.com/about-hydrogen/>

<https://aturapower.com/atura-overview/our-stations/niagara-hydrogen-centre/>

Best regards,

Darius Sokal (hear it)

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Wednesday, October 18, 2023 5:54 PM

To: Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: Re: Supportive Comment

Dear Darius,

This is good news! I was hoping that some serious attention was being paid to the potential for hydrogen to displace natural gas in fuelling the fleet. I think more publicity should be given to the hydrogen potential especially in light of the strong opposition to gas generation that I have been hearing at the municipal level recently. I am a retired engineer who has worked extensively on generation projects internationally. I maintain a strong interest in the field.

Sincerely

[REDACTED]

Sent from my iPad

From: [REDACTED]

Sent: Thursday, October 5, 2023 7:18 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: PEC distribution list

Hello.

Would you please add me to the Portlands Energy Centre information distribution list?

Thank you and best regards,

[REDACTED]
Project Lead, Environment & Climate Division
City of Toronto



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:16 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: PEC distribution list

Hello [REDACTED]

Thanks for reaching out to us.

Yes, we will add your information to our list and email you project-related updates.

Kindest regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Thursday, October 5, 2023 7:05 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Question for tonight's public forum

Since the live questions have been handpicked and completely irrelevant, I'm hoping you'll address real questions on real issues that are pressing and upon us such as wild fires and floods and emissions. There's a climate crisis!!!

There are many, many Canadians who want natural energy to be the focus. We want to fund only natural energy alternatives.

Why does our publicly owned utility think more fossil gas burning is a good idea in the middle of a climate crisis?

Why is there no effort to go natural?

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:19 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Question for tonight's public forum

Hello, [REDACTED]

Thank you for your questions.

Wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity. However, other resources are required to maintain system reliability. It is common to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.

The IESO established the Resource Adequacy Framework in 2021 to provide a flexible and cost-effective approach for competitively securing the resources necessary to meet demand and ensure system reliability. These upgrades are part of the plan IESO put in place to meet Ontario's energy needs.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 7:53 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email

Address: [REDACTED]

Enter Your Message Here: Hi - we did not hear about this meeting until this evening & the meeting. Is over. We live near to the facility - is there an opportunity for us to comment & review the project documents?

Why was this not better publicized to residents in the area

I accept the privacy policy:

Checked

On Oct 17, 2023, at 11:02 PM, Upgrade project for PEC
<portlandsupgrade@aturapower.com> wrote:

Hello, [REDACTED]

The meeting notice was published in the Toronto Star and Toronto Sun on September 6th, and in the Beach Metro News on September 19th.

You can review the project documents and provide comments through the project webpage here: www.aturapower.com/portlandsupgrade.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Wednesday, October 18, 2023 3:21 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: [REDACTED]

Subject: Re: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi - not everyone impacted subscribes to these newspapers & the beaches news is not distributed in Lesliville.

We have reviewed the project documents and the website you pointed us to - how can we submit comments to be included in the public consultation? What is the email to submit to and when do you need them by?

Thanks in advance,

Sent from my iPhone

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, October 30, 2023 2:37 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: [REDACTED]

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello, [REDACTED]

You can submit your comments and questions to this email address, and they will form part of the project's engagement record. Our public and Indigenous consultation period is ongoing and will continue into 2024.

Thank you for your questions and interest in our proposed efficiency upgrades.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | [Atura Power](#)

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 6:52 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here:

On a Per Mw basis what will be the emission increase (also absolute number) after the refit.

I accept the privacy policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:29 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi [REDACTED]

Thanks for your message.

GE Gas Power – Services, the manufacturer of the equipment being installed for the upgrades, provided a letter stating that the upgrades to the turbine generator ‘will maintain [air] emissions levels at or below site permit levels’.

Emissions concentrations are not expected to change following the upgrades.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 6:52 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email [REDACTED]

Address: [REDACTED]

Enter Your Message Here: I object to any further expansion of the Portlands Energy Centre. The city already had air quality issues that this plant and any upgrades will make worse, increasing the health risks of the people of Toronto, especially in the city's east end.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:30 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your message. Please check the project webpage from time-to-time for updates:
<https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 6:49 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: By expanding Gas powered plants, Atura Power and the province of Ontario is shooting itself in the foot environmentally and financially. Fossil fuels are being phased out as we speak as there are healthier and cheaper alternatives for the taxpayer.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:32 AM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your message. Please feel free to check the project webpage from time-to-time for updates: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Thursday, October 5, 2023 5:09 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: My opposition

I am writing because I cannot attend the public meeting but I want it known that I am very opposed to the Portland's increase in capacity. This is the wrong direction to be going in. Any government money and/or private capital spent on this could be much better spent on off shore wind and solar - much cheaper and emissions-free.

Also Toronto has great plans in the Net-Zero Emissions by 2040 strategy that passed in council recently. We need industry that will help us get there. Expanding gas in our city will not do so. Our council doesn't want it and nor do a majority of Torontonians.

People are becoming increasingly aware of the climate crisis and the role of fossil fuels in having created the crisis. We will not sit by and let our present and future be hijacked by ill conceived notions of the need for anymore gas.

Thank you

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:35 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: My opposition

Hello, [REDACTED]

Thank you for your message. Please feel free to check the project webpage from time-to-time for updates: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 4:31 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: I am strongly opposed to the expansion of the PEC fossil fuel plant.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:35 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your message. Please feel free to check the project webpage from time-to-time for updates: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Wednesday, January 3, 2024 3:20 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, January 11, 2024 9:26 AM
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Re: My comments on the proposed Portlands gas plant expansion

Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached.

Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.

Sent on behalf of Darius Sokal

Senior Communications Advisor

Atura Power

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
<p>I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.</p>	<p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p>
<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>

Comment	Atura Power's Response
	<p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 12:59 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: I am not in favour of any expansion or increase of natural gas output. Improving efficiency so that an increase of 50MW can be facilitated is not about sustainability, carbon reduction or resiliency. It is simply continuing the use of fossil fuels.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:36 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your message. Please feel free to check the project webpage from time-to-time for updates: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 11:37 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email: [REDACTED]

Address: [REDACTED]

Enter Your Message Here: Even the major fossil fuel companies are recognizing the threat to life as we know it on planet earth that is climate change. According to the IPCC we only have until 2030 to roll back carbon emissions. We need to get off gas. Ramp up green energy!

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:36 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your message. Please feel free to check the project webpage from time-to-time for updates: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Tuesday, January 2, 2024 4:30 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, January 11, 2024 9:26 AM
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Re: My comments on the proposed Portlands gas plant expansion

Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached.

Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.

Sent on behalf of Darius Sokal

Senior Communications Advisor

Atura Power

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

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And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
<p>I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.</p>	<p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p>
<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>

Comment	Atura Power's Response
	<p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 6:58 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email [REDACTED]

Address: [REDACTED]

Enter Your Message Here: I don't support expanding the burning of fossil fuels for power. While some fossil fuels may be needed while we transition to cleaner sources of energy and storage options, more should be done on that front instead of investing more in gas plants.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:43 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

We are not proposing an expansion of PEC, only efficiency upgrades to the existing turbines during a scheduled maintenance period.

Thank you for your message.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, October 5, 2023 10:42 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: I'd like to attend the 6:30 pm meeting Oct. 5, if it's possible

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, October 27, 2023 1:55 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

We hope you were able to join the public meeting on Oct. 5th

If you were unable to attend, please note that materials from the meeting will be posted on the project webpage available at aturapower.com/portlandsupgrade. Alternatively, please feel free to reach out if you have any questions.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Thursday, October 5, 2023 10:58 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Q & A in virtual meeting

Please restate the location of the Q & A. I'm not seeing this on my screen.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, October 27, 2023 2:00 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Q & A in virtual meeting

Hello [REDACTED]

Thank you for your email regarding the Portlands Energy Centre Efficiency Upgrades project. We hope you were able to locate the Q & A function during the public meeting on Oct. 5th.

If not, please note that materials from the meeting will be posted on the project webpage available at aturapower.com/portlandsupgrade should you like to review them. Alternatively, please feel free to reach out using this project email address if you have any questions.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

> -----Original Message-----

From:

Sent: Thursday, October 5, 2023 6:53 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Portlands

I've lived in Leslieville since 1997. We were promised limited use of the plant as backup power only - now it is operating 21 hours daily! And how can we be sure It won't expand? It's not ratio of emissions, it's total emissions that matter. Will I have to choose between my home and being able to breathe?



Sent from my iPhone

On Oct 17, 2023, at 11:25 PM, Upgrade project for PEC <portlandsupgrade@aturapower.com> wrote:

Hi [REDACTED]

> Thank you for your message.

PEC operations are dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year. Historically, the plant has run as few as 1750 hours per year to as much as 4500 per year, always at the instruction of the IESO.

And these are the only current upgrade plans for PEC, as this is the latest technology available. Atura Power always strives to be on the leading edge of technology and will be open to future advancements that make the engines more fuel efficient.

> Best regards,

Darius Sokal (hear it)
Sr. Communications Advisor | Atura Power
1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4
E: darius.sokal@aturapower.com
M: 289-795-6573

From: [REDACTED]

Sent: Wednesday, October 18, 2023 4:53 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Portlands

I moved into Leslieville 25 years ago. In recent years I've had trouble breathing and have been diagnosed with asthma. I am otherwise a healthy, physically active non-smoking 68 year old. All I can think of that has changed is the Portland plant operating "at the instruction of the IESO". I guess the problem isn't of your making, but is the fault of an irresponsible government that continues to think increasing the burning of fossil fuels - even in the heart of our major cities - is the future, not the past.

From: [REDACTED]

Sent: Thursday, October 5, 2023 10:42 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Questions for Portlands Energy Centre - Efficiency Upgrades Public Meeting

Questions:

With the excess power available from Quebec Hydro why is this natural, renewable, and very cheap hydro not the first and only option?

1. [On May 10th Toronto City Council passed a resolution opposing the expansion of the Portlands gas plant.](#) Why is OPG **not** respecting the wishes of Toronto City Council?
2. Why does our publicly owned utility think more fossil gas burning is a good idea in the middle of a climate crisis?
3. Why spend millions expanding a fossil fuel plant instead of spending that money on [energy conservation programs](#) that can help residents and businesses save money?
4. What plans does OPG have to invest in [wind](#) and solar energy instead of fossil fuels?
5. Does the company plan to continue burning fossil fuels after 2035?
6. Why is OPG asking Ontario's Ministry of the Environment to exempt its proposal to increase Portland's gas-fired generating capacity by 50 MW from the *Environmental Assessment Act*?

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, October 30, 2023 2:09 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Questions for Portlands Energy Centre - Efficiency Upgrades Public Meeting

Hello, [REDACTED]

Thank you for your email and interest in our proposed project.

The governments of Ontario and Quebec have an electricity trade agreement where the IESO can call on 500 MW of capacity from Quebec up until 2030. Under the current Ontario-Quebec electricity trade agreement, the IESO can call on 500 MW of capacity from Quebec up until 2030. Ontario will maintain this option under the new agreement. The governments are also supporting a new 600 megawatt (MW) trade agreement between Ontario's [Independent Electricity System Operator \(IESO\)](#) and Hydro-Québec that will optimize the use of existing electricity generation capacity in both provinces.

Ontario will maintain the original option for 500 MW under the new agreement. Ontario has one of the cleanest electricity grids in the world, receiving most of its clean electricity supply from nuclear, hydroelectric, and renewable generation.

While Atura Power is a subsidiary of OPG, we cannot answer questions on their behalf.

After years of strong energy supply, Ontario is entering a period of growing electricity system demand (a predicted energy supply gap) and actions are needed to ensure the continued reliability of the electricity grid. To close this gap and meet the projected demand, the Independent Electricity System Operator (IESO) is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. The upgrades to PEC are part of Atura Power's efforts to address this supply gap.

The upgrades to PEC also play a role in Ontario's ability to rely on renewable energy sources. Wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity, however other resources are required to maintain system reliability. It is common to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.

PEC is expected to operate until the contract term end date which is in April 2034. Finally, Atura Power is not pursuing an exemption from the Ontario *Environmental Assessment Act* for the PEC Efficiency Upgrades project.

Thank you again for your question.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Wednesday, November 1, 2023 10:15 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Questions for Portlands Energy Centre - Efficiency Upgrades Public Meeting

Gas fired and nuclear power plants are not clean energy. And the dangers of operating them are unwarranted. Overcoat, under performing. Very expensive and very dangerous. Wind, solar and get the rest of required kw from Quebec Hydro at a fraction of the cost. And safe and renewable. People have caught on to this greenwashing. Watching that grade 6 presentation was embarrassing. And the scripted questions? How stupid do you think the audience was? More pressure coming your way. You'd think you'd like your life, your families and future generations to live well. But you only think of your salary and that will not protect you from the climate disaster as it spirals

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, November 2, 2023 12:35 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Questions for Portlands Energy Centre - Efficiency Upgrades Public Meeting

Thank you for your email, [REDACTED]

Your comments are noted and part of the project record.

Please continue visiting aturapower.com/portlandsupgrade for project updates and additional information.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

On Sat, Oct 7, 2023 at 2:13 PM [REDACTED] wrote:

Hello,

> Thank you for answering some of our questions about the expansion on October 5th. Because of time restrictions there were several that were unable to be answered in that time - thank you for providing this email for us to continue getting information. I have a couple more questions below:

-How much does the upgrade to PEC cost?

> -What upgrades will be needed to convert Atura's plants to hydrogen, and how much are these upgrades expected to cost?

- If Atura's plants are upgraded to hydrogen, would they use hydrogen created from fossil fuels if there wasn't enough hydrogen created from carbon-neutral sources?

Thank you for your time.

Sincerely,

> [REDACTED]

From: [REDACTED]

Sent: Thursday, October 12, 2023 11:42 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Portlands Upgrade

Hello,

Thank you again for answering questions last week. Just following up on these ones that I didn't get a chance to ask.

Best,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, October 27, 2023 2:19 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Portlands Upgrade

Hi again, [REDACTED]

I just sent you a response to your original email.

I apologize for the delay.

Regards,

Darius Sokal (hear it)

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, October 27, 2023 2:17 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Portlands Upgrade

Hello [REDACTED]

Thank you for your email and your interest in the Portlands Energy Centre Efficiency Upgrades project.

We are currently not publicizing the cost to make the efficiency upgrades at PEC.

We will begin blending green hydrogen into the fuel stream at our Halton Hills Generating Station starting in late 2024/early 2025. The hydrogen will be produced by electrolysis at our hydroelectric-powered Niagara Hydrogen Centre. Blending technology required includes piping, blending skids and gas metering. You can find out more about our work to develop Ontario's hydrogen economy and related projects here: <https://aturapower.com/about-hydrogen/>.

Best regards,

Darius Sokal (hear it)

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Thursday, December 7, 2023 8:17 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Portlands Upgrade

Hi Darius,

A couple more questions about the upgrades:

- What is the cost of the upgrade? Will Atura ever publish this?
- What percent blend of hydrogen will be able to be used at PEC with these upgrades?

Thank you

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, December 11, 2023 5:56 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Portlands Upgrade

Good day, [REDACTED]

At this time, Atura Power is unable to share commercially sensitive financial information related to its efficiency upgrades at the Portlands Energy Centre (PEC).

Additionally, Atura Power is not planning to produce, store, nor consume hydrogen at PEC.

Thank you for your email and interest in our project. You can find more information and project updates at www.aturapower.com/portlandupgrade.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, October 10, 2023 12:32 PM

To: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: Portlands Energy Centre – Toronto

Email [REDACTED]

Address: [REDACTED]

Enter Your Message Here: I attended the meeting on Oct 5 for the consultation on the Portlands Upgrade. Can you please send me a copy of the Q&A promised during the meeting, or a link to where it is posted. Thanks

I accept the privacy policy: Checked

From: [REDACTED]

Sent: Tuesday, October 10, 2023 3:36 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Requesting Copy of Q&A from the Virtual Public Meeting, Oct 6, 2023

Hello:

Can you advise if the Q&A resulting from the Oct 5 public consultation meeting has been published and where it is available for review.

I attended the meeting on Oct 5 for the consultation on the Portlands Upgrade. We were advised that the Q&A would be published and made available. I am looking for a copy.

Thanks in advance

[REDACTED]

From: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Sent: October 11, 2023 2:09 PM

To: [REDACTED]

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

Thanks for your message, [REDACTED]

A summary of the meeting plus answers to commonly asked questions will be posted on the project webpage here: www.aturapower.com/portlandsupgrade

Thank you.

Regards,

[REDACTED]
Plant Manager | Portlands Energy Centre

Atura Power

[REDACTED]
470 Unwin Avenue, Toronto, ON, M4M 3B9

From: [REDACTED]

Sent: Thursday, October 12, 2023 12:07 PM

To: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

Hello Don: Thank you for your quick reply. Do you have any idea when the Q&A's will be posted?

[REDACTED]

From: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Sent: Thursday, October 12, 2023 6:21 PM

To: [REDACTED]

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

I would expect them to be posted in the next couple of weeks [REDACTED] Thanks for your interest.

Regards,

[REDACTED]
Plant Manager | Portlands Energy Centre
Atura Power
[REDACTED]
470 Unwin Avenue, Toronto, ON, M4M 3B9

From: [REDACTED]

Subject: Portlands water use

Date: October 10, 2023 at 9:20:39 AM EDT

To: portlandsupgrade@aturapower.com

Atura Power;

I have a question concerning the Portlands electricity generation plant.

When the former Ontario Hydro established the Lennox Generating Station in Bath, they also had plans to mitigate the effects of warm water being discharged from the plant, which was then designed to burn oil -and has since been converted to natural gas. It was projected that the warmer water discharged into the North Channel would make the ice unsafe. To compensate for this, a bubble system was installed to enable the Amherst Island Ferry to operate year-round.

Does the Portland's electricity generation plant use water from Lake Ontario for cooling purposes?

Is so, how much water is used daily, and what is the projected effect on Lake Ontario from the Portlands plant? What is the temperature of the water as it is taken from Lake Ontario, and what is the temperature of the water being discharged into Lake Ontario?

I look forward to receiving your response.

[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Monday, October 16, 2023 11:55 AM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Cc: [REDACTED]
Subject: Fwd: Portlands water use

Atura Power;

I am forwarding the letter that I sent to your office last week as it has not been acknowledged, nor have I received an answer to my questions.

I am looking forward to receiving your response.

[REDACTED]

On Oct 18, 2023, at 7:05 AM, Upgrade project for PEC <portlandsupgrade@aturapower.com> wrote:

Hello, [REDACTED]

Thank you for your questions.

Yes, PEC uses water from Lake Ontario to cool and condense the steam exiting from the steam turbine which allows us to reuse that condensate in the steam generation process, thereby raising the station's efficiency.

Approximately 300 m³ of water passes through the station per day on average when the facility is operating. The average increase in water temperature from intake to discharge is in the range of 5 to 8°C. PEC also provides a service in the summer months where it sterilizes the water of E-coli bacteria through a chlorination/dichlorination process, thereby improving the quality of the water to nearby beaches.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Wednesday, October 18, 2023 11:48 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Portlands water use

Hi Darius;

Thank you very much for the responses to my questions about water use at the Portlands Energy Centre. I appreciate your assistance in understanding another aspect of this electricity generating project.

I do need some help though.

Is 300 m³ translated into my simple English 300 cubic metres of water that is used as a coolant daily?

May your day go well;

[REDACTED]

On Oct 26, 2023, at 10:27 PM, Upgrade project for PEC
<portlandsupgrade@aturapower.com> wrote:

Hi [REDACTED]

Yes, 300 m³ is 300 cubic meters of water is used daily to cool and condense the steam exiting from the steam turbine.

A very good day – eve, in this case – to you as well!

From: [REDACTED]

Sent: Friday, October 27, 2023 7:49 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Portlands water use

Thanks again Darius.

I'm surprised by how little water is used, and re-used, for cooling purposes.

This has implications for reducing the environmental impact.

May your day go well, and thanks again for taking time to respond.

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, October 27, 2023 1:41 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Portlands water use

Thank you, [REDACTED]

It's a pleasure speaking with you.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]
Sent: Tuesday, October 10, 2023 8:21 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Information request

Further to the Public meeting on Oct 5, please send me any follow-up information and updates.

Thank you,
[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 2:38 AM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Information request

Hi [REDACTED]

We will add your email address to the project email list and share updates with you.

Thank you for your interest.

Best regards,

Darius Sokal (hear it)

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Wednesday, January 3, 2024 5:00 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Response to PEC Environmental Screening Process Draft Screening Report

January 3, 2024

Mr. Darius Sokal
Senior Communications Advisor Atura Power
Oakville, Ontario
portlandsupgrade@aturapower.com

Dear Mr. Sokal

Thank you for your December 6 email and links to the Environmental Screening Process Draft Screening Report for review and comments.

My Background

I'm a resident who **lives within 5 kilometres** of the Portlands Energy Centre. I'm also a member of SCAN! (Seniors for Climate Action Now!) and TERRE (Toronto East Residents for Renewable Energy.)

Concerns and Comments

1. It is incomprehensible to me that an **Environmental Screening Process** would conclude that there are no potential negative environmental effects from the project by looking narrowly at the mechanics of the capacity upgrade installation with **no acknowledgement of the negative environmental and health impacts of the facility when in operation.**
2. The report notes that in 2003 an Environmental Review Report concluded that the negative net effects of the proposed PEC were considered to be "temporary or negligible" (p 1). There has **never been a full environmental assessment** of this facility. Given that PEC is reported to be the **largest emitter of greenhouse gases in Toronto, the largest emitter of nitrogen oxides in Toronto** (Environmental Defence) and on the list of **Ontario's largest industrial emitters** (CBC Oct 5, 2023), a **full environmental assessment is needed.**
3. **The report should be expanded to provide specific quantitative data regarding the impact of PEC's operation on air quality** as a result of emissions from the facility before and after the proposed capacity expansion. Information should also be provided regarding **any potential adverse impacts on public health and climate** of these emissions
4. The report states that the proposed project, "allows PEC to continue to provide electricity system reliability by operating on demand in times when intermittent energy sources (e.g., wind and solar) alone cannot meet energy demand" (Table 5-1 p. 48) , giving the impression of an infrequently used "peaker" plant. In light of the recent media report (Toronto Star, Oct 2, 2023) that many of the province's gas plants have effectively been transformed, "from rarely used peaker plants into baseload power plants" and that PEC ran "nearly 21 hours a day all summer long", **the report needs to provide more transparent and complete information regarding the current extent of operation, the expected date of closure and the extent of operation projected to be ordered by the Independent Electricity Systems Operator until the expected closure.**
5. This capacity expansion **does not have the support of Toronto City Council.** In May and June of 2023, the City of Toronto passed resolutions **opposing Atura's proposal** to increase PEC's capacity. This information was **omitted from the draft report.** This is especially relevant in light of the recent cancellation of proposed plants in Halton Hills and Thorold when opposed by local councils. Damage to the environment from the operation of an expanded existing plant is not different from the damage that would have resulted from these proposed plants. **An explanation is required justifying this disregard for local government.**
6. No consideration was given to **possible alternative renewable energy sources** such as wind, solar and hydro power from Quebec. These sources might assist in meeting the province's demand for electricity in a manner which is less harmful to health and climate and ultimately more cost effective. **The report requires a more fulsome analysis of the cost and benefits of operating this facility compared to alternative renewable energy sources and this should take into consideration the cost of mitigating any adverse health and climate impacts.**

Summary

As a resident living close to the Portlands Energy Centre, I have significant concerns and questions left unanswered by this environmental screening report. The report needs to be revised and expanded to include specific quantitative information regarding the impact on air quality of PEC's operation, both before and after the proposed capacity expansion. For full transparency, the report should also include information regarding potential health risks and climate impact of the facility's current and projected operation. Opposition to the expansion by municipal council should be acknowledged and respected. A comprehensive costs and benefits analysis of the plant's current and proposed operation compared to cleaner energy alternatives should be included. In summary, the proposed capacity expansion should be paused pending the outcome of a full environmental assessment.

Sincerely,

A black rectangular redaction box covering the signature of the sender.

Sent with a [Spark](#)

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, February 12, 2024 1:40 PM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Response to PEC Environmental Screening Process Draft Screening Report

Good morning, [REDACTED]

Thank you for your interest, comments, and questions regarding the Portlands Energy Centre (PEC) Efficiency Upgrades project. Atura Power's responses are in the attached PDF.

Please send any further comments or questions to the project email address, portlandsupgrade@aturapower.com, thank you.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Feb. 12, 2024

Dear [REDACTED]

**Re: Response to PEC Environmental Screening Process Draft Screening
 Report**

Thank you for your interest in the Portlands Energy Centre (PEC) Efficiency Upgrades project and your comments/ enquiries shared on Jan. 3, 2024. In response to each of the comments raised in your email, we offer the following responses in the table below.

Comment Number	Your Comment	Atura's Response
1.	It is incomprehensible to me that an Environmental Screening Process would conclude that there are no potential negative environmental effects from the project by looking narrowly at the mechanics of the capacity upgrade installation with no acknowledgement of the negative environmental and health impacts of the facility when in operation.	<p>As per Section 3.2 of the draft Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project.</p> <p>In recent correspondence to the project team, it was confirmed that "[Ministry of Environment, Conservation and Parks'] MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.</p>
2.	The report notes that in 2003 an Environmental Review Report concluded that the negative net effects of the proposed PEC were considered to be "temporary or negligible" (p 1). There has never been a full environmental assessment of this facility. Given that PEC is reported to be the largest emitter of greenhouse gases in Toronto, the largest emitter of nitrogen oxides in Toronto (Environmental Defence) and on the list of Ontario's largest industrial emitters (CBC Oct 5, 2023), a full environmental assessment is needed.	The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects <i>of the project</i> would occur. The existing PEC facility went through an Environmental Assessment and is therefore not the subject of the Screening Report. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. We can confirm that Ministry of the MECP is aware of the scope and assessment process that Atura Power is undertaking for the project.
3.	The report should be expanded to provide specific quantitative data regarding the impact of PEC's operation on air quality as a result of emissions from the facility before and after the proposed capacity expansion. Information should also be provided regarding any potential adverse impacts on public health and climate of these emissions.	See Response #1 above.
4.	The report states that the proposed project, "allows PEC to continue to provide electricity system reliability by operating on demand in times when intermittent energy sources (e.g., wind and solar) alone cannot	As stated in Appendix B3a of the draft Screening Report, PEC operations are dictated by the Independent Electricity System Operator (IESO) based on the electricity supply and demand balance,

Comment Number	Your Comment	Atura's Response
	<p>meet energy demand" (Table 5-1 p. 48), giving the impression of an infrequently used "peaker" plant. In light of the recent media report (Toronto Star, Oct 2, 2023) that many of the province's gas plants have effectively been transformed, "from rarely used peaker plants into baseload power plants" and that PEC ran "nearly 21 hours a day all summer long", the report needs to provide more transparent and complete information regarding the current extent of operation, the expected date of closure and the extent of operation projected to be ordered by the Independent Electricity Systems Operator until the expected closure.</p>	<p>which fluctuates season by season and year to year. Historically, the plant has operated between 1,750 to 4,500 hours per year, always at the direction of the IESO.</p> <p>The following link https://ieso.ca/en/Power-Data/Data-Directory indicates that all reports found through the IESO's public reports website can be accessed using the tabs on that webpage, should you like more information regarding the IESO's operations.</p> <p>PEC is contracted to operate until April 2034. It is unknown at this time if PEC will continue to operate beyond 2034.</p>
5.	<p>This capacity expansion does not have the support of Toronto City Council. In May and June of 2023, the City of Toronto passed resolutions opposing Atura's proposal to increase PEC's capacity. This information was omitted from the draft report. This is especially relevant in light of the recent cancelation of proposed plants in Halton Hills and Thorold when opposed by local councils. Damage to the environment from the operation of an expanded existing plant is not different from the damage that would have resulted from these proposed plants. An explanation is required justifying this disregard for local government.</p>	<p>A municipal support resolution is not required for the PEC Efficiency Upgrades project. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) Request for Proposal (RFP), results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades.</p>
6.	<p>No consideration was given to possible alternative renewable energy sources such as wind, solar and hydro power from Quebec. These sources might assist in meeting the province's demand for electricity in a manner which is less harmful to health and climate and ultimately more cost effective. The report requires a more fulsome analysis of the cost and benefits of operating this facility compared to alternative renewable energy sources and this should take into consideration the cost of mitigating any adverse health and climate impacts.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive E-LT1-RFP, in May 2023. Given the recommendations of the IESO and government initiatives, other alternatives were not considered as part of the project, nor are they required as part of the Screening Process being followed for the project.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, October 11, 2023 3:51 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: Just want to stay updated on the project.

I accept the privacy policy: Checked

From: Upgrade project for PEC

Sent: Tuesday, October 17, 2023 10:37 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi [REDACTED]

We will add your email address to the project email list and share updates with you.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, November 16, 2023 12:22 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Can you kindly provide notice to me of the following events in relation to the

Message Here: Portlands Energy Centre upgrade:
- publication of the draft Screening Report, and
- publication of the Screening Report and Notice of Completion.

[REDACTED]

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, November 17, 2023 12:53 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good morning, [REDACTED]

The draft Screening Report for our proposed PEC efficiency upgrades will be available in the next few weeks. The Notice of Completion and the final Screening Report should be available in either January or February 2024.

Please let me know if you would like to be added to our email list for project updates.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Friday, November 17, 2023 7:59 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Re: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Thank you for the information.

Please add me to the email list for project updates.

Thank you

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, November 17, 2023 1:01 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

You are very welcome.

Consider it done, sir.

Have a great day.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, November 28, 2023 2:46 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: Can you please include me on the listserv

I accept the privacy policy: Checked

From: Darius Sokal <Darius.Sokal@aturapower.com>

Sent: Tuesday, November 28, 2023 4:02 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello, [REDACTED]

Thank you for your email and interest in our project. We have added your email address to our project contact list and will share updates with you.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Email sent by Atura Power to interested members of the public, including draft Environmental Screening Report, on December 6, 2023

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Wednesday, December 6, 2023 1:32 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good morning.

As you know, Atura Power is planning efficiency upgrades at the Portlands Energy Centre (PEC). The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01 under the Ontario *Environmental Assessment Act*. Atura Power prepared a draft copy of the Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is 'No', indicating that there will be no potential negative environmental effects resulting from the project.

The draft Screening Report is now available on our project webpage at aturapower.com/portlandsupgrade. We are sharing this draft copy to offer an additional opportunity to review the project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power is voluntarily providing this opportunity so that comments can be incorporated in the final Screening Report. We will be collecting comments on the draft Screening Report through our project email address, portlandupgrade@aturapower.com, **until Jan. 7, 2024**. After that date, we will prepare and release the final version of the Screening Report in the Winter 2024.

Thank you for your interest in the PEC Efficiency Upgrades project.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Friday, December 8, 2023 12:38 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email [REDACTED]

Address: [REDACTED]

Enter Your Message Here: I attended the Oct 5th public meeting but have not heard anything since. Has any new information been sent out? I recall hearing that questions that were not answered during the session would be.

I accept the privacy policy: Checked

On Friday, December 8, 2023 at 03:40:41 p.m. EST, Upgrade project for PEC <portlandsupgrade@aturapower.com> wrote:

Hello [REDACTED]

Yes, there is new information available on the project website, where we posted a summary of the questions and answers and a draft of the PEC Efficiency Upgrades project's screening report. Both documents are available here: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>.

Thank you for your continued interest in our proposed project.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Friday, December 8, 2023 9:10 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Thank-you Darius,

Would you please send me a copy of the draft EA Screening report. Is there a place where I can find the original EA report for PEC?

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, December 13, 2023 7:48 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hi, [REDACTED]

I've attached a PDF copy of the draft Portlands Energy Centre (PEC) Efficiency Upgrades screening report as you requested.

Unfortunately, we do not have access to a complete copy of the original PEC EA as Atura Power was not the proponent of the previous EA.

Thanks again for your email and interest in our project.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, December 12, 2023 5:49 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic: PEC Upgrade

Email Address:

[REDACTED]

Enter Your

Message Here:

Would you please add me to the distribution list for the PEC Project as well as the PEC Newsletter.

Thanks,

[REDACTED]

I accept the privacy policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, December 13, 2023 12:11 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello, [REDACTED]

Yes, I will add your name and email address to the PEC efficiency upgrades email distribution list as requested.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Friday, December 15, 2023 11:53 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email

Address: [REDACTED]

**Enter Your
Message
Here:**

I submitted questions to Darius(on vacation to Jan 2). I am hoping that you can respond to my questions. I have also submitted other questions to Darius and have not yet received a reply. I may have additional questions based on the replies.

**I accept the
privacy
policy:**

Checked

F

From: [REDACTED]

Sent: Tuesday, December 19, 2023 1:12 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - Questions - Dec 18

Hi,

More questions:

1. Do the emissions limits that PEC is supposed to conform to include the emissions from production of the natural methane gas that it burns?
2. pg. 110 - Air Quality - a number of people express concerns about air quality health impacts and the Atura response seems to be that we are operating within environmental permitting requirements. Would you add a note indicating the name of the organization that concerns on air quality health should be addressed to? It would also help if Atura pointed to a study for a region that had a similar load of pollution which showed no impact on health - does such a study exist?
3. pg. 111 - Emissions of Greenhouse Gases - there are several questions in this section which are not answered by the response provided by Atura - would you answer them? (e.g, On the Environmental Effects slide, I noticed CO2 was not listed (just NO, NO2, and CO) under the emissions that were not supposed to increase as per GE. Was that a mistake, or is there reason to expect CO2 emissions will increase?)
4. pg. 112 - Engagement Process - Would you add a note to the question "Could you clarify what public and Indigenous engagement means?" that the MECP publishes a guide (Consultation in Ontario's Environmental Assessment Process) on the EA Consultation process and provide the link to it (<https://www.ontario.ca/page/consultation-ontarios-environmental-assessment-process>)?
5. pg. 115 - Operating Capacity - would you add to your response a clarification on the frequency of operation - does your response mean that you operate every day but just not at 100% capacity? That the plant is "on" every day but the number of hours that it produces electricity varies? I find this response unclear.
6. pg. 116 - There is a record from the Ontario Energy Board that indicates that PEC is licensed to operate until 2024. There is reference in the project materials that PEC is contracted to operate until 2029 and plans to extend this until 2034. What licenses and approvals does PEC need to operate to 2029 and 2034? Does 'contracted to operate' mean that PEC has a contract with a customer to produce electricity?
7. Did PEC/Atura conduct a communications test to determine if area residents/businesses were aware of the plan to expand PEC's generating capability?
8. pg 117 - Are PEC's emissions limits based on the most recent guideline or have they been grandfathered from a previous guideline?

More questions to come.

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Wednesday, December 20, 2023 2:32 PM
To: ██████████ Upgrade project for PEC <portlandsupgrade@aturapower.com>
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: RE: Aturapower.com | Contact Form Submission from ██████████ about PEC Upgrade

Hello ██████████

I wanted to provide a response to your email regarding the PEC Efficiency Upgrades project on December 15, 2023, in which you noted you have submitted questions regarding our PEC Efficiency Upgrades project and not received a reply. Based on your inquiry, I went back through our engagement records to be sure we have addressed your questions. I have the following record of correspondence with you:

Enquiry	Atura Power's Reply
<p>On December 8, 2023: "I attended the Oct 5th public meeting but have not heard anything since. Has any new information been sent out? I recall hearing that questions that were not answered during the session would be."</p>	<p>On December 8, 2023: "Hello ██████████ Yes, there is new information available on the project website, where we posted a summary of the questions and answers and a draft of the PEC Efficiency Upgrades project's screening report. Both documents are available here: https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/. Thank you for your continued interest in our proposed project. Darius Sokal"</p>
<p>On December 9, 2023: "Thank-you Darius, Would you please send me a copy of the draft EA Screening report. Is there a place where I can find the original EA report for PEC? ██████████</p>	<p>On December 13, 2023: "Hi, ██████████ I've attached a PDF copy of the draft Portlands Energy Centre (PEC) Efficiency Upgrades screening report as you requested. Unfortunately, we do not have access to a complete copy of the original PEC EA as Atura Power was not the proponent of the previous EA. Thanks again for your email and interest in our project. Darius Sokal"</p>
<p>On December 12, 2023: "Would you please add me to the distribution list for the PEC Project as well as the PEC Newsletter. Thanks, ██████████</p>	<p>On December 13, 2023: "Hello, ██████████ Yes, I will add your name and email address to the PEC efficiency upgrades email distribution list as requested. Best regards, Darius Sokal</p>

More recently, I see you submitted a list of questions to the project inbox the evening of December 18, 2023. We will work to get you a response to these questions shortly.

Thank you for your continued interest in the project,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: [REDACTED]
Sent: Thursday, December 21, 2023 2:02 AM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Re: Aturapower.com | Summary of Questions

Thanks Stephen,

I submitted a number of emails with questions to Darius - emails are copied in below. Will you be addressing those questions as well?

Thanks,

[REDACTED]

----- START

----- Forwarded Message -----

From: [REDACTED]
To: darius.sokal@aturapower.com <darius.sokal@aturapower.com>
Sent: Wednesday, December 13, 2023 at 12:39:12 a.m. EST
Subject: Fw: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - Questions

Hi Darius,

I am reading through the Draft Screening Report and I have a few questions so far - it is a long report and will take some time to get through.

Questions:

1. page 36 - Items 3.1 and 3.2 - am I to take it that Autura is absolving itself from future increases in demand from IESO for more electricity that will lead to more GHG and NO from the facility? If so, isn't this counter to the Ontario approach of producer responsibility? I understand that PEC is already the biggest source of GHG and NO in Toronto while only operating for an average of 14 hours per day so far in 2023.

2. page 38 - Items on Socio-Economics - what detailed criteria were used to assess each of these items?

That is all for now. I am pretty sure I will have more questions as I move through the rest of the report.

----- Forwarded Message -----

From: [REDACTED]
To: darius.sokal@aturapower.com <darius.sokal@aturapower.com>
Sent: Thursday, December 14, 2023 at 06:14:04 p.m. EST
Subject: PEC Draft Screening Report - more questions

Hi Darius,

Some more questions have occurred to me about the PEC Draft Screening report. I expect that I will have more as I continue to move through the report.

1. pg 35 - Review of Screening Criteria

It seems that many of the answers in this section reflect a 'more of the same' response - which of the previous Screening reports answered these questions fully?

2. pg 36 - Item 2.3 be inconsistent with municipal land use policies, plans and zoning by-laws?

In view of the fact that Toronto City Council voted against the PEC expansion, would you add a note to indicate this fact in the answer to this item?

3. pg 36 - Item 3.1 have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants?

In view of the fact that the Toronto Star has reported that PEC is the largest source of GHG and nitrous oxides in Toronto based on the plant producing electricity for less than 24 hours per day, would you add a note to indicate this fact in the answer to this item.

4. ibid - If IESO requests PEC to operate 24 hours per day, what would the total of various gases and particulates be over an entire year? Understanding that with the shut down of Ontario's nuclear plants that the current plan is to use gas powered plants to make up much of the difference.

5. The draft Screening report seems to indicate that only the expansion project is being considered against the MECP's Areas of Interest and Screening criteria. Do you have agreement from MECP that it is only the project to be considered or whether the full PEC facility (after the expansion) needs to be considered?

6. pg 36 - Item 3.2 cause negative effects from the emission of greenhouse gases (carbon dioxide (CO₂), methane)?

I find the answer to this question, again, focuses just on the project rather than the full facility after the expansion project is completed. A further complication is the requests from the IESO to operate more hours per day. The answer does not identify any negative effects from GHG on people nor it's contribution to Canada's GHG inventory. Would you add a note to indicate these additional points in the answer to this item?

7. pg 38 - Item 6.4 have negative effects related to increases in the demands on community services and infrastructure?

There have been a number of public health studies - including from Toronto Public Health

- which show that air pollution causes respiratory illness, hospitalizations and death. Since the exhaust from PEC will add to the level of pollution in the neighbourhood, would you add a note to indicate that overall exhaust from PEC increases the risk related to respiratory illness, hospitalizations and death as it relates to our health care system?

8. pg 38 - Item 6.5 have negative effects on the economic base of a municipality or community?

Since business and residents may decide not to move into a neighbourhood that has Toronto's largest source of GHG and nitrous oxides in it, would you add a note to this effect in the answer?

9. pg 38 - Item 6.8 cause public concerns related to public health and safety?

Would you add a note to the answer to this item to indicate that various individuals, groups and municipal representatives and offices have expressed concern relating to public health? Would you also add a note that concerns have been expressed since the inception of PEC? Would you also add a note to indicate that cumulative air pollution from all sources in the area is a concern? Would you add a note to indicate that area monitoring stations for pollution are located far from the PEC site? Would you add a note to indicate that a study on the high incidence of respiratory illness in the East End of Toronto was completed in the mid-2000s and no follow-up study has been completed since.

10. pg 43 - Table 4-1

Is there some reason that the Beaches MP was left off the list?

Is there some reason that the Members of Provincial Parliament was left off the list?

Why was York region put on the list?

Is there some reason that the Ontario Ministry of Health and Public Health Ontario were left off the list?

Why was the Ministry of Mines put on the list?

Is there some reason that Toronto Public Health and Community Health Centres (e.g. South Riverdale Community Health, East End Community Health, others) were left off the list?

Why were Cherry Beach Park and Cherry Beach Sports Field included on the list?

Is there some reason that Anishnabeg, Chippewa, Wendat Indigenous groups were left off the list?

Is there some reason that local BIAs and Residents Associations were left off the list?

That is all for now.

Thanks,

[REDACTED]

----- Forwarded Message -----

From: [REDACTED]
To: Darius Sokal <darius.sokal@aturapower.com>
Sent: Friday, December 15, 2023 at 06:06:26 p.m. EST
Subject: Draft Screening Report - Dec 15 Questions

Hi Darius,

Here are some additional questions.

1. - pg 55 - Item 4.8: A number of people that I know that attended the initial public meeting did not receive notice that the draft Screening report was available. What distribution list was used to send out the notification that the draft Screening report was available?

2. - pg 55 - item 4.9: I see Atura is planning on answering questions on the draft Screening report after the comment period has closed. What opportunity will I have to ask follow-up questions after you have published the answers to the questions? I understand that this is supposed to be a collaborative effort. Will the 30 day review period be interactive (with more than one cycle of questions and answers) with clarifications made to the final report?

3. - pg 57 - Section 5 - was the PEC Community Liason Committee asked to provide input to Table 5-1?

4. - pg 57 - Table 5-1: While illness from pollution is difficult to attribute to a single facility, there are numerous studies identified by Toronto Public Health which link illness to pollution

> I would suggest that one of the disadvantages that should be identified is that of increased GHG and NO that will come as a result of the requests from the IESO to operate more hours as a result of the nuclear power plants being shut down.

> I would suggest that one of the disadvantages that should be identified is the potential for increased respiratory illness from residents as a result of increased pollution - especially the young whose lungs are still developing and the very old.

> I would suggest that one of the disadvantages that should be identified is the potential for increased morbidity and mortality of the residents (as well as the difficulties that will introduce to their lives and the lives of their families) as a result of increased pollution

> I would suggest that one of the disadvantages that should be identified is lost time from work for residents and the impact to employers from illness due to increased pollution

> I would suggest that one of the disadvantages that should be identified is the increased in health care

costs from illness due to pollution

> I would suggest that conservation, wind and solar power are more cost effective solutions but are not currently available to expand the electrical supply

> I would suggest that the increased GHG emissions expected from PEC will add to Canada's GHG emissions inventory which is counter to public policy of reducing emissions

> I would suggest that businesses looking to locate in a region that has clean power will be dissuaded from locating in a region that uses burned methane to create electricity

5. pg 58 - Would you provide me with a copy of the SENES Consultants Limited (2003). Environmental Review Report for the Portlands Energy

Centre. Prepared for TransCanada Energy Limited. Prepared for TransCanada Energy and Ontario Power Generation.

6. Other documents. These documents are no longer available at the indicated location - would you provide me with a copy of them:

[http://www.portlandsenergycentre.com/docs/nov2003/PEC_Air_Impact_Assessment-](http://www.portlandsenergycentre.com/docs/nov2003/PEC_Air_Impact_Assessment-Final.pdf)

[Final.pdf](http://www.portlandsenergycentre.com/docs/nov2003/PEC_Human_Health_Risk-Final.pdf) and http://www.portlandsenergycentre.com/docs/nov2003/PEC_Human_Health_Risk-Final.pdf

7. pg 69 - Is there some reason that the project to boost efficiency is also increasing the generating capability of PEC by 50 mw? Could the upgrade have been done without increasing the generating capability of PEC beyond 550 mw?

More questions to come.



-----END

From: [REDACTED]

Sent: Thursday, December 21, 2023 11:42 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - Questions - Dec 21

Hi,

Some additional questions:

1. pg. 119 - Consideration of Alternatives - do you know if IESO even considered some new renewable energy projects to partially account for the increase in demand? As the people who live with the consequences of other people's decisions, it is difficult to accept that no attempt was made to reduce the amount of gas being burned.
2. pg. 120 - Good question that did not get answered - IESO Procurement Process: Did Atura Power lobby for the plant?
- 3, pg 120 - Role of Gas in Ontario Energy Supply - Would you change the answer to point out that renewable energy can be used to reduce the demand for electricity from gas generation?
4. What is a P2 plan and why doesn't PEC have one? It sounds like it has to do with pollution reduction.
5. Does PEC's draft Screening report adhere to the guidance from the Ontario Energy Board - ENVIRONMENTAL GUIDELINES FOR THE LOCATION, CONSTRUCTION AND OPERATION OF HYDROCARBON PIPELINES AND FACILITIES IN ONTARIO?
6. pg 121 - When PEC was first built it was seen as a temporary solution until renewables matured. While some people oppose off-shore wind because they don't like the interrupted view of the natural environment, it does not produce emissions and renewable energy has definitely matured. Would you provide a better response to the questions asking why renewable energy is not being used?
7. pg 130 - Gwh supplied to the IESO grid - this link leads to a page that requires a login id of a market participant. Would you provide the data requested on pg 129 - Gwh supplied to the IESO controlled grid for each year from 2017 to 2022?

8. pg 240 to pg 247 - Did Atura have any response from Mayor Chow, Councilor Fletcher or MP Dabrusin?

9. Is there some reason Atura did not engage Councilor Brad Bradford, MPP Mary-Margaret McMahon and MP Nathaniel Erskine-Smith?

10. pg 255 - Is there some reason the Ontario Ministry of Health and Toronto Public Health were not included in correspondence? Also, Ontario Ministry of Economic Development, Job Creation and Trade, Ministry of Education, Ministry of Indigenous Affairs, Ministry of Municipal Affairs and Housing.

11. pg 255 - Is there some reason that correspondence with all agencies listed were not included in the section starting on page 239?

12. pg 255 - Once again why was York Region included?

13. pg, 271 Indicates: "If there are sensitive receptors in the surrounding area of this project, a quantitative air quality/odour impact assessment will be useful to evaluate alternatives, determine impacts and identify appropriate mitigation measures. The scope of the assessment can be determined based on the potential effects of the proposed alternatives, and typically includes source and receptor characterization and a quantification of local air quality impacts on the sensitive receptors and the environment in the study area. The assessment will compare to all applicable standards or guidelines for all contaminants of concern."

It seems to me that humans are sensitive receptors. Given the many studies which indicate the link between air pollution and respiratory illness, hospitalizations and death in humans and that PEC (while operating on average 14 hours per day this year and expected to operate more in the future) - did Atura conduct such a study?

14. pg. 277 Indicates: "Please include in the report a list of all subsequent permits or approvals that may be required for the implementation of the project" Why is this missing from the draft Screening report?

15. pg 296 - What response did you receive from Waterfront Toronto?

16. pg 321 - Are there additional responses from stakeholders listed in the contact list for which no correspondence is provided?

17. pg 321 - What response was provided to the TRCA questions?

18. pg 45 - Do your Indigenous contacts include both traditional and elected leadership?



From: [REDACTED]

Sent: Friday, December 22, 2023 3:16 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - Questions - Dec 22

Hi,

Some additional questions.

1. Did Atura identify any environmental effect or issue in the screening process that will be addressed under another environmental approval (e.g., an approval under the Environmental Protection Act)?
2. Did Atura consider attempting to engage with the public through social media (e.g. Facebook, Instagram, X, etc.) or other means?
3. Did Atura identify any environment effects from the project that require mitigation or managing?
4. Will Atura conduct an Air Quality Test in the neighbourhoods surrounding PEC before and after project completion? Antidotally I heard that a previous study was reviewed as being conducted in the fall rather than in the summer when pollution levels are higher and that monitoring stations were too far away from the neighbourhoods surrounding PEC.
5. Does Atura recognise that the public perception of and concerns about PEC have changed since it moved from being a peaker plant to a baseload plant?
6. Was the Notice of Commencement mailed to households in the immediate vicinity of PEC? If so, what streets or neighbourhoods?
7. Where is the summary of public and agency concerns or issues in the Screening report?
8. Is there other supporting documentation or correspondence related to the Screening Report that was not included in the Screening Report?
9. Would you send me copies of previous Screening reports done for PEC. I understand that Atura does not have a copy of the original EA - is it available from OPG or TransCanada?
10. Section 3.1 of the draft Screening report identifies current conditions as a description of the physical facility. The EA Guide for Electricity Projects suggests a description of the local environment and conditions. Would you modify this section to reflect local environment and conditions?

9. Which libraries, municipal offices or recreation centres are you planning on making the Screening report available in?

10. What residents, businesses and local interest groups are you planning on sending the EA Completion notice to?

11. Have any commitments been made from previous EAs?

12. Has a Climate Change Impact Assessment been completed for PEC? (as per Ontario's Considering climate change in the environmental assessment process) If so, would you please provide a copy of it.

Thanks,



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Monday, January 29, 2024 11:14 AM
To: [REDACTED]
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: Question on Draft Screening Report

Good afternoon, [REDACTED]

Thank you for your series of questions and comments that we received in December 2023 and earlier this month regarding Atura Power's proposed Portlands Energy Centre (PEC) Efficiency Upgrades draft Screening Report.

Please find answers to your questions in addition to information about Atura Power's approach to the Environmental Screening Process in the attached PDF.

Also note that each of your individual question and comments will be included in the record of engagement in the final Screening Report.

Thank you for your interest on our project, and please visit www.aturapower.com/portlandsupgrade for updates.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Friday, January 5, 2024 10:43 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Question on Draft Screening Report

Hi,

One additional question on the Draft Screening Report.

The Emissions Limits (e.g. NO_x, CO, Sulphur Dioxide) that PEC operates under - when these limits were determined, what were the assumptions made in the modelling? Was there an assumption that these gases would be dispersed? What would happen if the gases were not dispersed or built up in the area surrounding PEC?

Thanks,

[REDACTED]

January 29, 2024

Dear [REDACTED]

Re: Questions on the draft Portlands Energy Centre (PEC) Efficiency Upgrades Screening Report

Thank you for your continued interest in the PEC Efficiency Upgrades project. We received your enquiries to the project inbox on Dec. 19, 21 and 22, 2023, and Jan. 5, 2024. Please note this response includes responses to your original enquiries sent to me on Dec. 13, 14 and 15, 2023, which you forwarded to the project inbox on Dec. 21 and 22, 2023.

Upon reviewing your enquiries, we note several common themes including:

- a. Efficiency Upgrades vs. Expansion and Scope of Assessment**
- b. Screening Criteria**
- c. Municipal Support**
- d. IESO Procurement Process, Project Need, and Consideration of Alternatives**
- e. Emissions and Air Quality**
- f. Engagement Process, Requirements and Project Contact List**
- g. Project Notification**
- h. Review of draft Screening Report**
- i. Project Documentation, Resources and Materials**
- j. Frequency and Schedule of Operations**

As your questions relate to these recurring themes, we provided additional information below regarding Atura Power's approach to each of these themes over the course of the Environmental Screening Process. It is our hope that this provides you with a more fulsome understanding of the key themes driving your individual questions. Additionally, please note each of your individual comments will be included as part of the record of engagement in the final Screening Report.

a. Efficiency Upgrades vs. Expansion and Scope of Assessment

Several of your comments refer to the project as the "PEC expansion". We would like to offer an important clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The advanced materials allow a higher power output per gigajoule (GJ) of fuel consumed.

The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects *of the project* would occur. The existing PEC facility went through an Environmental Assessment and is therefore not the subject of the Screening Report. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. We can confirm that Ministry of the Environment, Conservation and Parks (MECP) is aware of the scope and assessment process that Atura Power is undertaking for the project.

b. Screening Criteria

Several of your comments request further information about the nine Screening Criteria required by the environmental assessment process. The project was assessed against each Screening Criteria as it relates

to the potential for the efficiency upgrades to cause negative effects. As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades.

c. Municipal Support

Several of your comments request further information about municipal support in relation to the project. A municipal support resolution is not required for the PEC Efficiency Upgrades project. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades.

d. IESO Procurement Process, Project Need, and Consideration of Alternatives

In response to your request for further information about the IESO procurement process, project need, and consideration of alternatives to the efficiency upgrades, we offer the following information. As stated in Section 3.3 of the draft Screening Report, the IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023. Given the recommendations of the IESO and government initiatives, other alternatives were not considered as part of the project, nor are they required as part of the Screening Process being followed for the project.

Additionally, we are not able to speak on behalf of the IESO regarding their process for determining the types of and/or alternatives to energy projects required to meet the province's energy demands in the future.

e. Emissions and Air Quality

As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project.

In recent correspondence to the project team, it was confirmed that "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.

Details of PEC's Environmental Compliance Approval (ECA) (Air/Noise) are provided in Appendix B3a in the response to public comments under the air quality sub-category. The response can be expanded by

noting that air standards under O. Reg. 419/05 are set by the MECP's Standards Development Branch to protect against health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP currently requires to be assessed for contaminants released to the air, 5,099 are health based. PEC's Emission Summary and Dispersion Modelling (ESDM) report must be updated on an annual basis to reflect changes such as sources no longer in operation, updates to MECP's *Air Contaminants Benchmarks List: standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants*, as well as updates to the MECP approved air dispersion model versions.

The contaminants listed on the Environmental Effects slide for the virtual public meeting was limited to NO_x and CO as these are the contaminants which have facility-specific emission concentration limits noted in the ECA based on MECP's *Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines*. As noted in Section 2.1 of the draft Screening Report, the ECA amendment application for the project submitted Jun. 23, 2023, included updated Guideline A-5 calculations based on proposed facility and equipment parameters (i.e., nominal rating of combined-cycle combustion turbine facility, nominal rating of natural gas fired combustion turbines, nominal heat input of natural gas fired duct burners, and nominal rating of the steam generator). The PEC combustion turbines following the efficiency upgrades do not meet the trigger set in the Guideline A-5 (2021) definition of a modified combustion turbine and therefore, as verified by the MECP, Guideline A-5 (1994) applies. As per Guideline A-5 (2021), "this approach is meant to encourage upgrades in thermal efficiency and technology modernization of Existing SCTs [Stationary Combustion Turbines] that are intended to increase efficiency or reduce emissions but without expecting the more stringent emission limits of New SCTs to be met."

f. Engagement Process, Requirements and Project Contact List

Several of your comments request further information about the engagement process, associated requirements, and the project contact list. Ontario Regulation 116/01's *Guide to Environmental Assessment Requirements for Electricity Projects* (the Guide) outlines the purpose and requirements associated with engagement for each type of project and associated environmental assessment process. Atura Power also considers Ontario's guidance on the environmental assessment consultation process, but it is more general when compared to the specific requirements outlined in the Guide referenced above.

The project contact list was generated based on the requirements of the Guide and updated over the course of the project based on engagement with the agencies, updates to the Environmental Assessment Government Review Team Master Distribution List, and as communications developed with project contacts over the course of the Environmental Screening Process to date.

Appendix B contains copies of all comments between the project team and members of the public, municipal staff and elected officials, and agencies shared over the course of the project, from the date the project commenced on Sept. 6, 2023, to early November 2023, when the draft Screening Report was prepared. A full record of the comments provided over the duration of the entire project will be provided in the final Screening Report (for example, correspondence such as the project team's response to Toronto and Region Conservation Authority (TRCA) questions in December 2023 will be provided in the final Screening Report).

Note, in response to your inquiry about a PEC Community Liaison Committee, a committee has not been set up for this upgrades project.

g. Project Notification

As noted in Section 4.2 of the draft PEC Screening Report, the Notice of Commencement was shared with adjacent property owners/tenants, provincial and federal ministries, regional and municipal contacts, a variety of other agencies/utilities, and several Indigenous communities. Communication methods were selected based on identified preference, previous project experience and/or available contact information.

Notice that the draft PEC Screening Report is available was shared with key agencies and organizations, Indigenous communities and interested members of the public. Interested members of the public included individuals who requested to be added to the project contact list as well as any member of the public who contacted the project email inbox (portlandsupgrade@aturapower.com) during the Environmental Screening Process. The draft PEC Screening Report was also made available on the project webpage. The final PEC Screening Report will include a section describing distribution of the draft Screening Report.

Based on the current project contact list, Atura Power will be sharing the Notice of Completion with the same project contacts who received the Notice of Commencement in September 2023 (see Section 4.2 of the draft PEC Screening Report), as well as project contacts who received the draft Screening Report in early December 2023. Additionally, it will be advertised in the same publications used to share the Notice of Commencement in September 2023, including the *Toronto Sun*, *Toronto Star*, and *Beach Metro* newspapers. Anyone who has contacted the project team via the project email (portlandsupgrade@aturapower.com) will also receive a copy of the Notice of Completion. Finally, a copy of the Notice of Completion will also be posted on the project webpage, in lieu of providing a physical copy for review in any local libraries, municipal offices, or recreation centres.

h. Review of draft Screening Report

The project email inbox (portlandsupgrade@aturapower.com) will continue to be available throughout the duration of the project. Comments on the draft PEC Screening Report that were provided by Jan. 7, 2023, will be incorporated and reflected in the final PEC Screening Report. Comments on the final PEC Screening Report will be responded to via email and are welcome until the end of the mandated 30-day review period which commences with the release of the Notice of Completion. The Notice will include details regarding the mandated 30-day review period.

Note, in response to your inquiry about a PEC Community Liaison Committee, a committee has not been set up for this Upgrades project.

i. Project Documentation, Resources and Materials

Several of your comments request further information about project resources and materials used to complete the Environmental Screening Process. A combination of desktop research and the following resources were used to complete the Environmental Screening Assessment:

- Sources listed in the References section of the draft Screening Report,
- Letters from GE Gas Power Services found in Appendix A of the draft Screening Report,
- Documentation associated with the Environmental Review completed by SENES Consultants Limited in 2003, and
- Documentation associated with environmental permitting for PEC.

Atura Power does not have access to a complete copy of the original PEC Environmental Assessment (which included an Environmental Review Report) as Atura Power was not the proponent of the previous EA, nor does Atura Power have copies of the other documents you shared links to in one of your emails

to the PEC project inbox on Dec. 21, 2023. The following link <https://ieso.ca/en/Power-Data/Data-Directory> indicates that all reports found through the IESO's public reports website can be accessed using the tabs on that webpage.

All information relevant to the screening is included in the report and associated appendices, with the exception of correspondence records capturing engagement between Atura Power and Indigenous communities which is being shared directly with each Indigenous community engaged during the Environmental Screening Process.

j. Frequency and Schedule of Operations

Several of your comments request further information about the frequency of and schedule of PEC operations. As stated in Appendix B3a of the draft Screening Report, PEC operations are dictated by the IESO based on the electricity supply and demand balance, which fluctuates season by season and year to year. Historically, the plant has operated between 1,750 to 4,500 hours per year, always at the direction of the IESO.

PEC is contracted to operate until April 2034. Atura Power does not know if PEC will continue to operate beyond 2034.

We hope that the responses above provide clarification regarding your comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The comments you provided, including this response letter, will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communication Advisor
Atura Power

From: [REDACTED]

Sent: Wednesday, January 31, 2024 4:30 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Question on Draft Screening Report

Hi Darius,

I find Atura's responses to my questions significantly less than satisfactory - primarily because instead of answering the questions, blanket general responses were provided. I have attached my list of questions to this note and ask that Atura respond this time with answers that will enhance my understanding of the project and PEC operation. I am aware that Atura would like to move forward to the Final Screening report process and I would like to get any follow-up questions I have answered before that process begins.

Without the initial screening report for PEC (and the other documents I requested) there is no way of knowing whether this project is more of the same or whether we are entering new territory. If the initial screening report describes PEC as a peaker plant operating for a few hours each day that is very different from the baseload plant that PEC has grown into and continues to expand from. I ask that Atura check with Trans-Canada Energy and OPG to verify they do not have copies of those documents. I'm also reminded that Atura may want to check with the IT area as I understand historical backups are kept. As I see it, the absence of these documents is a serious deficiency in the Atura response. Your response indicates that documentation from the SENS Environmental Review of 2003 is available - I ask that you send it to me. I ask that you provide me with a copy of the partial report of the original PEC Environmental Assessment that you do have. While your response indicates that you have made available all 'relevant' documents for the purposes of the Screening report, I do have a different perspective and do not agree.

I hope that you continue to have access to Avaanz Ltd. to be able to answer how responses to some of the questions in the draft Screening report were arrived at. I appreciate that there must have been significant risk assessment work behind some of the responses on criteria for Air/Noise and Socio-Economic impacts. I would like to know whose viewpoint is represented in findings which suggest low impact, low probability to be able to answer as No impact. From the viewpoint of an area resident there are definitely health impacts as have been detailed by the Toronto Department of Public Health, the Ontario Ministry of Health, Health Canada and other organizations. Additional concerns are raised by organizations concerned with climate change. The analysis that spreads from those details spreads through all the criteria questions. I have found many guides to Socio-Economic evaluations which suggest a much more in-depth review that what appears to have been done for this project.

I find that the Atura answers in the section on MECP's Areas of Interest dealing with Climate Change and Air Quality/Dust/Noise do not answer the points highlighted by MECP and I ask that those responses be expanded to fully answer the questions/criteria.

There are a number of times in the draft Screening report that Atura points to the IESO as the organization that is initiating the project or requesting more electricity be generated but no direct response has been provided by IESO to explain such things as alternatives explored, why municipal support is not required, how much electricity they foresee being requested from PEC and other matters. I ask that Atura take the initiative to remove this siloed approach to providing answers and obtain responses directly from the IESO for inclusion in the report.

I have been able to obtain a copy of the letter that Ontario Energy Minister Todd Smith sent to the IESO on December 22, 2022. I have also obtained a copy of the IESO's E-LT1 final contract (attached) and I suggest looking at section 2.14 Municipal Support Confirmation which seems to indicate a requirement to obtain support within 18 months of signing the contract. I have not been able to find anything which suggest that the Energy Minister has changed his directive.

I have recently started researching dispersal modelling and I may have questions in the future. Of particular concern to me is what happens when the wind does not blow on a very hot day - how far away from PEC do pollutants fall in that scenario, how do they build up over time and what is the cumulative impact when combined with other pollution sources. The cumulative impact has been an item of concern to health agencies at all levels of government. Although there are four air monitoring stations within Toronto, none are close to PEC and recent information suggests that air quality at any significant distance from the monitors can vary widely. I only have a vague reference to the PEC Air Impact Assessment report which suggests that it was done in autumn rather than on a windless hot summer day. Would you please send me a copy of the PEC Emission Summary and Dispersion Modelling report.

I was under the impression that a PEC Community Liason Committee (not project specific) was already in existence. From your response I get the impression that is not true. You identify "the Guide" for Electricity Projects and make passing reference to "Consultation in Ontario's environmental assessment process". I will suggest that

how people communicate today is at odds with publishing notices in newspapers and I hope Atura updates their perspective to include (local) social media. With the busy lives that many people in my neighbourhood live I did not find it surprising that my neighbours knew nothing of the PEC project. I'm sure that a simple polling of area residents would be a good test of how effective communications have been. From reading the screening report I noted that there was not a single comment which clearly supported the project which, I believe, is a sign that more work needs to be done to win over the neighbours.

I'm sure that Atura would agree that low cost, reliable electricity, clean air and safety from climate change are important for our society. I believe that the environmental assessments are important to protect the environment that humans and other living species depend on in this complex world that we live in. With this in mind I look forward to mitigating the impacts that are inherent with technology projects.

My concerns are serious and urgent and I hope that you provide updated answers as soon as possible.



----- Forwarded Message -----

From: [REDACTED]
To: darius.sokal@aturapower.com <darius.sokal@aturapower.com>
Sent: Wednesday, December 13, 2023 at 12:39:12 a.m. EST
Subject: Fw: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - Questions

Hi Darius,

I am reading through the Draft Screening Report and I have a few questions so far - it is a long report and will take some time to get through.

Questions:

1. page 36 - Items 3.1 and 3.2 - am I to take it that Autura is absolving itself from future increases in demand from IESO for more electricity that will lead to more GHG and NO from the facility? If so, isn't this counter to the Ontario approach of producer responsibility? I understand that PEC is already the biggest source of GHG and NO in Toronto while only operating for an average of 14 hours per day so far in 2023.
2. page 38 - Items on Socio-Economics - what detailed criteria were used to assess each of these items?

That is all for now. I am pretty sure I will have more questions as I move through the rest of the report.

[REDACTED]

----- Forwarded Message -----

From: [REDACTED]
To: darius.sokal@aturapower.com <darius.sokal@aturapower.com>
Sent: Thursday, December 14, 2023 at 06:14:04 p.m. EST
Subject: PEC Draft Screening Report - more questions

Hi Darius,

Some more questions have occurred to me about the PEC Draft Screening report. I expect that I will have more as I continue to move through the report.

1. pg 35 - Review of Screening Criteria
It seems that many of the answers in this section reflect a 'more of the same' response - which of the previous Screening reports answered these questions fully?
2. pg 36 - Item 2.3 be inconsistent with municipal land use policies, plans and zoning by-laws?
In view of the fact that Toronto City Council voted against the PEC expansion, would you add a note to indicate this fact in the answer to this item?
3. pg 36 - Item 3.1 have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants?
In view of the fact that the Toronto Star has reported that PEC is the largest source of GHG and nitrous oxides in Toronto based on the plant producing electricity for less than 24 hours per day, would you add a note to indicate this fact in the answer to this item.
4. ibid - If IESO requests PEC to operate 24 hours per day, what would the total of various gases and particulates be over an entire year? Understanding that with the shut down of Ontario's nuclear plants that the current plan is to use gas powered plants to make up much of the difference.

5. The draft Screening report seems to indicate that only the expansion project is being considered against the MECP's Areas of Interest and Screening criteria. Do you have agreement from MECP that it is only the project to be considered or whether the full PEC facility (after the expansion) needs to be considered?

6. pg 36 - Item 3.2 cause negative effects from the emission of greenhouse gases (carbon dioxide (CO2), methane)? I find the answer to this question, again, focuses just on the project rather than the full facility after the expansion project is completed. A further complication is the requests from the IESO to operate more hours per day. The answer does not identify any negative effects from GHG on people nor it's contribution to Canada's GHG inventory. Would you add a note to indicate these additional points in the answer to this item?

7. pg 38 - Item 6.4 have negative effects related to increases in the demands on community services and infrastructure? There have been a number of public health studies - including from Toronto Public Health - which show that air pollution causes respiratory illness, hospitalizations and death. Since the exhaust from PEC will add to the level of pollution in the neighbourhood, would you add a note to indicate that overall exhaust from PEC increases the risk related to respiratory illness, hospitalizations and death as it relates to our health care system?

8. pg 38 - Item 6.5 have negative effects on the economic base of a municipality or community? Since business and residents may decide not to move into a neighbourhood that has Toronto's largest source of GHG and nitrous oxides in it, would you add a note to this effect in the answer?

9. pg 38 - Item 6.8 cause public concerns related to public health and safety? Would you add a note to the answer to this item to indicate that various individuals, groups and municipal representatives and offices have expressed concern relating to public health? Would you also add a note that concerns have been expressed since the inception of PEC? Would you also add a note to indicate that cumulative air pollution from all sources in the area is a concern? Would you add a note to indicate that area monitoring stations for pollution are located far from the PEC site? Would you add a note to indicate that a study on the high incidence of respiratory illness in the East End of Toronto was completed in the mid-2000s and no follow-up study has been completed since.

10. pg 43 - Table 4-1

Is there some reason that the Beaches MP was left off the list?

Is there some reason that the Members of Provincial Parliament was left off the list?

Why was York region put on the list?

Is there some reason that the Ontario Ministry of Health and Public Health Ontario were left off the list?

Why was the Ministry of Mines put on the list?

Is there some reason that Toronto Public Health and Community Health Centres (e.g. South Riverdale Community Health, East End Community Health, others) were left off the list?

Why were Cherry Beach Park and Cherry Beach Sports Field included on the list?

Is there some reason that Anishnabeg, Chippewa, Wendat Indigenous groups were left off the list?

Is there some reason that local BIAs and Residents Associations were left off the list?

That is all for now.

Thanks,

[REDACTED]

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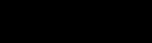
From: [REDACTED]
To: Darius Sokal <darius.sokal@aturapower.com>
Sent: Friday, December 15, 2023 at 06:06:26 p.m. EST
Subject: Draft Screening Report - Dec 15 Questions

Hi Darius,

Here are some additional questions.

1. - pg 55 - Item 4.8: A number of people that I know that attended the initial public meeting did not receive notice that the draft Screening report was available. What distribution list was used to send out the notification that the draft Screening report was available?
2. - pg 55 - item 4.9: I see Atura is planning on answering questions on the draft Screening report after the comment period has closed. What opportunity will I have to ask follow-up questions after you have published the answers to the questions? I understand that this is supposed to be a collaborative effort. Will the 30 day review period be interactive (with more than one cycle of questions and answers) with clarifications made to the final report?
3. - pg 57 - Section 5 - was the PEC Community Liason Committee asked to provide input to Table 5-1?
4. - pg 57 - Table 5-1: While illness from pollution is difficult to attribute to a single facility, there are numerous studies identified by Toronto Public Health which link illness to pollution
 - > I would suggest that one of the disadvantages that should be identified is that of increased GHG and NO that will come as a result of the requests from the IESO to operate more hours as a result of the nuclear power plants being shut down.
 - > I would suggest that one of the disadvantages that should be identified is the potential for increased respiratory illness from residents as a result of increased pollution - especially the young whose lungs are still developing and the very old.
 - > I would suggest that one of the disadvantages that should be identified is the potential for increased morbidity and mortality of the residents (as well as the difficulties that will introduce to their lives and the lives of their families) as a result of increased pollution
 - > I would suggest that one of the disadvantages that should be identified is lost time from work for residents and the impact to employers from illness due to increased pollution
 - > I would suggest that one of the disadvantages that should be identified is the increased in health care costs from illness due to pollution
 - > I would suggest that conservation, wind and solar power are more cost effective solutions but are not currently available to expand the electrical supply
 - > I would suggest that the increased GHG emissions expected from PEC will add to Canada's GHG emissions inventory which is counter to public policy of reducing emissions
 - > I would suggest that businesses looking to locate in a region that has clean power will be dissuaded from locating in a region that uses burned methane to create electricity
5. pg 58 - Would you provide me with a copy of the SENES Consultants Limited (2003). Environmental Review Report for the Portlands Energy Centre. Prepared for TransCanada Energy Limited. Prepared for TransCanada Energy and Ontario Power Generation.
6. Other documents. These documents are no longer available at the indicated location - would you provide me with a copy of them:
http://www.portlandsenergycentre.com/docs/nov2003/PEC_Air_Impact_Assessment-Final.pdf and
http://www.portlandsenergycentre.com/docs/nov2003/PEC_Human_Health_Risk-Final.pdf
7. pg 69 - Is there some reason that the project to boost efficiency is also increasing the generating capability of PEC by 50 mw? Could the upgrade have been done without increasing the generating capability of PEC beyond 550 mw?

More questions to come.



From: [REDACTED]
To: Upgrade Project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, December 21, 2023 at 06:42:07 p.m. EST
Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - Questions - Dec 21

Hi,

Some additional questions:

1. pg. 119 - Consideration of Alternatives - do you know if IESO even considered some new renewable energy projects to partially account for the increase in demand? As the people who live with the consequences of other people's decisions, it is difficult to accept that no attempt was made to reduce the amount of gas being burned.
2. pg. 120 - Good question that did not get answered - IESO Procurement Process: Did Atura Power lobby for the plant?
3. pg 120 - Role of Gas in Ontario Energy Supply - Would you change the answer to point out that renewable energy can be used to reduce the demand for electricity from gas generation?
4. What is a P2 plan and why doesn't PEC have one? It sounds like it has to do with pollution reduction.
5. Does PEC's draft Screening report adhere to the guidance from the Ontario Energy Board - ENVIRONMENTAL GUIDELINES FOR THE LOCATION, CONSTRUCTION AND OPERATION OF HYDROCARBON PIPELINES AND FACILITIES IN ONTARIO?
6. pg 121 - When PEC was first built it was seen as a temporary solution until renewables matured. While some people oppose off-shore wind because they don't like the interrupted view of the natural environment, it does not produce emissions and renewable energy has definitely matured. Would you provide a better response to the questions asking why renewable energy is not being used?
7. pg 130 - Gwh supplied to the IESO grid - this link leads to a page that requires a login id of a market participant. Would you provide the data requested on pg 129 - Gwh supplied to the IESO controlled grid for each year from 2017 to 2022?
8. pg 240 to pg 247 - Did Atura have any response from Mayor Chow, Councilor Fletcher or MP Dabrusin?
9. Is there some reason Atura did not engage Councilor Brad Bradford, MPP Mary-Margaret McMahon and MP Nathaniel Erskine-Smith?
10. pg 255 - Is there some reason the Ontario Ministry of Health and Toronto Public Health were not included in correspondence? Also, Ontario Ministry of Economic Development, Job Creation and Trade, Ministry of Education, Ministry of Indigenous Affairs, Ministry of Municipal Affairs and Housing.
11. pg 255 - Is there some reason that correspondence with all agencies listed were not included in the section starting on page 239?
12. pg 255 - Once again why was York Region included?
13. pg, 271 Indicates: "If there are sensitive receptors in the surrounding area of this project, a quantitative air quality/odour impact assessment will be useful to evaluate alternatives, determine impacts and identify appropriate mitigation measures. The scope of the assessment can be determined based on the potential effects of the proposed alternatives, and typically includes source and receptor characterization and a quantification of local air quality

impacts on the sensitive receptors and the environment in the study area. The assessment will compare to all applicable standards or guidelines for all contaminants of concern. "

It seems to me that humans are sensitive receptors. Given the many studies which indicate the link between air pollution and respiratory illness, hospitalizations and death in humans and that PEC (while operating on average 14 hours per day this year and expected to operate more in the future) - did Atura conduct such a study?

14. pg. 277 Indicates: "Please include in the report a list of all subsequent permits or approvals that may be required for the implementation of the project" Why is this missing from the draft Screening report?

15. pg 296 - What response did you receive from Waterfront Toronto?

16. pg 321 - Are there additional responses from stakeholders listed in the contact list for which no correspondence is provided?

17. pg 321 - What response was provided to the TRCA questions?

18. pg 45 - Do your Indigenous contacts include both traditional and elected leadership?

[REDACTED]

----- Forwarded Message -----

From: [REDACTED]
To: Upgrade Project for PEC <portlandsupgrade@aturapower.com>
Sent: Friday, December 22, 2023 at 10:16:08 a.m. EST
Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - Questions - Dec 22

Hi,

Some additional questions.

1. Did Atura identify any environmental effect or issue in the screening process that will be addressed under another environmental approval (e.g., an approval under the Environmental Protection Act)?
2. Did Atura consider attempting to engage with the public through social media (e.g. Facebook, Instagram, X, etc.) or other means?
3. Did Atura identify any environment effects from the project that require mitigation or managing?
4. Will Atura conduct an Air Quality Test in the neighbourhoods surrounding PEC before and after project completion? Antidotally I heard that a previous study was reviewed as being conducted in the fall rather than in the summer when pollution levels are higher and that monitoring stations were too far away from the neighbourhoods surrounding PEC.
5. Does Atura recognise that the public perception of and concerns about PEC have changed since it moved from being a peaker plant to a baseload plant?
6. Was the Notice of Commencement mailed to households in the immediate vicinity of PEC? If so, what streets or neighbourhoods?
7. Where is the summary of public and agency concerns or issues in the Screening report?
8. Is there other supporting documentation or correspondence related to the Screening Report that was not included in the Screening Report?

9. Would you send me copies of previous Screening reports done for PEC. I understand that Atura does not have a copy of the original EA - is it available from OPG or TransCanada?

10. Section 3.1 of the draft Screening report identifies current conditions as a description of the physical facility. The EA Guide for Electricity Projects suggests a description of the local environment and conditions. Would you modify this section to reflect local environment and conditions?

11. Which libraries, municipal offices or recreation centres are you planning on making the Screening report available in?

12. What residents, businesses and local interest groups are you planning on sending the EA Completion notice to?

13. Have any commitments been made from previous EAs?

14. Has a Climate Change Impact Assessment been completed for PEC? (as per Ontario's Considering climate change in the environmental assessment process) If so, would you please provide a copy of it.

Thanks,

[REDACTED]

----- Forwarded Message -----

From: [REDACTED]
To: portlandupgrade@aturapower.com <portlandupgrade@aturapower.com>
Sent: Friday, January 5, 2024 at 10:39:31 a.m. EST
Subject: Question on Draft Screening Report

Hi,

One additional question on the Draft Screening Report.

The Emissions Limits (e.g. NOx, CO, Sulphur Dioxide) that PEC operates under - when these limits were determined, what were the assumptions made in the modelling? Was there an assumption that these gases would be dispersed? What would happen if the gases were not dispersed or built up in the area surrounding PEC?

Thanks,

[REDACTED]

Note: Due to the length of this document, only the title page is included.



EXPEDITED LONG-TERM RELIABILITY SERVICES (E-LT 1) CONTRACT

Between



– and –

INDEPENDENT ELECTRICITY SYSTEM OPERATOR

DATED as of the  day of , 2023.

From: [REDACTED]

Sent: Sunday, February 11, 2024 4:02 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Question on Draft Screening Report

Hi Darius,

Do you have any news on my questions?

I have some additional concerns based on my readings on dispersion modelling. Do you have any information which addresses the following:

- dispersion modelling does not identify the chemical reactions or transformations that may result when the pollutants released from the stacks mix with elements already in the atmosphere
- if the metrological data input to the model does not heavily favour inversion layers then the results will not show what happens when there is an inversion. Did the modelling conducted include a scenario where there is an extended inversion event?
- the terrain down-wind of the stacks influences dispersion - did the modelling done for PEC take into account the slope to the north rising from the lake?
- I gather that the impacts on tall buildings - of which there are a growing number in the neighbourhood - are not accurately portrayed in the results
- Third party review of modelling results increases confidence in results

Given that the modelling done for PEC is now more than 20 years old, would Atura consider re-running the modelling with more recent metrological data? Since the study was done we have gone from "heat waves" and introduced the new term "heat domes".

I look forward to getting an update on your response.

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, February 12, 2024 1:30 PM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Question on Draft Screening Report

Hi, [REDACTED]

Thank you for your email yesterday and the earlier one sent on Jan. 31, 2024.

Due to the volume and nature of your comments and questions, we will need a few weeks to formulate and share our responses with you.

Thank you for your ongoing interest in our Portlands Energy Centre efficiency upgrades project.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, February 16, 2024 12:23 PM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Question on Draft Screening Report

Hello, [REDACTED]

You're very welcome for the response.

We're working on responding to all your inquiries and will try to have our responses available for in the final screening report. However, the timing for publishing the screening report is yet to be determined.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]
Sent: Tuesday, February 13, 2024 5:51 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Re: Question on Draft Screening Report

Hi Darius,

Thanks for your response.

Will there still be an opportunity to have my comments and questions (with Atura responses) included in the Final Screening report? I may also have some follow-up questions based on the Atura responses.

[REDACTED]

From: [REDACTED]

Sent: Sunday, February 18, 2024 11:15 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: PEC's most recent ESDM Report

Hi Darius,

Would you please send me PEC's most recent Emissions Summary and Dispersion Modelling report.

Thanks,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Date: February 22, 2024 at 1:49:36 PM CST
To: [REDACTED]
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: PEC's most recent ESDM Report

Hello, [REDACTED]

I've attached an executive summary of PEC's most recent ESDM report in response to your request.

Thank you and let me know if you have any questions.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

EXECUTIVE SUMMARY AND EMISSION SUMMARY TABLE

This Emission Summary and Dispersion Modelling (ESDM) report was prepared for Portlands Energy Centre L.P. (the Facility) located at 470 Unwin Avenue in Toronto, Ontario. The ESDM report was originally prepared to support the Facility's application and amendment to a Certificate of Approval (CofA), now known as an Environmental Compliance Approval (ECA). The Facility currently operates under ECA Number 3557-BUJKWR.

In accordance with s.25(3) of Ontario Regulation 419/05 (O.Reg. 419/05), the Facility has updated this ESDM report so that it is accurate as of December 31, 2020. The ESDM report was prepared in accordance with s.26 of O.Reg. 419/05 and guidance in the Ministry publication "Procedure for Preparing an Emission Summary and Dispersion Modelling Report, Version 4.1" [1] dated March 2018 (ESDM Procedure Document) was followed, as appropriate.

The Facility is a natural gas-fired combined cycle power generation plant having a nominal generating capacity of 550 megawatts (MW). Electricity is derived from two (2) 175 MW (nominal) gas turbine generator sets (CTGs), each equipped with a Heat Recovery Steam Generator (HRSG) that feed steam to a 238.5 MW (nominal) steam turbine generator (STG). There are also natural gas-fired duct burners installed in the HRSGs which augment power production in the STG. Other natural gas combustion equipment includes an auxiliary boiler and comfort heating equipment. There is also a one (1) MW emergency diesel generator.

The North American Industry Classification System (NAICS) code that applies to the Facility is 221112- Fossil-Fuel Electric Power Generation. As such, s.20 of O.Reg.419/05 applies, and compliance has been assessed using an approved dispersion model (AERMOD) and the Schedule 3 standards listed in the "Air Contaminants Benchmarks (ACB) List, Version 2.0" [2], as well as the applicable limits listed in the publication "Emergency Generator Checklist Supplement To Application For Approval, EPA s.9, PIBS 7976e" [3].

The principal contaminant released from the Facility is nitrogen oxides (NOx) from natural gas combustion and testing of the emergency diesel generator. Some sources and contaminants were considered negligible in accordance with s.8 of O.Reg. 419/05. The maximum emission rates for each significant contaminant emitted from the Facility were calculated in accordance with s.11 of O.Reg. 419/05 and the data quality assessed following the process outlined in the requirements of the ESDM Procedure Document.

A maximum point of impingement (POI) concentration for each significant contaminant emitted from the Facility was calculated based on the calculated emission rates and the output from the approved dispersion model; the results are presented in the following Emission Summary Table in accordance with s.26 of O.Reg. 419/05. The POI concentrations were compared against the Ministry's ACB List and the Ministry's Emergency Generator

Checklist screening levels.

All contaminants listed in the Emission Summary Table have limits in the ABC List or Ministry screening levels. All predicted POI concentrations are below the corresponding POI Limits. For example, the POI concentration of NO_x from the operation of the HRSGs and auxiliary boiler is 30% of the 1-hour NO_x standard of 400 µg/m³ and 21% of the 24-hour NO_x standard of 200 µg/m³. The POI concentration of NO_x due to testing of the emergency diesel generator is 72% of the half-hour screening level of 1,880 µg/m³.

This ESDM report demonstrates that the Facility is compliant with O.Reg. 419/05.

Table ES-1: Emission Summary Table

Contaminant Name	CAS No.	Total Facility Emission Rate [g/s]	Air Dispersion Model Used	Max. POI Concentration [$\mu\text{g}/\text{m}^3$] ^[4]	Averaging Period	Ministry POI Limit [$\mu\text{g}/\text{m}^3$]	Limiting Effect	Source ^{[5][6]}	ACB Category	Regulation Schedule #	Percentage of Ministry POI Limit (%)
Nitrogen oxides (NO _x) ^[1]	10102-44-0	117.0	AERMOD 19191	121.9	1-hour	400	Health	Standard	B1	3	30%
				41.1	24-hour	200	Health	Standard	B1	3	21%
Nitrogen oxides (NO _x) ^{[2][3]}	10102-44-0	6.7	AERMOD 19191	1350.6	½-hour	1880	Health	EGC	n/a	n/a	72%

Notes:

1. Nitrogen oxides from all significant, non-emergency equipment, including the heat recovery steam generator stacks and the auxiliary boiler.
2. Nitrogen oxides from the emergency generator only.
3. The 1-hour average maximum POI from AERMOD is converted to a ½-hour maximum by multiplying the 1-hour POI by a conversion factor of 1.2, as per Section 4.4 of the "Air Dispersion Modelling Guideline for Ontario" [4].
4. The meteorological anomalies have been removed for the maximum POI concentration as per Section 6.5 of the "Air Dispersion Modelling Guideline for Ontario" [4].
5. "Standard" means the standards published in the Ministry's "Air Contaminants Benchmark List", Version 2.0, dated April 2018 [2].
6. "EGC" means the screening level published in the Ministry's "Emergency Generator Checklist Supplement To Application For Approval", dated November 2010 [3].

From: [REDACTED]
To: [Upgrade project for PEC](#)
Subject: Re: PEC's most recent ESDM Report
Date: February 22, 2024 3:46:12 PM

Thank-you Darius,

Would you send me a copy of the complete report. I have some questions which were not answered in the Executive Summary.

[REDACTED]

From: [REDACTED]

Sent: Monday, March 4, 2024 10:34 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Fw: PEC's most recent ESDM Report

Hi Darius,

Would you also send me the

- Emissions Summary
- Guideline A-5 calculations based on proposed facility and equipment parameters

Any news on when you will be able to respond to my other requests and when the final Screening report will be out?

Thanks,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, March 6, 2024 5:22 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: PEC's most recent ESDM Report

Good morning, [REDACTED]

According to section 27 of O. Reg. 419/05 and referenced in section 2.4 of Guideline A-10 (<https://www.ontario.ca/document/guideline-10-procedure-preparing-emission-summary-and-dispersion-modelling-esdm-report#foot-1>), Atura Power is required to provide the most up-to-date executive summary of the ESDM report to any person, without charge, within 15 days after the person requests it.

Atura Power has met the above requirements as you requested the executive summary on Feb. 18, 2024, and received it on Feb. 22, 2024.

Thank you, and please note that we are still developing responses to your numerous other questions and comments and will deliver them to you in the coming days.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Thursday, March 7, 2024 9:44 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: PEC - Additional Questions

Hi Darius,

Would you please send me the the last four Community Ecological Committee (CEC) newsletters.

I appreciate that Atura is not obliged to send the full Air Dispersion Modelling study. Would you answer these questions:

- Was "Shoreline fumigation" ruled out as a possibility?
- Were there any additional components used in the AERMON model, other than standard components (e.g. BPIP PRIME)?
- Was "Calms Processing" invoked during the execution of the model?
- What station's ground and atmospheric observations were used in the execution of the model?
- What years were the ground and atmospheric observations from?
- What are the characteristics of the 'receptors' used in the model?
- The "Procedure for Preparing an Emissions Summary and Dispersion Modelling" indicates that it is to be updated annually. Is there some reason the Executive Summary that Atura provided references an EDSM from December 31, 2020 rather than December 31, 2023?
- What is the reason that the Executive Summary only lists NOx in the Emissions Summary Table and not CO (indicated in the ECA 3557-BUJKWR)?
- Media reports from the 2003 ER suggested that PM10 and PM2.5 were also concerns - what did the modelling show for them and in comparison to the current air shed levels?
- What area did the modelling cover and how was the local terrain described?
- The "Procedure for Preparing an Emissions Summary and Dispersion Modelling" indicates "The assessment of all contaminants that are discharged from the facility regardless of whether or not a ministry POI Limit is available." Given that PEC is the largest source of GHG in Toronto, why isn't CO2e listed in the table?

Thanks,

[REDACTED]

From: [REDACTED]

Sent: Wednesday, February 28, 2024 4:37 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Questions from other facilities

Hi Darius,

I just finished reviewing the Screening Report for the Halton Hills Generating Station and the Environmental Review Reports for Capital Power's Goreway Power Station and Invenergy's St. Clair Energy Station. I have some questions based on the review.

1. The Halton Hills Generating Station is a sister plant to PEC. Is there some reason the Halton Hills Screening report includes an Emissions Summary and Modelling results and PEC does not?
2. The Goreway Power Station Environmental Review report included a forecast of the lifetime emissions of the plant. Is there some reason that the Goreway ER was able to calculate lifetime emissions and PEC does not?
3. The Goreway Power Station ER flags GHG emissions as one of the reasons for raising the review to an ER. The St. Clair Energy Station ER flags some emissions being close to the limit for raising the review to an ER. Given that PEC has been flagged as having the highest GHG emissions in Toronto (with an expectation that they will increase even more) and, from media and other reports from PEC's 2003 ER, that local NOx and particulate matter were high - is there some reason Atura did not upgrade the PEC EA to an Environmental Review?

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, March 15, 2024 12:12 PM

To: [REDACTED]

Subject: Atura Power PEC Efficiency Upgrades Project

Hello [REDACTED]

Thank you for your recent enquiries regarding the PEC Efficiency Upgrades project. Please see the attached which includes Atura Power's responses to your comments and questions. Note that one of the responses in the attached PDF confirms that Atura Power has acquired a copy of the 2003 Environmental Review Report. Please find a copy of the Environmental Review Report attached as well.

Sent on behalf of Stephen Smith

Environmental Specialist

March 15, 2024

Dear [REDACTED]

Re: Questions on the draft Portlands Energy Centre (PEC) Efficiency Upgrades Screening Report

Thank you for your continued interest in the PEC Efficiency Upgrades project. We received your enquiries to the project inbox on Dec. 19, 21 and 22, 2023, as well as Jan. 5, Feb. 11 and 28, and Mar. 4 and 7, 2024. Please note this response also includes responses to your original enquiries sent to me on Dec. 13, 14 and 15, 2023, which you forwarded to the project inbox on Dec. 21 and 22, 2023.

Please see the following table which includes Atura Power's responses. Note the responses are organized by category.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
2023-12-15	27	Appendix B1 of draft Screening Report	Efficiency Upgrades vs. Expansion, and Scope of Assessment	Is there some reason that the project to boost efficiency is also increasing the generating capability of PEC by 50 mw? Could the upgrade have been done without increasing the generating capability of PEC beyond 550 mw?	As stated in Section 3.3 of the draft Screening Report, the IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023.
2023-12-22	55	Section 3.1 of draft Screening Report		Section 3.1 of the draft Screening report identifies current conditions as a description of the physical facility. The EA Guide for Electricity Projects suggests a description of the local environment and conditions. Would you modify this section to reflect local environment and conditions?	The project will take place entirely within the facility; the facility footprint will not change. Section 3.1 of the draft Screening Report includes a description of the local environment and conditions relative to the PEC Efficiency Upgrades project. As such, text in this section remains accurate as is.
2023-12-22	59	N/A		Has a Climate Change Impact Assessment been completed for PEC? (as per Ontario's Considering climate change in the environmental assessment process) If so, would you please provide a copy of it.	A separate Climate Change Impact Assessment was not completed for the PEC Upgrades project.
2023-12-19	1	N/A	Emissions and Air Quality	Do the emissions limits that PEC is supposed to conform to include the emissions from production of the natural methane gas that it burns?	PEC's Environmental Compliance Approval (ECA) specifies facility-specific NOx, SO ₂ , and CO emission concentration limits for the undiluted gases emitted from the heat recovery steam generator stacks which are based on MECP's Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines.
2023-12-19	2	Appendix B3a of draft Screening Report		Air Quality - a number of people express concerns about air quality health impacts and the Atura response seems to be that we are operating within environmental permitting requirements. Would you add a note indicating the name of the organization that concerns on air quality health should be addressed to? It would also help if Atura pointed to a study for a region that had a similar load of pollution which showed no impact on health - does such a study exist?	Details of PEC's Environmental Compliance Approval (ECA) (Air/Noise) are provided in Appendix B3a in the response to public comments under the air quality sub-category. The response can be expanded by noting that air standards under O. Reg. 419/05 are set by the MECP's Standards Development Branch to protect against health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP currently requires to be assessed for contaminants released to the air, 5,099 are health based. PEC's Emission Summary and Dispersion Modelling (ESDM) report must be updated on an annual basis to reflect changes such as sources no longer in operation, updates to MECP's Air Contaminants Benchmarks List: standards, guidelines and screening levels for assessing point of impingement

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	[REDACTED] Comment	Atura Power's Response
					concentrations of air contaminants, as well as updates to the MECP approved air dispersion model versions.
2023-12-19	3	Appendix B3a of draft Screening Report		Emissions of Greenhouse Gases - there are several questions in this section which are not answered by the response provided by Atura - would you answer them? (e.g, On the Environmental Effects slide, I noticed CO2 was not listed (just NO, NO2, and CO) under the emissions that were not supposed to increase as per GE. Was that a mistake, or is there reason to expect CO2 emissions will increase?)	The statement on the slide was referring to emission concentrations of contaminants with facility-specific emission concentration limits (see response to comment #1).
2023-12-19	8	Appendix B3a of draft Screening Report		Are PEC's emissions limits based on the most recent guideline or have they been grandfathered from a previous guideline?	The PEC combustion turbines following the efficiency upgrades do not meet the Guideline A-5 (2021) definition of a modified combustion turbine and therefore, as verified by the MECP, Guideline A-5 (1994) applies. As per Guideline A-5 (2021), "this approach is meant to encourage upgrades in thermal efficiency and technology modernization of Existing SCTs that are intended to increase efficiency or reduce emissions but without expecting the more stringent emission limits of New SCTs to be met."
2023-12-13	9	Section 3.4 of draft Screening Report		Am I to take it that Autura is absolving itself from future increases in demand from IESO for more electricity that will lead to more GHG and NO from the facility? If so, isn't this counter to the Ontario approach of producer responsibility? I understand that PEC is already the biggest source of GHG and NO in Toronto while only operating for an average of 14 hours per day so far in 2023.	<p>The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects <i>of the project</i> would occur. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades.</p> <p>As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades.</p> <p>In recent correspondence to the project team, it was confirmed that, "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational[e] provided, the ministry</p>

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
					concur that an air quality impact assessment is not needed for this undertaking".
2023-12-14	13	Section 3.4 of draft Screening Report		Have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants? In view of the fact that the Toronto Star has reported that PEC is the largest source of GHG and nitrous oxides in Toronto based on the plant producing electricity for less than 24 hours per day, would you add a note to indicate this fact in the answer to this item.	<p>Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the Canadian Environmental Protection Act (CEPA). The NPRI tracks over 300 pollutants.</p> <p>Greenhouse gas emissions are regulated by the Emissions Performance Standards Regulation (O. Reg. 241/19) under the Environmental Protection Act. Furthermore, information on GHG emissions from facilities across Canada who meet the requirements is collected under section 46 of the Canadian Environmental Protection Act.</p> <p>The net heat rate of the gas turbine generators (i.e., kilojoules/kilowatthours (kJ/kWh) higher heating value (HHV)) following the upgrades is expected to reduce by 2% at baseload and 15°C ambient temperature. The greenhouse gas intensity (i.e., the ratio of CO2 equivalent emissions to total electricity generation) of the facility is also expected to reduce by 2%.</p> <p>PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to all provincial and federal emissions reporting programs.</p> <p>As such, text in this section remains accurate as is.</p>
2023-12-14	16	Section 3.4 of draft Screening Report		Cause negative effects from the emission of greenhouse gases (carbon dioxide (CO2), methane)? I find the answer to this question, again, focuses just on the project rather than the full facility after the expansion project is completed. A further complication is the requests from the IESO to operate more hours per day. The answer does not identify any negative effects from GHG on people nor it's contribution to Canada's GHG inventory. Would you add a note to indicate these additional points in the answer to this item?	See response to comment #13.
2023-12-14	17	Section 3.4 of		Have negative effects related to increases in the demands on community services and infrastructure? There have been a	See response to comment #2.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
		draft Screening Report		number of public health studies - including from Toronto Public Health - which show that air pollution causes respiratory illness, hospitalizations and death. Since the exhaust from PEC will add to the level of pollution in the neighbourhood, would you add a note to indicate that overall exhaust from PEC increases the risk related to respiratory illness, hospitalizations and death as it relates to our health care system?	
2023-12-21	40	Appendix B5b of draft Screening Report		Indicates: "If there are sensitive receptors in the surrounding area of this project, a quantitative air quality/odour impact assessment will be useful to evaluate alternatives, determine impacts and identify appropriate mitigation measures. The scope of the assessment can be determined based on the potential effects of the proposed alternatives, and typically includes source and receptor characterization and a quantification of local air quality impacts on the sensitive receptors and the environment in the study area. The assessment. It seems to me that humans are sensitive receptors. Given the many studies which indicate the link between air pollution and respiratory illness, hospitalizations and death in humans and that PEC (while operating on average 14 hours per day this year and expected to operate more in the future) - did Atura conduct such a study? will compare to all applicable standards or guidelines for all contaminants of concern.	See response to comment #9.
2024-01-05	60	N/A		The Emissions Limits (e.g. NOx, CO, Sulphur Dioxide) that PEC operates under - when these limits were determined, what were the assumptions made in the modelling? Was there an assumption that these gases would be dispersed? What would happen if the gases were not dispersed or built up in the area surrounding PEC?	See response to comment #1. Note that the emissions limits are determined based on calculations completed in accordance with MECP's Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines.
2024-02-28	67	N/A		The Halton Hills Generating Station is a sister plant to PEC. Is there some reason the Halton Hills Screening report includes an Emissions Summary and Modelling results and PEC does not?	Of the nine screening criteria categories, one category (i.e., air and noise) was associated with some uncertainty in determining the potential for effects on air quality for the HHGS Efficiency Upgrades project. To provide further details on the Screening Criteria related to air quality, an assessment was undertaken and is outlined in Sections 3.3.1 to 3.3.3 of the HHGS Efficiency Upgrades Screening Report. The assessment determined that without mitigation, the project will produce emissions that meet the applicable AAQC set by the MECP.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
					For the PEC Efficiency Upgrades project, there was no uncertainty associated in determining the potential for effects on air quality as the efficiency upgrades equipment manufacturer provided a letter to Atura Power stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels".
2023-12-19	4	Appendix B3a of draft Screening Report	Engagement Process, Requirements and Project Contact List	Engagement Process - Would you add a note to the question "Could you clarify what public and Indigenous engagement means?" that the MECP publishes a guide (Consultation in Ontario's Environmental Assessment Process) on the EA Consultation process and provide the link to it (https://www.ontario.ca/page/consultation-ontarios-environmental-assessment-process)?	The Guide to Environmental Assessment Requirements for Electricity Projects outlines the purpose and requirements associated with engagement for each type of project and associated environmental assessment process. Atura Power also considers Ontario's guidance on the environmental assessment consultation process, but it is more general when compared to the specific requirements outlined in the Guide referenced above. For this reason, we will not be providing the link to the Consultation in Ontario's Environmental Assessment Process you have referenced. As such, text in this section remains accurate as is.
2023-12-19	7	Appendix B3a of draft Screening Report		Did PEC/Atura conduct a communications test to determine if area residents/businesses were aware of the plan to expand PEC's generating capability?	Atura Power is undertaking the Environmental Screening Process according to Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the Guide to Environmental Assessment Requirements for Electricity Projects.
2023-12-14	20	Section 4.2 of draft Screening Report		Is there some reason that the Beaches MP was left off the list? Is there some reason that the Members of Provincial Parliament was left off the list? Why was York region put on the list? Is there some reason that the Ontario Ministry of Health and Public Health Ontario were left off the list? Why was the Ministry of Mines put on the list? Is there some reason that Toronto Public Health and Community Health Centres (e.g. South Riverdale Community Health, East End Community Health, others) were left off the list? Why were Cherry Beach Park and Cherry Beach Sports Field included on the list? Is there some reason that Anishnabeg, Chippewa, Wendat Indigenous groups were left off the list? Is there some reason that local BIAs and Residents Associations were left off the list?	The project contact list was generated based on the requirements of Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the Guide to Environmental Assessment Requirements for Electricity Projects and updated over the course of the project based on engagement with the agencies, updates to the Environmental Assessment Government Review Team Master Distribution List, and as communications developed with project contacts over the course of the Environmental Screening Process to date.
2023-12-15	22	Section 4.9 of draft		I see Atura is planning on answering questions on the draft Screening report after the comment period has closed. What opportunity will I have to ask follow-up questions after you have published the answers to the questions? I understand	The project email inbox (portlandsupgrade@aturapower.com) will continue to be available throughout the duration of the project. Comments on the draft PEC Screening Report that were provided by Mar. 8, 2024, will be incorporated and

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
		Screening Report		that this is supposed to be a collaborative effort. Will the 30 day review period be interactive (with more than one cycle of questions and answers) with clarifications made to the final report?	reflected in the final PEC Screening Report. Comments on the final PEC Screening Report will be responded to via email and are welcome until the end of the mandated 30-day review period. The Notice of Completion, which is released at the same time as the final Screening Report, marks the beginning of the 30-day mandated review period.
2023-12-15	23	Section 5 of draft Screening Report		Was the PEC Community Liason Committee asked to provide input to Table 5-1?	A committee has not been set up for this upgrades project.
2023-12-21	35	Appendix B4 of draft Screening Report		Did Atura have any response from Mayor Chow, Councilor Fletcher or MP Dabrusin?	Appendix B contains copies of all comments from members of the public, municipal staff and elected officials, and agencies shared over the course of the project, from the date the project commenced on September 6, 2023, to early November 2023, when the draft Screening Report was being finalized. A full record of the comments and emails provided over the duration of the entire project will be provided in the final Screening Report.
2023-12-21	36	Appendix B4 of draft Screening Report		Is there some reason Atura did not engage Councilor Brad Bradford, MPP Mary-Margaret McMahon and MP Nathaniel Erskine-Smith?	See response to comment #20.
2023-12-21	37	Appendix B5a of draft Screening Report		Is there some reason the Ontario Ministry of Health and Toronto Public Health were not included in correspondence? Also, Ontario Ministry of Economic Development, Job Creation and Trade, Ministry of Education, Ministry of Indigenous Affairs, Ministry of Municipal Affairs and Housing.	See response to comment #20.
2023-12-21	38	Appendix B4 of draft Screening Report		Is there some reason that correspondence with all agencies listed were not included in the section starting on page 239?	See response to comment #35.
2023-12-21	39	Appendix B5a of draft Screening Report		Once again why was York Region included?	See response to comment #20.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	[REDACTED] Comment	Atura Power's Response
2023-12-21	42	Appendix B5b of draft Screening Report		What response did you receive from Waterfront Toronto?	<p>In December 2023, Waterfront Toronto shared two comments with Atura Power regarding the PEC Efficiency Upgrades project.</p> <ul style="list-style-type: none"> i. One comment was to share a clarification regarding the description of the project location in the draft Screening Report. Atura Power thanked Waterfront Toronto for the information and took steps to update the description of the project location in the final Screening Report. ii. The second comment Waterfront Toronto shared was to ask whether the upgrades proposed will result in an increase in discharge water temperature conditions, or whether the thermal impacts will remain relatively consistent with current operations. In response, Atura Power confirmed that the PEC efficiency upgrades to the gas turbines will have no impact on the cooling water discharged by the facility. Cooling water temperatures will remain within compliance of the existing ECA and thus no change to the Industrial Sewage Works ECA or limits are required. <p>Please note a full record of the comments provided over the duration of the entire project up to Mar. 8, 2024 will be provided in the final Screening Report.</p>
2023-12-21	43	Appendix B5c of draft Screening Report		Are there additional responses from stakeholders listed in the contact list for which no correspondence is provided?	See response to comment #35.
2023-12-21	44	Appendix B5c of draft Screening Report		What response was provided to the TRCA questions?	<p>In December 2023, Atura Power provided responses to TRCA's comments received in October 2023. Atura Power's response included:</p> <ul style="list-style-type: none"> i. Confirming that the upgrades will take place within the existing facility and associated paved areas, the existing facility footprint will not change, and acknowledging that further engagement with TRCA should be initiated should the project extend beyond the building footprint and associated paved areas, ii. Recognizing the Highly Vulnerable Aquifer in the surrounding region, confirming that the upgrades will take place within the existing facility footprint and will

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
					<p>not require excavation, and acknowledging that further engagement with TRCA should be initiated should the project require excavation,</p> <p>iii. Confirming that all critical equipment is to be stored inside the facility, any equipment stored outside will be temporarily stored on tractor trailer/flatbeds located on existing paved or gravel parking areas and driveways, and Atura Power does not expect to affect or change the facility's existing stormwater management plan/program nor are effects to erosion or sediment anticipated, and</p> <p>iv. Acknowledging that the project is located within the Toronto Waterfront Screening Area and that while future permits under the Conservation Authorities Act regulations are not required, TRCA will continue to be involved in the PEC Efficiency Upgrades project throughout the EA process, and confirming that Atura Power will continue to notify the TRCA of EA milestones including the release of the draft Screening Report as well as the Notice of Completion and publication of the final Screening Report.</p>
2023-12-21	45	Section 4.2 of draft Screening Report		Do your Indigenous contacts include both traditional and elected leadership?	Atura Power has communicated with the consultation departments of elected leadership for the Six Nations of the Grand River, Mississaugas of the Credit and Métis Nation of Ontario. Atura Power has also engaged with and communicated with the Haudenosaunee Development Institute. Atura Power has engaged Indigenous communities regarding the PEC Efficiency Upgrades project as guided by the MECP.
2023-12-22	47	Section 4 of draft Screening Report		Did Atura consider attempting to engage with the public through social media (e.g. Facebook, Instagram, X, etc.) or other means?	See response to comment #7.
2023-12-22	53	N/A		Is there other supporting documentation or correspondence related to the Screening Report that was not included in the Screening Report?	All information relevant to the screening is included in the report and associated appendices. With respect to records of correspondence between Atura Power and Indigenous communities, these are only being shared directly with each respective Indigenous community. All other documentation has been provided and made available in the screening report.
2023-12-21	28	Appendix B3a of	IESO Procurement	Do you know if IESO even considered some new renewable energy projects to partially account for the increase in	

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
		draft Screening Report	Process, Project Need, and Consideration of Alternatives	demand? As the people who live with the consequences of other people's decisions, it is difficult to accept that no attempt was made to reduce the amount of gas being burned.	<p>Atura Power will not comment on the IESO regarding their process for determining the types of and/or alternatives to energy projects required to meet the province's energy demands in the future.</p> <p>You may wish to review the IESO's latest Request for Proposal (RFP) referred to as the Long-Term 2 (LT2) RFP process, which includes the IESO's recent call for renewable energy production to support Ontario's electricity sector: https://www.ieso.ca/Sector-Participants/Resource-Acquisition-and-Contracts/Long-Term-2-RFP.</p>
2023-12-21	29	Appendix B3a of draft Screening Report		IESO Procurement Process: Did Atura Power lobby for the plant?	Atura Power responded to the IESO's call for efficiency upgrades under the E-LT1 process.
2023-12-21	30	Appendix B3a of draft Screening Report		Would you change the answer to point out that renewable energy can be used to reduce the demand for electricity from gas generation?	The current messaging in Appendix B3a of the draft Screening Report noting the role of gas in Ontario energy supply is accurate and reflects Atura Power's perspective on this topic.
2023-12-21	33	Appendix B3a of draft Screening Report		When PEC was first built it was seen as a temporary solution until renewables matured. While some people oppose off-shore wind because they don't like the interrupted view of the natural environment, it does not produce emissions and renewable energy has definitely matured. Would you provide a better response to the questions asking why renewable energy is not being used?	See response to comment #30.
2023-12-14	12	Section 3.4 of draft Screening Report	Municipal Support	Be inconsistent with municipal land use policies, plans and zoning bylaws? In view of the fact that Toronto City Council voted against the PEC expansion, would you add a note to indicate this fact in the answer to this item?	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades. As such, text in this section remains accurate as is.
2023-12-19	5	Appendix B3a of draft Screening Report	Operations	Operating Capacity - would you add to your response a clarification on the frequency of operation - does your response mean that you operate every day but just not at 100% capacity? That the plant is "on" every day but the number of hours that it produces electricity varies? I find this response unclear.	PEC operates as dictated by the IESO to meet the electricity demands of Torontonians and Ontarians, based on the supply and demand balance. PECs operations fluctuate season by season and year to year.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
2023-12-19	6	Appendix B3a of draft Screening Report		There is a record from the Ontario Energy Board that indicates that PEC is licensed to operate until 2024. There is reference in the project materials that PEC is contracted to operate until 2029 and plans to extend this until 2034. What licenses and approvals does PEC need to operate to 2029 and 2034? Does 'contracted to operate' mean that PEC has a contract with a customer to produce electricity?	PEC is contracted to operate until April 2034.
2023-12-22	50	N/A		Does Atura recognise that the public perception of and concerns about PEC have changed since it moved from being a peaker plant to a baseload plant?	PEC is a peaker plant and not a baseload plant. It can be operated as needed, during periods of peak demand or when intermittent energy sources like wind and solar are not available or cannot meet the electricity demands of Torontonians and the province.
2023-12-14	14	Appendix B3a of draft Screening Report	Out of Scope	If IESO requests PEC to operate 24 hours per day, what would the total of various gases and particulates be over an entire year? Understanding that with the shut down of Ontario's nuclear plants that the current plan is to use gas powered plants to make up much of the difference.	This question is beyond the scope of the PEC Efficiency Upgrades project.
2023-12-21	31	N/A		What is a P2 plan and why doesn't PEC have one? It sounds like it has to do with pollution reduction.	This question is beyond the scope of the PEC Efficiency Upgrades project.
2023-12-22	49	N/A		Will Atura conduct an Air Quality Test in the neighbourhoods surrounding PEC before and after project completion? Antidotally I heard that a previous study was reviewed as being conducted in the fall rather than in the summer when pollution levels are higher and that monitoring stations were too far away from the neighbourhoods surrounding PEC.	This question is beyond the scope of the PEC Efficiency Upgrades project.
2023-12-22	58	N/A		Have any commitments been made from previous EAs?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-02-11	61	N/A		I have some additional concerns based on my readings on dispersion modelling. Do you have any information which addresses the following: Dispersion modelling does not identify the chemical reactions or transformations that may result when the pollutants released from the stacks mix with elements already in the atmosphere	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-02-11	62	N/A		If the metrological data input to the model does not heavily favour inversion layers then the results will not show what happens when there is an inversion. Did the modelling	This question is beyond the scope of the PEC Efficiency Upgrades project.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
				conducted include a scenario where there is an extended inversion event?	
2024-02-11	63	N/A		The terrain down-wind of the stacks influences dispersion - did the modelling done for PEC take into account the slope to the north rising from the lake?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-02-11	64	N/A		I gather that the impacts on tall buildings - of which there are a growing number in the neighbourhood - are not accurately portrayed in the results	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-02-11	65	N/A		Third party review of modelling results increases confidence in results	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-02-11	66	N/A		Given that the modelling done for PEC is now more than 20 years old, would Atura consider re-running the modelling with more recent metrological data? Since the study was done we have gone from "heat waves" and introduced the new term "heat domes".	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-02-28	68	N/A		The Goreway Power Station Environmental Review report included a forecast of the lifetime emissions of the plant. Is there some reason that the Goreway ER was able to calculate lifetime emissions and PEC does not?	This question is beyond the scope of the PEC Efficiency Upgrades project. Atura Power cannot comment on a project belonging to another proponent.
2024-02-28	69	N/A		The Goreway Power Station ER flags GHG emissions as one of the reasons for raising the review to an ER. The St. Clair Energy Station ER flags some emissions being close to the limit for raising the review to an ER. Given that PEC has been flagged as having the highest GHG emissions in Toronto (with an expectation that they will increase even more) and, from media and other reports from PEC's 2003 ER, that local NOx and particulate matter were high - is there some reason Atura did not upgrade the PEC EA to an Environmental Review?	This question is beyond the scope of the PEC Efficiency Upgrades project. Atura Power cannot comment on a project belonging to another proponent.
2024-03-07	72	N/A		I appreciate that Atura is not obliged to send the full Air Dispersion Modelling study. Would you answer these questions: - Was "Shoreline fumigation" ruled out as a possibility?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	73	N/A		- Were there any additional components used in the AERMON model, other than standard components (e.g. BPIP PRIME)?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	74	N/A		- Was "Calms Processing" invoked during the execution of the model?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	75	N/A		- What station's ground and atmospheric observations were used in the execution of the model?	This question is beyond the scope of the PEC Efficiency Upgrades project.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
2024-03-07	76	N/A		- What years were the ground and atmospheric observations from?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	77	N/A		- What are the characteristics of the 'receptors' used in the model?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	78	N/A		- The "Procedure for Preparing an Emissions Summary and Dispersion Modelling" indicates that it is to be updated annually. Is there some reason the Executive Summary that Atura provided references an EDSM from December 31, 2020 rather than December 31, 2023?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	79	N/A		-What is the reason that the Executive Summary only lists NOx in the Emissions Summary Table and not CO (indicated in the ECA 3557-BUJKWR)?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	80	N/A		- Media reports from the 2003 ER suggested that PM10 and PM2.5 were also concerns - what did the modelling show for them and in comparison to the current air shed levels?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	81	N/A		- What area did the modelling cover and how was the local terrain described?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2024-03-07	82	N/A		- The "Procedure for Preparing an Emissions Summary and Dispersion Modelling" indicates "The assessment of all contaminants that are discharged from the facility regardless of whether or not a ministry POI Limit is available." Given that PEC is the largest source of GHG in Toronto, why isn't CO2e listed in the table?	This question is beyond the scope of the PEC Efficiency Upgrades project.
2023-12-15	25	Section 1.1 of draft Screening Report		Project Documentation, Resources and Materials	Would you provide me with a copy of the SENES Consultants Limited (2003). Environmental Review Report for the Portlands Energy Centre. Prepared for TransCanada Energy Limited. Prepared for TransCanada Energy and Ontario Power Generation.
2023-12-15	26	N/A		"Other documents. These documents are no longer available at the indicated location - would you provide me with a copy of them: http://www.portlandsenergycentre.com/docs/nov2003/PEC_Air_Impact_Assessment-Final.pdf and http://www.portlandsenergycentre.com/docs/nov2003/PEC_Human_Health_Risk-Final.pdf "	The documents you reference relate to the 2003 Environmental Review Report by SENES. Please see response to #25 above.
2023-12-21	34	Appendix B3b of draft		Gwh supplied to the IESO grid - this link leads to a page that requires a login id of a market participant. Would you provide the data requested on pg 129 - Gwh supplied to the IESO controlled grid for each year from 2017 to 2022?	The following link: https://ieso.ca/en/Power-Data/Data-Directory indicates that all reports found through the IESO's public reports website can be accessed using the tabs on that webpage.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
		Screening Report			
2023-12-22	54	Section 1.1 of draft Screening Report		Would you send me copies of previous Screening reports done for PEC. I understand that Atura does not have a copy of the original EA - is it available from OPG or TransCanada?	See response to comment #25.
2024-03-04	70	N/A		Would you also send me the - Emissions Summary - Guideline A-5 calculations based on proposed facility and equipment parameters	The ESDM and A5 guideline calculations are currently being assessed by the MECP as part of the ECA amendment referenced in Section 2 of the draft Screening Report. The Executive Summary of the ESDM can be made available once approved by the MECP.
2023-12-15	21	Section 4.8 of draft Screening Report	Project Notification	A number of people that I know that attended the initial public meeting did not receive notice that the draft Screening report was available. What distribution list was used to send out the notification that the draft Screening report was available?	Notice that the draft PEC Screening Report is available was shared with key agencies and organizations, Indigenous communities and interested members of the public. Interested members of the public included individuals who requested to be added to the project contact list as well as any member of the public who contacted the project email inbox (portlandsupgrade@aturapower.com) during the Environmental Screening Process. The draft PEC Screening Report was also made available on the project webpage.
2023-12-22	51	Section 4.2 of draft Screening Report		Was the Notice of Commencement mailed to households in the immediate vicinity of PEC? If so, what streets or neighbourhoods?	The Notice of Commencement was distributed according to the requirements set out in the Guide to Environmental Assessment Requirements for Electricity Projects. As noted in Section 4.2 of the draft PEC Screening Report, the Notice was shared with adjacent property owners/tenants, provincial and federal ministries, regional and municipal contacts, a variety of other agencies/utilities, and several Indigenous communities.
2023-12-22	56	Section 4.1 of draft Screening Report		Which libraries, municipal offices or recreation centres are you planning on making the Screening report available in?	Based on the current project contact list, Atura Power will be sharing the Notice of Completion with the same project contacts who received the Notice of Commencement in September 2023 (see Section 4.2 of the draft PEC Screening Report), as well as project contacts who received the draft Screening Report in early December 2023. Additionally, it will be advertised in the same publications used to share the Notice of Commencement in September 2023, including the Toronto Sun, Toronto Star, and Beach Metro newspapers. Anyone who has contacted the project team via the project email (portlandsupgrade@aturapower.com) will also receive a copy of the Notice of Completion. Finally, a copy of the Notice of Completion will also be posted on the project webpage.

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
2023-12-22	57	Section 4.9 of draft Screening Report		What residents, businesses and local interest groups are you planning on sending the EA Completion notice to?	See response to comment #56.
2023-12-21	41	Appendix B5b of draft Screening Report	Review of draft Screening Report	Indicates: "Please include in the report a list of all subsequent permits or approvals that may be required for the implementation of the project" Why is this missing from the draft Screening report?	This information is available in Section 2: Permits and Approvals of the draft Screening Report.
2023-12-22	52	Section 4.3 and 4.5 of the draft Screening Report		Where is the summary of public and agency concerns or issues in the Screening report?	This information is available in Section 4.3: Public Engagement and Section 4.5: Agency Engagement of the draft Screening Report.
2023-12-13	10	Section 3.4 of draft Screening Report	Screening Criteria	What detailed criteria were used to assess each of these items?	Per the Guide to Environmental Assessment Requirements for Electricity Projects, the project was assessed against each Screening Criteria as it relates to the potential for the efficiency upgrades to cause negative effects.
2023-12-14	11	Section 3.4 of draft Screening Report		It seems that many of the answers in this section reflect a 'more of the same' response -which of the previous Screening reports answered these questions fully?	See response to comment #10.
2023-12-14	15	Section 3 of the draft Screening Report		The draft Screening report seems to indicate that only the expansion project is being considered against the MECP's Areas of Interest and Screening criteria. Do you have agreement from MECP that it is only the project to be considered or whether the full PEC facility (after the expansion) needs to be considered?	Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The advanced materials allow a higher power output per gigajoule (GJ) of fuel consumed. Please also see response to comment #9.
2023-12-14	18	Section 3.4 of draft Screening Report		Have negative effects on the economic base of a municipality or community? Since business and residents may decide not to move into a neighbourhood that has Toronto's largest source of GHG and nitrous oxides in it, would you add a note to this effect in the answer?	The Environmental Screening Process determined that all Screening Criteria scored 'No' as a result of the PEC Upgrades project, and without any mitigation, all regulatory requirements will be met. Further, the manufacturer of the equipment being installed for the upgrades provided a letter stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels."

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
					Given the facility will continue to operate within all environmental permitting requirements, text in this section remains accurate as is.
2023-12-22	46	Section 3 of the draft Screening Report		Did Atura identify any environmental effect or issue in the screening process that will be addressed under another environmental approval (e.g., an approval under the Environmental Protection Act)?	See response to comment #41.
2023-12-22	48	Section 3 of the draft Screening Report		Did Atura identify any environment effects from the project that require mitigation or managing?	As noted in Section 3.5 of the draft Screening Report, "the Screening identified that, without any mitigation, all regulatory requirements will be met, and no other impact management commitments will be required. Atura Power will continue to manage air emissions from PEC through ongoing continuous emissions monitoring per the terms and conditions of the facility's ECA."
2023-12-14	19	Section 3.4 of draft Screening Report	Other	Cause public concerns related to public health and safety? Would you add a note to the answer to this item to indicate that various individuals, groups and municipal representatives and offices have expressed concern relating to public health? Would you also add a note that concerns have been expressed since the inception of PEC? Would you also add a note to indicate that cumulative air pollution from all sources in the area is a concern? Would you add a note to indicate that area monitoring stations for pollution are located far from the PEC site? Would you add a note to indicate that a study on the high incidence of respiratory illness in the East End of Toronto was completed in the mid-2000s and no follow-up study has been completed since.	See response to comment #35 above. The remainder of the questions provided are beyond the scope of the PEC Efficiency Upgrades project.
2023-12-15	24	Section 5 of draft Screening Report		While illness from pollution is difficult to attribute to a single facility, there are numerous studies identified by Toronto Public Health which link illness to pollution > I would suggest that one of the disadvantages that should be identified is that of increased GHG and NO that will come as a result of the requests from the IESO to operate more hours as a result of the nuclear power plants being shut down. > I would suggest that one of the disadvantages that should be identified is the potential for increased respiratory illness from residents as a result of increased pollution - especially the young whose lungs are still developing and the very old.	The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental

Date Submitted	Comment #	Relevant Section of draft Screening Report	Topic	Comment	Atura Power's Response
				<p>> I would suggest that one of the disadvantages that should be identified is the potential for increased morbidity and mortality of the residents (as well as the difficulties that will introduce to their lives and the lives of their families) as a result of increased pollution</p> <p>> I would suggest that one of the disadvantages that should be identified is lost time from work for residents and the impact to employers from illness due to increased pollution</p> <p>> I would suggest that one of the disadvantages that should be identified is the increased in health care costs from illness due to pollution</p> <p>> I would suggest that conservation, wind and solar power are more cost effective solutions but are not currently available to expand the electrical supply</p> <p>> I would suggest that the increased GHG emissions expected from PEC will add to Canada's GHG emissions inventory which is counter to public policy of reducing emissions</p> <p>> I would suggest that businesses looking to locate in a region that has clean power will be dissuaded from locating in a region that uses burned methane to create electricity</p>	<p>effects resulting from the activities associated with the efficiency upgrades.</p> <p>Additionally, please see response to #13.</p>
2023-12-21	32	N/A		Does PEC's draft Screening report adhere to the guidance from the Ontario Energy Board - ENVIRONMENTAL GUIDELINES FOR THE LOCATION, CONSTRUCTION AND OPERATION OF HYDROCARBON PIPELINES AND FACILITIES IN ONTARIO?	Ontario Regulation 50/24 (previously Ontario Regulation 116/01) defines the type of environmental assessment (EA) to be undertaken under the Ontario Environmental Assessment Act (the Act). Ontario Regulation 50/24 notes that any applicable facility undergoing a change that would increase the name plate capacity of the facility by five megawatts or more must undergo an Environmental Screening Process. Atura Power has undertaken the Environmental Screening Process according to the guidance in the Guide to Environmental Assessment Requirements for Electricity Projects.
2024-03-04	71	N/A		Any news on when you will be able to respond to my other requests and when the final Screening report will be out?	Atura Power is responding to your enquiries as quickly as possible and anticipate releasing the final Screening Report in the coming weeks.

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. This letter will be included as part of the record of engagement in the final Screening Report.

Sincerely,

Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

Note: Due to the length of this document, only the title page is included.

Environmental Review Report for the Portlands Energy Centre



Report Prepared By



SENE Consultants Limited

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L4B 3N4

In Association With



November 2003

From: TERRE <terrecoalition@gmail.com>

Sent: Friday, January 5, 2024 10:35 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

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Subject: Input to Atura Power's Draft Screening Report for proposed 50 megawatt expansion of the Portlands Energy Centre

Attached is our input to Atura Power's Draft Screening Report for the proposed 50 megawatt expansion of the Portlands Energy Centre.

Sincerely,

Toronto East Residents for Renewable Energy (TERRE)

350.org Toronto

Canadian Association of Physicians for the Environment - Ontario Regional Committee

Citizens Climate Lobby - Toronto East Chapter

Citizens Climate Lobby - Toronto Yonge Street Chapter

Climate Action for Lifelong Learners

Climate Emergency Unit

Climate Fast

For Our Grandchildren

For Our Kids - Toronto

Grandmothers Act to Save the Planet (GASP)

Green 13

Ontario Clean Air Alliance

Ontario Climate Emergency Campaign

Parkdale-High Park 4 Climate Action

Seniors for Climate Action Now (SCAN)

South Riverdale Community Health

Toronto East End Climate Collective (TEECC)



January 5, 2024

By email: portlandsupgrade@aturapower.com

Mr. Darius Sokal
Atura Power Senior Communications Advisor

Re: Atura Power's Draft Screening Report for proposed 50 megawatt expansion of the Portlands Energy Centre

Dear Mr. Sokal,

The proposed expansion of the Portlands Energy Center (PEC) output capacity by 50 megawatts is an urgent and important issue for the Toronto East end community. This expansion raises many questions not addressed in the Draft Screening Report. These questions need to be addressed as the proposed expansion has political implications, immediate and ongoing harmful health impacts for Toronto East end residents, as well as environmental and fiscal repercussions for all Torontonians and Ontarians at large.

Atura Power's community engagement process and Draft Screening Report (DSR) have failed to address the following issues:

The DSR fails to address why this expansion should be approved despite the explicit opposition of Toronto City Council.

In 2023 Toronto City Council passed two separate resolutions opposing Atura Power's plans to increase PEC's output capacity. This is directly counter to a 2022 directive by Energy Minister Todd Smith to the Independent Electricity Systems Operator (IESO) that municipal approval is required for Ontario's proposed energy procurement of 4,000 megawatts. As the PEC expansion is part of this procurement effort, it requires the support of Toronto City Council to proceed. The DSR fails to indicate why this expansion should proceed without the required support of Toronto City Council.

The DSR fails to address the climate and health impacts of the proposed expansion and increased operation.

When PEC was first built it was communicated to the City of Toronto that it was a 'peaker plant', operating only during peak hours to top up base-load supply; however,



recent studies found that the plant was operating up to 21 hours a day¹. Since 2018, emissions from PEC have increased 550 percent with further announced plans to increase output and emissions by 700 percent by 2043². It is clear that PEC is no longer intended to operate exclusively during peak hours, and it has instead become a base-load power plant without community consultation or the stated support of the City of Toronto.

PEC is the largest emitter of greenhouse gasses and nitrous oxides in Toronto. In addition to worsening the climate crisis, these pollutants have immediate health impacts on local residents, hindering lung development in children, and contributing to respiratory illness that can lead to hospitalization and death. Many studies have shown increased asthma rates in areas with persistent air pollution³.

By excluding the data on PEC's current greenhouse gas emissions, nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), and sulphur dioxide, and the increases in these emissions that the proposed expansion will have, the DSR fails to address local health and ongoing climate impacts of the proposed expansion.

The DSR fails to provide the financial cost of the proposed expansion.

The cost of living for all Torontonians is increasing, which amplifies the economic impact of the proposed upgrade as a pressing issue. As seen in the correspondence from your community outreach, Atura Power is unwilling to provide any information about the cost of the upgrade despite receiving many questions from the community about this matter. Since Atura Power is a wholly owned subsidiary of the crown corporation Ontario Power Generation, these costs should be made public, as the operational costs of PEC are ultimately borne by the taxpayer. There can be no meaningful discussion about the economic impact of the upgrade without this information, which Atura Power has declined to provide in the DSR.

The DSR fails to indicate alternatives to the proposed expansion.

We are in a global climate crisis. Despite available alternatives to meet Ontario's power needs, Atura Power's DSR fails to indicate carbon-neutral alternatives to its proposed expansion. Wind, solar and storage are among the most affordable on the market.

¹https://www.thestar.com/news/canada/ontario-gas-plants-were-supposed-to-run-only-during-peak-periods-instead-they-re-running/article_8ba52f13-bd5a-541a-b80e-9f497ff498be.html

² <https://www.cleanairalliance.org/campaigns/gas-how-2/>

³<https://globalnews.ca/news/2078460/poorer-more-polluted-toronto-neighbourhoods-have-higher-childhood-asthma-rates-study/>



Additionally, Ontario has the ability to import surplus hydro-electricity from Quebec⁴. Atura Power's DSR fails to indicate alternatives to their proposal, and in doing so fails to justify the need for its proposed expansion.

In light of the above, it is clear that Atura Power's public consultation process and subsequent DSR has failed to provide key information about their proposal which has direct and immediate impacts on the community. The DSR fails to include any socio-economic impact or environmental disadvantages the proposed upgrades will have on the community. There is no evidence provided in the DSR to indicate that the proposed expansion would be a benefit to the local community, or that the proposed expansion would not pose a danger to the climate or public health. We are therefore demanding an immediate halt to the proposed expansion and that the DSR be revised to include:

1. An explanation why Atura believes PEC should be expanded without explicit support from Toronto City Council.
2. The expected closure date of PEC.
3. The projected power generation to be ordered by the IESO from 2024 through to PEC's expected closure.
4. The plans for PEC's replacement after its expected closure.
5. The financial cost of the proposed expansion and the expected impact on electricity costs to consumers.
6. A full environmental assessment that:
 - Examines the smog, climate, and health impacts of the PEC at present and until its expected closure.
 - Evaluates the cost and benefits of cleaner alternatives (e.g. energy efficiency, demand management, and renewables).

Sincerely,

Toronto East Residents for Renewable Energy (TERRE)

350.org Toronto

Canadian Association of Physicians for the Environment - Ontario Regional Committee

Citizens Climate Lobby - Toronto East Chapter

Citizens Climate Lobby - Toronto Yonge Street Chapter

Climate Action for Lifelong Learners

Climate Emergency Unit

Climate Fast

For Our Grandchildren

⁴<https://news.ontario.ca/en/release/1003444/the-governments-of-ontario-and-quebec-support-new-electricity-trade-agreement>



For Our Kids - Toronto
Grandmothers Act to Save the Planet (GASP)
Green 13
Ontario Clean Air Alliance
Ontario Climate Emergency Campaign
Parkdale-High Park 4 Climate Action
Seniors for Climate Action Now (SCAN)
South Riverdale Community Health
Toronto East End Climate Collective (TEECC)

CC:

Beaches East York MP Nathaniel Erskine-Smith
Beaches-East York MPP Mary-Margaret McMahon
City of Toronto - Beaches East York Councillor Brad Bradford
City of Toronto - Chairs of Transform T.O. Climate Advisory Group - Lyn Adamson & Maggie Chang
City of Toronto - Mayor Olivia Chow
City of Toronto - Toronto Danforth Councillor Paula Fletcher
City of Toronto - Toronto Public Health - Chief Medical Officer - Dr. Eileen de Villa
Haudenosaunee Development Institute
IESO - President and CEO - Lesley Gallinger
Metis Nation of Ontario
Mississaugas of the Credit First Nation
Province of Ontario - Energy Minister Todd Smith
Province of Ontario - Environment, Conservation and Parks Minister Andrea Khanjin
Province of Ontario - Health Minister Sylvia Jones
Toronto Danforth MP Julie Dabrusin
Toronto Danforth MPP Peter Tabuns

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, January 26, 2024 2:15 PM

To: TERRE <terrecoalition@gmail.com>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Input to Atura Power's Draft Screening Report for proposed 50 megawatt expansion of the Portlands Energy Centre

Good afternoon.

Thank you for your email and attached letter regarding the draft Screening Report for Atura Power's proposed Portlands Energy Centre Efficiency Upgrades project received on Jan. 5, 2024.

We appreciate you taking the time to review our draft report and provide responses to your questions and comments in the attached PDF.

Thank you for your keen interest in our proposed efficiency upgrades, and please direct additional questions to the project email address at portlandsupgrade@aturapower.com.

Sincerely,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Jan. 26, 2024

Dear Toronto East Residents for Renewable Energy,

Re: Atura Power's Draft Screening Report for the proposed efficiency upgrades of the Portlands Energy Centre

Thank you for your recent letter on Jan. 5, 2024, sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project and draft Screening Report released for review on Dec. 6, 2023. Your comments are noted and part of the project record.

Before we respond to your individual comments, we would like to make an important clarification: Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. All planned project activities will occur within the footprint of the existing facility and the parts that are being replaced are the same parts that would normally be replaced during regular maintenance but, due to improved technology, will be more efficient.

In response to each of the comments raised in your letter, we offer the following responses below:

TERRE Comment (Page #)	TERRE Comment	Atura Power's Response
#1 (p1)	<p>The Draft Screening Report (DSR) fails to address why this expansion should be approved despite the explicit opposition of Toronto City Council</p> <p>In 2023 Toronto City Council passed two separate resolutions opposing Atura Power's plans to increase PEC's output capacity. This is directly counter to a 2022 directive by Energy Minister Todd Smith to the Independent Electricity Systems Operator (IESO) that municipal approval is required for Ontario's proposed energy procurement of 4,000 megawatts. As the PEC expansion is part of this procurement effort, it requires the support of Toronto City Council to proceed. The DSR fails to indicate why this expansion should proceed without the required support of Toronto City Council.</p>	<p>A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) Long-Term (LT1) Request for Proposals (RFP) process which is not related to the PEC Efficiency Upgrades project. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023 and for which the IESO awarded a contract to PEC.</p>
#2 (p1,p2)	<p>The DSR fails to address the climate and health impacts of the proposed expansion and increased operation.</p> <p>When PEC was first built it was communicated to the City of Toronto that it was a 'peaker plant', operating only during peak hours to top up base-load supply; however, recent studies found that the plant was operating up to 21 hours a day. Since 2018, emissions from PEC have increased 550 percent with further announced plans to increase output and emissions by 700 percent by 2043. It is clear that PEC is no longer intended to operate exclusively during peak hours, and it has instead become a base-load power plant without community consultation or the stated support of the City of Toronto.</p>	<p>The purpose of the draft Screening Report is to assess the effects of the proposed <i>efficiency upgrades</i> (see Section 1.4: Project Description of the draft Screening Report). As such, this comment is beyond the scope of the draft Screening Report and associated Environmental Screening Process.</p>
#3 (p2)	<p>PEC is the largest emitter of greenhouse gasses and nitrous oxides in Toronto. In addition to worsening the climate crisis, these pollutants have immediate health impacts on local residents, hindering lung development in children, and contributing to respiratory illness that can lead to hospitalization and death. Many studies have shown increased asthma rates in areas with persistent air pollution.</p>	<p>For a detailed response to public comments on Emissions of Greenhouse Gases please refer to the sub-category provided in Appendix B3a.</p> <p>Similarly, details of PEC's Environmental Compliance Approval (ECA) (Air/Noise) are provided in Appendix B3a in the response to public comments under the air quality sub-category. The response can be expanded by noting that air standards under O. Reg. 419/05 are set by the MECP's Standards Development Branch to protect against health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP currently requires to be assessed for contaminants released to the air, 5,099 are health based.</p>

TERRE Comment (Page #)	TERRE Comment	Atura Power's Response
#4 (p2)	<p>By excluding the data on PEC's current greenhouse gas emissions, nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), and sulphur dioxide, and the increases in these emissions that the proposed expansion will have, the DSR fails to address local health and ongoing climate impacts of the proposed expansion.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project.</p> <p>In recent correspondence to the project team, it was confirmed that "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.</p>
#5 (p2)	<p>The DSR fails to provide the financial cost of the proposed expansion.</p> <p>The cost of living for all Torontonians is increasing, which amplifies the economic impact of the proposed upgrade as a pressing issue. As seen in the correspondence from your community outreach, Atura Power is unwilling to provide any information about the cost of the upgrade despite receiving many questions from the community about this matter. Since Atura Power is a wholly owned subsidiary of the crown corporation Ontario Power Generation, these costs should be made public, as the operational costs of PEC are ultimately borne by the taxpayer. There can be no meaningful discussion about the economic impact of the upgrade without this information, which Atura Power has declined to provide in the DSR.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p> <p>Additionally, the IESO sets the price of electricity in Ontario. Therefore, please direct your question regarding electricity costs for consumers to the IESO here: https://www.ieso.ca/en/Corporate-IESO/Contact.</p>

TERRE Comment (Page #)	TERRE Comment	Atura Power's Response
#6 (p2, p3)	<p>The DSR fails to indicate alternatives to the proposed expansion.</p> <p>We are in a global climate crisis. Despite available alternatives to meet Ontario's power needs, Atura Power's DSR fails to indicate carbon-neutral alternatives to its proposed expansion. Wind, solar and storage are among the most affordable on the market. Additionally, Ontario has the ability to import surplus hydro-electricity from Quebec. Atura Power's DSR fails to indicate alternatives to their proposal, and in doing so fails to justify the need for its proposed expansion.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023.</p>
#7 (p3)	<p>In light of the above, it is clear that Atura Power's public consultation process and subsequent DSR has failed to provide key information about their proposal which has direct and immediate impacts on the community. The DSR fails to include any socio-economic impact or environmental disadvantages the proposed upgrades will have on the community. There is no evidence provided in the DSR to indicate that the proposed expansion would be a benefit to the local community, or that the proposed expansion would not pose a danger to the climate or public health. We are therefore demanding an immediate halt to the proposed expansion and that the DSR be revised to include:</p> <ol style="list-style-type: none"> <li data-bbox="394 878 1058 971">1. An explanation why Atura believes PEC should be expanded without explicit support from Toronto City Council. 	<p>See Response #1 above.</p>
#8 (p3)	<ol style="list-style-type: none"> <li data-bbox="394 984 846 1011">2. The expected closure date of PEC. 	<p>PEC is contracted to operate until April 2034. As Atura Power responds to Ontario energy needs as directed by the IESO, plans beyond PEC's contract period are not certain at this time.</p>
#9 (p3)	<ol style="list-style-type: none"> <li data-bbox="394 1097 1136 1154">3. The projected power generation to be ordered by the IESO from 2024 through to PEC's expected closure. 	<p>PEC operations are dictated by the IESO based on the province's supply and demand balance. The plant will continue to operate as directed by the IESO.</p>
#10 (p3)	<ol style="list-style-type: none"> <li data-bbox="394 1195 1129 1222">4. The plans for PEC's replacement after its expected closure. 	<p>See response #8 above.</p>
#11 (p3)	<ol style="list-style-type: none"> <li data-bbox="394 1243 1066 1300">5. The financial cost of the proposed expansion and the expected impact on electricity costs to consumers. 	<p>See response #5 above.</p> <p>Atura Power does not dictate the price that customers pay for electricity, nor do we set government policies. Our business is to safely, reliably, and affordably generate electricity to meet the needs of Ontarians.</p>
#12 (p3)	<ol style="list-style-type: none"> <li data-bbox="394 1438 884 1466">6. A full environmental assessment that: 	<p>See response to comment #3, #4 and #6 above.</p>

TERRE Comment (Page #)	TERRE Comment	Atura Power's Response
	<ul style="list-style-type: none"> - Examines the smog, climate, and health impacts of the PEC at present and until its expected closure. - Evaluates the cost and benefits of cleaner alternatives (e.g. energy efficiency, demand management, and renewables). 	

We hope that the responses above provide clarification regarding the comments raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please contact us through our project email address at portlandsupgrade@aturapower.com.

Thank you,

Darius Sokal
Senior Communications Advisor
Atura Power

From: TERRE <terrecoalition@gmail.com>

Sent: Saturday, February 24, 2024 1:00 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Mayor_Chow@toronto.ca <Mayor_Chow@toronto.ca>; councillor_fletcher@toronto.ca <councillor_fletcher@toronto.ca>; publichealth@toronto.ca <publichealth@toronto.ca>; transform@toronto.ca <transform@toronto.ca>; tabunsp-co@ndp.on.ca <tabunsp-co@ndp.on.ca>; mmcmahon.mpp.co@liberal.ola.org <mmcmahon.mpp.co@liberal.ola.org>; ministerenergy@ontario.ca <ministerenergy@ontario.ca>; sylvia.jones@ontario.ca <sylvia.jones@ontario.ca>; minister.mecp@ontario.ca <minister.mecp@ontario.ca>; julie.dabrusin@parl.gc.ca <julie.dabrusin@parl.gc.ca>; nathaniel.erskine-smith@parl.gc.ca <nathaniel.erskine-smith@parl.gc.ca>; [REDACTED]

[REDACTED]
customer.relations@ieso.ca <customer.relations@ieso.ca>; tammy.wong@opg.com <tammy.wong@opg.com>

Subject: TERRE Statement on Atura DSR Response

Attached please find TERRE's Statement on Atura's Draft Screening Report Response.

Sincerely,

Toronto East Residents for Renewable Energy (TERRE)



February 23, 2024

By email: portlandsupgrade@aturapower.com

Mr. Darius Sokal
Atura Power Senior Communications Advisor

Re: Atura Power's Community Engagement Process

Dear Mr. Sokal,

Atura Power's community engagement and environmental screening process for its 50 MW expansion of the Portlands Energy Centre (PEC) has neglected to address the numerous concerns raised by residents who are part of Toronto East Residents for Renewable Energy (TERRE). Atura's responses (received January 26, 2024) to the questions and concerns raised by TERRE and 17 other groups (representing 1,000s of Ontario residents) in our January 5th, 2024 submission on the PEC Draft Screening Report are inadequate, not forthcoming, and flawed in the following ways:

- Counter to a letter from Energy Minister Todd Smith in December of 2022 indicating explicit directives to the Independent Electricity Systems Operator (IESO) requiring municipal approval for new power procurements, Atura Power has stated that this procurement of 50 MW does not require municipal support as it falls under "Expedited Long-Term (E-LT1) RFP [Requests For Proposals]", which they claim the Minister was not referring to. **TERRE found no subsequent communication which absolves Atura from complying with the Minister's directive to obtain municipal support. Atura has provided no evidence which justifies disregarding the Minister's statement.**
- In response to questions about the financial cost of the expansion, Atura Power has not shared any information, stating they are "unable to share commercially sensitive financial details" about the expansion. **TERRE feels that this information must be provided in order to assess the socio-economic impacts of the expansion. Atura Power is a crown corporation and therefore taxpayers are entitled to this information.**
- In response to questions about greenhouse gas, nitrogen oxides, and other harmful emissions from the PEC, Atura Power has indicated that questions about emissions are "beyond the scope of the draft screening report and associated Environmental Screening Process." **TERRE feels that if the environmental screening process does not take into account greenhouse gas and other harmful emissions related to the expansion then the screening process is not able to properly assess the project's health and environmental risks.**



Due to Atura Power's disregard for the required municipal approval for the project, lack of transparency surrounding the project costs, and lack of information surrounding environmental impacts, TERRE finds the answers provided by Atura Power to our DSR submission to be unsatisfactory. Increasing Ontario's gas power generation capacity by expanding the capacity of the Portlands Energy Centre will inflame the current climate crisis, is financially irresponsible, and has negative impacts on community health.

Sincerely,

Toronto East Residents for Renewable Energy

Cc.

Beaches East York MP Nathaniel Erskine-Smith

Beaches-East York MPP Mary-Margaret McMahon

City of Toronto - Beaches East York Councillor Brad Bradford

City of Toronto - Chairs of Transform T.O. Climate Advisory Group - Lyn Adamson & Maggie Chang

City of Toronto - Mayor Olivia Chow

City of Toronto - Toronto Danforth Councillor Paula Fletcher

City of Toronto - Toronto Public Health - Chief Medical Officer - Dr. Eileen de Villa
Haudenosaunee Development Institute

IESO - President and CEO - Lesley Gallinger

Metis Nation of Ontario

Mississaugas of the Credit First Nation

Province of Ontario - Energy Minister Todd Smith

Province of Ontario - Environment, Conservation and Parks Minister Andrea Khanjin

Province of Ontario - Health Minister Sylvia Jones

Toronto Danforth MP Julie Dabrusin

Toronto Danforth MPP Peter Tabuns

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, February 29, 2024 6:07 AM

To: TERRE <terrecoalition@gmail.com>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: TERRE Statement on Atura DSR Response

Good morning.

Thank you for your responses received via email on Feb. 23, 2024. Please find our replies in the attached PDF which, among other points, clarifies that we are proposing turbine upgrades during a scheduled maintenance period at PEC and not an expansion of the facility as you have inaccurately stated more than once despite our clarifications. Note that this email and responses to these comments will be included as part of the record of engagement in the final Screening Report.

Please contact us through our project email address at portlandsupgrade@aturapower.com with any further questions or comments.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Feb. 29, 2024

Dear Toronto East Residents for Renewable Energy (TERRE),

Re: Atura Power's Community Engagement Process

Thank you for your recent letter on Feb. 23, 2024, sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project and associated engagement process. Your comments are noted and part of the project engagement record.

Before we respond to your individual comments, we would like to offer one important clarification. Atura Power is not proposing an "expansion" of the existing PEC facility, as erroneously referenced in your letter on Jan. 5, 2024, and again in your more recent letter on Feb. 23, 2024. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. All planned project activities will occur within the footprint of the existing facility and the parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls.

In response to each of the comments raised by TERRE and circulated by TERRE via carbon copy to several groups, we offer the following responses in the table below:

TERRE Comment	TERRE Comment	Atura Power's Response
#1	<p>Counter to a letter from Energy Minister Todd Smith in December of 2022 indicating explicit directives to the Independent Electricity Systems Operator (IESO) requiring municipal approval for new power procurements, Atura Power has stated that this procurement of 50 MW does not require municipal support as it falls under "Expedited Long-Term (E-LT1) RFP [Requests For Proposals]", which they claim the Minister was not referring to. TERRE found no subsequent communication which absolves Atura from complying with the Minister's directive to obtain municipal support. Atura has provided no evidence which justifies disregarding the Minister's statement.</p>	<p>Atura Power does not require municipal approval to complete the efficiency upgrade project for the following reasons:</p> <ul style="list-style-type: none"> i) As stated in Section 3.3 of the draft Screening Report, the IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023. The IESO awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades; as such, municipal support resolution for E-LT1 is not required. The IESO's May 2023 Resource Adequacy Update explains the upgrades to existing gas plants approved under the E-LT1 process, while the 'Results Table' link provided in the Resource Adequacy Update (located under the 'Expedited Process' heading) identifies PEC as one of the seven existing facilities approved for efficiency upgrades. ii) While the IESO's E-LT1 process does not require municipal approval, the PEC efficiency upgrades project is subject to the Environmental Screening Process for Electricity Projects subject to Ontario Regulation (O. Reg.) 116/01, under the Ontario <i>Environmental Assessment Act</i>, since the project proposes to increase the facility's generation capacity by more than five megawatts (MW). The Environmental Screening Process is a proponent-driven process that Atura Power is carrying out, according to the requirements outlined in O. Reg. 116.01. While municipal engagement is an important component of the environmental assessment process, municipal approval is not required.
#2	<p>In response to questions about the financial cost of the expansion, Atura Power has not shared any information, stating they are "unable to share commercially sensitive financial details" about the expansion. TERRE feels that this information must be provided in order to assess the socio-economic impacts of the expansion. Atura Power is</p>	<p>As noted previously, Atura Power is not sharing commercially sensitive financial details related to its efficiency upgrades. As the IESO sets the price of electricity in Ontario, please direct your question regarding electricity costs for consumers to the IESO here: https://www.ieso.ca/en/Corporate-IESO/Contact.</p>

TERRE Comment	TERRE Comment	Atura Power's Response
	<p>a crown corporation and therefore taxpayers are entitled to this information.</p>	
#3	<p>In response to questions about greenhouse gas, nitrogen oxides, and other harmful emissions from the PEC, Atura Power has indicated that questions about emissions are "beyond the scope of the draft screening report and associated Environmental Screening Process." TERRE feels that if the environmental screening process does not take into account greenhouse gas and other harmful emissions related to the expansion then the screening process is not able to properly assess the project's health and environmental risks.</p>	<p>Several of your comments refer to the project as the "PEC expansion"; however, as we communicated to you, Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period.</p> <p>The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects <i>of the project</i> would occur. The existing PEC facility went through an Environmental Assessment and is therefore not the subject of the Screening Report. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. We can confirm that Ministry of the Environment, Conservation and Parks (MECP) is aware of the scope and assessment process that Atura Power is undertaking for the project. This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.</p>

We hope that the responses above provide clarification regarding the comments raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: [REDACTED]

Sent: Thursday, January 11, 2024 5:45 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: portlandsupgrade

Dear Atura Power Senior Communications Advisor Darius Sokal ,
From your response to my letter:“the upgrades to the turbine generator
“will maintain [air] emissions levels at or below site permit levels”.”
From my letter:”We know there are alternatives to increasing fossil gas
burning, including cleaner and lower cost renewables, conservation and
load shifting. The final screening report should include an analysis of the
costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that
examines the smog, climate, economic and health impacts of the
Portlands Energy Centre at present and until its expected closure.”
It is not good enough to “maintain {air} emissions”. Doing so would
perpetuate diseases of the lungs, heart, vascular systems and brain
along with premature deaths, not to mention premature deaths due to
heat stroke.

Maintaining emissions will exacerbate climate change resulting in
greater extremities of temperature, both hot and cold, greater
extremities of precipitation, more floods and droughts, extremities and
frequency of storms which damage forests, crops, shorelines,
infrastructure and buildings (to mention only a few).

You have not provided me with the ‘cost benefit analysis until its final
closure’. Will you be providing compensation (polluter pay) to those who
suffer from the damages your maintaining “[air] emissions levels at or
below site permit levels”?

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Tuesday, January 16, 2024 4:43 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: portlandsupgrade

Good day, [REDACTED]

The Independent Electricity System Operator (IESO) determined the need for an additional 4,000 megawatts (MW) of flexible electricity generation capacity that can generate and store electricity, especially in the near-term while Ontario's nuclear fleet is refurbished or potentially retired. Ontario is entering a period of growing electricity demand and actions are needed to ensure the continued reliability of the electricity grid, especially during high-demand periods of extreme cold as we are experiencing this week. To help close this gap and meet the projected demand, the IESO awarded Atura Power with a contract to upgrade the internal gas turbine parts and modify the control systems at our Portlands Energy Centre (PEC) during routine maintenance to increase the stations' efficiency.

The Ontario Ministry of Environment, Conservation and Parks technical staff reviewed the draft environmental screening report for the proposed upgrades at the PEC and concurred that an air quality impact assessment is not needed, and that it is projected to cause no additional negative affects to the natural environment or species at risk.

And, as noted in our initial response, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades at this time.

Thank you again for your ongoing interest in the project. Your comments will be part of the record of engagement in the final screening report that is being prepared as part of the ongoing environmental assessment process.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Thursday, January 11, 2024 9:50 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

Region/Topic:

PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: May I please be added to your notification distribution list

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, January 15, 2024 11:00 AM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good morning, [REDACTED]

I will add your information to our contact list to provide you with project updates.

Thanks for your message and interest in our proposed PEC Efficiency Upgrades project.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

The following section includes copies of a generic comment form submitted to the PEC project inbox by approximately 130 members of the public from January 2, 2024, to January 23, 2024. Approximately 120 of the comment forms submitted were identical. A copy of this identical form as well as Atura Power's response are provided.

Following the identical comment form and Atura Power's response are eight (8) unique versions of the comment form that include minor variations where members of the public amended or personalized the comment form text. These unique comment forms as well as Atura Power's response to them are provided as well.

From: <civiciinput@newmode.org>

Sent: Tuesday, January 2, 2024 4:50 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, January 11, 2024 9:26 AM
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Re: My comments on the proposed Portlands gas plant expansion

Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached.

Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.

Sent on behalf of Darius Sokal

Senior Communications Advisor

Atura Power

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
<p>I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.</p>	<p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p>
<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>

Comment	Atura Power's Response
	<p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: [REDACTED] <civiciinput@newmode.org>
Sent: Thursday, January 4, 2024 1:00 AM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, January 11, 2024 9:26 AM
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Re: My comments on the proposed Portlands gas plant expansion

Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached.

Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.

Sent on behalf of Darius Sokal

Senior Communications Advisor

Atura Power

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
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<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>

Comment	Atura Power's Response
	<p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: [REDACTED] <civiciput@newmode.org>

Sent: Tuesday, January 2, 2024 3:58 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I have asthma, and so do some of my children and grandchildren. Toronto smog makes it worse.

Thus, I do NOT support the expansion of the Portlands gas plant. Toronto City Council also doesn't support the expansion.

Please, Atura, explain how you can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers - AND the impact on our health (which will increase costs to our healthcare system, such as it is these days).

Cleaner and lower cost renewables, conservation and load shifting are better alternatives. The final screening report should include an analysis of the costs and benefits of cleaner alternatives, and this MUST include the costs to our health (including work and school absenteeism and healthcare costs).

The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Do not inflict more pollution on the struggling people of Toronto.

Fossil fuels are the technology of the last century. Renewables will help us survive the rising climate catastrophe of this century. Have the courage and integrity to act accordingly.

Sincerely,

[REDACTED]

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, January 11, 2024 9:26 AM
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Re: My comments on the proposed Portlands gas plant expansion

Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached.

Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.

Sent on behalf of Darius Sokal

Senior Communications Advisor

Atura Power

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
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<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
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	<p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>

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Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: [REDACTED] <civicinput@newmode.org>
Sent: Tuesday, January 2, 2024 2:26 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not and never will support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

The science shows the health hazards to those who live within the air shed of such plants. It is breach of public trust to put at risk the health of those who reside within that air shed. And, of greatest concern, the most recent reports by IPCC, IEA and more sound the alarm on the use of fossil fuels to generate electricity. Surely the unprecedented, record-breaking fires of 2023, floods of 2023, heat waves of 2023 must give us all pause and trigger a rapid end to such profligate use of fossil fuels. We must not further endanger the security and health of those young people and our companion species who come after us. Continuing to use natural gas in this way is intergenerational betrayal.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

[REDACTED]

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, January 11, 2024 9:26 AM
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Re: My comments on the proposed Portlands gas plant expansion

Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached.

Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.

Sent on behalf of Darius Sokal

Senior Communications Advisor

Atura Power

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

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Comment	Atura Power's Response
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<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
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Darius Sokal
Senior Communications Advisor
Atura Power

From: [REDACTED] <civiciinput@newmode.org>
Sent: Tuesday, January 2, 2024 3:58 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

I totally support the points in the letter below!!

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

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Thank you.

Sincerely,

[REDACTED]

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To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
<p>I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.</p>	<p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p>
<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>

Comment	Atura Power's Response
	<p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: [REDACTED] <civicinput@newmode.org>
Sent: Tuesday, January 2, 2024 4:48 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

In responding to the invitation to address the draft screening report for the expansion of the Portlands gas plant, I wish to express my opposition to the expansion in strongest terms.

Not only are there less polluting options but strong opposition to the plans has also emerged from Toronto City Council.

Atura must respect our right to a clean environment.

Sincerely,

[REDACTED]

From: [Upgrade project for PEC](#)
To: [Upgrade project for PEC](#); [REDACTED]
Cc: [Darius Sokal](#)
Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto
Date: January 9, 2024 2:41:01 PM

Thank you for your email, [REDACTED]

Your comments are noted and part of the project record.

Please continue visiting aturapower.com/portlandsupgrade for project updates and additional information.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-657

From: [REDACTED] <civiciinput@newmode.org>

Sent: Friday, January 5, 2024 2:22 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Let us not move backward!

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, January 11, 2024 9:26 AM
Cc: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Re: My comments on the proposed Portlands gas plant expansion

Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached.

Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.

Sent on behalf of Darius Sokal

Senior Communications Advisor

Atura Power

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
<p>I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.</p>	<p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p>
<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>

Comment	Atura Power's Response
	<p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: [REDACTED] <civinput@newmode.org>
Sent: Sunday, January 7, 2024 2:18 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

I have read the draft screening report and find it lacking in a number of places: it should include definite figures of GHG emitted over the past 4-5 years (not "historical" amounts); it should include the financial cost of the proposed expansion; it should include the expected impact on electricity costs to consumers.

We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.

And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, January 11, 2024 8:29 PM

To: [REDACTED]

Subject: Re: My comments on the proposed Portlands gas plant expansion

Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached.

Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.

Sent on behalf of Darius Sokal
Senior Communications Advisor
Atura Power

January 11, 2024

Good afternoon,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
<p>I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.</p>	<p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p>
<p>I have read the draft screening report and find it lacking in a number of places: it should include definite figures of GHG emitted over the past 4-5 years (not "historical" amounts); it should include the financial cost of the proposed expansion; it should include the expected impact on electricity costs to consumers.</p>	<p>All PEC emissions reports are publicly available on the provincial and federal government websites. At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades. Additionally, it is the IESO which sets the price of electricity in Ontario, therefore, please direct your question regarding electricity costs for consumers to the IESO here: https://www.ieso.ca/en/Corporate-IESO/Contact.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>

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We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

From: [REDACTED] <civicinput@newmode.org>
Sent: Tuesday, January 23, 2024 3:14 AM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.

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And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

[REDACTED]
[REDACTED]

From: [REDACTED] <civicinput@newmode.org>
Sent: Thursday, February 8, 2024 12:06 AM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: My comments on the proposed Portlands gas plant expansion

Dear Atura Power Senior Communications Advisor Darius Sokal ,

Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant.

I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.

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And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.

Thank you.

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Sunday, February 11, 2024 9:32 PM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: My comments on the proposed Portlands gas plant expansion

Hello again, [REDACTED]

Your questions below are identical to those you asked on Jan. 22, 2024, via an email to this project email address.

As a result, I've reattached our response originally emailed on Jan. 26, 2024, to you from this email address.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

January 11, 2024

Good morning,

Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record.

Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

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<p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.</p>	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>
<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>

Comment	Atura Power's Response
	<p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Senior Communications Advisor
Atura Power

Appendix B5: Correspondence Records with Municipal Staff and Elected Officials

Email sent by Atura Power to Municipal Staff and Elected Officials, including cover letter and Notice of Commencement, on September 6, 2023

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, September 6, 2023 10:53 AM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Wednesday, September 6, 2023

To whom it may concern,

This letter is to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), on the site of the former Richard L. Hearn Generating Station on Villiers Island at 470 Unwin Ave., Toronto, Ont. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. These upgrades will occur during a regular maintenance cycle and, due to improved technology, will result in better performance. All activities to complete the upgrades will take place within the footprint of the existing facility. This project is part of Atura Power's effort to build a more efficient and resilient electricity grid in Ontario.

Currently, PEC is capable of outputting 550 megawatts (MW) to Ontario's electricity grid with proposed upgrades increasing its capacity to 600 MW. This planned increase of 50 MW results in the upgrades being subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. The attached Notice is issued to communicate the start of the Environmental Screening Process. A copy of the Notice was published in the *Toronto Star* and *Toronto Sun* on Wednesday, September 6, 2023, and will also be published in the *Beach Metro* newspaper in the coming days. A copy is also available on the project webpage at aturapower.com/portlandsupgrade.

Atura Power is committed to engaging all interested parties on all our projects. This includes you, our valued neighbours. We want to hear from you and would like to **invite you to attend a virtual public meeting on Thursday, October 5, 2023, from 6:30 to 7:30 p.m.** to learn more about the planned upgrades and give us your feedback. The attached Notice includes details on how to join.

For more information about the project, please visit our project webpage (see link above). If you have any other questions or inquiries, please do not hesitate to contact us at portlandsupgrade@aturapower.com.

Sincerely,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power

Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

Portlands Energy Centre Upgrades

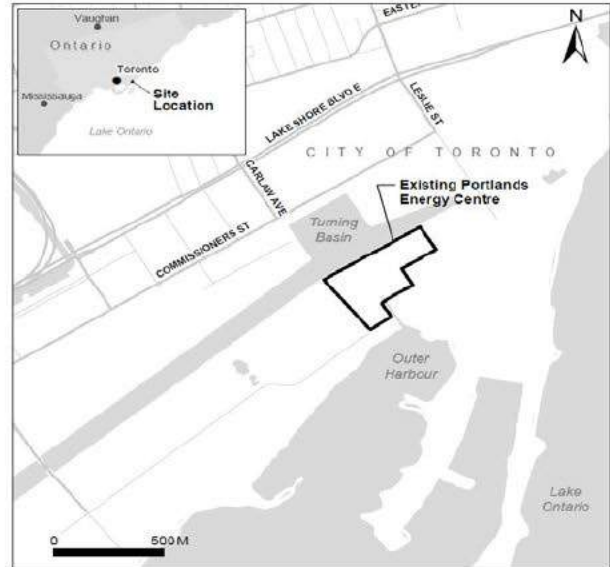
Atura Power is planning to make efficiency upgrades at its Portlands Energy Centre (PEC).

Project Description

PEC has operated since 2009 in the City of Toronto on the site of the former Richard L. Hearn Generating Station on Villiers Island. It's capable of outputting 550 megawatts (MW) to Ontario's electricity grid.

The upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts during a regular maintenance cycle and will result in an increase in output capacity to 600 MW. All upgrades will take place within the existing facility and **there will be no changes or expansion beyond the existing PEC footprint.**

Atura Power



Atura Power is committed to building a resilient electricity grid in Ontario and is working to address the energy supply shortfall, identified by the Independent Electricity System Operator, that Ontario will experience in the near future. The planned efficiency upgrades to PEC are part of Atura Power's efforts to address this supply gap and to make energy production more efficient and affordable.

Environmental Screening Process

Since the project will result in a 50 MW increase in output capacity of PEC, it's subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. This Notice is issued to communicate the start of the Environmental Screening Process.

Virtual Public Meeting

Atura Power is committed to engaging with Indigenous communities, the public and other interested parties on all our projects. We invite you to attend an upcoming virtual public meeting to learn more and provide feedback. **You can access the link to join the public meeting on the project webpage.** If you are unable to participate, meeting materials will be posted on the project webpage for review following the meeting.

How to Join	Date:	Thursday, October 5, 2023
	Time:	6:30 to 7:30 p.m. Eastern Time
	Project webpage:	aturapower.com/portlandsupgrade

Project Contacts

Please email your questions or comments to portlandsupgrade@aturapower.com.

For more information: aturapower.com/portlandsupgrade

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

Reminder email sent by Atura Power to Municipal Staff and Elected Officials on October 3, 2023

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Tuesday, October 3, 2023 5:22 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades

Good day.

A reminder that Atura Power will be hosting a virtual public meeting on Thursday, October 5th, from 6:30 to 7:30 p.m. ET about the planned efficiency upgrades at Portlands Energy Centre.

A link to access the meeting will be available on the project webpage here:
aturapower.com/portlandsupgrade.

If you are unable to participate, meeting materials will be posted on the project webpage following the meeting.

Thank you, and please email any questions or comments to portlandsupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Email sent by Atura Power to Municipal Staff and Elected Officials, including draft Environmental Screening Report, on December 14, 2023

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, December 14, 2023 9:38 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Portlands Energy Centre Draft Screening Report

Good afternoon.

As you know, Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre (PEC). The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. Atura Power has prepared a draft copy of the Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the project.

Attached to this email is the draft copy of the Screening Report. We are sharing this draft with Indigenous communities, key agencies, and elected officials such as yourselves, and interested members of the public to offer an additional opportunity for those interested to review the project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power is voluntarily providing this opportunity so that comments can be incorporated in the final Screening Report. We invite you to review the draft report and share any comments on the report via our project email address, portlandsupgrade@aturapower.com. We are **accepting comments until Jan. 7, 2024**, after which time we will prepare and release the final version of the Screening Report in Winter 2024.

Thank you very much and please contact us at portlandsupgrade@aturapower.com with any questions.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, September 6, 2023 9:05 AM

To: mayor_chow@toronto.ca

Subject: Portlands Energy Centre Efficiency Upgrades

Good morning, Mayor Chow.

My name is Darius Sokal, the communications and municipal relations advisor for Atura Power.

I'm reaching out to let you know that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre (PEC), located on the site of the former Richard L. Hearn Generating Station on Villiers Island. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. All upgrades will take place within the existing facility and **there will be no changes or expansion beyond the existing PEC footprint**. The attached letter and Notice of Commencement provide more details about the proposed activities, engagement opportunities, and how to learn more.

I'd also appreciate an opportunity to meet with you and your staff to further discuss the project and explain how Atura Power and PEC help meet the City of Toronto's growing energy needs.

Thank you for your time, and please let me know if you have any questions, and if you'd like to meet at a date and time that fit your schedule.

Sincerely,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Mayor Chow <Mayor_Chow@toronto.ca>
Sent: Wednesday, September 6, 2023 11:05 AM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades

Please note this is an automatic response.

Thank you for contacting the Office of Mayor Olivia Chow!

Your email is important to us and we want you to know that your message has been received. The Mayor's office receives a high volume of correspondence, but the Mayor's Staff reads and reviews every incoming email. We do our best to respond to all constituents and direct your inquiry as appropriate.

That means some concerns or questions will need to be forwarded to the appropriate City of Toronto official and/or your local Councillor who may be best suited to assist you. We thank you in advance for your understanding.

- * If you require immediate help from the City of Toronto regarding services such as waste collection, snow clearing, road safety, or other municipal services, please call 311.
- * If you are emailing to invite the Mayor to an event please be sure to include key details, and someone from our office will reach out to respond to your request.
- * If you are requesting a Proclamation, Congratulatory Scroll, or Letter of Greeting, please follow this link to make your request: www.toronto.ca/city-government/awards-tributes

Thank you again for taking the time to write.

Office of Mayor Olivia Chow

City Hall, 2nd Floor
100 Queen St. W.
Toronto, ON M5H 2N2

Our office is committed to accountability and transparency. If you are requesting a meeting with the Mayor or a member of the Mayor's staff on behalf of a for-profit group or enterprise or a group that represents for-profit enterprises, you need to confirm that you are in compliance with the Lobbyists' Code of Conduct. Please contact the Office of the Lobbyist Registrar by phone at 416-338-5858 or by email at lobbyistregistrar@toronto.ca

From: Darius Sokal

Sent: Tuesday, September 19, 2023 3:36 PM

To: mayor_chow@toronto.ca

Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon, Mayor Chow.

I'm following up on my sincere offer to meet with you to discuss the efficiency upgrades that Atura Power is proposing to make at our Portlands Energy Centre. We'd like an opportunity to review the project with you and answer any questions that you may have.

Please note that I called and left a similar message with your office voicemail minutes ago.

Thank you once again, and I hope to hear from you soon.

Kindest regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Mayor Chow <Mayor_Chow@toronto.ca>
Sent: Tuesday, September 19, 2023 3:36 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades

Please note this is an automatic response.

Thank you for contacting the Office of Mayor Olivia Chow!

Your email is important to us and we want you to know that your message has been received. The Mayor's office receives a high volume of correspondence, but the Mayor's Staff reads and reviews every incoming email. We do our best to respond to all constituents and direct your inquiry as appropriate.

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- * If you are requesting a Proclamation, Congratulatory Scroll, or Letter of Greeting, please follow this link to make your request: www.toronto.ca/city-government/awards-tributes

Thank you again for taking the time to write.

Office of Mayor Olivia Chow

City Hall, 2nd Floor
100 Queen St. W.
Toronto, ON M5H 2N2

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From: Mayor Chow <Mayor_Chow@toronto.ca>
Sent: Thursday, December 14, 2023 9:50 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Automatic reply: Portlands Energy Centre Draft Screening Report

Please note this is an automatic response.

Thank you for contacting the Office of Mayor Olivia Chow!

Your email is important to us and we want you to know that your message has been received. The Mayor's office receives a high volume of correspondence, but the Mayor's Staff reads and reviews every incoming email. We do our best to respond to all constituents and direct your inquiry as appropriate.

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- If you are emailing to invite Mayor Chow to an event, please use this form: https://www.mayoroliviachow.ca/invite_the_mayor
- If you require immediate help from the City of Toronto regarding services such as waste collection, snow clearing, road safety, or other municipal services, please call 311.
- If you are requesting a Proclamation, Congratulatory Scroll, or Letter of Greeting, please follow this link to make your request: www.toronto.ca/city-government/awards-tributes

Thank you again for taking the time to write.

Office of Mayor Olivia Chow

City Hall, 2nd Floor
100 Queen St. W.
Toronto, ON M5H 2N2

Our office is committed to accountability and transparency. If you are requesting a meeting with the Mayor or a member of the Mayor's staff on behalf of a for-profit group or enterprise or a group that represents for-profit enterprises, you need to confirm that you are in compliance with the Lobbyists' Code of Conduct. Please contact the Office of the Lobbyist Registrar by phone at 416-338-5858 or by email at lobbyistregistrar@toronto.ca

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Wednesday, September 6, 2023 9:10 AM
To: councillor_fletcher@toronto.ca
Subject: Portlands Energy Centre Efficiency Upgrades

Good morning, Councillor Fletcher.

This is Darius Sokal again, the communications and municipal relations advisor for Atura Power.

I'm reaching out to let you know that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre (PEC), located on the site of the former Richard L. Hearn Generating Station on Villiers Island. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. All upgrades will take place within the existing facility and **there will be no changes or expansion beyond the existing PEC footprint**. The attached letter and Notice of Commencement provide more details about the proposed activities, engagement opportunities, and how to learn more.

I'd also appreciate an opportunity to meet with you and your staff to further discuss the project and explain how Atura Power and PEC help meet the City of Toronto's growing energy needs.

Thank you for your time, and please let me know if you have any questions, and if you'd like to meet at a date and time that fit your schedule.

Sincerely,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Wednesday, September 6, 2023

To whom it may concern,


This letter is to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), on the site of the former Richard L. Hearn Generating Station on Villiers Island at 470 Unwin Ave., Toronto, Ont. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. These upgrades will occur during a regular maintenance cycle and, due to improved technology, will result in better performance. All activities to complete the upgrades will take place within the footprint of the existing facility. This project is part of Atura Power's effort to build a more efficient and resilient electricity grid in Ontario.

Currently, PEC is capable of outputting 550 megawatts (MW) to Ontario's electricity grid with proposed upgrades increasing its capacity to 600 MW. This planned increase of 50 MW results in the upgrades being subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. The attached Notice is issued to communicate the start of the Environmental Screening Process. A copy of the Notice was published in the *Toronto Star* and *Toronto Sun* on Wednesday, September 6, 2023, and will also be published in the *Beach Metro* newspaper in the coming days. A copy is also available on the project webpage at aturapower.com/portlandsupgrade.

Atura Power is committed to engaging with Indigenous communities, agencies, the public and other interested parties on all our projects. A virtual public meeting will be hosted on **Thursday, October 5, 2023, from 6:30 to 7:30 p.m.** to share more about the planned upgrades and collect feedback from members of the public. The attached Notice includes details on how to join. Outreach to Indigenous communities is also underway to learn how they wish to be engaged about the project.

For more information about the project, please visit our project webpage (see link above). If you have any other questions or inquiries, please do not hesitate to contact us at portlandsupgrade@aturapower.com.

Sincerely,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power

Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

Portlands Energy Centre Upgrades

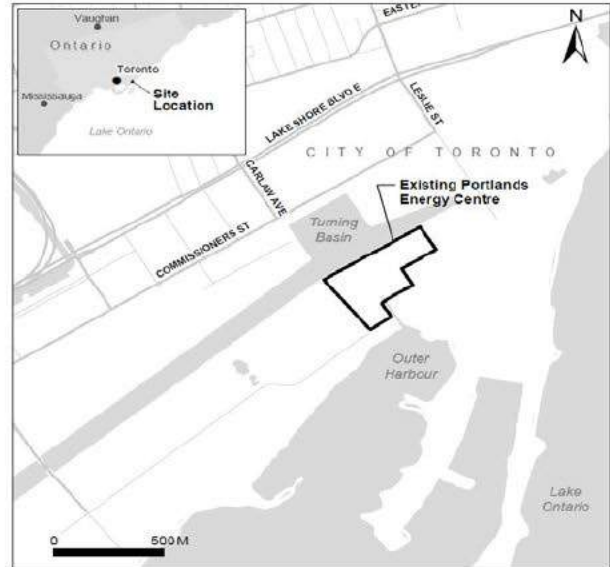
Atura Power is planning to make efficiency upgrades at its Portlands Energy Centre (PEC).

Project Description

PEC has operated since 2009 in the City of Toronto on the site of the former Richard L. Hearn Generating Station on Villiers Island. It's capable of outputting 550 megawatts (MW) to Ontario's electricity grid.

The upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts during a regular maintenance cycle and will result in an increase in output capacity to 600 MW. All upgrades will take place within the existing facility and **there will be no changes or expansion beyond the existing PEC footprint.**

Atura Power



Atura Power is committed to building a resilient electricity grid in Ontario and is working to address the energy supply shortfall, identified by the Independent Electricity System Operator, that Ontario will experience in the near future. The planned efficiency upgrades to PEC are part of Atura Power's efforts to address this supply gap and to make energy production more efficient and affordable.

Environmental Screening Process

Since the project will result in a 50 MW increase in output capacity of PEC, it's subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. This Notice is issued to communicate the start of the Environmental Screening Process.

Virtual Public Meeting

Atura Power is committed to engaging with Indigenous communities, the public and other interested parties on all our

projects. We invite you to attend an upcoming virtual public meeting to learn more and provide feedback. **You can access the link to join the public meeting on the project webpage.** If you are unable to participate, meeting materials will be posted on the project webpage for review following the meeting.

How to Join	Date:	Thursday, October 5, 2023
	Time:	6:30 to 7:30 p.m. Eastern Time
	Project webpage:	aturapower.com/portlandsupgrade

Project Contacts

Please email your questions or comments to portlandsupgrade@aturapower.com.

For more information: aturapower.com/portlandsupgrade

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

From: Darius Sokal

Sent: Tuesday, September 19, 2023 3:30 PM

To: councillor_fletcher@toronto.ca

Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon, Councilor Fletcher.

I'm following up on my sincere offer to meet with you to discuss the efficiency upgrades that Atura Power is proposing to make at our Portlands Energy Centre. We'd like an opportunity to review the project with you and answer any questions that you may have.

Please note that I called and spoke with a representative from your office, and she suggested that I follow up with you by email.

Thank you once again, and I hope to hear from you soon.

Kindest regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, September 6, 2023 12:53 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Dabrusin, Julie - M.P. <Julie.Dabrusin@parl.gc.ca>

Sent: Wednesday, September 6, 2023 12:53 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades

Thank you for writing to me. Due to high volume, there may be a delay in my response. I appreciate your patience.

If you have emailed in your casework request, you will have a response within 48 hours. If it is an emergency, we will get back to you sooner. To better assist you, please avoid sending duplicate requests through different channels.

Federal resources and programs

My office can help Toronto—Danforth constituents with federal government resources and programs. You can find out [who your MP is with your postal code](#). Below you'll find a guide on how your email will be prioritized:

- If your query is related to immigration CPP, EI, tax issues, etc., consent forms will need to be filled out before your file can be activated. Please find our [consent form here](#) and send your signed document to julie.dabrusin.c1@parl.gc.ca. You can scan documents using either [iPhone](#) or [Android](#). Please let me know if this is not an option that is available to you.
- Queries regarding government programs, policies and operations take time to research, contact appropriate departments, and collate information for the response. If you have provided your full contact details with your query, a response will be forthcoming.

Auto-Generated Advocacy emails

If your email is an auto-generated advocacy email it may not receive a response at this time. We receive a high volume of correspondence hence our response time for email has increased. Automated, cc'd, and forwarded emails are a lower priority at this time.

Unfortunately, I do not have the staff capacity to personally answer every auto-generated email.

I may have addressed your issue already in one of my Facebook Live videos. Please visit [here](#) for my conversations with community members and experts in their fields. Click [here](#) for all of my videos including my Ask Me Anythings. My future Facebook Live sessions will be announced in my email newsletter and on social media.

If you have not signed up for email updates, please click on “Get Updates” at <https://juliedabrusin.libparl.ca/>

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, September 6, 2023 12:53 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Kaufman, Rob <KaufmanR@ndp.on.ca>

Sent: Tuesday, September 12, 2023 4:26 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: FW: Portlands Energy Centre Efficiency Upgrades

Darius, Peter Tabuns, MPP Toronto-Danforth looks forward to attending the meeting on the 5th.
All the best.

Robin Kaufman
Assistant to MPP Peter Tabuns
Toronto-Danforth
923 Danforth Ave.
416-461-0223

[Join Peter's e-bulletin list](#)

From: Darius Sokal

Sent: Wednesday, September 13, 2023 7:06 AM

To: 'Kaufman, Rob' <KaufmanR@ndp.on.ca>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

Good morning, Robin.

Thank you for the message, and we look forward to Mr. Tabuns joining us next month.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power

Sent: Thursday, September 28, 2023 6:14 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from Peter about PEC Upgrade

You don't often get email from no-reply@sendgrid.opg.com. [Learn why this is important](#)

First name: Peter

Last name: Tabuns

Region/Topic: PEC Upgrade

Email Address: tabunsp@ndp.on.ca

Enter Your Message Here: please keep me up to date.

I accept the privacy policy: Checked

|

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, October 2, 2023 9:44 AM

To: tabunsp@ndp.on.ca

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from Peter about PEC Upgrade

Good morning, Mr. Tabuns.

We will most certainly keep you up to date.

Please attend our upcoming live virtual public meeting on Oct. 5th, from 6:30 to 7:30 p.m., to learn more about the PEC efficiency upgrades and provide your project-related feedback and questions.

A link to the meeting will be available on the project webpage here: <https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/>

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Jennifer Dsouza (Environment) <Jennifer.Dsouza7@toronto.ca> on behalf of James Nowlan <James.Nowlan@toronto.ca>

Sent: Friday, January 5, 2024 9:04 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: David Jollimore <David.Jollimore@toronto.ca>; Josephine Cusumano <Josephine.Cusumano@toronto.ca>

Subject: City of Toronto comments on the draft Screening Report for the Portlands Energy Centre upgrade project

Good day,

I am sending the attached letter on behalf of James Nowlan, Executive Director - Environment & Climate Division, City of Toronto.

Thank you,

Jennifer DSouza

Support Assistant B

Environment and Climate Division

[City of Toronto](#)

Tel: (416) 397-5789



Environment & Climate

Union Station
East Wing, 2nd floor
c/o Metro Hall mailroom
55 John Street
Toronto, Ontario M5V 3C6

Tel: 416-392-6064
James.Nowlan@toronto.ca
www.toronto.ca/environment

January 5, 2024

Mr. Darius Sokal
Senior Communications Advisor
Atura Power
1415 Joshuas Creek Drive, Unit 101
Oakville, ON
L6H 7G4
Via email: portlandsupgrade@aturapower.com

Subject: City of Toronto comments on the draft Screening Report for the Portlands Energy Centre upgrade project

Dear Mr. Sokal,

I offer the following comments on the draft Screening Report for the Portlands Energy Centre (PEC) upgrade project.

Toronto City Council positions:

The planned upgrade would increase PEC's electricity generation capacity from 550 MW to 600 MW, counter to Toronto City Council's recent statements:

- In June 2023, Toronto City Council requested, "the Government of Canada to issue Clean Electricity Regulations that prohibit increasing the gas-fired generating capacity at the Portlands Energy Centre, effective immediately" ([2023.MM7.25](#), Part 1).
- In May 2023, Toronto City Council voted to "oppose any new power generation proposal involving increased burning of fossil fuels, including natural gas, in the City" ([2023.MM6.13](#), Part 1).
- City Council voted to "request the Province of Ontario to immediately invest in programs to deliver energy efficiency, demand management and conservation to meet the capacity and energy needs that would have been fulfilled by expansion of electricity production through burning of fossil fuels" ([2023.MM6.13](#), Part 2).

Local context and emissions:

PEC is located in the Port Lands which are currently under development, and near the heart of the City of Toronto that has a population of over three million people. As such, any

change in emissions from the facility will occur near a densely populated area. In recent years, PEC's operating hours have increased significantly beyond what was anticipated when the facility was proposed as a peaking plant.

The draft Screening Report does not provide the following quantitative information, and we request that it be included in the final Screening Report to provide clarity about the project:

1. If the upgrade is undertaken, is the quantity of natural gas consumed annually expected to increase, decrease, or stay the same? What quantity of natural gas will be consumed and how does this compare to PEC's current state?
2. What emission intensity and total annual quantity of each relevant air pollutant (carbon monoxide, nitrogen oxides, particulate matter (PM_{2.5}) and sulphur dioxide) would be emitted, and how do these compare to PEC's current state?

The required Screening Criteria Checklist, question 3.1 asks if the project would, "have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants?" A quantitative analysis of how the upgrade project would impact PEC emissions would answer this question.

3. What total annual quantity of greenhouse gases (GHGs) would be emitted, and how does this compare to PEC's current state?

The draft Screening Report, page 18, indicates that the upgrade project is expected to lower the facility's GHG intensity by two percent. What is not clear is how the upgrade project would impact total, annual GHG emissions.

Planning today for net zero:

Achieving Toronto's goal of net-zero GHG emissions community-wide by 2040, as outlined in the [TransformTO Net Zero Strategy](#), among North America's most ambitious climate plans, requires transitioning buildings and transportation from fossil fuels to clean electricity. A critical step for success is developing a resilient, carbon-free, affordable electricity supply in Ontario and increasing local renewable electricity generation, rather than increasing electricity generation from fossil fuels.

As we think ahead, we are interested to hear if Atura plans to capture and store emissions from PEC, including emissions from any increased capacity by 2040. We look forward to discussions in the years to come, with Atura, other facility operators, utilities, other levels of government and their agencies, about collectively transitioning Ontario's electricity sector.

Best regards,



James Nowlan
Executive Director, Environment & Climate Division
City of Toronto

Cc:

David Jollimore, Deputy City Manager, Corporate Services
City of Toronto
Email: David.Jollimore@toronto.ca

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Monday, February 5, 2024 7:41 PM
To: James Nowlan <James.Nowlan@toronto.ca>
Cc: David Jollimore <David.Jollimore@toronto.ca>; Josephine Cusumano <Josephine.Cusumano@toronto.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>
Subject: RE: City of Toronto comments on the draft Screening Report for the Portlands Energy Centre upgrade project

Hello, Ms. Dsouza.

Thank you and Mr. Nowlan for your email and Mr. Nowlan's letter received on Jan. 5, 2023, about Atura Power's draft screening report for the proposed Portlands Energy Centre Upgrades.

I've attached a PDF which contains Atura Power's responses to Mr. Nowlan's comments and questions.

Thank you for your interest in our project, and please email this address with any additional questions.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Feb. 5, 2024

Mr. James Nowlan
Executive Director, Environment & Climate Division
City of Toronto

Cc: David Jollimore, Deputy City Manager, Corporate Services
City of Toronto

Re: City of Toronto comments on the draft Screening Report for the Portlands Energy Centre upgrade project

Dear Mr. Nowlan,

Thank you for your recent letter on Jan. 5, 2024, sharing the City of Toronto's comments about the draft Portlands Energy Centre (PEC) Screening Report. Your comments are noted and are part of the project record.

In response to each of the questions/comments raised in your email, we offer the following responses in the table below.

Comment	Atura Power's Response
Toronto City Council Positions	
<p>The planned upgrade would increase PEC's electricity generation capacity from 550 MW to 600 MW, counter to Toronto City Council's recent statements:</p> <ul style="list-style-type: none"> • In June 2023, Toronto City Council requested, "the Government of Canada to issue Clean Electricity Regulations that prohibit increasing the gas-fired generating capacity at the Portlands Energy Centre, effective immediately" (2023.MM7.25, Part 1). • In May 2023, Toronto City Council voted to "oppose any new power generation proposal involving increased burning of fossil fuels, including natural gas, in the City"(2023.MM6.13, Part 1). • City Council voted to "request the Province of Ontario to immediately invest in programs to deliver energy efficiency, demand management and conservation to meet the capacity and energy needs that would have been fulfilled by expansion of electricity production through burning of fossil fuels" (2023.MM6.13, Part 2). 	<p>A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Independent Electricity System Operator (IESO) has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) Request for Proposal (RFP), results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades.</p>
<p>Local Context and Emissions: <i>"The draft Screening Report does not provide the following quantitative information, and we request that it be included in the final Screening Report to provide clarity about the project..."</i></p>	
<p>If the upgrade is undertaken, is the quantity of natural gas consumed annually expected to increase, decrease, or stay the same? What quantity of natural gas will be consumed and how does this compare to PEC's current state?</p>	<p>The quantity of natural gas consumed after the efficiency upgrades are completed will depend on the how often the IESO calls on PEC to operate. As stated in Appendix B3a of the draft Screening Report, PEC operations are dictated by the IESO based on the electricity supply and demand balance, which fluctuates season by season and year to year.</p> <p>Also note that, as per Section 3.3 in Table 3-1 of the draft PEC Efficiency Upgrades Screening Report, the same amount of fuel used will produce more power after the upgrades.</p>
<p>What emission intensity and total annual quantity of each relevant air pollutant (carbon monoxide, nitrogen oxides, particulate matter (PM2.5) and sulphur dioxide) would be emitted, and how do these compare to PEC's current state? The required Screening Criteria Checklist, question 3.1 asks if the project would, "have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants?" A quantitative analysis of how the upgrade project would impact PEC emissions would answer this question.</p>	<p>As per Section 3.2 of the draft Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project.</p> <p>In recent correspondence to the project team, it was confirmed that "[Ministry of Environment, Conservation and Parks'] MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below</p>

Comment	Atura Power's Response
	<p>site permit levels. Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.</p>
<p>What total annual quantity of greenhouse gases (GHGs) would be emitted, and how does this compare to PEC's current state? The draft Screening Report, page 18, indicates that the upgrade project is expected to lower the facility's GHG intensity by two percent. What is not clear is how the upgrade project would impact total, annual GHG emissions.</p>	<p>The text on page 18 of the draft Screening Report indicating that the greenhouse gas intensity of the facility is expected to reduce by two per cent relates to the fact the same amount of fuel used will produce more power after the upgrades.</p> <p>The total annual quantity of GHGs emitted will depend on the how often the IESO calls on PEC to operate. As stated in Appendix B3a of the draft Screening Report, PEC operations are dictated by the IESO based on the electricity supply and demand balance, which fluctuates season by season and year to year.</p>
<p>Planning Today for Net Zero:</p>	
<p>Achieving Toronto's goal of net-zero GHG emissions community-wide by 2040, as outlined in the TransformTO Net Zero Strategy, among North America's most ambitious climate plans, requires transition buildings and transportation from fossil fuels to clean electricity. A critical step for success is developing a resilient, carbon-free, affordable electricity supply in Ontario and increasing local renewable electricity generation, rather than increasing electricity generation from fossil fuels.</p>	<p>The IESO is moving forward with a procurement process to meet near, medium and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>
<p>As we think ahead, we are interested to hear if Atura plans to capture and store emissions from PEC, including emissions from any increased capacity by 2040. We look forward to discussions in the years to come, with Atura, other facility operators, utilities, other levels of government and their agencies, about collectively transitioning Ontario's electricity sector.</p>	<p>Atura Power is playing a leadership role in establishing the supply of low-carbon hydrogen in Ontario to help the province move towards a net-zero future with plans for low-carbon hydrogen facilities in Niagara, Windsor, and Nanticoke. We are also developing a 250 MW battery energy storage system (BESS) in Napanee, and have submitted proposals to develop additional BESS projects in Nanticoke, Napanee and Peterborough.</p>

We hope that the responses above provide clarification regarding the comments and questions raised about the draft Screening Report and associated Environmental Screening Process. The responses to these comments will be included as part of the record of engagement in the final Screening Report.

Should you require further clarification on project details, please continue to contact us through our project email address at portlandsupgrade@aturapower.com.

Sincerely,

Darius Sokal
Senior Communications Advisor
Atura Power

Appendix B6: Correspondence Records with Agencies

- **B6a: Correspondence Records with MECP**
- **B6b: Correspondence Records with Other Agencies**

Email sent by Atura Power to Agencies,
including cover letter and Notice of
Commencement, on September 6, 2023

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Wednesday, September 6, 2023 10:53 AM
To: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Wednesday, September 6, 2023

To whom it may concern,

This letter is to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), on the site of the former Richard L. Hearn Generating Station on Villiers Island at 470 Unwin Ave., Toronto, Ont. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. These upgrades will occur during a regular maintenance cycle and, due to improved technology, will result in better performance. All activities to complete the upgrades will take place within the footprint of the existing facility. This project is part of Atura Power's effort to build a more efficient and resilient electricity grid in Ontario.

Currently, PEC is capable of outputting 550 megawatts (MW) to Ontario's electricity grid with proposed upgrades increasing its capacity to 600 MW. This planned increase of 50 MW results in the upgrades being subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. The attached Notice is issued to communicate the start of the Environmental Screening Process. A copy of the Notice was published in the *Toronto Star* and *Toronto Sun* on Wednesday, September 6, 2023, and will also be published in the *Beach Metro* newspaper in the coming days. A copy is also available on the project webpage at aturapower.com/portlandsupgrade.

Atura Power is committed to engaging all interested parties on all our projects. This includes you, our valued neighbours. We want to hear from you and would like to **invite you to attend a virtual public meeting on Thursday, October 5, 2023, from 6:30 to 7:30 p.m.** to learn more about the planned upgrades and give us your feedback. The attached Notice includes details on how to join.

For more information about the project, please visit our project webpage (see link above). If you have any other questions or inquiries, please do not hesitate to contact us at portlandsupgrade@aturapower.com.

Sincerely,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power

Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

Portlands Energy Centre Upgrades

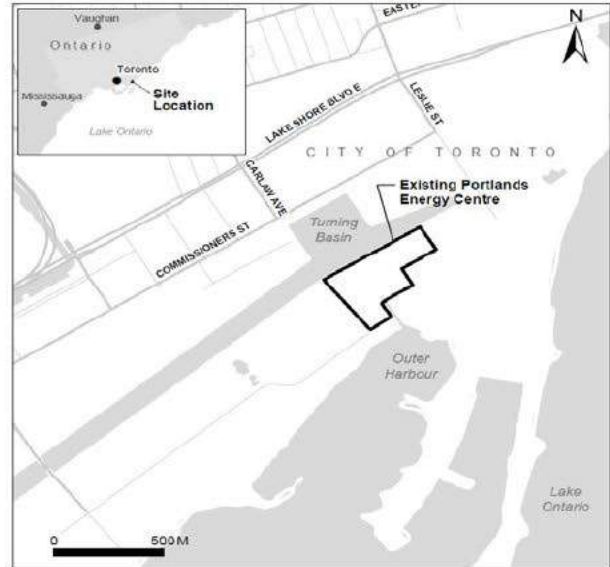
Atura Power is planning to make efficiency upgrades at its Portlands Energy Centre (PEC).

Project Description

PEC has operated since 2009 in the City of Toronto on the site of the former Richard L. Hearn Generating Station on Villiers Island. It's capable of outputting 550 megawatts (MW) to Ontario's electricity grid.

The upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts during a regular maintenance cycle and will result in an increase in output capacity to 600 MW. All upgrades will take place within the existing facility and **there will be no changes or expansion beyond the existing PEC footprint.**

Atura Power



Atura Power is committed to building a resilient electricity grid in Ontario and is working to address the energy supply shortfall, identified by the Independent Electricity System Operator, that Ontario will experience in the near future. The planned efficiency upgrades to PEC are part of Atura Power's efforts to address this supply gap and to make energy production more efficient and affordable.

Environmental Screening Process

Since the project will result in a 50 MW increase in output capacity of PEC, it's subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. This Notice is issued to communicate the start of the Environmental Screening Process.

Virtual Public Meeting

Atura Power is committed to engaging with Indigenous communities, the public and other interested parties on all our

projects. We invite you to attend an upcoming virtual public meeting to learn more and provide feedback. **You can access the link to join the public meeting on the project webpage.** If you are unable to participate, meeting materials will be posted on the project webpage for review following the meeting.

How to Join	Date:	Thursday, October 5, 2023
	Time:	6:30 to 7:30 p.m. Eastern Time
	Project webpage:	aturapower.com/portlandsupgrade

Project Contacts

Please email your questions or comments to portlandsupgrade@aturapower.com.

For more information: aturapower.com/portlandsupgrade

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

Reminder email sent by Atura Power
to key Agencies on October 3, 2023

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Tuesday, October 3, 2023 5:22 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades

Good day.

A reminder that Atura Power will be hosting a virtual public meeting on Thursday, October 5th, from 6:30 to 7:30 p.m. ET about the planned efficiency upgrades at Portlands Energy Centre.

A link to access the meeting will be available on the project webpage here:
aturapower.com/portlandsupgrade.

If you are unable to participate, meeting materials will be posted on the project webpage following the meeting.

Thank you, and please email any questions or comments to portlandsupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Email sent by Atura Power to key Agencies,
including draft Environmental Screening Report,
on December 14, 2023

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Tuesday, December 5, 2023 3:21 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good afternoon.

As you know, Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC). The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01 under the Ontario *Environmental Assessment Act*. Atura Power has prepared a *draft* copy of the Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is 'No', indicating that there would not be potential negative environmental effects resulting from the project.

Attached to this email is a draft of the Screening Report. We are sharing this draft with Indigenous communities, key agencies such as yourselves, and interested members of the public to offer an additional opportunity to review the project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power is voluntarily providing this opportunity so comments can be incorporated in the final Screening Report. We invite you to review the draft report and share any comments on the report via our project email address, portlandupgrade@aturapower.com. We will **accept comments until Jan. 7, 2024**, after which time we will prepare and release the final version of the Screening Report in winter 2024.

Thank you very much, and please send your project-related questions to portlandupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Appendix B6a: Correspondence Records with MECP

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, September 6, 2023 6:29 AM

To: ClassEAnotices@ontario.ca; EA Notices to CRegion (MECP) <Eanotification.cregion@ontario.ca>; Nazariy.Kiriliak@ontario.ca

Subject: Notice of Commencement - Portlands Energy Centre

Good morning:

The materials attached are to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC) on the site of the former Richard L. Hearn Generating Station on Villiers Island. Please see the letter, Notice of Commencement, and MECP Project Information Form attached for more detail on the proposed activities, engagement opportunities, and how to learn more.

Thank you,

David Patterson

EHS Manager | **Atura Power**

905 870-4233 | david.patterson@aturapower.com

Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

Portlands Energy Centre Upgrades

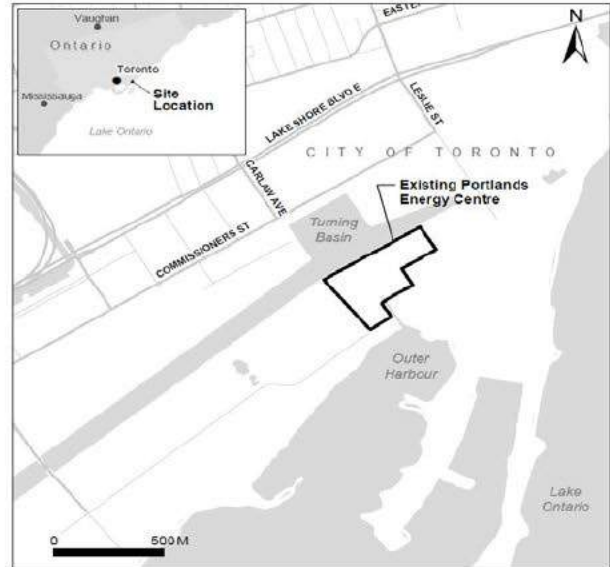
Atura Power is planning to make efficiency upgrades at its Portlands Energy Centre (PEC).

Project Description

PEC has operated since 2009 in the City of Toronto on the site of the former Richard L. Hearn Generating Station on Villiers Island. It's capable of outputting 550 megawatts (MW) to Ontario's electricity grid.

The upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts during a regular maintenance cycle and will result in an increase in output capacity to 600 MW. All upgrades will take place within the existing facility and **there will be no changes or expansion beyond the existing PEC footprint.**

Atura Power



Atura Power is committed to building a resilient electricity grid in Ontario and is working to address the energy supply shortfall, identified by the Independent Electricity System Operator, that Ontario will experience in the near future. The planned efficiency upgrades to PEC are part of Atura Power's efforts to address this supply gap and to make energy production more efficient and affordable.

Environmental Screening Process

Since the project will result in a 50 MW increase in output capacity of PEC, it's subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. This Notice is issued to communicate the start of the Environmental Screening Process.

Virtual Public Meeting

Atura Power is committed to engaging with Indigenous communities, the public and other interested parties on all our

projects. We invite you to attend an upcoming virtual public meeting to learn more and provide feedback. **You can access the link to join the public meeting on the project webpage.** If you are unable to participate, meeting materials will be posted on the project webpage for review following the meeting.

How to Join	Date:	Thursday, October 5, 2023
	Time:	6:30 to 7:30 p.m. Eastern Time
	Project webpage:	aturapower.com/portlandsupgrade

Project Contacts

Please email your questions or comments to portlandsupgrade@aturapower.com.

For more information: aturapower.com/portlandsupgrade

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

Wednesday, September 6, 2023

To whom it may concern,

This letter is to inform you that Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), on the site of the former Richard L. Hearn Generating Station on Villiers Island at 470 Unwin Ave., Toronto, Ont. The planned work will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts. These upgrades will occur during a regular maintenance cycle and, due to improved technology, will result in better performance. All activities to complete the upgrades will take place within the footprint of the existing facility. This project is part of Atura Power's effort to build a more efficient and resilient electricity grid in Ontario.

Currently, PEC is capable of outputting 550 megawatts (MW) to Ontario's electricity grid with proposed upgrades increasing its capacity to 600 MW. This planned increase of 50 MW results in the upgrades being subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. The attached Notice is issued to communicate the start of the Environmental Screening Process. A copy of the Notice was published in the *Toronto Star* and *Toronto Sun* on Wednesday, September 6, 2023, and will also be published in the *Beach Metro* newspaper in the coming days. A copy is also available on the project webpage at aturapower.com/portlandsupgrade.

Atura Power is committed to engaging Indigenous communities, agencies, the public and other interested parties on all projects. A virtual public meeting will be hosted on **Thursday, October 5, 2023, from 6:30 to 7:30 p.m.** to share more about the planned upgrades and collect feedback from members of the public. The attached Notice includes details on how to join.

Atura Power is seeking input from the Ministry of Environment, Conservation and Parks (MECP) regarding the Indigenous communities that should be engaged as part of the Environmental Screening Process. The attached Notice includes a map of the project location. We would appreciate if the MECP would provide us with a list of communities with whom we should engage on this project. Given that the planned upgrades to PEC are minor, similar to routine maintenance activities and will be contained entirely within the footprint of PEC, Atura Power will be in contact with Mr. Nick Colella, Manager (Acting) of Environmental Assessment Services with the MECP, to pursue an exemption to the Ontario *Environmental Assessment Act* for this project.

For more information about the project, please visit our project webpage (see link above). If you have any other questions or inquiries, please do not hesitate to contact us at portlandsupgrade@aturapower.com.

Sincerely,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power

What to do:

Step 1. Look for the type of EA project in column B that applies to you.

Step 2. Complete columns C to J for that project.

Step 3. Send this form in Excel format to the MECFP regional office email address where the project is located.

MECFP regional office email addresses are listed at

www.ontario.ca/gov/projects-environmental-assessments

Class EA/Streamlined EA	Proponent Name	Proponent Contact	Project Name	Project Schedule	Project Type	Project Location	MOECC Region	Project Initiation Date
1 CD - Remedial flood and erosion control projects								
2 ECP Transit - Class EA								
3 Hydro One - Minor transmission facilities								
4 MIA - Class EA for municipal infrastructure projects								
5 Ministry of Infrastructure - Public works								
6 MNM - Activities of the Ministry of Northern Development and Mines under the Mining Act								
7 MNRP - Provincial parks and conservation reserves								
8 MNRP - Resource stewardship and facility development projects								
9 MTO - Provincial transportation facilities								
10 O. Reg. 101/07 - Waste management projects								
11 O. Reg. 116/01 - Electricity projects	Akura Power	Krishana Gnanachandran	Portlands Energy Centre Upgrade Project	Category B	Natural gas	Toronto, City of	Central	2023-09-01
12 OWA - Waterpower projects								

Enter the proponent's name.

Enter the name and email address of the person who the MECFP should contact about your project. This should be the same contact person who is listed on the notice.

Enter the project name as it appears on the notice.

Select the project schedule from the drop-down menu.

Select the project type from the drop-down menu.

Select the name of the municipality or unincorporated/uneval area where your project is located from the drop-down menu.

Select the MECFP region from the drop-down menu. Read the "MECFP regions" worksheet to find the MECFP region where your project is located.

Enter the date that the streamlined EA process was initiated (e.g. notice of commencement). This date may be when the project notice was first published.

From: EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>

Sent: Monday, October 16, 2023 4:00 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Caicedo, Jimena (MECP) <Jimena.Caicedo@ontario.ca>; EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>

Subject: RE: Notice of Commencement - Portlands Energy Centre

Dear Project Team,

Please find the attached response letter and relevant supporting information for this project. If you have any questions regarding the information shared, please let us know.

Thank you,

Chunmei Liu (she/her) | Regional Environmental Planner

Environmental Assessments Branch, Ontario Ministry of the Environment, Conservation and Parks | 7th Flr, 135 St Clair Ave W, Toronto, ON M4V 1P5 | Chunmei.Liu@ontario.ca | 437-249-3102

We want to hear from you. How was my service? You can provide feedback at 1-888-745-8888 or ontario.ca/inspectionfeedback

Nous attendons vos commentaires. Qu'avez-vous pensé de mon service? Vous pouvez nous faire part de vos commentaires au 1-888-745-8888 ou à ontario.ca/retroactioninspection

Ministry of the Environment,
Conservation and Parks

Ministère de l'Environnement, de la
Protection de la nature et des Parcs

Environmental Assessment Branch Direction des évaluations
environnementales

1st Floor
135 St. Clair Avenue W
Toronto ON M4V 1P5
Tel.: 416 314-8001
Fax.: 416 314-8452

Rez-de-chaussée
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél. : 416 314-8001
Télééc. : 416 314-8452

October 16, 2023

Atura Power
portlandsupgrade@aturapower.com
BY EMAIL ONLY

Re: **Portlands Energy Centre Upgrades
Atura Power
Electricity Projects Regulation, O. Reg. 116/01 (Category B)
Acknowledgement of Notice of Commencement**

Dear Project Team,

This letter is in response to the Notice of Commencement for the above noted project. The Ministry of the Environment, Conservation and Parks (MECP) acknowledges that the Atura Power (proponent) has indicated that the study is following the approved environmental planning process for a Category B project set out in the *Electricity Projects Regulation, O. Reg. 116/01* (the “Environmental Screening Process”), made under the *Environmental Assessment Act*.

The **updated (August 2022)** attached “Areas of Interest” document provides guidance regarding the ministry’s interests with respect to the Environmental Screening Process. Please address all areas of interest in the Environmental Screening and Environmental Review at an appropriate level for the Environmental Screening Process. Proponents who address all the applicable areas of interest can minimize potential delays to the project schedule. **Further information is provided at the end of the Areas of Interest document relating to recent changes to the Environmental Assessment Act through Bill 197, Covid-19 Economic Recovery Act 2020.**

The Crown has a legal duty to consult Aboriginal communities when it has knowledge, real or constructive, of the existence or potential existence of an Aboriginal or treaty right and contemplates conduct that may adversely impact that right. Before authorizing this project, the

Crown must ensure that its duty to consult has been fulfilled, where such a duty is triggered. Although the duty to consult with Aboriginal peoples is a duty of the Crown, the Crown may delegate procedural aspects of this duty to project proponents while retaining oversight of the consultation process.

The proposed project may have the potential to affect Aboriginal or treaty rights protected under Section 35 of Canada's *Constitution Act* 1982. Where the Crown's duty to consult is triggered in relation to the proposed project, **the MECP is delegating the procedural aspects of rights-based consultation to the proponent through this letter.** The Crown intends to rely on the delegated consultation process in discharging its duty to consult and maintains the right to participate in the consultation process as it sees fit.

The site is located within treaty 13, 1805 w/ Mississaugas, within the traditional territory and claim area of the Mississaugas of the Credit, and within the 1701 Nanfan Deed. Based on information provided to date and the Crown's preliminary assessment the proponent is required to consult with the following communities who have been identified as potentially affected by the proposed project:

- Mississaugas of the Credit First Nation
- Six Nations of the Grand River (both elected and HCCC/HDI)
 - both the elected council and HCCC claim to represent the Six Nations Community. The HCCC is the traditional council and the SNGR elected was established by Canada pursuant to the Indian Act, 1924.

Steps that the proponent may need to take in relation to Aboriginal consultation for the proposed project are outlined in the [“Code of Practice for Consultation in Ontario's Environmental Assessment Process”](#). Additional information related to Ontario's Environmental Assessment Act is available online at: www.ontario.ca/environmentalassessments.

Please also refer to the attached document “A Proponent's Introduction to the Delegation of Procedural Aspects of consultation with Aboriginal Communities” for further information, including the MECP's expectations for Screening/Environmental Review Report documentation related to consultation with communities.

The proponent must contact the Director of Environmental Assessment Branch (EABDirector@ontario.ca) under the following circumstances after initial discussions with the communities identified by the MECP:

- Aboriginal or treaty rights impacts are identified to you by the communities;
- You have reason to believe that your proposed project may adversely affect an Aboriginal or treaty right;
- Consultation with Indigenous communities or other stakeholders has reached an impasse; or
- An elevation request is expected on the basis of outstanding environmental concerns.

The MECP will then assess the extent of any Crown duty to consult for the circumstances and will consider whether additional steps should be taken, including what role you will be asked to play should additional steps and activities be required.

A draft copy of the report should be sent directly to me prior to the filing of the final report, allowing a minimum of 30 days for the ministry's technical reviewers to provide comments.

Please ensure a copy of the final notice is sent to the ministry's Central Region Environmental Assessment (EA) notification email account (eanotification.cregion@ontario.ca) when available.

Should you or any members of your project team have any questions regarding the material above, please contact me at chunmei.liu@ontario.ca.

Sincerely,



Chunmei Liu
Regional Environmental Planner – Central Region
Project Review Unit, Environmental Assessment Branch

Cc: Gavin Battarino, Supervisor, Project Review Unit, MECP
Jimena Caicedo, Manager, Toronto District Office, MECP

Enclosed: Areas of Interest

Attached: Client's Guide to Preliminary Screening for Species at Risk
A Proponent's Introduction to the Delegation of Procedural Aspects of Consultation with Aboriginal Communities

AREAS OF INTEREST (v. August 2022)

It is suggested that you check off each section after you have considered / addressed it.

Planning and Policy

- Applicable plans and policies should be identified in the report, and the proponent should describe how the proposed project adheres to the relevant policies in these plans.

- Projects located in MECP Central, Eastern or West Central Region may be subject to [A Place to Grow: Growth Plan for the Greater Golden Horseshoe \(2020\)](#).
 - Projects located in MECP Central or Eastern Region may be subject to the [Oak Ridges Moraine Conservation Plan \(2017\)](#) or the [Lake Simcoe Protection Plan \(2014\)](#).
 - Projects located in MECP Central, Southwest or West Central Region may be subject to the [Niagara Escarpment Plan \(2017\)](#).
 - Projects located in MECP Central, Eastern, Southwest or West Central Region may be subject to the [Greenbelt Plan \(2017\)](#).
 - Projects located in MECP Northern Region may be subject to the [Growth Plan for Northern Ontario \(2011\)](#).
- The [Provincial Policy Statement \(2020\)](#) contains policies that protect Ontario's natural heritage and water resources. Applicable policies should be referenced in the report, and the proponent should describe how the proposed project is consistent with these policies.
 - In addition to the provincial planning and policy level, the report should also discuss the planning context at the municipal and federal levels, as appropriate.

Source Water Protection

The *Clean Water Act, 2006* (CWA) aims to protect existing and future sources of drinking water. To achieve this, several types of vulnerable areas have been delineated around surface water intakes and wellheads for every municipal residential drinking water system that is located in a source protection area. These vulnerable areas are known as a Wellhead Protection Areas (WHPAs) and surface water Intake Protection Zones (IPZs). Other vulnerable areas that have been delineated under the CWA include Highly Vulnerable Aquifers (HVAs), Significant Groundwater Recharge Areas (SGRAs), Event-based modelling areas (EBAs), and Issues Contributing Areas (ICAs). Source protection plans have been developed that include policies to address existing and future risks to sources of municipal drinking water within these vulnerable areas.

Projects that are subject to the Environmental Assessment Act that fall under a Class EA, or one of the Regulations, have the potential to impact sources of drinking water if they occur in designated vulnerable areas or in the vicinity of other at-risk drinking water systems (i.e. systems that are not municipal residential systems). Projects may include activities that, if located in a vulnerable area, could be a threat to sources of drinking water (i.e. have the potential to adversely affect the quality or quantity of drinking water sources) and the activity could therefore be subject to policies in a source protection plan. Where an activity poses a risk to drinking water, policies in the local source protection plan may impact how or where that activity is undertaken. Policies may prohibit certain activities, or they may require risk management measures for these activities. Municipal Official Plans, planning decisions, Class EA projects (where the project includes an activity that is a threat to drinking water) and

prescribed instruments must conform with policies that address significant risks to drinking water and must have regard for policies that address moderate or low risks.

- The proponent should identify the source protection area and should clearly document how the proximity of the project to sources of drinking water (municipal or other) and any delineated vulnerable areas was considered and assessed. Specifically, the report should discuss whether or not the project is located in a vulnerable area and provide applicable details about the area.
- If located in a vulnerable area, proponents should document whether any project activities are prescribed drinking water threats and thus pose a risk to drinking water (this should be consulted on with the appropriate Source Protection Authority). Where an activity poses a risk to drinking water, the proponent must document and discuss in the report how the project adheres to or has regard to applicable policies in the local source protection plan. This section should then be used to inform and be reflected in other sections of the report, such as the identification of net positive/negative effects of alternatives, mitigation measures, evaluation of alternatives etc.
- While most source protection plans focused on including policies for significant drinking water threats in the WHPAs and IPZs it should be noted that even though source protection plan policies may not apply in HVAs, these are areas where aquifers are sensitive and at risk to impacts and within these areas, activities may impact the quality of sources of drinking water for systems other than municipal residential systems.
- In order to determine if this project is occurring within a vulnerable area, proponents can use [Source Protection Information Atlas](#), which is an online mapping tool available to the public. Note that various layers (including WHPAs, WHPA-Q1 and WHPA-Q2, IPZs, HVAs, SGRAs, EBAs, ICAs) can be turned on through the “Map Legend” bar on the left. The mapping tool will also provide a link to the appropriate source protection plan in order to identify what policies may be applicable in the vulnerable area.
- For further information on the maps or source protection plan policies which may relate to their project, proponents must contact the appropriate source protection authority. **Please consult with the local source protection authority to discuss potential impacts on drinking water. Please document the results of that consultation within the report and include all communication documents/correspondence.**

More Information

For more information on the *Clean Water Act*, source protection areas and plans, including specific information on the vulnerable areas and drinking water threats, please refer to [Conservation Ontario’s website](#) where you will also find links to the local source protection plan/assessment report.

A list of the prescribed drinking water threats can be found in [section 1.1 of Ontario Regulation 287/07](#) made under the *Clean Water Act*. In addition to prescribed drinking water threats, some source protection plans may include policies to address additional “local” threat activities, as approved by the MECP.

Climate Change

The document "[Considering Climate Change in the Environmental Assessment Process](#)" (Guide) is now a part of the Environmental Assessment program's Guides and Codes of Practice. The Guide sets out the MECP's expectation for considering climate change in the preparation, execution and documentation of environmental assessment studies and processes. The guide provides examples, approaches, resources, and references to assist proponents with consideration of climate change in their study. Proponents should review this Guide in detail.

- **The MECP expects proponents of projects under a Class EA or EA Act Regulation to:**
 1. Consider during the assessment of alternative solutions and alternative designs, the following:
 - a. the project's expected production of greenhouse gas emissions and impacts on carbon sinks (climate change mitigation); and
 - b. resilience or vulnerability of the undertaking to changing climatic conditions (climate change adaptation).
 2. Include a discrete section in the report detailing how climate change was considered in the EA.

How climate change is considered can be qualitative or quantitative in nature and should be scaled to the project's level of environmental effect. In all instances, both a project's impacts on climate change (mitigation) and impacts of climate change on a project (adaptation) should be considered. **Please ensure climate change is considered in the report.**

- The MECP has also prepared another guide to support provincial land use planning direction related to the completion of energy and emission plans. The "[Community Emissions Reduction Planning: A Guide for Municipalities](#)" document is designed to educate stakeholders on the municipal opportunities to reduce energy and greenhouse gas emissions, and to provide guidance on methods and techniques to incorporate consideration of energy and greenhouse gas emissions into municipal activities of all types. We encourage you to review the Guide for information.

Air Quality, Dust and Noise

- If there are sensitive receptors in the surrounding area of this project, a quantitative air quality/odour impact assessment will be useful to evaluate alternatives, determine impacts and identify appropriate mitigation measures. The scope of the assessment can be determined based on the potential effects of the proposed alternatives, and typically

includes source and receptor characterization and a quantification of local air quality impacts on the sensitive receptors and the environment in the study area. The assessment will compare to all applicable standards or guidelines for all contaminants of concern.

Please contact this office for further consultation on the level of Air Quality Impact Assessment required for this project if not already advised.

- If a quantitative Air Quality Impact Assessment is not required for the project, the MECP expects that the report contain a qualitative assessment which includes:
 - A discussion of local air quality including existing activities/sources that significantly impact local air quality and how the project may impact existing conditions;
 - A discussion of the nearby sensitive receptors and the project's potential air quality impacts on present and future sensitive receptors;
 - A discussion of local air quality impacts that could arise from this project during both construction and operation; and
 - A discussion of potential mitigation measures.
- As a common practice, "air quality" should be used as an evaluation criterion for all road projects.
- Dust and noise control measures should be addressed and included in the construction plans to ensure that nearby residential and other sensitive land uses within the study area are not adversely affected during construction activities.
- The MECP recommends that non-chloride dust-suppressants be applied. For a comprehensive list of fugitive dust prevention and control measures that could be applied, refer to [*Cheminfo Services Inc. Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities*](#) report prepared for Environment Canada. March 2005.
- The report should consider the potential impacts of increased noise levels during the operation of the completed project. The proponent should explore all potential measures to mitigate significant noise impacts during the assessment of alternatives.

Ecosystem Protection and Restoration

- Any impacts to ecosystem form and function must be avoided where possible. The report should describe any proposed mitigation measures and how project planning will protect and enhance the local ecosystem.
- Natural heritage and hydrologic features should be identified and described in detail to assess potential impacts and to develop appropriate mitigation measures. The following sensitive environmental features may be located within or adjacent to the study area:

- Key Natural Heritage Features: Habitat of endangered species and threatened species, fish habitat, wetlands, areas of natural and scientific interest (ANSIs), significant valleylands, significant woodlands; significant wildlife habitat (including habitat of special concern species); sand barrens, savannahs, and tallgrass prairies; and alvars.
- Key Hydrologic Features: Permanent streams, intermittent streams, inland lakes and their littoral zones, seepage areas and springs, and wetlands.
- Other natural heritage features and areas such as: vegetation communities, rare species of flora or fauna, Environmentally Sensitive Areas, Environmentally Sensitive Policy Areas, federal and provincial parks and conservation reserves, Greenland systems etc.

We recommend consulting with the Ministry of Natural Resources and Forestry (MNRF), Fisheries and Oceans Canada (DFO) and your local conservation authority to determine if special measures or additional studies will be necessary to preserve and protect these sensitive features. In addition, for projects located in Central Region you may consider the provisions of the Rouge Park Management Plan if applicable.

Species at Risk

- The Ministry of the Environment, Conservation and Parks has now assumed responsibility of Ontario's Species at Risk program. Information, standards, guidelines, reference materials and technical resources to assist you are found at <https://www.ontario.ca/page/species-risk>.
- The Client's Guide to Preliminary Screening for Species at Risk (Draft May 2019) has been attached to the covering email for your reference and use. Please review this document for next steps.
- For any questions related to subsequent permit requirements, please contact SAROntario@ontario.ca.

Surface Water

- The report must include enough information to demonstrate that there will be no negative impacts on the natural features or ecological functions of any watercourses within the study area. Measures should be included in the planning and design process to ensure that any impacts to watercourses from construction or operational activities (e.g. spills, erosion, pollution) are mitigated as part of the proposed undertaking.
- Additional stormwater runoff from new pavement can impact receiving watercourses and flood conditions. Quality and quantity control measures to treat stormwater runoff should be considered for all new impervious areas and, where possible, existing surfaces. The ministry's [Stormwater Management Planning and Design Manual \(2003\)](#) should be

referenced in the report and utilized when designing stormwater control methods. **A Stormwater Management Plan should be prepared as part of the Environmental Screening Process** that includes:

- Strategies to address potential water quantity and erosion impacts related to stormwater draining into streams or other sensitive environmental features, and to ensure that adequate (enhanced) water quality is maintained
 - Watershed information, drainage conditions, and other relevant background information
 - Future drainage conditions, stormwater management options, information on erosion and sediment control during construction, and other details of the proposed works
 - Information on maintenance and monitoring commitments.
- Any potential approval requirements for surface water taking or discharge should be identified in the report. A Permit to Take Water (PTTW) under the *Ontario Water Resources Act* (OWRA) will be required for any water takings that exceed 50,000 L/day, except for certain water taking activities that have been prescribed by the Water Taking EASR Regulation – *O. Reg. 63/16*. These prescribed water-taking activities require registration in the EASR instead of a PTTW. Please review the [Water Taking User Guide for EASR](#) for more information. Additionally, an Environmental Compliance Approval under the OWRA is required for municipal stormwater management works.

Groundwater

- The status of, and potential impacts to any well water supplies should be addressed. If the project involves groundwater takings or changes to drainage patterns, the quantity and quality of groundwater may be affected due to drawdown effects or the redirection of existing contamination flows. In addition, project activities may infringe on existing wells such that they must be reconstructed or sealed and abandoned. Appropriate information to define existing groundwater conditions should be included in the report.
- If the potential construction or decommissioning of water wells is identified as an issue, the report should refer to Ontario Regulation 903, Wells, under the OWRA.
- Potential impacts to groundwater-dependent natural features should be addressed. Any changes to groundwater flow or quality from groundwater taking may interfere with the ecological processes of streams, wetlands or other surficial features. In addition, discharging contaminated or high volumes of groundwater to these features may have direct impacts on their function. Any potential effects should be identified, and appropriate

mitigation measures should be recommended. The level of detail required will be dependent on the significance of the potential impacts.

- Any potential approval requirements for groundwater taking or discharge should be identified in the report. A Permit to Take Water (PTTW) under the OWRA will be required for any water takings that exceed 50,000 L/day, with the exception of certain water taking activities that have been prescribed by the Water Taking EASR Regulation – *O. Reg. 63/16*. These prescribed water-taking activities require registration in the EASR instead of a PTTW. Please review the [Water Taking User Guide for EASR](#) for more information.
- Consultation with the railroad authorities is necessary wherever there is a plan to use construction dewatering in the vicinity of railroad lines or where the zone of influence of the construction dewatering potentially intercepts railroad lines.

Excess Materials Management

- In December 2019, MECP released a new regulation under the Environmental Protection Act, titled “[On-Site and Excess Soil Management](#)” (O. Reg. 406/19) to support improved management of excess construction soil. This regulation is a key step to support proper management of excess soils, ensuring valuable resources don’t go to waste and to provide clear rules on managing and reusing excess soil. New risk-based standards referenced by this regulation help to facilitate local beneficial reuse which in turn will reduce greenhouse gas emissions from soil transportation, while ensuring strong protection of human health and the environment. The new regulation is being phased in over time, with the first phase in effect on January 1, 2021. For more information, please visit <https://www.ontario.ca/page/handling-excess-soil>.
- The report should reference that activities involving the management of excess soil should be completed in accordance with O. Reg. 406/19 and the MECP’s current guidance document titled “[Management of Excess Soil – A Guide for Best Management Practices](#)” (2014).
- All waste generated during construction must be disposed of in accordance with ministry requirements.

Contaminated Sites

- Any current or historical waste disposal sites should be identified in the report. The status of these sites should be determined to confirm whether approval pursuant to Section 46 of the EPA may be required for land uses on former disposal sites. We recommend referring to the [MECP’s D-4 guideline](#) for land use considerations near landfills and dumps.

- Resources available may include regional/local municipal official plans and data; provincial data on [large landfill sites](#) and [small landfill sites](#); Environmental Compliance Approval information for waste disposal sites on [Access Environment](#).
- Other known contaminated sites (local, provincial, federal) in the study area should also be identified in the report (Note – information on federal contaminated sites is found on the Government of Canada’s [website](#)).
- The location of any underground storage tanks should be investigated in the report. Measures should be identified to ensure the integrity of these tanks and to ensure an appropriate response in the event of a spill. The ministry’s Spills Action Centre must be contacted in such an event.
- Since the removal or movement of soils may be required, appropriate tests to determine contaminant levels from previous land uses or dumping should be undertaken. If the soils are contaminated, you must determine how and where they are to be disposed of, consistent with *Part XV.1 of the Environmental Protection Act* (EPA) and Ontario Regulation 153/04, Records of Site Condition, which details the new requirements related to site assessment and clean up. Please contact the appropriate MECP District Office for further consultation if contaminated sites are present.

Servicing, Utilities and Facilities

- The report should identify any above or underground utilities in the study area such as transmission lines, telephone/internet, oil/gas etc. The owners should be consulted to discuss impacts to this infrastructure, including potential spills.
- The report should identify any servicing infrastructure in the study area such as wastewater, water, stormwater that may potentially be impacted by the project.
- Any facility that releases emissions to the atmosphere, discharges contaminants to ground or surface water, provides potable water supplies, or stores, transports or disposes of waste must have an Environmental Compliance Approval (ECA) before it can operate lawfully. Please consult with MECP’s Environmental Permissions Branch to determine whether a new or amended ECA will be required for any proposed infrastructure.
- We recommend referring to the ministry’s [environmental land use planning guides](#) to ensure that any potential land use conflicts are considered when planning for any infrastructure or facilities related to wastewater, pipelines, landfills or industrial uses.

Mitigation and Monitoring

- Contractors must be made aware of all environmental considerations so that all environmental standards and commitments for both construction and operation are met. Mitigation measures should be clearly referenced in the report and regularly monitored during the construction stage of the project. In addition, we encourage proponents to conduct post-construction monitoring to ensure all mitigation measures have been effective and are functioning properly.
- Design and construction reports and plans should be based on a best management approach that centres on the prevention of impacts, protection of the existing environment, and opportunities for rehabilitation and enhancement of any impacted areas.
- The proponent's construction and post-construction monitoring plans must be documented in the report.

Consultation

- The report must demonstrate how the consultation provisions of the Environmental Screening Process have been fulfilled, including documentation of all stakeholder consultation efforts undertaken during the planning process. This includes a discussion in the report that identifies concerns that were raised and **describes how they have been addressed by the proponent** throughout the planning process. The report should also include copies of comments submitted on the project by interested stakeholders, and the proponent's responses to these comments (as directed by the Guide to Environmental Assessment Requirements for Electricity Projects to include full documentation).
- Please include the full stakeholder distribution/consultation list in the documentation.

Environmental Screening Process

- The purpose of the Environmental Screening report is to document the process followed and the conclusions reached. It should provide clear and complete documentation of the planning process in order to allow for transparency in decision-making and to allow for its timely review by government agencies, and interested persons, including Indigenous communities.
- The Environmental Screening Process requires the consideration of the effects of the project on all aspects of the environment (including planning, natural, social, cultural, economic, technical). The report should include a level of detail (e.g. hydrogeological investigations, terrestrial and aquatic assessments, cultural heritage assessments) such that

all potential impacts can be identified, and appropriate mitigation measures can be developed. Any supporting studies conducted during the Environmental Screening Process should be referenced and included as part of the report.

- There are two possible stages of review required under the Environmental Screening Process, depending on the environmental effects of a project: a Screening stage and an Environmental Review stage.
 - All projects that are subject to the process are required to go through the Screening stage, which requires proponents to apply a series of screening criteria to identify the potential environmental effects of the project.
 - A more detailed study (an Environmental Review) is required if potential concerns are raised during the Screening stage that could not be readily addressed.
- Please include in the report a list of all subsequent permits or approvals that may be required for the implementation of the project, including but not limited to, MECP's PTTW, EASR Registrations and ECAs, conservation authority permits, species at risk permits, MTO permits and approvals under the *Impact Assessment Act, 2019*.
- Proponents are encouraged to circulate a draft of the Environmental Review Report, or relevant sections of the report, to the appropriate agencies and key stakeholders for comment prior to the formal review periods.
- Ministry guidelines and other information related to the issues above are available at <http://www.ontario.ca/environment-and-energy/environment-and-energy>. We encourage you to review all the available guides and to reference any relevant information in the report.

Once the Environmental Screening Report is finalized, the proponent must issue a Notice of Completion providing a minimum 30-day period during which documentation may be reviewed and comment and input can be submitted to the proponent. The Notice of Completion must be sent to the appropriate MECP Regional Office email address.

The public can submit an elevation request, which requests a higher level of assessment on a project if they have outstanding environmental concerns. In addition, at any point in the Environmental Screening Process, if it is determined that a project is likely to have significant negative environmental effects, and that the scope and scale of these effects are such that an individual EA is warranted, the Minister of the Environment may of his or her own initiative require that a project be made subject to Part II of the *Environmental Assessment Act* (an

individual EA). If the Minister requires an individual EA, the proponent will be informed in writing, stating reasons for the decision.

The proponent cannot proceed with the project until at least 30 days after the end of the comment period provided for in the Notice of Completion. Further, the proponent may not proceed after this time if:

- an elevation request has been submitted by any interested person including Indigenous communities to the ministry regarding outstanding environmental concerns, or
- the Minister has given notice to the proponent requiring that an environmental assessment be prepared.

Please ensure that the Notice of Completion advises that outstanding concerns are to be directed to the proponent for a response, and that in the event there are outstanding environmental concerns, elevation requests should be addressed in writing to:

Director, Environmental Assessment Branch
Ministry of Environment, Conservation and Parks
135 St. Clair Ave. W, 1st Floor
Toronto ON, M4V 1P5
EABDirector@ontario.ca

For more information on the Environmental Screening Process and environmental assessment requirements for Electricity Projects, please visit the following link: [Guide to Environmental Assessment Requirements for Electricity Projects | ontario.ca](#)

A PROPONENT’S INTRODUCTION TO THE DELEGATION OF PROCEDURAL ASPECTS OF CONSULTATION WITH ABORIGINAL COMMUNITIES

DEFINITIONS

The following definitions are specific to this document and may not apply in other contexts:

Aboriginal communities – the First Nation or Métis communities identified by the Crown for the purpose of consultation.

Consultation – the Crown’s legal obligation to consult when the Crown has knowledge of an established or asserted Aboriginal or treaty right and contemplates conduct that might adversely impact that right. This is the type of consultation required pursuant to s. 35 of the *Constitution Act, 1982*. Note that this definition does not include consultation with Aboriginal communities for other reasons, such as regulatory requirements.

Crown – the Ontario Crown, acting through a particular ministry or ministries.

Procedural aspects of consultation – those portions of consultation related to the process of consultation, such as notifying an Aboriginal community about a project, providing information about the potential impacts of a project, responding to concerns raised by an Aboriginal community and proposing changes to the project to avoid negative impacts.

Proponent – the person or entity that wants to undertake a project and requires an Ontario Crown decision or approval for the project.

I. PURPOSE

The Crown has a legal duty to consult Aboriginal communities when it has knowledge of an existing or asserted Aboriginal or treaty right and contemplates conduct that may adversely impact that right. In outlining a framework for the duty to consult, the Supreme Court of Canada has stated that the Crown may delegate procedural aspects of consultation to third parties. This document provides general information about the Ontario Crown’s approach to delegation of the procedural aspects of consultation to proponents.

This document is not intended to instruct a proponent about an individual project, and it does not constitute legal advice.

II. WHY IS IT NECESSARY TO CONSULT WITH ABORIGINAL COMMUNITIES?

The objective of the modern law of Aboriginal and treaty rights is the *reconciliation* of Aboriginal peoples and non-Aboriginal peoples and their respective rights, claims and interests. Consultation is an important component of the reconciliation process.

The Crown has a legal duty to consult Aboriginal communities when it has knowledge of an existing or asserted Aboriginal or treaty right and contemplates conduct that might adversely impact that right. For example, the Crown’s duty to consult is triggered when it considers

issuing a permit, authorization or approval for a project which has the potential to adversely impact an Aboriginal right, such as the right to hunt, fish, or trap in a particular area.

The scope of consultation required in particular circumstances ranges across a spectrum depending on both the nature of the asserted or established right and the seriousness of the potential adverse impacts on that right.

Depending on the particular circumstances, the Crown may also need to take steps to accommodate the potentially impacted Aboriginal or treaty right. For example, the Crown may be required to avoid or minimize the potential adverse impacts of the project.

III. THE CROWN'S ROLE AND RESPONSIBILITIES IN THE DELEGATED CONSULTATION PROCESS

The Crown has the responsibility for ensuring that the duty to consult, and accommodate where appropriate, is met. However, the Crown may delegate the procedural aspects of consultation to a proponent.

There are different ways in which the Crown may delegate the procedural aspects of consultation to a proponent, including through a letter, a memorandum of understanding, legislation, regulation, policy and codes of practice.

If the Crown decides to delegate procedural aspects of consultation, the Crown will generally:

- Ensure that the delegation of procedural aspects of consultation and the responsibilities of the proponent are clearly communicated to the proponent;
- Identify which Aboriginal communities must be consulted;
- Provide contact information for the Aboriginal communities;
- Revise, as necessary, the list of Aboriginal communities to be consulted as new information becomes available and is assessed by the Crown;
- Assess the scope of consultation owed to the Aboriginal communities;
- Maintain appropriate oversight of the actions taken by the proponent in fulfilling the procedural aspects of consultation;
- Assess the adequacy of consultation that is undertaken and any accommodation that may be required;
- Provide a contact within any responsible ministry in case issues arise that require direction from the Crown; and
- Participate in the consultation process as necessary and as determined by the Crown.

IV. THE PROPONENT'S ROLE AND RESPONSIBILITIES IN THE DELEGATED CONSULTATION PROCESS

Where aspects of the consultation process have been delegated to a proponent, the Crown, in meeting its duty to consult, will rely on the proponent's consultation activities and documentation of those activities. The consultation process informs the Crown's decision of whether or not to approve a proposed project or activity.

A proponent's role and responsibilities will vary depending on a variety of factors including the extent of consultation required in the circumstance and the procedural aspects of consultation the Crown has delegated to it. Proponents are often in a better position than the Crown to discuss a project and its potential impacts with Aboriginal communities and to determine ways to avoid or minimize the adverse impacts of a project.

A proponent can raise issues or questions with the Crown at any time during the consultation process. If issues or concerns arise during the consultation that cannot be addressed by the proponent, the proponent should contact the Crown.

a) What might a proponent be required to do in carrying out the procedural aspects of consultation?

Where the Crown delegates procedural aspects of consultation, it is often the proponent's responsibility to provide notice of the proposed project to the identified Aboriginal communities. The notice should indicate that the Crown has delegated the procedural aspects of consultation to the proponent and should include the following information:

- a description of the proposed project or activity;
- mapping;
- proposed timelines;
- details regarding anticipated environmental and other impacts;
- details regarding opportunities to comment; and
- any changes to the proposed project that have been made for seasonal conditions or other factors, where relevant.

Proponents should provide enough information and time to allow Aboriginal communities to provide meaningful feedback regarding the potential impacts of the project. Depending on the nature of consultation required for a project, a proponent also may be required to:

- provide the Crown with copies of any consultation plans prepared and an opportunity to review and comment;
- ensure that any necessary follow-up discussions with Aboriginal communities take place in a timely manner, including to confirm receipt of information, share and update information and to address questions or concerns that may arise;

- as appropriate, discuss with Aboriginal communities potential mitigation measures and/or changes to the project in response to concerns raised by Aboriginal communities;
- use language that is accessible and not overly technical, and translate material into Aboriginal languages where requested or appropriate;
- bear the reasonable costs associated with the consultation process such as, but not limited to, meeting hall rental, meal costs, document translation(s), or to address technical & capacity issues;
- provide the Crown with all the details about potential impacts on established or asserted Aboriginal or treaty rights, how these concerns have been considered and addressed by the proponent and the Aboriginal communities and any steps taken to mitigate the potential impacts;
- provide the Crown with complete and accurate documentation from these meetings and communications; and
- notify the Crown immediately if an Aboriginal community not identified by the Crown approaches the proponent seeking consultation opportunities.

b) What documentation and reporting does the Crown need from the proponent?

Proponents should keep records of all communications with the Aboriginal communities involved in the consultation process and any information provided to these Aboriginal communities.

As the Crown is required to assess the adequacy of consultation, it needs documentation to satisfy itself that the proponent has fulfilled the procedural aspects of consultation delegated to it. The documentation required would typically include:

- the date of meetings, the agendas, any materials distributed, those in attendance and copies of any minutes prepared;
- the description of the proposed project that was shared at the meeting;
- any and all concerns or other feedback provided by the communities;
- any information that was shared by a community in relation to its asserted or established Aboriginal or treaty rights and any potential adverse impacts of the proposed activity, approval or disposition on such rights;
- any proposed project changes or mitigation measures that were discussed, and feedback from Aboriginal communities about the proposed changes and measures;
- any commitments made by the proponent in response to any concerns raised, and feedback from Aboriginal communities on those commitments;
- copies of correspondence to or from Aboriginal communities, and any materials distributed electronically or by mail;

- information regarding any financial assistance provided by the proponent to enable participation by Aboriginal communities in the consultation;
- periodic consultation progress reports or copies of meeting notes if requested by the Crown;
- a summary of how the delegated aspects of consultation were carried out and the results; and
- a summary of issues raised by the Aboriginal communities, how the issues were addressed and any outstanding issues.

In certain circumstances, the Crown may share and discuss the proponent's consultation record with an Aboriginal community to ensure that it is an accurate reflection of the consultation process.

c) Will the Crown require a proponent to provide information about its commercial arrangements with Aboriginal communities?

The Crown may require a proponent to share information about aspects of commercial arrangements between the proponent and Aboriginal communities where the arrangements:

- include elements that are directed at mitigating or otherwise addressing impacts of the project;
- include securing an Aboriginal community's support for the project; or
- may potentially affect the obligations of the Crown to the Aboriginal communities.

The proponent should make every reasonable effort to exempt the Crown from confidentiality provisions in commercial arrangements with Aboriginal communities to the extent necessary to allow this information to be shared with the Crown.

The Crown cannot guarantee that information shared with the Crown will remain confidential. Confidential commercial information should not be provided to the Crown as part of the consultation record if it is not relevant to the duty to consult or otherwise required to be submitted to the Crown as part of the regulatory process.

V. WHAT ARE THE ROLES AND RESPONSIBILITIES OF ABORIGINAL COMMUNITIES' IN THE CONSULTATION PROCESS?

Like the Crown, Aboriginal communities are expected to engage in consultation in good faith. This includes:

- responding to the consultation notice;
- engaging in the proposed consultation process;
- providing relevant documentation;

- clearly articulating the potential impacts of the proposed project on Aboriginal or treaty rights; and
- discussing ways to mitigate any adverse impacts.

Some Aboriginal communities have developed tools, such as consultation protocols, policies or processes that provide guidance on how they would prefer to be consulted. Although not legally binding, proponents are encouraged to respect these community processes where it is reasonable to do so. Please note that there is no obligation for a proponent to pay a fee to an Aboriginal community in order to enter into a consultation process.

To ensure that the Crown is aware of existing community consultation protocols, proponents should contact the relevant Crown ministry when presented with a consultation protocol by an Aboriginal community or anyone purporting to be a representative of an Aboriginal community.

VI. WHAT IF MORE THAN ONE PROVINCIAL CROWN MINISTRY IS INVOLVED IN APPROVING A PROPONENT'S PROJECT?

Depending on the project and the required permits or approvals, one or more ministries may delegate procedural aspects of the Crown's duty to consult to the proponent. The proponent may contact individual ministries for guidance related to the delegation of procedural aspects of consultation for ministry-specific permits/approvals required for the project in question. Proponents are encouraged to seek input from all involved Crown ministries sooner rather than later.

Client's Guide to Preliminary Screening for Species at Risk

***Ministry of the Environment, Conservation and Parks
Species at Risk Branch, Permissions and Compliance***

DRAFT - May 2019

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1.0 Purpose, Scope, Background and Context

1.1 Purpose of this Guide

This guide has been created to:

- help clients better understand their obligation to gather information and complete a preliminary screening for species at risk before contacting the ministry,
- outline guidance and advice clients can expect to receive from the ministry at the preliminary screening stage,
- help clients understand how they can gather information about species at risk by accessing publicly available information housed by the Government of Ontario, and
- provide a list of other potential sources of species at risk information that exist outside the Government of Ontario.

It remains the client's responsibility to:

- carry out a preliminary screening for their projects,
- obtain best available information from all applicable information sources,
- conduct any necessary field studies or inventories to identify and confirm the presence or absence of species at risk or their habitat,
- consider any potential impacts to species at risk that a proposed activity might cause, and
- comply with the *Endangered Species Act (ESA)*.

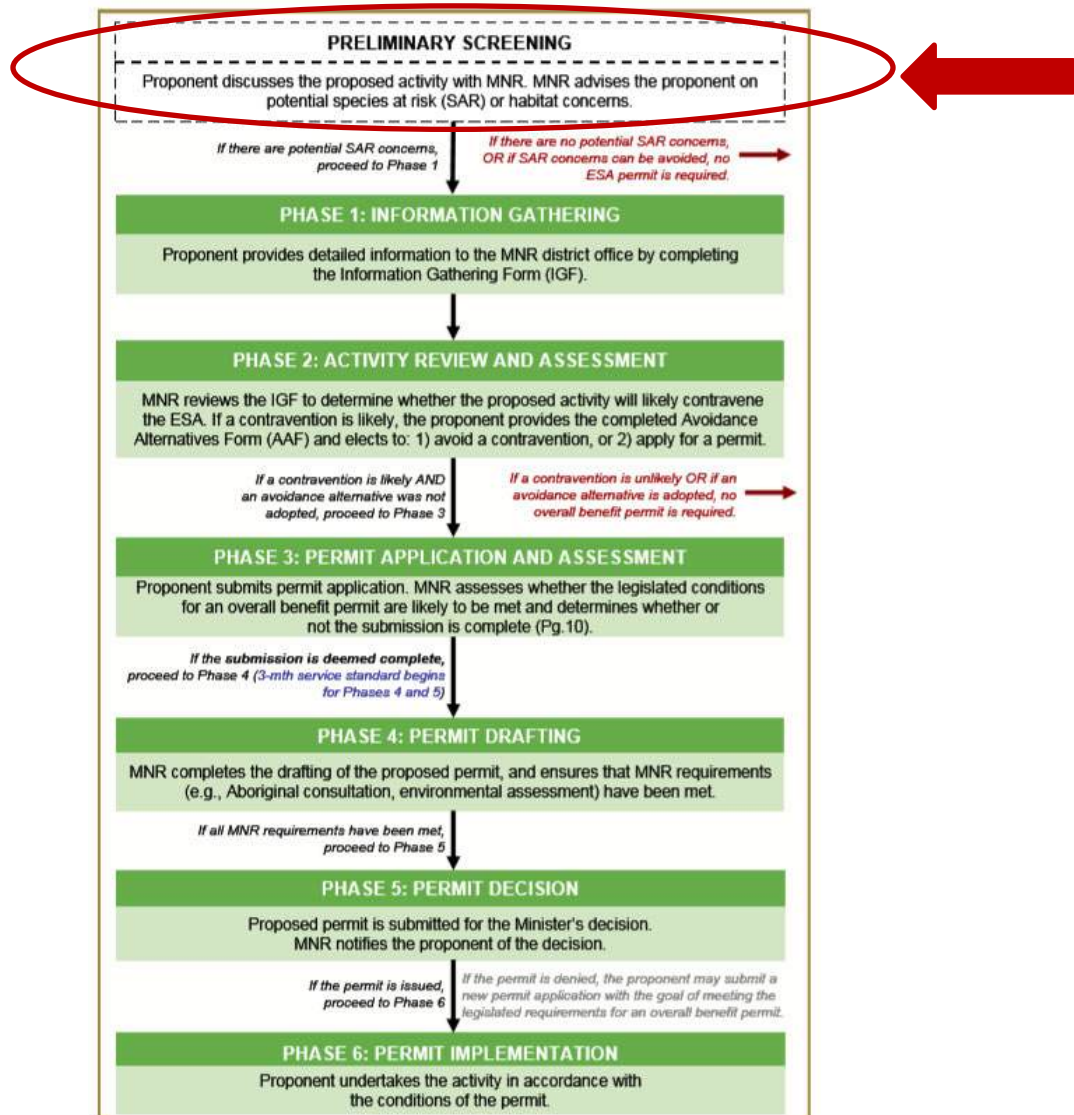
To provide the most efficient service, clients should initiate species at risk screenings and seek information from all applicable information sources identified in this guide, at a minimum, prior to contacting Government of Ontario ministry offices for further information or advice.

1.2 Scope

This guide is a resource for clients seeking to understand if their activity is likely to impact species at risk or if they are likely to trigger the need for an authorization under the ESA. It is not intended to circumvent any detailed site surveys that may be necessary to document species at risk or their habitat nor to circumvent the need to assess the impacts of a proposed activity on species at risk or their habitat. This guide is not an exhaustive list of available information sources for any given area as the availability of information on species at risk and their habitat varies across the province. This guide is intended to support projects and activities carried out on Crown and private land, by private landowners, businesses, other provincial ministries and agencies, or municipal government.

1.3 Background and Context

To receive advice on their proposed activity, clients must first determine whether any species at risk or their habitat exist or are likely to exist at or near their proposed activity, and whether their proposed activity is likely to contravene the ESA. Once this step is complete, clients may contact the ministry at SAROntario@ontario.ca to discuss the main purpose, general methods, timing and location of their proposed activity as well as information obtained about species at risk and their habitat at, or near, the site. At this stage, the ministry can provide advice and guidance to the client about potential species at risk or habitat concerns, measures that the client is considering to avoid adverse effects on species at risk or their habitat and whether additional field surveys are advisable. This is referred to as the “Preliminary Screening” stage. For more information on additional phases in the diagram below, please refer to the *Endangered Species Act Submission Standards for Activity Review and 17(2)(c) Overall Benefit Permits* policy available online at <https://www.ontario.ca/page/species-risk-overall-benefit-permits>



2.0 Roles and Responsibilities

To provide the most efficient service, clients should initiate species at risk screenings and seek information from all applicable information sources identified in this guide prior to contacting Government of Ontario ministry offices for further information or advice.

Step 1: Client seeks information regarding species at risk or their habitat that exist, or are likely to exist, at or near their proposed activity by referring to all applicable information sources identified in this guide.

Step 2: Client reviews and consider guidance on whether their proposed activity is likely to contravene the ESA (see section 3.4 of this guide for guidance on what to consider).

Step 3: Client gathers information identified in the checklist in section 4 of this guide.

Step 4: Client contacts the ministry at SAROntario@ontario.ca to discuss their preliminary screening. Ministry staff will ask the client questions about the main purpose, general methods, timing and location of their proposed activity as well as information obtained about species at risk and their habitat at, or near, the site. Ministry staff will also ask the client for their interpretation of the impacts of their activity on species at risk or their habitat as well as measures the client has considered to avoid any adverse impacts.

Step 5: Ministry staff will provide advice on next steps.

Option A: Ministry staff may advise the client they can proceed with their activity without an authorization under the ESA where the ministry is confident that:

- no protected species at risk or habitats are likely to be present at or near the proposed location of the activity; or
- protected species at risk or habitats are known to be present but the activity is not likely to contravene the ESA; or
- through the adoption of avoidance measures, the modified activity is not likely to contravene the ESA.

Option B: Ministry staff may advise the client to proceed to Phase 1 of the overall benefit permitting process (i.e. Information Gathering in the previous diagram), where:

- there is uncertainty as to whether any protected species at risk or habitats are present at or near the proposed location of the activity; or
- the potential impacts of the proposed activity are uncertain; or
- ministry staff anticipate the proposed activity is likely to contravene the ESA.

3.0 Information Sources

Land Information Ontario (LIO) and the Natural Heritage Information Centre (NHIC) maintain and provide information about species at risk, as well as related information about fisheries, wildlife, crown lands, protected lands and more. This information is made available to organizations, private individuals, consultants, and developers through online sources and is often considered under various pieces of legislation or as part of regulatory approvals and planning processes.

The information available from LIO or NHIC and the sources listed in this guide should not be considered as a substitute for site visits and appropriate field surveys. Generally, this information can be regarded as a starting point from which to conduct further field surveys, if needed. While this data represents best available current information, it is important to note that a lack of information for a site does not mean that species at risk or their habitat are not present. There are many areas where the Government of Ontario does not currently have information, especially in more remote parts of the province. The absence of species at risk location data at or near your site does not necessarily mean no species at risk are present at that location. On-site assessments can better verify site conditions, identify and confirm presence of species at risk and/or their habitats.

Information on the location (i.e. observations and occurrences) of species at risk is considered sensitive and therefore publicly available only on a 1km square grid as opposed to as a detailed point on a map. This generalized information can help you understand which species at risk are in the general vicinity of your proposed activity and can help inform field level studies you may want to undertake to confirm the presence, or absence of species at risk at or near your site.

Should you require specific and detailed information pertaining to species at risk observations and occurrences at or near your site on a finer geographic scale; you will be required to demonstrate your need to access this information, to complete data sensitivity training and to obtain a Sensitive Data Use License from the NHIC. Information on how to obtain a license can be found online at <https://www.ontario.ca/page/get-natural-heritage-information>.

Many organizations (e.g. other Ontario ministries, municipalities, conservation authorities) have ongoing licensing to access this data so be sure to check if your organization has this access and consult this data as part of your preliminary screening if your organization already has a license.

3.1 Make a Map: Natural Heritage Areas

The Make a Natural Heritage Area Map (available online at http://www.gisapplication.lrc.gov.on.ca/mamnh/Index.html?site=MNR_NHLUPS_NaturalHeritage&viewer=NaturalHeritage&locale=en-US) provides public access to natural heritage information, including species at risk, without the user needing to have Geographic Information System (GIS) capability. It allows users to view and identify generalized species at risk information, mark areas of interest, and create and print a custom map directly from the web application. The tool also shows topographic information such as roads, rivers, contours and municipal boundaries.

Users are advised that sensitive information has been removed from the natural areas dataset and the occurrences of species at risk has been generalized to a 1-kilometre grid to mitigate the risks to the species (e.g. illegal harvest, habitat disturbance, poaching).

The web-based mapping tool displays natural heritage data, including:

- Generalized Species at risk occurrence data (based on a 1-km square grid),
- Natural Heritage Information Centre data.

Data cannot be downloaded directly from this web map; however, information included in this application is available digitally through Land Information Ontario (LIO) at <https://www.ontario.ca/page/land-information-ontario>.

3.2 Land Information Ontario (LIO)

Most natural heritage data is publicly available. This data is managed in a large provincial corporate database called the LIO Warehouse and can be accessed online through the LIO Metadata Management Tool at <https://www.javacoeapp.lrc.gov.on.ca/geonetwork/srv/en/main.home>. This tool provides descriptive information about the characteristics, quality and context of the data. Publicly available geospatial data can be downloaded directly from this site.

While most data are publicly available, some data may be considered highly sensitive (i.e. nursery areas for fish, species at risk observations) and as such, access to some data maybe restricted.

3.3 Additional Species at Risk Information Sources

- The Breeding Bird Atlas can be accessed online at <http://www.birdsontario.org/atlas/index.jsp?lang=en>
- eBird can be accessed online at <https://ebird.org/home>
- iNaturalist can be accessed online at <https://www.inaturalist.org/>
- The Ontario Reptile and Amphibian Atlas can be accessed online at <https://ontarionature.org/programs/citizen-science/reptile-amphibian-atlas>
- Your local Conservation Authority. Information to help you find your local Conservation Authority can be accessed online at <https://conservationontario.ca/conservation-authorities/find-a-conservation-authority/>

Local naturalist groups or other similar community-based organizations

- Local Indigenous communities
- Local land trusts or other similar Environmental Non-Government Organizations
- Field level studies to identify if species at risk, or their habitat, are likely present or absent at or near the site.
- When an activity is proposed within one of the continuous caribou ranges, please be sure to consider the caribou Range Management Policy. This policy includes figures and maps of the continuous caribou range, can be found online at <https://www.ontario.ca/page/range-management-policy-support-woodland-caribou-conservation-and-recovery>

3.4 Information Sources to Support Impact Assessments

- Guidance to help you understand if your activity is likely to adversely impact species at risk or their habitat can be found online at <https://www.ontario.ca/page/policy-guidance-harm-and-harass-under-endangered-species-act> and <https://www.ontario.ca/page/categorizing-and-protecting-habitat-under-endangered-species-act>
- A list of species at risk in Ontario is available online at <https://www.ontario.ca/page/species-risk-ontario>. On this webpage, you can find out more about each species, including where it lives, what threatens it and any specific habitat protections that apply to it by clicking on the photo of the species.

4.0 Check-List

Please feel free to use the check list below to help you confirm you have explored all applicable information sources and to support your discussion with Ministry staff at the preliminary screening stage.

- ✓ Land Information Ontario (LIO)
- ✓ Natural Heritage Information Centre (NHIC)
- ✓ The Breeding Bird Atlas
- ✓ eBird
- ✓ iNaturalist
- ✓ Ontario Reptile and Amphibian Atlas
- ✓ List Conservation Authorities you contacted: _____

- ✓ List local naturalist groups you contacted: _____

- ✓ List local Indigenous communities you contacted: _____

- ✓ List any other local land trusts or Environmental Non-Government Organizations you contacted: _____

- ✓ List and field studies that were conducted to identify species at risk, or their habitat, likely to be present or absent at or near the site: _____

- ✓ List what you think the likely impacts of your activity are on species at risk and their habitat (e.g. damage or destruction of habitat, killing, harming or harassing species at risk): _____

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, November 24, 2023 3:40 PM

To: EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Caicedo, Jimena (MECP) <Jimena.Caicedo@ontario.ca>

Subject: RE: Notice of Commencement - Portlands Energy Centre

Good afternoon MECP,

Thank you for the letter acknowledging our Notice of Commencement for the Portlands Energy Centre Efficiency Upgrade project, please see our attached response.

If you have additional questions or comments, please let our team know,

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

November 24, 2023

Environmental Assessment Branch
Environmental Assessment and Permissions Division
Ministry of the Environment, Conservation and Parks (MECP)
135 St. Clair Avenue West
Toronto, ON M4V 1P5

**Re: Portlands Energy Centre (PEC) Upgrades
Atura Power
Electricity Projects Regulation, O. Reg. 116/01 (Category B)
Acknowledgement of Notice of Commencement**

Dear Ms. Liu,

Thank you for your recent letter on October 16, 2023, acknowledging our Notice of Commencement for the Portlands Energy Centre (PEC) Efficiency Upgrades project. Atura Power will review the guidance related to the (August 2022) "Areas of Interest" and address applicable areas of interest with respect to the Screening Stage assessment being undertaken as part of the Environmental Screening process for the project.

Prior to publishing the Notice of Commencement, Atura Power initiated engagement with the Indigenous communities identified in your letter and will continue to engage with these Indigenous communities over the course of the Environmental Screening Process.

We anticipate releasing the draft Screening Report for review in a few weeks. A copy of the draft report will be shared with the MECP at that time, as per the contact information specified in your letter. Upon completion of the review period, Atura Power will address and incorporate any comments received before releasing the final Screening Report for a 30-day review period in early 2024, as per the Environmental Screening Process under O.Reg. 116/01.

In the meantime, please let us know if you would like any additional information or have any questions as we progress through the Environmental Screening process. We would also be happy to meet with you either virtually or in-person to discuss any questions or other project details that may be helpful to you.

Thank you,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power
289-834-9084
Krishana.gnanachandran@aturapower.com

From: Caicedo, Jimena (MECP) <Jimena.Caicedo@ontario.ca>

Sent: Friday, November 24, 2023 3:41 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Automatic reply: Notice of Commencement - Portlands Energy Centre

Hello,

I will be out of the office on Friday (Nov.24,2023). If you require immediate assistance, please contact Paul Celsie at Paul.Celsie@ontario.ca.

Regards,

Jimena Caicedo

Manager

Toronto District Office

Ontario Ministry of the Environment, Conservation and Parks 5775 Yonge Street |9th
Floor| Toronto ON

Tel: 416-709-1636

From: EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>

Sent: Monday, November 27, 2023 4:20 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>

Cc: Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Caicedo, Jimena (MECP) <Jimena.Caicedo@ontario.ca>

Subject: RE: Notice of Commencement - Portlands Energy Centre

Thank you for responding our acknowledge letter for this project. If any concerns or questions come up, we'll follow up with your project team.

Many thanks,
Chunmei

From: EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>

Sent: Thursday, November 30, 2023 4:53 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Stephen Smith <Stephen.Smith@aturapower.com>

Cc: Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Caicedo, Jimena (MECP) <Jimena.Caicedo@ontario.ca>; EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>; Martin, Paul (MECP) <Paul.D.Martin@ontario.ca>; Antunes, Marinha (MECP) <Marinha.Antunes@ontario.ca>

Subject: RE: Notice of Commencement - Portlands Energy Centre

Dear Project Team, hope you're all doing well

Further to the ministry's acknowledge letter for this project. The ministry also recommends that your project team conduct an air quality impact assessment during the Environmental Screening Process. The air assessment should entail modelling of the existing scenario (550 MW) versus the future scenario (600 MW). The assessment should also include a discussion how the proposed changes will comply with the local Air Regulation 419/05 and if any mitigation measures are needed.

If your project team require additional clarification or questions and concerns, please let us know.

Many thanks,

Chunmei Liu (she/her) | Regional Environmental Planner

Environmental Assessments Branch, Ontario Ministry of the Environment, Conservation and Parks | 7th Flr, 135 St Clair Ave W, Toronto, ON M4V 1P5 | Chunmei.Liu@ontario.ca | 437-249-3102

We want to hear from you. How was my service? You can provide feedback at 1-888-745-8888 or ontario.ca/inspectionfeedback

Nous attendons vos commentaires. Qu'avez-vous pensé de mon service? Vous pouvez nous faire part de vos commentaires au 1-888-745-8888 ou à ontario.ca/retroactioninspection

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, December 8, 2023 3:33 PM

To: EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Caicedo, Jimena (MECP) <Jimena.Caicedo@ontario.ca>; Martin, Paul (MECP) <Paul.D.Martin@ontario.ca>; Antunes, Marinha (MECP) <Marinha.Antunes@ontario.ca>; Stephen Smith <Stephen.Smith@aturapower.com>; David Patterson <david.patterson@aturapower.com>

Subject: RE: Notice of Commencement - Portlands Energy Centre

Good afternoon, Chunmei.

Thank you for your recent email sharing the ministry's recommendation for Atura Power to conduct an air quality impact assessment during the Environmental Screening Process for our Portlands Energy Centre (PEC) Efficiency Upgrades project.

You would have received a copy of our draft Screening Report for the PEC Efficiency Upgrades project by now. We shared this draft report with Indigenous communities, key agencies such as yourselves, and interested members of the public on Dec. 5, 2023, to offer an additional opportunity for those interested to review the project details, the Environmental Screening Process undertaken, and assessment findings.

You will note that Section 3 of the draft Screening Report explains that the Environmental Screening Process found that "no further studies are needed as there are no identified negative environmental effects from the project related to the Screening Criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, stated that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels" and that the upgrades are "not expected to increase noise levels from the facility." As such, air and noise assessments are not needed and have not been undertaken for the project".

In addition to the Environmental Screening Process findings, we note that an air quality assessment of the existing scenario (550 MW) versus the future scenario (600 MW), including a discussion of how the proposed changes will comply with the local Air Regulation 419/05 and if any mitigation measures are needed, is not required. As noted above, the manufacturer of the equipment for the upgrades has stated that [air] emissions levels will be at or below current levels. Therefore, there are no differences between an air quality assessment of the existing scenario (550 MW) versus the future scenario (600 MW). An Environmental Compliance Approval (ECA) amendment application (reference number: 1000231733) has been completed and submitted by Atura on June 23, 2023, which demonstrates that the facility complies with the local Air Regulation 419/05.

Based on this, we understand that no further studies are required as part of the Environmental Screening Process per Ontario Regulation 116/01 under the *Ontario Environmental Assessment Act*. Should the ministry have any remaining questions or concerns regarding the Environmental Screening Process undertaken and the assessment findings, we would be pleased to meet with the ministry to discuss those items.

Thank you for your time and attention, and please do not hesitate to contact us with any further questions or to schedule a meeting.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>

Sent: Friday, January 5, 2024 8:49 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Stephen Smith <Stephen.Smith@aturapower.com>; David Patterson <david.patterson@aturapower.com>

Cc: Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Caicedo, Jimena (MECP) <Jimena.Caicedo@ontario.ca>; Martin, Paul (MECP) <Paul.D.Martin@ontario.ca>; Antunes, Marinha (MECP) <Marinha.Antunes@ontario.ca>; EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>; Colella, Nick (MECP) <Nick.Colella@ontario.ca>

Subject: RE: Notice of Commencement - Portlands Energy Centre

Happy New Year, Project Team

MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking.

MECP's Toronto District staff have also reviewed the draft ESR from the lens of the district and do not have any further comments. It is understood that the proposed efficiency upgrades are occurring within the facility, will not require works beyond the footprint of the facility and are projected to cause no additional negative effects to the natural environment or species at risk.

Initial concerns with this project were centered around visible emissions as MECP's district staff regularly receive complaints regarding plumes originating from the plant due to the startup/shutdown procedures. In the report, the equipment manufacturer has demonstrated that the upgrades will maintain [air] emissions levels at or below site permit levels. Similarly, the manufacturer has stated that the upgrades are not expected to increase noise levels from the facility. This was previously assured through discussions with Atura Power representatives in June 2023 when the Environmental Compliance Approval amendment was submitted.

Attached we have also asked the full record of indigenous consultation information including emails, call logs, meeting notes, etc. for the review of the draft ESR.

If the requested information is not available at the draft ESR review stage, the ministry will request the full record of indigenous consultation information for our review when a Notice of Completion and the final ESR for the project is released during the 30-day public review period.

If you have any questions regarding our request, please let us know.

Many thanks,

Chunmei Liu (she/her) | Regional Environmental Planner

Environmental Assessments Branch, Ontario Ministry of the Environment, Conservation and Parks | 7th Flr, 135 St Clair Ave W, Toronto, ON M4V 1P5 | Chunmei.Liu@ontario.ca | 437-249-3102

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, January 12, 2024 4:48 PM

To: EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>

Cc: Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Caicedo, Jimena (MECP) <Jimena.Caicedo@ontario.ca>; Martin, Paul (MECP) <Paul.D.Martin@ontario.ca>; Antunes, Marinha (MECP) <Marinha.Antunes@ontario.ca>; Colella, Nick (MECP) <Nick.Colella@ontario.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>; Stephen Smith <Stephen.Smith@aturapower.com>; David Patterson <david.patterson@aturapower.com>

Subject: RE: Notice of Commencement - Portlands Energy Centre

Hello, Chunmei, and Happy New Year to you as well!

Thank you for your email dated Jan. 5, 2024. We appreciate the MECP's confirmation that an air quality impact assessment is not needed for the PEC Efficiency Upgrades project, and that the MECP's Toronto District staff have reviewed the draft Screening Report and do not have further comments.

In response to the MECP's request for the full record of Indigenous engagement information, we would like to note that the draft Environmental Screening Report (Section 4) summarizes our engagement with Indigenous communities during the Environmental Screening Process to date. We have not included the detailed correspondence records in the draft Screening Report as we are sharing these records with each Indigenous community first.

And, as noted in your email, we will provide the correspondence with Indigenous communities to the MECP with the Notice of Completion and final Screening Report.

Thank you again, and please let us know if you have further questions.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandupgrade@aturapower.com>

Sent: Tuesday, December 5, 2023 3:21 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

As you know, Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC). The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01 under the Ontario *Environmental Assessment Act*. Atura Power has prepared a *draft* copy of the Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is 'No', indicating that there would not be potential negative environmental effects resulting from the project.

Attached to this email is a draft of the Screening Report. We are sharing this draft with Indigenous communities, key agencies such as yourselves, and interested members of the public to offer an additional opportunity to review the project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power is voluntarily providing this opportunity so comments can be incorporated in the final Screening Report. We invite you to review the draft report and share any comments on the report via our project email address, portlandupgrade@aturapower.com. We will **accept comments until Jan. 7, 2024**, after which time we will prepare and release the final version of the Screening Report in winter 2024.

Thank you very much, and please send your project-related questions to portlandupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>
Sent: Monday, December 11, 2023 3:21 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>
Cc: Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Averill, Jon (MECP) <Jon.Averill@ontario.ca>
Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Dear Project Team,

The ministry is requesting the full record of indigenous consultation information including emails, call logs, meeting notes, etc. for the review of the draft ESR for this project.

If the requested information is not available at the draft ESR review stage, the ministry will request the full record of indigenous consultation information for our review when a Notice of Completion and the final ESR for the project is released during the 30-day public review period.

If you have any questions regarding our request, please let us know.

Many thanks,

Chunmei Liu (she/her) | Regional Environmental Planner

Environmental Assessments Branch, Ontario Ministry of the Environment, Conservation and Parks | 7th Flr, 135 St Clair Ave W, Toronto, ON M4V 1P5 | Chunmei.Liu@ontario.ca | 437-249-3102

From: O'Neill, Kathleen (MECP) <Kathleen.Oneill@ontario.ca>

Sent: Friday, November 17, 2023 2:30 PM

To: jack@cleanairalliance.org <jack@cleanairalliance.org>

Cc: David Patterson <david.patterson@aturapower.com>; Liu, Chunmei (MECP) <Chunmei.Liu@ontario.ca>; Randolph, Clinton (MECP) <Clinton.Randolph@ontario.ca>; Colella, Nick (MECP) <Nick.Colella@ontario.ca>; Battarino, Gavin (MECP) <Gavin.Battarino@ontario.ca>; Yumbla, Josephine (MECP) <Josephine.Yumbla@ontario.ca>

Subject: Reply Letter - Ministry of the Environment Conservation and Parks (MECP)

Good afternoon,

Please see attached letter from MECP. Regards,

Kathleen O'Neill

Director, Environmental Assessment Branch Ministry of Environment, Conservation and Parks
647-287-5664

Ministry of the Environment,
Conservation and Parks

Ministère de l'Environnement, de la
Protection de la nature et des Parcs



Environmental Assessment
Branch

Direction des évaluations
environnementales

7th Floor
135 St. Clair Avenue W
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Tel.: 416 314-8001
Fax.: 416 314-8452

7ème étage
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél. : 416 314-8001
Télec. : 416 314-8452

357-2023-2041

November 17, 2023

Jack Gibbons
Chair, Ontario Clean Air Alliance
Email: jack@cleanairalliance.org

Dear Jack Gibbons:

Thank you for your October 10, 2023, email regarding the proposal by Atura Power to increase the capacity of its Portlands Energy Centre (PEC) by 50 Megawatts (MW). I understand that you would like to know how the public can participate in the environmental assessment process and the process for submitting an elevation request.

As the proposal by Atura Power will result in a 50 MW increase in output capacity of the PEC, the proposal is subject to the Environmental Screening Process (ESP) for Electricity Projects pursuant to O. Reg. 116/01 made under the *Environmental Assessment Act*. As part of this process, interested members of the public will be provided with an opportunity to provide feedback and comments at key decision making points in the ESP. The proponent has a responsibility to develop and implement a consultation program which provides appropriate opportunities for the public to participate in the screening process. The ESP also requires that there be a 30-day period during which the Screening Report or the Environmental Review Report is available to the public for review. Please refer to [Atura's project website](#) for more information about the PEC efficiency upgrades and upcoming public meetings.

I understand that you also have questions about the elevation request process. In accordance with O. Reg. 116/01, when a Notice of Completion is issued for a project, members of the public have an opportunity to request that a project be elevated to a more rigorous level of review. For further information about the elevation request process, please refer to the [Guide to Environmental Assessment Requirements for Electricity Projects](#).

...2

Jack Gibbons
Page 2.

The ministry understands that a Notice of Commencement for the ESP was published in September 2023. As the ESP is still ongoing, I encourage you to take the opportunity to share any comments or concerns about the proposal directly with Atura Power. You can contact David Patterson, EHS Manager, Atura Power, at the following email address: david.patterson@aturapower.com.

Thank you again for writing.

Sincerely,

Kathleen O'Neill

Kathleen O'Neill
Director
Environmental Assessment Branch

c: David Patterson, EHS Manager, Atura Power

Appendix B6b: Correspondence Records with Other Agencies

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: September 6, 2023 12:53 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: SUN Hongxia <Susan.SUN@HydroOne.com> on behalf of SECONDARY LAND USE Department <Department.SecondaryLandUse@hydroone.com>

Sent: Monday, September 11, 2023 2:29 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: SECONDARY LAND USE Department <Department.SecondaryLandUse@hydroone.com>

Subject: Hydro One Response: 20230911-NoticeOfPIC1-Portlands Energy Centre Efficiency Upgrades

Please see the attached for Hydro One's Response.

Hydro One Networks Inc

SecondaryLandUse@HydroOne.com

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Hydro One Networks Inc.

483 Bay Street
8th Floor South Tower
Toronto, Ontario M5G 2P5

HydroOne.com

September 11, 2023

Re: Portlands Energy Centre Efficiency Upgrades

Attention:
Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power

Thank you for sending us notification regarding (Portlands Energy Centre Efficiency Upgrades). In our preliminary assessment, we confirm there are no existing Hydro One Transmission assets in the subject area. Please be advised that this is only a preliminary assessment based on current information.

If plans for the undertaking change or the study area expands beyond that shown, please contact Hydro One to assess impacts of existing or future planned electricity infrastructure.

Any future communications are sent to Secondarylanduse@hydroone.com.

Be advised that any changes to lot grading and/or drainage within proximity to Hydro One transmission corridor lands must be controlled and directed away from the transmission corridor.

Sent on behalf of,

**Secondary Land Use
Asset Optimization
Strategy & Integrated Planning
Hydro One Networks Inc.**

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: September 6, 2023 12:53 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Johnston, Keith (He/Him) (MNRF) <Keith.Johnston@ontario.ca>

Sent: Wednesday, September 6, 2023 12:53 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades

Thank you for your email.

I am currently out of the office. I will not have access to email at this time and I will respond to your email when I return September 18.

If you need immediate assistance, please contact: Jim Boothby (Jim.Boothby@ontario.ca) with copy to my email account.

If you need assistance with OPCC or EA Notices, Environmental Registry or Regulatory Registry, please contact: Environmental.Planning.Team@ontario.ca

Regards,

Keith Johnston [He/Him]
A/Team Lead, Environmental Planning

From: Bale, Sarah (MNRF) <Sarah.Bale@ontario.ca>
Sent: Thursday, September 14, 2023 11:16 AM
To: Darius Sokal <Darius.Sokal@aturapower.com>
Subject: RE: Portlands Energy Centre Efficiency Upgrades

Dear Darius:

The Ministry of Natural Resources and Forestry (MNRF) received the Notice of Commencement for the Portlands Energy Centre Efficiency Upgrades on September 6, 2023. Thank you for circulating this to our office. Please note the ministry has not completed a screening of natural heritage, natural hazards, other natural resource values, or applicable ministry permits or approvals at this time.

This response provides information to guide you in identifying ministry interests and engaging the ministry for advice as needed. MNRF has prepared the attached to provide proponents an overview of MNRF mandated interests and the ministry's commenting role in respect of external requests for comment for projects subject to the *Environmental Assessment Act*.

Please note it is the proponent's responsibility to be aware of, and comply with, all relevant federal or provincial legislation, municipal by-laws and/or other agency approvals.

After reviewing the information provided, if you have identified that your project would not impact any MNRF interests there is no need to circulate any subsequent notices to our office. If you have identified MNRF interests and/or may require permit(s) or further technical advice, please direct your specific questions to the undersigned.

If you have any questions or concerns, please feel free to contact me.

Best Regards,

Sarah Bale (she/her), Regional Planner

Land Use Planning and Strategic Issues Section | Southern Region

Ministry of Natural Resources and Forestry

Sarah.Bale@Ontario.ca | (613) 504-2254



As part of providing [accessible customer service](#), please let me know if you have any accommodation needs or require communication supports or alternate formats.

Ministry of Natural Resources and
Forestry

Land Use Planning and Strategic Issues
Section
Southern Region

Regional Operations Division
300 Water Street
Peterborough, ON K9J 3C7
Tel.: 705 761-4839

Ministère des Richesses naturelles et des Forêts

Section de l'aménagement du territoire et des
questions stratégiques
Région du Sud

Division des opérations régionales
300, rue Water
Peterborough (ON) K9J 3C7
Tél. : 705 761-4839



September 14, 2023

Darius Sokal
Sr. Communications Advisor, Atura Power
darius.sokal@aturapower.com

SUBJECT: Portlands Energy Centre Efficiency Upgrades; re: Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting

The Ministry of Natural Resources and Forestry (MNRF) received the *Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting* on September 6, 2023. Thank you for circulating this to our office. Please note that we have not completed a screening of natural heritage or other resource values for the project at this time. This response, however, does provide information to guide you in identifying and assessing natural features and resources as required by applicable policies and legislation, as well as engaging with the Ministry for advice as needed.

Please also note that it is the proponent's responsibility to be aware of, and comply with, all relevant federal or provincial legislation, municipal by-laws or other agency approvals.

Natural Heritage

MNRF's natural heritage and natural resources GIS data layers can be obtained through the Ministry's [Land Information Ontario \(LIO\)](#) website. You may also view natural heritage information online (e.g., Provincially Significant Wetlands, ANSI's, woodlands, etc.) using the [Make a Map: Natural Heritage Areas](#) tool.

We recommend that you use the above-noted sources of information during the review of your project proposal.

Natural Hazards

A series of natural hazard technical guides developed by MNRF are available to support municipalities and conservation authorities implement the natural hazard policies in the Provincial Policy Statement (PPS). For example, standards to address flood risks and the potential impacts and costs from riverine flooding are addressed in the *Technical Guide River and Stream Systems: Flooding Hazard Limit (2002)*. We recommend that you consider these technical guides as you assess specific improvement projects that can be undertaken to reduce the risk of flooding.

Petroleum Wells & Oil, Gas and Salt Resources Act

There may be petroleum wells within the proposed project area. Please consult the Ontario Oil, Gas and Salt Resources Library website (www.ogsrlibrary.com) for the best-known data on any wells recorded by MNR. Please reference the 'Definitions and Terminology Guide' listed in the publications on the library website to better understand the well information available. Any oil and gas wells in your project area are regulated by the *Oil, Gas and Salt Resource Act*, and the supporting regulations and operating standards. If any unanticipated wells are encountered during development of the project, or if the proponent has questions regarding petroleum operations, the proponent should contact the Petroleum Operations Section at POSRecords@ontario.ca or 519-873-4634.

Fish and Wildlife Conservation Act

Please note, that should the project require:

- The relocation of fish outside of the work area, a Licence to Collect Fish for Scientific Purposes under the *Fish and Wildlife Conservation Act* will be required.
- The relocation of wildlife outside of the work area (including amphibians, reptiles, and small mammals), a Wildlife Collector's Authorization under the *Fish and Wildlife Conservation Act* will be required.

Public Lands Act & Lakes and Rivers Improvement Act

Some Project may be subject to the provisions of the *Public Lands Act* or *Lakes and River Improvement Act*. Please review the information on MNR's web pages provided below regarding when an approval is, or is not, required. Please note that many of the authorizations under the *Lakes and Rivers Improvement Act* are administered by the local Conservation Authority.

- For more information about the *Public Lands Act*: <https://www.ontario.ca/page/crown-land-work-permits>
- For more information about the *Lakes and Rivers Improvement Act*: <https://www.ontario.ca/page/lakes-and-rivers-improvement-act-administrative-guide>

After reviewing the information provided, if you have not identified any of MNR's interests stated above, there is no need to circulate any subsequent notices to our office. If you have identified any of MNR's interests and/or may require permit(s) or further technical advice, please direct your specific questions to the undersigned.

If you have any questions or concerns, please feel free to contact me.

Best Regards,

Sarah Bale (she/her), Regional Planner

Land Use Planning and Strategic Issues Section | Southern Region

Ministry of Natural Resources and Forestry

Sarah.Bale@Ontario.ca | (613) 504-2254

From: Darius Sokal <Darius.Sokal@aturapower.com>
Sent: Wednesday, September 27, 2023 11:32 AM
To: Bale, Sarah (MNRF) <Sarah.Bale@ontario.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: Portlands Energy Centre Efficiency Upgrades

Good morning, Sarah.

Thank you for confirming receipt of the Notice of Commencement for the Portlands Energy Centre Efficiency Upgrades and sharing the information to guide us in identifying ministry interests and engaging the ministry for advice as needed over the course of the Environmental Screening Process.

We will review the materials and reach out with any questions or concerns.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Bale, Sarah (MNRF) <Sarah.Bale@ontario.ca>

Sent: Tuesday, October 3, 2023 9:22 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades

I am in training from 12pm Tuesday (October 2) until 4:30pm Thursday (October 5). I will respond to you as soon as possible.

Thanks, Sarah

From: Upgrade project for PEC <portlandupgrade@aturapower.com>

Sent: December 5, 2023 3:21 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good afternoon.

As you know, Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC). The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01 under the Ontario *Environmental Assessment Act*. Atura Power has prepared a *draft* copy of the Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is 'No', indicating that there would not be potential negative environmental effects resulting from the project.

Attached to this email is a draft of the Screening Report. We are sharing this draft with Indigenous communities, key agencies such as yourselves, and interested members of the public to offer an additional opportunity to review the project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power is voluntarily providing this opportunity so comments can be incorporated in the final Screening Report. We invite you to review the draft report and share any comments on the report via our project email address, portlandupgrade@aturapower.com. We will **accept comments until Jan. 7, 2024**, after which time we will prepare and release the final version of the Screening Report in winter 2024.

Thank you very much, and please send your project-related questions to portlandupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Bale, Sarah (MNRF) <Sarah.Bale@ontario.ca>

Sent: Monday, December 11, 2023 12:28 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Hello Darius,

Thank you for sending the draft Screening Report. Based on the information contained in the report, we do not have any concerns or further comment at this time.

Please continue to circulate us on key stages/milestones in the process. You can send future circulations directly to me at sarah.bale@ontario.ca.

Sincerely,

Sarah

Sarah Bale (she/her), Regional Planner

Land Use Planning and Strategic Issues Section | Southern Region

Ministry of Natural Resources and Forestry

Sarah.Bale@Ontario.ca | (613) 504-2254



As part of providing [accessible customer service](#), please let me know if you have any accommodation needs or require communication supports or alternate formats

From: Darius Sokal <Darius.Sokal@aturapower.com>

Sent: Monday, December 11, 2023 5:38 PM

To: Bale, Sarah (MNR) <Sarah.Bale@ontario.ca>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: Stephen Smith <Stephen.Smith@aturapower.com>; David Patterson
<david.patterson@aturapower.com>; Krishana Gnanachandran
<Krishana.Gnanachandran@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Thank you for your message and quick review, Sarah.

They are very much appreciated.

Sincerely,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: September 6, 2023 12:53 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: [External Sender] Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Office Of The Fire Chief <OfficeOfTheFireChief@toronto.ca>

Sent: Thursday, September 14, 2023 3:24 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Office Of The Fire Chief <OfficeOfTheFireChief@toronto.ca>

Subject: Toronto Fire Services Reply RE: Portlands Energy Centre Efficiency Upgrades

Good afternoon Darius,

Thank you for contacting Toronto Fire Services, Office of the Fire Chief to provide this notice regarding the above-mentioned. I have forwarded this to our Fire Prevention and Inspections division who will review and attend if necessary, or be in contact if further information is required.

Kind regards,
Heather

Heather Smith (she/her)
Administrative Assistant for
Matthew Pegg, Fire Chief and General Manager

Office of the Fire Chief | Toronto Fire Services
4330 Dufferin Street, 3rd Floor
Toronto, ON | M3H 5R9
O: (416) 338-9061 C: (416) 476-3361 Fax: (416) 338-9060
Heather.Smith@toronto.ca | OfficeOfTheFireChief@toronto.ca

I acknowledge the land I am standing on is the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and is now home to many diverse First Nations, Inuit and Métis peoples. I also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit and the Williams Treaty signed with multiple Mississaugas and Chippewa bands.

I acknowledge all Treaty peoples – including those who came here as settlers – as migrants either in this

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, September 6, 2023 12:53 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>

Sent: Tuesday, September 19, 2023 3:58 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades

Thank you for your email.

I'm currently out of the office and will return on Wednesday, September 27, 2023. If your email is urgent please contact Madison Antonangeli at madison.antonangeli@trca.ca, otherwise I will return your email at my earliest convenience upon my return to the office.

Thank-you

Corinna Thomassen-Darby, M.PL (she/her/hers)

Planner

Infrastructure Planning and Permits | Development and Engineering Services

T: (416) 661-6600 ext. 5625

E: corinna.thomassen-darby@trca.ca

C: (647) 649-8964

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6](#) | trca.ca

From: Jackie Ho <Jackie.Ho@trca.ca>
Sent: Tuesday, September 19, 2023 2:07 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>
Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>
Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Darius,

I will be the main contact at TRCA for this project. I am confirming receipt of the Notice of Commencement. Please be advised that a formal response will be coming from TRCA.

TRCA staff are unable to attend the public meeting live on October 5th. Would you please share the materials with us for TRCA staff to review?

Thanks,
Jackie

Jackie Ho (she/her)
Planner I
Infrastructure Planning and Permits | Development and Engineering Services

T: [437-880-2147](tel:437-880-2147)

E: jackie.ho@trca.ca

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6 | trca.ca](https://www.trca.ca)



From: Darius Sokal <Darius.Sokal@aturapower.com>

Sent: Tuesday, September 19, 2023 1:58 PM

To: Jackie Ho <Jackie.Ho@trca.ca>

Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Jackie.

Thank you for your message.

I will share the public meeting materials with you shortly after the meeting. They will also be posted on the project webpage at aturapower.com/portlandsupgrade.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Jackie Ho <Jackie.Ho@trca.ca>

Sent: Tuesday, September 19, 2023 4:08 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Darius,

Thanks for confirming. I noted on the project webpage that Atura Power has applied for an exemption with MECP. Is there an expected timeline for when it will be known whether the EA proceeds?

Best,
Jackie

Jackie Ho (she/her)

Planner I

Infrastructure Planning and Permits | Development and Engineering Services

T: [437-880-2147](tel:437-880-2147)

E: jackie.ho@trca.ca

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6](https://www.trca.ca/101-Exchange-Avenue-Vaughan-ON-L4K-5R6) | [trca.ca](https://www.trca.ca)



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:57 AM

To: Jackie Ho <Jackie.Ho@trca.ca>

Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Jackie.

Atura Power is not pursuing an exemption with the MECP.

Thanks, and sorry for my delayed reply.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC portlandupgrade@aturapower.com
Sent: Tuesday, December 5, 2023 3:21 PM
To: Darius Sokal Darius.Sokal@aturapower.com
Subject: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good afternoon.

As you know, Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC). The upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01 under the Ontario *Environmental Assessment Act*. Atura Power has prepared a *draft* copy of the Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is 'No', indicating that there would not be potential negative environmental effects resulting from the project.

Attached to this email is a draft of the Screening Report. We are sharing this draft with Indigenous communities, key agencies such as yourselves, and interested members of the public to offer an additional opportunity to review the project details, the Environmental Screening Process undertaken, and assessment findings. Atura Power is voluntarily providing this opportunity so comments can be incorporated in the final Screening Report. We invite you to review the draft report and share any comments on the report via our project email address, portlandupgrade@aturapower.com. We will **accept comments until Jan. 7, 2024**, after which time we will prepare and release the final version of the Screening Report in winter 2024.

Thank you very much, and please send your project-related questions to portlandupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Jackie Ho <Jackie.Ho@trca.ca>

Sent: Wednesday, December 6, 2023 10:21 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Hi Krishana and Darius,

TRCA staff note that there were no detailed responses to our comments included in the draft screening report. Please provide us with detailed responses for TRCA staff review in the attached appendix.

Please be advised, as noted in the response letter, this application is subject to a \$5,005 application review fee as per TRCA's [Fee Schedule](#). For payment options, refer to How to Pay TRCA Review Fees. Ensure your accounting department references CFN 69952 when making payment. An invoice will be sent from TRCA Accounting staff in a few days.

Best,
Jackie

Jackie Ho (she/her)

Planner I

Infrastructure Planning and Permits | Development and Engineering Services

T: [437-880-2147](tel:437-880-2147)

E: jackie.ho@trca.ca

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6](#) | trca.ca



October 31, 2023

CFN 69952

BY E-MAIL ONLY (portlandsupgrade@aturapower.com)

Krishana Gnanachandran, Project Manager
Atura Power
1415 Joshuas Creek Drive, Unit #101
Oakville, ON
L6H 7G4

Dear Krishana Gnanachandran,

**Re: Notice of Commencement
Portlands Energy Centre Efficiency Upgrades
Environmental Screening Process for Electricity Projects – Category B**

These comments respond to the notice received by Toronto and Region Conservation Authority (TRCA) staff on Wednesday, September 6, 2023 along with supporting presentation materials from the Public Meeting held on October 5, 2023.

OVERVIEW

This project involves efficiency upgrades to the Portlands Energy Centre (PEC) at 470 Unwin Avenue, in the City of Toronto. The Portlands Energy Centre was previously known as the Richard L. Hearn Generating Station on Villiers Island. Upgrading the equipment at the PEC will increase its generating capacity by 50 MW to an output of 600 MW. The efficiency upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines. All upgrade activities will take place within the existing facility and there will be no changes or expansion beyond the existing PEC footprint. Public engagement for this project is planned from June to December 2023 including the release of a Draft Screening Report and 30-day review period, with a Statement of Completion planned to be submitted in February 2024. A listing of documents reviewed is included/provided in Appendix A: Documents Reviewed by TRCA.

A virtual Public Meeting was held on October 5, 2023 where Atura Power provided a presentation including information on the project, proponent, and Environmental Assessment process. Atura Power is undergoing a Screening Stage assessment under the Environmental Screening Process for Electricity Projects subject to Ontario Regulation 116/01. TRCA staff did not attend live but have provided comments on the presentation materials as part of this Notice of Commencement, detailed below.

COMMENTING ROLE

Staff have reviewed the study area associated with this project in accordance with the [Conservation Authorities Act](#), including mandatory commenting on Planning Act and Environmental Assessment Act applications. TRCA undertakes review and commenting functions in accordance with [The Living City Policies](#). For additional information, please see [TRCA Role in the Plan Input and Review Process](#).

TRCA REVIEW

1. TRCA staff have interest within the study area related to both impacts on natural systems, natural hazard management, and mitigating and adapting for the effects of climate change. As the EA progresses and alternatives are reviewed, opportunities to avoid, mitigate, restore, and as a last resort, compensate for impacts to shorelines should be addressed. Additionally, both source water protection and best management practices that support climate change mitigation and adaptation must be considered.
2. Staff have completed the review of this submission and have several comments which are enclosed as Appendix B: TRCA Comments and Proponent Responses. These should be addressed as the EA progresses.
3. Specifically, staff note the following:
 - a. The project is located within the Toronto Waterfront Screening Area. As such, a permit from TRCA is not required.

CONTACT INFORMATION

1. To ensure TRCA concerns are addressed early in the review process, it is recommended that the TRCA planner be contacted when key project milestones are reached, as detailed in the [Recommended TRCA Contact Points in the Municipal Class EA or Other Processes](#).

SUBMISSION REQUIREMENTS, TRCA DATA AND REVIEW FEES

1. Follow the [TRCA Digital Submission Requirements for Environmental Assessment Documents](#) to ensure all required information is provided in future submissions.
2. TRCA has select digital data available through an open data platform on the [TRCA website](#) that should be used to supplement the existing conditions analysis in the development of the environmental assessment.
3. Upon request, TRCA can provide additional data for areas of interest not available on the web. Please contact the undersigned as needed. TRCA charges an administration fee for the compilation of this additional data.

4. This application is subject to a \$ 5,005.00 application review fee as per our [Fee Schedule](#). For payment options, refer to [How to Pay TRCA Review Fees](#). Ensure your accounting department references CFN 69952 when making payment.

Should you have any questions or comments, please contact the undersigned.

Regards,



Jackie Ho
Planner I

Infrastructure Planning and Permits | Development and Engineering Services

Telephone: 437-880-2147

Email: Jackie.Ho@trca.ca

/jh

Attached: Appendix A: Documents Reviewed by TRCA.
Appendix B: TRCA Comments and Proponent Responses
Enclosed: Appendix B: TRCA Comments and Proponent Responses, Word digital file
for proponent response purposes

BY E-MAIL

cc: TRCA: Zack Carlan, Senior Planner, Infrastructure Planning and Permits

APPENDIX A: DOCUMENTS REVIEWED BY TRCA

DOCUMENTS REVIEWED

1. Letter; Notice of Commencement of a Screening and Invitation to a Virtual Public Meeting; prepared by Atura Power; dated September 6, 2023; received by TRCA on September 6, 2023;
2. Portlands Energy Efficiency Upgrades, Public Meeting; Presentation; prepared by Atura Power; dated October 5, 2023; received by TRCA on October 6, 2023.

APPENDIX B: TRCA COMMENTS AND PROPONENT RESPONSES
CFN 69952 – Atura Power – Portlands Energy Centre Efficiency Upgrades

ITEM	DISCIPLINE	TRCA COMMENTS (October 31, 2023)	PROPONENT/CONSULTANT RESPONSE (INSERT DATE)
1.	General	TRCA seeks clarification if any work within “existing facilities” extends beyond the building footprint and associated paved areas. If any work is proposed beyond the built and paved areas, consultation with TRCA should be initiated to prevent indirect and/or direct impacts to the nearby wetlands.	
2.		TRCA advises of the Highly Vulnerable Aquifer in this location. Should works require excavation, consultation with TRCA should be initiated.	
3.		TRCA recommends use of erosion and sediment control measures for stockpiling or staging of equipment outside of the building.	
4.	Planning	Be advised that this project is located within the Toronto Waterfront Screening Area and while TRCA will continue to comment on this project throughout the EA process, future permits under the Conservation Authorities Act regulations are not required. Depending on the works that are proposed during detailed design, an application made pursuant to the TRCA Voluntary Project Review process may be recommended by staff. Voluntary Project Review applications are subject to the discretion of the applicant due to the location of the project within the Toronto Waterfront Screening Area.	

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, December 11, 2023 10:46 AM

To: Jackie Ho <Jackie.Ho@trca.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>;
Darius Sokal <Darius.Sokal@aturapower.com>

Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Krishana Gnanachandran
<Krishana.Gnanachandran@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Good morning, Jackie.

I hope you had a great weekend.

Thank you for your December 6th message and timely review of our draft PEC Efficiency Upgrades Screening Report. Please find Atura Power's response in the attached letter and appendix.

Additionally, we will take steps to facilitate payment of the \$5,005 application fee associated with your team's review of project documentation.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Dec. 11, 2023

Toronto and Region Conservation Authority
101 Exchange Ave.
Vaughan, Ont. L4K 5R6

To whom it may concern,

**Re: Notice of Commencement
Portlands Energy Centre Efficiency Upgrades
Environmental Screening Process for Electricity Projects – Category B**

Thank you for your recent letter to Atura Power on Oct. 31, 2023, acknowledging our plans to make efficiency upgrades at the Portlands Energy Centre (PEC) and noting TRCA guidance for consideration, as well as your recent email to Atura Power on Dec. 6, 2023, after receiving a copy of our draft PEC Efficiency Upgrades Screening Report.

As you are aware, on Dec. 5, 2023, we released a draft copy of the Screening Report for review by agencies such as yourselves, Indigenous communities, and interested members of the public. The report documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is 'No', indicating that there would not be potential negative environmental effects resulting from the project. We are sharing this letter and a populated copy of Appendix B: TRCA Comments and Responses in response to your Oct. 31, 2023, and Dec. 6, 2023, correspondence.

Firstly, we recognize that the project is located within the Toronto Waterfront Screening Area and note the necessity of highlighting any potential impacts to Highly Vulnerable Aquifers and/or areas beyond the existing facility. Given that the upgrades will involve replacing the same parts that would normally be replaced at regular maintenance overhauls, will take place within the existing facility, and the existing facility footprint will not change, we do not anticipate any effects to the TRCA interests identified. Nonetheless, we reviewed the guidance provided including the staff comments and are responding via this letter as well as our responses to the Appendix B: TRCA Comments and Proponent Responses document provided (attached to this letter).

Upon completion of the draft Screening Report review period on Jan. 7, 2024, Atura Power will address and incorporate any comments received before releasing the final Screening Report for a 30-day review period in early 2024 as per the Environmental Screening Process under O.Reg. 116/01. We welcome any additional comments on the draft

Screening Report and associated Environmental Screening Process from TRCA during the draft review period. In the meantime, we will take steps to facilitate payment of the \$5,005 application fee associated with TRCA's review of project documentation.

If you have any other questions or comments about the project, please also do not hesitate to reach out using the information below.

Sincerely,



Krishana Gnanachandran
Project Manager - Outages and Projects
Atura Power
289-834-9084
krishana.gnanachandran@aturapower.com

APPENDIX B: TRCA COMMENTS AND PROPONENT RESPONSES

ITEM	DISCIPLINE	TRCA COMMENTS (Oct. 31, 2023)	PROponent/CONSULTANT RESPONSE (Dec. 8, 2023)
1.	General	TRCA seeks clarification if any work within "existing facilities" extends beyond the building footprint and associated paved areas. If any work is proposed beyond the built and paved areas, consultation with TRCA should be initiated to prevent indirect and/or direct impacts to the nearby wetlands.	No; the upgrades will take place within the existing facility and associated paved areas. The existing facility footprint will not change. Atura Power acknowledges that further engagement with TRCA should be initiated should the project extend beyond the building footprint and associated paved areas.
2.		TRCA advises of the Highly Vulnerable Aquifer in this location. Should works require excavation, consultation with TRCA should be initiated.	Atura Power recognizes the Highly Vulnerable Aquifer in this location. As noted above, the upgrades will take place within the existing facility footprint and will not require excavation. Atura Power acknowledges that further engagement with TRCA should be initiated should the project require excavation.
3.		TRCA recommends use of erosion and sediment control measures for stockpiling or staging of equipment outside of the building.	All critical equipment is to be stored inside the facility. Any equipment stored outside will be temporarily stored on tractor trailer/flatbeds located on existing paved or gravel parking areas and driveways. Atura Power does not expect to affect or change the facility's existing stormwater management plan/program. No effects to erosion or sediment are anticipated.
4.	Planning	Be advised that this project is located within the Toronto Waterfront Screening Area and while TRCA will continue to comment on this project throughout the EA process, future permits under the Conservation Authorities Act regulations are not required. Depending on the works that are	Atura Power acknowledges that this project is located within the Toronto Waterfront Screening Area and that while future permits under the <i>Conservation Authorities Act</i> regulations are not required, TRCA will continue to be involved in the PEC Efficiency

		<p>proposed during detailed design, an application made pursuant to the TRCA Voluntary Project Review process may be recommended by staff. Voluntary Project Review applications are subject to the discretion of the applicant due to the location of the project within the Toronto Waterfront Screening Area.</p>	<p>Upgrades project throughout the EA process. Note, following the successful completion of the EA process, Atura Power plans to move to construction of the planned upgrades in Fall 2024. Atura Power will continue to notify the TRCA of EA milestones including the release of the draft Screening Report (which Atura Power shared notification and a copy of the report with TRCA via email on Dec. 5, 2023) as well as the Notice of Completion and publication of the final Screening Report.</p>

From: Jackie Ho <Jackie.Ho@trca.ca>

Sent: Tuesday, December 12, 2023 4:07 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Krishana Gnanachandran <Krishana.Gnanachandran@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Hi Darius,

I'm confirming receipt of the response appendix. I will be back in touch following TRCA staff review.

Thanks,
Jackie

Jackie Ho (she/her)

Planner I

Infrastructure Planning and Permits | Development and Engineering Services

T: [437-880-2147](tel:437-880-2147)

E: jackie.ho@trca.ca

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6](https://www.trca.ca) | [trca.ca](https://www.trca.ca)



From: Darius Sokal <Darius.Sokal@aturapower.com>
Sent: Tuesday, December 12, 2023 9:09 PM
To: Jackie Ho <Jackie.Ho@trca.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Krishana Gnanachandran <Krishana.Gnanachandran@aturapower.com>
Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Thank you Jackie.

Darius Sokal ([hear it](#))
Sr. Communications Advisor | Atura Power
1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4
E: darius.sokal@aturapower.com
M: 289-795-6573

From: Jackie Ho <Jackie.Ho@trca.ca>
Sent: Thursday, December 21, 2023 8:47 PM
To: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>
Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Krishana Gnanachandran
<Krishana.Gnanachandran@aturapower.com>
Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Hi Darius,

TRCA staff are unable to meet the January 7 deadline proposed and request an extension of two weeks. Typically, our service delivery standards are up to 45 business days for reviewing draft EA reports, but staff expect to be able to provide comments by mid-January. Please confirm if Atura Power can accommodate.

Thanks,
Jackie

Jackie Ho (she/her)
Planner I
Infrastructure Planning and Permits | Development and Engineering Services

T: [437-880-2147](tel:437-880-2147)

E: jackie.ho@trca.ca

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6](https://www.trca.ca/101-Exchange-Avenue-Vaughan-ON-L4K-5R6) | [trca.ca](https://www.trca.ca)



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, December 22, 2023 5:22 PM

To: Jackie Ho <Jackie.Ho@trca.ca>; Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Krishana Gnanachandran <Krishana.Gnanachandran@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Hello Jackie,

Thank you for your update regarding TRCA's review of the draft PEC Efficiency Upgrades Screening Report and noting staff's need for a two-week extension beyond the January 7, 2024 deadline. We look forward to receiving TRCA's comments by January 19, 2024.

Thank you,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>
Sent: Friday, December 22, 2023 5:24 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades - Draft Screening Report

Thank-you for your email

Our offices are closed for the holidays from Saturday, December 23, 2023, through Monday, January 1, 2024. I'm currently out of the office and will return on Wednesday, January 3, 2024.

If your email requires a response prior to my return, please contact Sabriya Jahangir at Sabriya.Jahangir@trca.ca. Otherwise, I'll return your message at my earliest convenience upon my return to the office.

Corinna Thomassen-Darby, M.PL (*she/her/hers*)

Planner

Infrastructure Planning and Permits | Development and Engineering Services

T: (416) 661-6600 ext. 5625

E: corinna.thomassen-darby@trca.ca

C: (647) 649-8964

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6](#) | trca.ca

From: Jackie Ho <Jackie.Ho@trca.ca>
Sent: Wednesday, January 17, 2024 4:51 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Krishana Gnanachandran <Krishana.Gnanachandran@aturapower.com>
Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Zack Carlan <Zack.Carlan@trca.ca>; Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>
Subject: Atura Power - Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - TRCA Response (CFN 69952)

Good morning,

TRCA staff have completed our review of the Draft Screening Report for the above-noted project. Please see the attached response letter with our detailed comments.

If you have any questions, please let me know.

Best,
Jackie

Jackie Ho (she/her)
Planner I
Infrastructure Planning and Permits | Development and Engineering Services

T: [437-880-2147](tel:437-880-2147)

E: jackie.ho@trca.ca

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6](https://www.trca.ca) | [trca.ca](https://www.trca.ca)



January 17, 2024

CFN 69952

BY E-MAIL ONLY (portlandsupgrade@aturapower.com)

Krishana Gnanachandran, Project Manager
Atura Power
1415 Joshuas Creek Drive, Unit #101
Oakville, ON
L6H 7G4

Dear Krishana Gnanachandran,

**Re: Draft Screening Report for Electricity Projects
Portlands Energy Centre Efficiency Upgrades
Environmental Screening Process for Electricity Projects – Category B**

These comments respond to the draft screening report received by Toronto and Region Conservation Authority (TRCA) on December 5, 2023 along with email responses received on December 11, 2023.

OVERVIEW

This project involves efficiency upgrades to the Portlands Energy Centre (PEC) at 470 Unwin Avenue, in the City of Toronto. This site is located within the Toronto Waterfront Screening Area. The Portlands Energy Centre was previously known as the Richard L. Hearn Generating Station on Villiers Island. Upgrading the equipment at the PEC will increase its generating capacity by 50 MW to an output of 600 MW. The efficiency upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines. All upgrade activities will take place within the existing facility and there will be no changes or expansion beyond the existing PEC footprint. TRCA staff understand that any equipment stored outside of the facility will be temporarily stored on tractor trailer/flatbeds located on existing paved or gravel areas. No changes to the facility's existing stormwater management are expected.

Due to the 50 MW increase in output capacity of the PEC, Atura Power is undergoing a Screening Stage assessment under the Environmental Screening Process for Electricity Projects subject to Ontario Regulation 116/01, under the Ontario Environmental Assessment Act. Public engagement for this project occurred from June to December 2023 including the release of a Draft Screening Report and 30-day review period, with a Statement of Completion planned to be submitted in February 2024. A listing of documents reviewed is included/provided in Appendix A: Documents Reviewed by TRCA.

COMMENTING ROLE

Staff have reviewed the study area associated with this project in accordance with the Conservation Authorities Act, including mandatory commenting on Planning Act and Environmental Assessment Act applications. TRCA undertakes review and commenting functions in accordance with The Living City Policies. For additional information, please see TRCA Role in the Plan Input and Review Process.

TRCA REVIEW

1. TRCA previously reviewed the Notice of Commencement received on September 6, 2023 and presentation materials from the Public Meeting held on October 5, 2023. A response letter was provided on October 31, 2023. Atura Power has provided responses to these comments as part of this current submission.
2. TRCA staff have completed the review of this submission and have no objections in principle to the proposed work. Our comments on the Draft Screening Report are addressed. A record of TRCA comments is enclosed as Appendix B: TRCA Comments and Proponent Responses. Specifically, staff note the following:
 - a. The project is located within the Toronto Waterfront Screening Area. As such, a permit is not required.
 - b. Continue to notify TRCA of EA milestones including the Notice of Completion and publication of the final Screening Report.
3. Payment of \$5,005 for this application review has been received by TRCA on January 9, 2024.

Should you have any questions or comments, please contact the undersigned.

Regards,



Jackie Ho
Planner I

Infrastructure Planning and Permits | Development and Engineering Services

Telephone: 437-880-2147

Email: Jackie.Ho@trca.ca

/jh

Attached: Appendix A: Documents Reviewed by TRCA.
Appendix B: TRCA Comments and Proponent Responses

BY E-MAIL

cc: TRCA: Zack Carlan, Senior Planner, Infrastructure Planning and Permits

APPENDIX A: DOCUMENTS REVIEWED BY TRCA

DOCUMENTS REVIEWED

1. Letter; Notice of Commencement; prepared by Atura Power; dated December 11, 2023; received by TRCA on December 11, 2023;
2. Appendix B: TRCA Comments and Proponent Responses; dated December 8, 2023; received by TRCA on December 11, 2023;
3. Portlands Energy Efficiency Upgrades; DRAFT Screening Report for Electricity Projects; prepared by Atura Power; dated December, 2023; received by TRCA on December 5, 2023.

**APPENDIX B: TRCA COMMENTS AND PROPONENT RESPONSES
CFN 69952 – Atura Power – Portlands Energy Centre Efficiency Upgrades**

ITEM	DISCIPLINE	TRCA Comments - Notice of Commencement and Public Information Meeting (October 31, 2023)	PROponent/CONSULTANT RESPONSE (December 8, 2023)	TRCA Comments – Draft Screening Report (January 11, 2024)
1.	General	TRCA seeks clarification if any work within “existing facilities” extends beyond the building footprint and associated paved areas. If any work is proposed beyond the built and paved areas, consultation with TRCA should be initiated to prevent indirect and/or direct impacts to the nearby wetlands.	No; the upgrades will take place within the existing facility and associated paved areas. The existing facility footprint will not change. Atura Power acknowledges that further engagement with TRCA should be initiated should the project extend beyond the building footprint and associated paved areas.	Comment addressed. TRCA staff have reviewed the Draft Screening Report and have no concerns.
2.		TRCA advises of the Highly Vulnerable Aquifer in this location. Should works require excavation, consultation with TRCA should be initiated.	Atura Power recognizes the Highly Vulnerable Aquifer in this location. As noted above, the upgrades will take place within the existing facility footprint and will not require excavation. Atura Power acknowledges that further engagement with TRCA should be initiated should the project require excavation.	Comment addressed.
3.		TRCA recommends use of erosion and sediment control measures for stockpiling or staging of equipment outside of the building.	All critical equipment is to be stored inside the facility. Any equipment stored outside will be temporarily stored on tractor trailer/flatbeds located on existing paved or gravel parking	Comment addressed.

			<p>areas and driveways. Atura Power does not expect to affect or change the facility's existing stormwater management plan/program. No effects to erosion or sediment are anticipated.</p>	
4.	Planning	<p>Be advised that this project is located within the Toronto Waterfront Screening Area and while TRCA will continue to comment on this project throughout the EA process, future permits under the Conservation Authorities Act regulations are not required. Depending on the works that are proposed during detailed design, an application made pursuant to the TRCA Voluntary Project Review process may be recommended by staff. Voluntary Project Review applications are subject to the discretion of the applicant due to the location of the project within the Toronto Waterfront Screening Area.</p>	<p>Atura Power acknowledges that this project is located within the Toronto Waterfront Screening Area and that while future permits under the Conservation Authorities Act regulations are not required, TRCA will continue to be involved in the PEC Efficiency Upgrades project throughout the EA process. Note, following the successful completion of the EA process, Atura Power plans to move to construction of the planned upgrades in Fall 2024. Atura Power will continue to notify the TRCA of EA milestones including the release of the draft Screening Report (which Atura Power shared notification and a copy of the report with TRCA via email on Dec. 5, 2023) as well as the Notice of Completion and publication of the final Screening Report.</p>	<p>Comment addressed. Continue to notify TRCA of EA milestones including the Notice of Completion and publication of the final Screening Report.</p>

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, January 22, 2024 6:22 AM

To: Jackie Ho <Jackie.Ho@trca.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Zack Carlan <Zack.Carlan@trca.ca>; Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Krishana Gnanachandran <Krishana.Gnanachandran@aturapower.com>

Subject: RE: Atura Power - Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - TRCA Response (CFN 69952)

Good morning, Jackie.

Thank you for your email and attached letter concerning the TRCA's review of our draft screening report for our proposed Portlands Energy Centre efficiency upgrades.

Atura Power's response to your letter is in the attached PDF.

Thanks again and please let me know if you have any further questions or comments.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Jan. 22, 2024

Toronto Region Conservation Authority
Infrastructure Planning and Permits | Development and Engineering Services
101 Exchange Ave.,
Concord, Ont.
L4K 5R6

Dear Ms. Jackie Ho,

Re: Atura Power - Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - TRCA Response (CFN 69952)

Thank you for confirming TRCA staff have completed their review of the draft Screening Report for our Portlands Energy Centre (PEC) Efficiency Upgrades project and sharing the letter detailing TRCA's response. And thank you for confirming that TRCA has no objections to the proposed work and noting that your previous comments on the draft Screening Report shared in October 2023 have been addressed.

In response to your letter shared on Jan. 17, 2024, we wish to provide two minor clarifications:

1. In your letter, PEC is described as "previously known as the Richard L. Hearn Generating Station on Villiers Island". Please note that PEC is located in the Port Lands industrial area at 470 Unwin Ave. The former Richard L. Hearn Generating Station is located next to PEC on the southwestern side.
2. In your letter, TRCA notes that we plan to submit a Statement of Completion in February 2024. Please be advised that we plan to issue a Notice of Completion with the final Screening Report in February 2024 and will file a Statement of Completion once the screening process is complete.

Thank you again for your review of our draft Screening Report and project materials. As requested, we will continue to notify the TRCA of project milestones including sharing the Notice of Completion and final Screening Report.

Darius Sokal
Senior Communication Advisor
Atura Power

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, September 6, 2023 12:53 PM

To: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

This email and attached PDF are to inform you that Atura Power is planning to make efficiency upgrades at our Portlands Energy Centre, located on the site of the former Richard L. Hearn Generating Station in Toronto, Ont. Please see the attached letter and Notice of Commencement for more details about the proposed activities, engagement opportunities, and how to learn more.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Proximity <proximity@cn.ca>

Sent: Wednesday, September 6, 2023 1:25 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Automatic reply: Portlands Energy Centre Efficiency Upgrades

Thank you for your email. Due to higher than usual volumes, there may be delays in our response time. We appreciate your understanding.

Merci de votre courriel. En raison de volumes plus importants, il peut y avoir des délais additionnels dans notre temps de réponse. Nous vous remercions de votre compréhension.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, January 26, 2024 12:57 PM

To: heritageplanning@toronto.ca

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>; cityplanning@toronto.ca;
Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

Atura Power is planning to make efficiency upgrades at the Portlands Energy Centre (PEC), located at 470 Unwin Ave., Toronto. Since the upgrades will result in an increase in the nameplate capacity of more than five megawatts, the project is subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation 116/01, under the Ontario Environmental Assessment Act.

Please find an attached letter detailing our proposed project as well as a related enquiry for Heritage Planning staff.

Thank you very much and please contact us at portlandsupgrade@aturapower.com with any questions.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Jan. 26, 2024

City of Toronto
City Planning Department, Heritage Planning
Toronto City Hall
12th Fl. E., 100 Queen St. W.
Toronto Ont. M5H 2N2

To Whom it May Concern,

Subject: Ontario Regulation 116/06 - Environmental Screening Process for Electricity Projects – Portlands Energy Centre Efficiency Upgrades

Atura Power is planning to make efficiency upgrades (upgrades) at the Portlands Energy Centre (PEC) located at 470 Unwin Ave., Toronto. These upgrades will increase the facility generating contract capacity by an average of 50 megawatts (MW) to achieve a total average contract capacity of 600 MW. The upgrades will involve replacing internal parts of the natural gas fired combustion turbines with more efficient parts that will result in greater electrical output from the generators. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls but, due to improved technology, will be more efficient.

The project will take place entirely within the facility at 470 Unwin Ave. The PEC facility footprint will not change, and no additional external laydown areas will be required.

Since the upgrades will result in an increase in the nameplate capacity of more than five MW, the project underwent an Environmental Screening Process for Electricity Projects as required by Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. As part of the engagement process, Atura Power contacted the City Planning department, via cityplanning@toronto.ca, in early September 2023 to share the Notice of Commencement for the project. We contacted the City Planning department again in December 2023 to share a copy of our draft Environmental Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the project. We have not received any comments or questions about the proposed project, Environmental Screening Process, or assessment findings from the City Planning department to date.

Through correspondence with the Ministry of Citizenship and Multiculturalism, we were advised to contact City of Toronto Heritage Planning staff to determine if the proposed activities will adversely impact any heritage attributes of the property. As noted above, given that the project will take place entirely within the facility at 470 Unwin Ave., we are reaching out with this letter to confirm that a Heritage Impact Assessment is not required based on the current project description. We understand that the Richard L. Hearn Generating Station at 440 Unwin Ave. is designated under Part IV of the Ontario Heritage Act (City of Toronto By-laws #1144-2019 and #936-2020) and note that the PEC Efficiency Upgrades will not affect this property.

As you may be aware, this project was contracted by the Independent Electricity System Operator (IESO) on May 16, 2023, under their Expedited Long-Term (E-LT1) Request for Proposal and is associated with tight project timelines to meet the provinces near-term electricity needs. We would appreciate if Heritage Planning staff can respond to this letter by Jan. 31, 2024, as we hope to release the final Screening Report for review in February 2024.

We thank you for your time reviewing this letter and responding to our enquiry. We will notify Heritage Planning staff of future project milestones including sharing the Notice of Completion and final Screening Report.

If you have any questions, please feel free to contact project team at any time via the project inbox at portlandsupgrade@aturapower.com.

Sincerely,

Darius Sokal
Senior Communication Advisor
Atura Power

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Tuesday, February 13, 2024 12:27 PM

To: heritageplanning@toronto.ca

Cc: cityplanning@toronto.ca; Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

Good afternoon.

I'm following up on my email and attached letter sent to you on Jan. 26, 2024, about Atura Power's efficiency upgrades at our Portlands Energy Centre as we hoped to hear back from you by the end of January.

The Ministry of Citizenship and Multiculturalism advised us to contact City of Toronto Heritage Planning staff to determine if the proposed activities will adversely impact any heritage attributes of the property. Since the project will take place entirely within the facility at 470 Unwin Ave., Toronto, we are reaching out with this letter to get your confirmation that a Heritage Impact Assessment is not required based on the current project description.

Thank you for your attention to this matter, and please respond to this letter as soon as reasonably possible as we hope to release the final Screening Report for review this month.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Jan. 26, 2024

City of Toronto
City Planning Department, Heritage Planning
Toronto City Hall
12th Fl. E., 100 Queen St. W.
Toronto Ont. M5H 2N2

To Whom it May Concern,

Subject: Ontario Regulation 116/06 - Environmental Screening Process for Electricity Projects – Portlands Energy Centre Efficiency Upgrades

Atura Power is planning to make efficiency upgrades (upgrades) at the Portlands Energy Centre (PEC) located at 470 Unwin Ave., Toronto. These upgrades will increase the facility generating contract capacity by an average of 50 megawatts (MW) to achieve a total average contract capacity of 600 MW. The upgrades will involve replacing internal parts of the natural gas fired combustion turbines with more efficient parts that will result in greater electrical output from the generators. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls but, due to improved technology, will be more efficient.

The project will take place entirely within the facility at 470 Unwin Ave. The PEC facility footprint will not change, and no additional external laydown areas will be required.

Since the upgrades will result in an increase in the nameplate capacity of more than five MW, the project underwent an Environmental Screening Process for Electricity Projects as required by Ontario Regulation 116/01, under the Ontario *Environmental Assessment Act*. As part of the engagement process, Atura Power contacted the City Planning department, via cityplanning@toronto.ca, in early September 2023 to share the Notice of Commencement for the project. We contacted the City Planning department again in December 2023 to share a copy of our draft Environmental Screening Report which documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the project. We have not received any comments or questions about the proposed project, Environmental Screening Process, or assessment findings from the City Planning department to date.

Through correspondence with the Ministry of Citizenship and Multiculturalism, we were advised to contact City of Toronto Heritage Planning staff to determine if the proposed activities will adversely impact any heritage attributes of the property. As noted above, given that the project will take place entirely within the facility at 470 Unwin Ave., we are reaching out with this letter to confirm that a Heritage Impact Assessment is not required based on the current project description. We understand that the Richard L. Hearn Generating Station at 440 Unwin Ave. is designated under Part IV of the Ontario Heritage Act (City of Toronto By-laws #1144-2019 and #936-2020) and note that the PEC Efficiency Upgrades will not affect this property.

As you may be aware, this project was contracted by the Independent Electricity System Operator (IESO) on May 16, 2023, under their Expedited Long-Term (E-LT1) Request for Proposal and is associated with tight project timelines to meet the provinces near-term electricity needs. We would appreciate if Heritage Planning staff can respond to this letter by Jan. 31, 2024, as we hope to release the final Screening Report for review in February 2024.

We thank you for your time reviewing this letter and responding to our enquiry. We will notify Heritage Planning staff of future project milestones including sharing the Notice of Completion and final Screening Report.

If you have any questions, please feel free to contact project team at any time via the project inbox at portlandsupgrade@aturapower.com.

Sincerely,

Darius Sokal
Senior Communication Advisor
Atura Power

From: Heritage Planning <heritageplanning@toronto.ca>
Sent: Tuesday, February 13, 2024 4:29 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Cc: General Public Enquiries <cityplanning@toronto.ca>; Darius Sokal <Darius.Sokal@aturapower.com>
Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Darius,

Apologies for this late reply. I forwarded your email to my manager to assign a planner to coordinate with you and discuss your proposal for this property.

I will update you as soon as I hear from my manager.

Thank you.

Sheilah Mesina

Application Technician, Heritage Planning
City Planning Division - Urban Design
City of Toronto



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Wednesday, February 14, 2024 5:30 AM
To: Heritage Planning <heritageplanning@toronto.ca>
Cc: General Public Enquiries <cityplanning@toronto.ca>; Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: Portlands Energy Centre Efficiency Upgrades

Good morning, Sheilah.

Thank you very much for your reply and help. Please note that project details can be found at portlandsupgrade@aturapower.com.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Heritage Planning <heritageplanning@toronto.ca>

Sent: Wednesday, February 14, 2024 9:21 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: General Public Enquiries <cityplanning@toronto.ca>; Darius Sokal <Darius.Sokal@aturapower.com>; Amir Nissan <Amir.Nissan@toronto.ca>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Darius,

Amir Nissan, one of our assistant heritage planners will assist you regarding your proposal.

Regards,

Sheilah Mesina

Heritage Planning

City Planning Division – Urban Design

City of Toronto



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: February 15, 2024 9:29 AM

To: Heritage Planning <heritageplanning@toronto.ca>; Amir Nissan <Amir.Nissan@toronto.ca>

Cc: General Public Enquiries <cityplanning@toronto.ca>; Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>; Stephen Smith <Stephen.Smith@aturapower.com>; Krishana Gnanachandran <Krishana.Gnanachandran@aturapower.com>

Subject: [External Sender] RE: Portlands Energy Centre Efficiency Upgrades

Good morning, Sheilah.

Thank you for message and for connecting me with Amir.

Amir, please let us know when you are available to discuss our proposed upgrades project. I'm happy book an MS Teams/Zoom meeting for us at your earliest convenience.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Amir Nissan <Amir.Nissan@toronto.ca>

Sent: Thursday, February 15, 2024 11:22 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Heritage Planning <heritageplanning@toronto.ca>

Cc: General Public Enquiries <cityplanning@toronto.ca>; Darius Sokal <Darius.Sokal@aturapower.com>; Stephen Smith <Stephen.Smith@aturapower.com>; Krishana Gnanachandran <Krishana.Gnanachandran@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

I will look into this and get back to you.

Regards,

Amir Nissan (he/him)

Assistant Heritage Planner | Heritage Planning

City Planning Division - Urban Design, Heritage | Toronto City Hall

100 Queen Street West | Toronto, ON, M5H 2N2

Tel: 416 338 4805 | Amir.Nissan@toronto.ca



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, February 15, 2024 12:41 PM

To: Amir Nissan <Amir.Nissan@toronto.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>; Heritage Planning <heritageplanning@toronto.ca>

Cc: General Public Enquiries <cityplanning@toronto.ca>; Darius Sokal <Darius.Sokal@aturapower.com>; Stephen Smith <Stephen.Smith@aturapower.com>; Krishana Gnanachandran <Krishana.Gnanachandran@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Amir.

I appreciate you quick response and efforts, thank you.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | [Atura Power](#)

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Amir Nissan <Amir.Nissan@toronto.ca>
Sent: Saturday, February 24, 2024 10:18 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Darius,

Thank you for enquiring with Toronto Heritage Planning and for being so patient with our response. I have read your detailed letter outlining the scope of work. You have advised us that no proposed alteration will have impacts on any of the designated attributes listed in the designation by-law (linked below), including the interior attributes.

<https://www.toronto.ca/legdocs/bylaws/2019/law1144.pdf>

INTERIOR ATTRIBUTES:

- The spatial volumes of the boiler hall, turbine hall and fan hall.
- The steel structure of the boiler hall, including the long east-west multi-storey passage through the steel structure.
- The concrete structures and steel beams of the turbine hall.
- The principal entry lobby with its limestone cladding and stair with a metal balustrade.
- The control room configurations built-in desks with control panels as well as wall mounted control panels.

Please confirm via email that the proposed alterations will have no impact on the designated attributes listed above and within the linked designation by-law. Additionally, we would need to see architectural plans outlining the scope of work so that we may confirm if we can accept this project. Ultimately, we look forward to supporting this pending the review of architectural plans.

Regards,

Amir Nissan (he/him)

Assistant Heritage Planner | Heritage Planning
City Planning Division - Urban Design, Heritage | Toronto City Hall
100 Queen Street West | Toronto, ON, M5H 2N2

Tel: 416 338 4805 | Amir.Nissan@toronto.ca



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: February 29, 2024 7:42 AM
To: Amir Nissan <Amir.Nissan@toronto.ca>
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: [External Sender] RE: Portlands Energy Centre Efficiency Upgrades

Good morning, Amir.

Thanks for your email. I've attached a PDF with my formal response.

However, I'd like to reiterate that there remains confusion as to the facility that we are proposing to upgrade, specifically between our Portlands Energy Centre (PEC) project site and the nearby Hearn Generating Station, based on your email's reference to interior attributes and embedded link. **Our upgrades project site is at 470 Unwin Ave.**, while the Hearn Generating Station, the site of the interior attributes referenced in your letter, is at 440 Unwin Ave. Please see the map in the attached PDF for location details.

Therefore, based on this clarification, we assume that you will not require architectural plans outlining our scope of work for the PEC efficiency upgrades at **470 Unwin Ave. We are not proposing any upgrade or other activity at the Hearn Generating Station at 440 Unwin Ave.**

As previously mentioned, the efficiency upgrades will be limited to replacing parts of the existing natural gas-fired combustion turbines at PEC, and all upgrades will take place within the existing facility with no changes or expansion to the existing PEC buildings/structures.

Thank you, Amir, and please feel free to call or email me with any questions.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

February 28, 2024

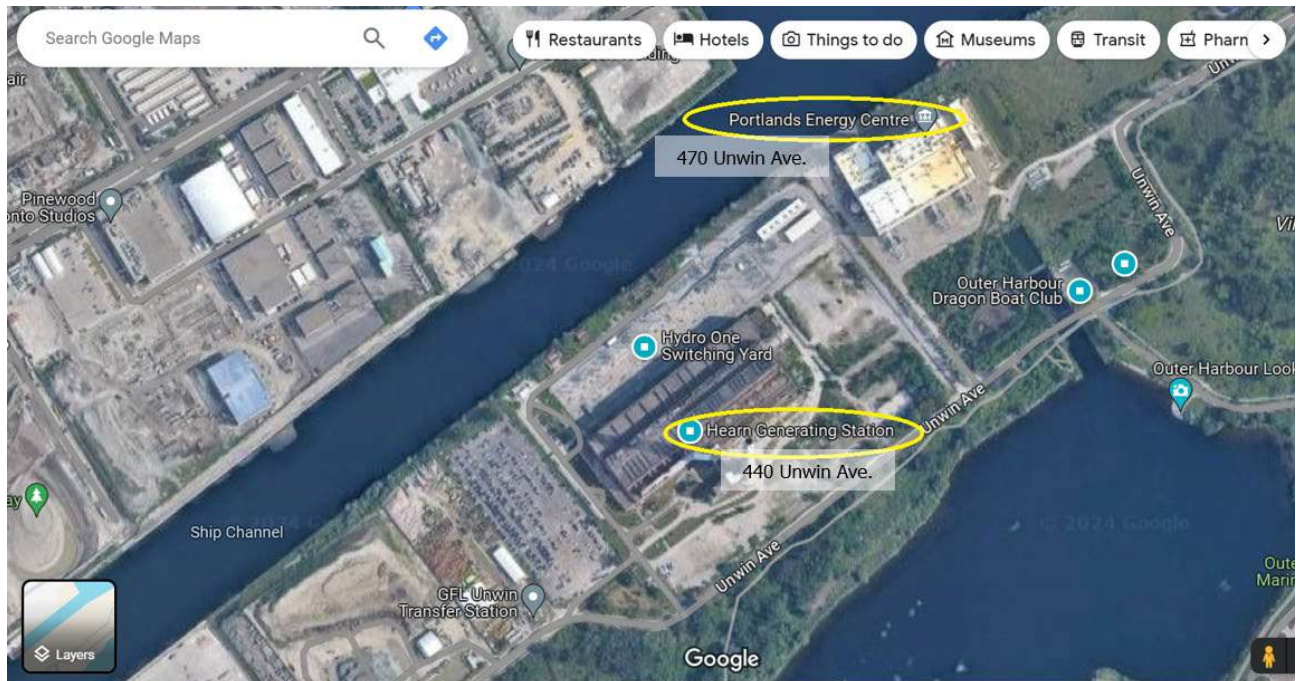
City of Toronto
City Planning Department, Heritage Planning
Toronto City Hall
12th Fl. E., 100 Queen St. W.
Toronto Ont. M5H 2N2

Dear Mr. Amir Nissan,

Re: Portlands Energy Centre Efficiency Upgrades

Thank you for reviewing our enquiry regarding the Portlands Energy Centre (PEC) Efficiency Upgrades project and sharing your feedback via email on Feb. 24, 2024.

Based on the address and list of interior attributes referenced in your email on Feb. 24, 2024, we believe there may be some confusion between our project site and the nearby Hearn Generating Station. **Our project site is located at 470 Unwin Ave.**, while the Hearn Generating Station (site of the interior attributes referenced in your letter) is located at 440 Unwin Ave. Please see the image below for further clarification.



As noted previously, the efficiency upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines with more efficient parts, all upgrades will take place within the existing facility, and that there will be no changes or expansion beyond the existing PEC footprint.

Based on the clarification above, we assume that you will not require architectural plans outlining our scope of work for the efficiency upgrades at **470 Unwin Ave.** If you have any other comments related to our project or project site, please do not hesitate to reach out.

Thank you again for reviewing our enquiry and associated materials. Should you have any further questions, we would appreciate if you would contact us by Mar. 8, 2024, as we plan to release our final Screening Report later in the next few weeks as per the Environmental Screening Process.

Sincerely,

Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: Amir Nissan <Amir.Nissan@toronto.ca>

Sent: Thursday, February 29, 2024 1:39 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades

Thank you, Darius for clarifying. Apologies for the confusion. Based off your rationale, Heritage Planning has no further comments.

Best,

Amir Nissan (he/him)

Assistant Heritage Planner | Heritage Planning

City Planning Division - Urban Design, Heritage | Toronto City Hall

100 Queen Street West | Toronto, ON, M5H 2N2

Tel: 416 338 4805 | Amir.Nissan@toronto.ca



From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Friday, March 1, 2024 9:02 AM
To: Amir Nissan <Amir.Nissan@toronto.ca>
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: Portlands Energy Centre Efficiency Upgrades

Hi Amir.

You are very welcome, and no need to apologize.

Thank you for your message and I hope you have a great day and weekend.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

Appendix B7: Other Correspondence

From: Muriel Draaisma <muriel.draaisma@cbc.ca>

Sent: Friday, October 6, 2023 1:09 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: questions for you

To whom it may concern,

I'm a reporter for CBC Toronto. I can be reached at (647) 203-4199.

I have a few questions following your meeting on Thursday.

1. Is it true that the upgrades to the Portlands Energy Centre will not increase the plant's greenhouse gas emissions?
2. Is it accurate to say that PEC is a natural gas electrical generating station?
3. Was the plant originally scheduled to close in 2029 but now will stay open until 2034?

Thank you very much.

Regards,

Muriel Draaisma

Senior Writer

CBC Toronto

From: Atura Media <media@aturapower.com>

Sent: Friday, October 6, 2023 4:50 PM

To: Muriel Draaisma <muriel.draaisma@cbc.ca>; Atura Media <media@aturapower.com>

Subject: RE: questions for you

Hi Muriel

Thank you for your questions and interest in our proposed Portlands Energy Centre Efficiency Upgrades project.

Here are my answers:

1. Is it true that the upgrades to the Portlands Energy Centre will not increase the plant's greenhouse gas emissions?

Portlands Energy Centre (PEC) emissions concentrations are not expected to change and will continue to remain at or below our permitted emission limits. Our facility's greenhouse gas emissions are specifically correlated to how often we operate and are unrelated to the efficiency upgrades project. The proposed project is expected to lower our greenhouse gas intensity because the upgraded equipment will improve the efficiency where the same amount of fuel can produce more power.

2. Is it accurate to say that PEC is a natural gas electrical generating station?

PEC is a combined-cycle gas turbine electricity generating station.

3. Was the plant originally scheduled to close in 2029 but now will stay open until 2034?

PEC currently has a 20-year Accelerated Clean Energy Supply Contract with the IESO. The contract contains an option to extend the contract term for an additional five years until 2034 to support system reliability and future energy needs.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Oved, Marco <moved@thestar.ca>

Sent: Thursday, October 5, 2023 7:32 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Updates

Please keep me up to date on developments with this project.

Thanks

Marco Chown Oved | Climate Change Reporter | Toronto Star

o: +1-416-869-4892 | c: +1-647-765-1615

[@MarcoOved](#)

Send me an encrypted message via [Signal](#)

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, October 18, 2023 3:06 AM

To: Oved, Marco <moved@thestar.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Updates

Hi Marco.

We will add your email address to the project database and email you with updates.

Thank you,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Tina Yazdani Tina.Yazdani@citytv.rogers.com>
Sent: Friday, October 6, 2023 2:07:10 PM (UTC-05:00) Eastern Time (US & Canada)
To: MEDIA RELATIONS <media@opg.com>
Subject: CityNews Request

Hi there

I'm Tina with CityNews. There's been quite a bit of opposition to plans to increase output at the Portlands Energy Centre in Toronto. I'm hoping a spokesperson is available for an interview with us on this today. Please email me back and let me know, thank you!

Tina Yazdani
CityNews Journalist
647-924-1246

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From: Darius Sokal
Sent: Friday, October 6, 2023 5:03 PM
To: Tina Yazdani <Tina.Yazdani@citytv.rogers.com>
Subject: FW: CityNews Request

Hi Tina.

Thank you for reaching out to us. Unfortunately, there is no one available at Atura Power for an interview today.

Portlands Energy Centre provides reliable electricity to meet local demand. Natural gas electricity generation supports not just the City of Toronto, but all of Ontario's capacity needs to ensure a reliable and affordable electricity system.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Friday, November 3, 2023 1:00 PM

To: Atura Media <media@aturapower.com>

Subject: Interview request regarding Portlands Energy Centre

Hello,

My name is [REDACTED] I am a journalism student at Toronto Metropolitan University, and I am currently working on a story about the Portlands Energy Centre and the community's concerns about the proposed efficiency upgrades. I was hoping to speak with someone from Atura Power before Tuesday, Nov. 7th, about this issue.

I hope to hear from you soon.

All the best,

[REDACTED]

On Fri, Nov 3, 2023 at 1:24 PM Atura Media <media@aturapower.com> wrote:

Hi [REDACTED]

Nice to hear from you, and thanks for your interest in our proposed upgrades at PEC. I'm not available today, but can speak with you Monday between 8-9 or 9:30-11 a.m., or between 2:30-4 p.m.

Do either of those times work for you?

Alternatively, I can answer your emailed questions by your Tuesday deadline.

Please let me know, thanks.

Darius Sokal ([hear it](#))

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Friday, November 3, 2023 1:36 PM

To: Atura Media <media@aturapower.com>

Subject: Re: Interview request regarding Portlands Energy Centre

Hi Darius,

Monday at 3:30 p.m. works for me. Would you prefer to talk over the phone or through a Zoom meeting?

Best,

[REDACTED]

From: Atura Media <media@aturapower.com>

Sent: Friday, November 3, 2023 1:42 PM

To: [REDACTED] Atura Media <media@aturapower.com>

Subject: RE: Interview request regarding Portlands Energy Centre

Hi again.

Either phone or Zoom work for me, [REDACTED] so whatever method you prefer, thanks.

Can you send me your questions in advance so I can prepare?

Regards,

Darius

From: Lexy Benedict <lexy.benedict@globalnews.ca>

Sent: Saturday, November 4, 2023 12:37 PM

To: Atura Media <media@aturapower.com>; jon.mills@cummins.com

Subject: Media Request - GLOBAL NEWS

Hi there ! Hope you are having a great day!

I'm a reporter with Global News - doing a story in the Portland Energy Centre expansion as well as concerns from residents. Wondering if you are able to give us comment on the update of this plant and why this energy source is needed?

Thanks so much!

Lexy Benedict

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From: Atura Media <media@aturapower.com>
Sent: Monday, November 6, 2023 7:16:02 AM
To: Lexy Benedict <lexy.benedict@globalnews.ca>; Atura Media <media@aturapower.com>;
jon.mills@cummins.com <jon.mills@cummins.com>
Subject: RE: Media Request - GLOBAL NEWS

Good morning, Lexy.

Thanks for your outreach and questions.

I see that your story was published and broadcast yesterday. Are you still interested in responses to your questions?

Please let me know, thank you.

Darius Sokal (hear it)
Sr. Communications Advisor | Atura Power
1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4
E: darius.sokal@aturapower.com
M: 289-795-6573

From: Lexy Benedict <lexy.benedict@globalnews.ca>

Sent: Monday, November 6, 2023 9:11 AM

To: Atura Media <media@aturapower.com>; jon.mills@cummins.com

Subject: Re: Media Request - GLOBAL NEWS

Hi there! Thanks so much for getting back to me. And yes please! We would love to add in your statement !

Thanks!

Lexy

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From: Atura Media <media@aturapower.com>

Sent: Monday, November 6, 2023 11:48:16 AM

To: Lexy Benedict <lexy.benedict@globalnews.ca>; Atura Media <media@aturapower.com>

Subject: RE: Media Request - GLOBAL NEWS

Hi Lexy.

Excellent, I'm glad to have an opportunity to respond! Here are my statements:

Atura Power's proposed efficiency upgrades to our Portlands Energy Centre (PEC) will involve replacing some parts of the facility's existing turbines with parts that will allow increased electricity output. All upgrade activities will take place within the station and there will be no changes or expansion beyond the existing footprint. We plan to complete the upgrades in the fall of 2024.

The efficiency upgrades at PEC are needed because Ontario is entering a period of growing electricity system demand, and actions are required to ensure the continued reliability of the electricity grid. The efficiency upgrades will also play a role in Ontario's ability to rely on intermittent renewable energy sources. Wind and solar generation are important resources and will continue to play an increasing role in supplying electricity. However other resources, such as natural gas electricity generation, are required to maintain system reliability. Natural gas generation plays a critical role, providing system reliability, and acting as an enabler of renewable generation.

Thank you, and have a great day, Lexy.

Best regards,

Darius Sokal (hear it)

Sr. Communications Advisor | Atura Power

1415 Joshuas Creek Dr., Unit #101, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Lexy Benedict <lexy.benedict@globalnews.ca>

Sent: Monday, November 6, 2023 12:06 PM

To: Atura Media <media@aturapower.com>

Subject: Re: Media Request - GLOBAL NEWS

Thank you so much Darius! Really appreciate this :) enjoy the rest of your day!!

Lexy Benedict

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Appendix B8: Notice of Completion (March 2024)

Notice of Completion of a Screening Report

Portlands Energy Centre Upgrades

Atura Power is a subsidiary of Ontario Power Generation and is planning to make efficiency upgrades at the Portlands Energy Centre (PEC).

Project Description

PEC is a combined-cycle natural gas-fueled electricity generating station with an electrical output of 550 megawatts (MW). The station is located in the Port Lands industrial area at 470 Unwin Ave., Toronto.

The upgrades will involve replacing internal parts of the natural gas fired combustion turbines with more efficient parts which will increase the facility generating contract capacity by an average of 50 MW to achieve a total average contract capacity of 600 MW. All upgrades will take place within the existing facility and there will be no changes or expansion beyond the existing PEC footprint.

The Independent Electricity System Operator (IESO) quantified the near-term additional electricity supply need in Ontario, stating that an additional 4,000 MW of new capacity is required by May 2027. Procurements for projects capable of meeting the increased electricity demand in 2027 will need to be completed in the short-term. Atura Power is prepared to help meet that need and support Ontarians through upgrades that will optimise and increase energy generation at PEC.

Environmental Screening Process

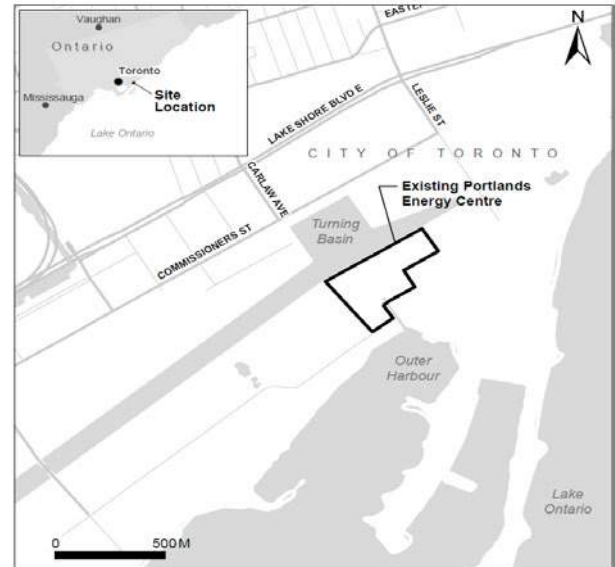
Given that the upgrades will result in a 50 MW increase in the nameplate capacity (electrical output) of PEC, the upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation (O.Reg.) 116/01, under the Ontario *Environmental Assessment Act*. Note: Since commencing the project in September 2023, the Government of Ontario has revoked O.Reg. 116/01, such that the upgrades are now subject to the Environmental Screening Process pursuant to O.Reg. 50/24.

Atura Power has prepared a Screening Report according to the Environmental Screening Process for Electricity Projects (pursuant to O.Reg. 50/24). The Screening Report documents the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ('Yes' or 'No'). The Environmental Screening Process determined that all Screening Criteria scored 'No' as a result of the PEC upgrades project, and without any mitigation, all regulatory requirements will be met. Atura Power intends to move forward with implementing the upgrades subject to other required approvals.

For more information: <https://aturapower.com/>

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

Atura Power



Indigenous communities, agencies, municipal staff, elected officials, and members of the public are invited to review the Screening Report beginning on March 27, 2024, online at aturapower.com/portlandsupgrade. The last day comments can be submitted is April 27, 2024.

Any outstanding concerns about the project should be shared with Atura Power by emailing portlandsupgrade@aturapower.com. If the matter is unable to be resolved, the concerned individual may submit a written request to the Minister, copying the Director of the Environmental Assessment and Approvals Branch, Ministry of the Environment, Conservation and Parks (MECP) and Atura Power, to elevate the project to either an Environmental Review or to a Comprehensive Environmental Assessment. Elevation requests must be made in accordance with the provisions set out in the MECP's Environmental Screening Process for Electricity Projects.

Note that elevation requests must be submitted to the Minister and a copy sent to the Director and Atura Power within the 30-day review period between March 27 and April 27, 2024.

MECP Contact Information

	Minister	Director
Mailing Address	Ministry of the Environment, Conservation and Parks 777 Bay St., 5 th Floor Toronto, ON M7A 2J3	Environmental Assessment Branch Ministry of the Environment, Conservation and Parks 135 St. Clair Ave. W., 1st Floor Toronto, ON M4V 1P5
Email Address	minister@mecp@ontario.ca	EABDirector@ontario.ca

Project Contact Information

More information including other project-related documentation is available online at aturapower.com/portlandsupgrade.

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For more information: <https://aturapower.com/>

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Legal

Notice of Completion of a Screening Report

Portlands Energy Centre Upgrades

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Ontario Superior Court of Justice

NOTICE TO KEEN ANTHONY MORGAN

A CASE HAS BEEN STARTED AGAINST YOU IN COURT at 330 University Avenue, 8th Floor, Toronto, Ontario, M5G 1E6. The Court may make an Order in this case that may affect your rights. You can get more information about this case from the Court office at 330 University Avenue, 8th Floor, Toronto, Ontario, M5G 1E6. You may also get information about this case from GLUCKSTEIN PERSONAL INJURY LAWYERS, 595 Bay Street, Suite 301, Toronto, Ontario, M5G 2C2. Tel: 416-408-4252. IF YOU DO NOT REPLY TO THIS CLAIM, AN ORDER MAY BE MADE WITHOUT YOU AND ENFORCED AGAINST YOU.

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Missing Persons

MISSING PERSON

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PEEL DISTRICT SCHOOL BOARD

Board Room, HJA Brown Education Centre
5650 Hurontario Street, Mississauga, Ontario
EDUCATION DEVELOPMENT CHARGES

TAKE NOTICE that on Wednesday, April 17, 2024 at 5:30 p.m., the Peel District School Board (the "Board") will hold a public meeting pursuant to subsection 257.60(2) of the Education Act (the "Act") at the location shown above.

The Board has begun the process of preparing a successor education development charge ("EDC") by-law for the Region of Peel. The purpose of this first meeting on April 17, 2024 will be to review the current EDC policies of the Board and to solicit public input.

AND FURTHER TAKE NOTICE that, following the policy review meeting referred to above, the Board will hold a second public meeting at 6:00 p.m. on Wednesday, April 17, 2024 at the same location pursuant to section 257.63 of the Education Act to consider proposed EDCs which may be imposed pursuant to an EDC by-law against land undergoing development in the Region of Peel.

The purpose of the second meeting on April 17, 2024 is to consider the continued imposition of EDCs and to review the successor by-laws, and to inform the public generally about the EDC proposal of the Board for the Region of Peel.

AND FURTHER TAKE NOTICE that the Board will consider enacting a successor by-law imposing EDCs in the Region of Peel at a public meeting to be held on Wednesday, May 22, 2024 at 7:00 p.m. at the location shown above. Should a successor by-law be passed on such date, collection of education development charges pursuant to such by-law may commence on July 1, 2024.

Information concerning the Board's EDC policies and the Education Development Charge Background Study required by Section 257.61 of the Act (including the proposed EDC by-laws) setting out the Board's EDC proposal will be available on April 2, 2024 in the Planning and Accommodation Department at the Board's administrative offices, 5650 Hurontario Street, Mississauga, Ontario and will also be posted on the Board's website (www.peelschools.org).

Any requests for further information regarding this matter may be directed to Suzanne Blakeman, Manager, Planning and Accommodation Support Services, Peel District School Board by phone at (905) 890-1010 ext. 2216 or by email at suzanne.blakeman@peelsb.com.

All interested persons are invited to attend the public meetings. Written submissions, filed seven days in advance of the meeting with the person named above, will also be considered.

Any person who wishes to make representations to the Board should download the request form at <https://www.peelschools.org/delegations> and email the same to legal.governance@peelsb.com at least seven days in advance of the meeting at which they wish to make representations.

All submissions received in writing and those opinions expressed at the public meetings will be considered prior to the Board's decision.

Peel District School Board
David Green
Chair of the Board
Rashmi Swarup,
Director of Education

BUSINESS

Community Corner

VENDORS WANTED



2024 SPRING Home Show

CLARINGTON HOME SHOW

Fri, April 12th 3 pm - 8 pm
Sat, April 13th 10 am - 5 pm
Sun, April 14th 10 am - 4 pm

Gamet B. Rickard Recreation Centre
Hwy. 57 & King Street, Bowmanville

Wendy Weber 905-447-8333 homeshow@durhamregion.com
Donna McNally 905-999-7390 www.durhamtradeshows.ca

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Notice of Completion of a Screening Report

Portlands Energy Centre Upgrades

Atura Power is a subsidiary of Ontario Power Generation and is planning to make efficiency upgrades at the Portlands Energy Centre (PEC).

Project Description

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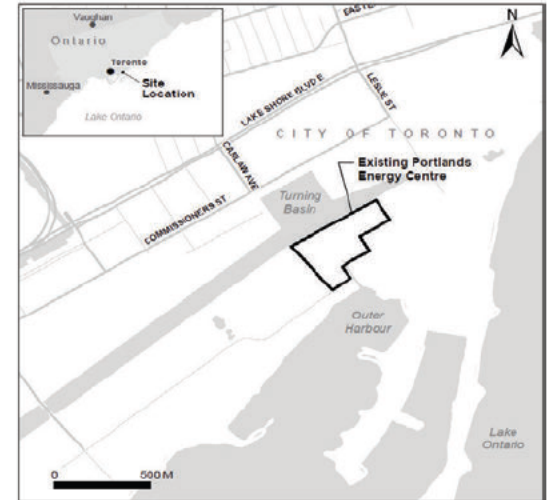
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Atura Power

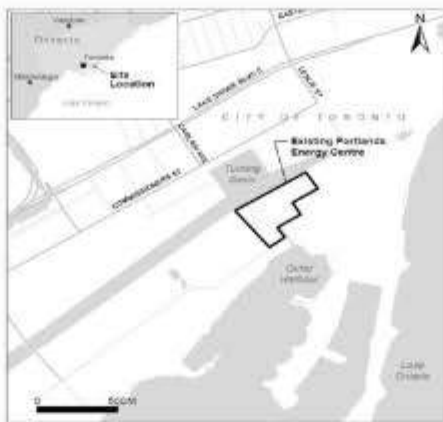


PHOTO: ALAN SHACKLETON
Members Jeff Paulin, Bob Murphy, Joe Calderone, Gord and Helen Pearce, and Doug and June Smith bid farewell to the building at 9 Dawes Rd. that has been home to Royal Canadian Legion Branch 11 for more than 50 years. The building is going to be demolished and replaced by a condo in which Branch 11 will be given new space.

Legion Branch 11 says goodbye to Dawes Road building

By Alan Shackleton

ROYAL CANADIAN Legion Branch 11 said farewell to the building it has called home at 9 Dawes Rd. for more than 50 years.

An open house was held on Saturday, March 30, for any residents and members who wanted to take one last look the 9 Dawes Rd. building before it is demolished and replaced by a condominium building.

However, Saturday's event did not mark the end of Branch 11 as part of the Royal Canadian Legion. It was just goodbye to the current building.

Once the new condo is built, Branch 11 will have a large new space on the ground floor and second floor to continue its service to Canadian veterans and the community as a whole.

It's going to be a number of years, though, before that new condo is completed and Branch 11 can move back into its space on Dawes Road. While waiting for the new space to be finished, Branch 11 is being hosted by the members of Royal Canadian Legion Branch 22 on Woodbine Avenue.

Branch 11 has called the Dawes Road building just south of Danforth Avenue home since 1971.

It is a big building that has hosted more community and social events than anyone can remember. There's a large main hall with a stage on the ground floor and a big clubroom (bar) for members with its own entrance on the lower level that backs out onto a small patio and the parking lot. Offices are upstairs in the building.

Prior to opening at 9 Dawes Rd., Branch 11 had been located at the corner of Dawes Road and Coleman Avenue (one block north of Danforth Avenue) since 1927. For almost 10 years before that though, a group of First World War veterans from the immediate area had established the East Toronto Branch of the Great War Veterans Association of Canada.

"During the early years meetings were held in individual members' houses and subsequently at Secord Public School," reads the Branch 11 history. "In January 1924 the original McPherson Presbyterian Church building at 66 Dawes Road was purchased for \$9,000.00. The first meeting at the new hall - renamed the East Toronto Veterans Memorial Hall - was held on November 11, 1924. On September 17, 1927 the corner stone for a two storey extension at the rear of the old church

Continued on Page 21

Appendix B9: Correspondence Since the Release of the Screening Report (March 2024)

- **B9a: Correspondence During the 30-Day Review Period**
- **B9b: Correspondence Since the 30-Day Review Period**

Appendix B9a: Correspondence During the 30-Day Review Period

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Wednesday, March 27, 2024 8:34 AM
To: Sarah Gingrich <Sarah.Gingrich@toronto.ca>
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: City of Toronto comments on the draft Screening Report for the Portlands Energy Centre upgrade project

Good morning, Ms. Gingrich.

Thank you for your email.

May I ask what community organization requested Mr. Nowland's Jan. 5th and our Feb. 5th letters?

Please note that the information in our Feb. 5th response to Mr. Nowland is publicly available in the *Portlands Energy Centre Efficiency Upgrades Screening Report for Electricity Projects* posted on our project webpage at www.aturapower.com/portlandsupgrade.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Sarah Gingrich <Sarah.Gingrich@toronto.ca>

Sent: Wednesday, March 27, 2024 5:41 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: City of Toronto comments on the draft Screening Report for the Portlands Energy Centre upgrade project

Hello, Mr. Sokal.

The community group that requested a copy of the letters is TERRE - Toronto East Residents for Renewable Energy.

Best,

Sarah

Sarah Gingrich

Project Lead, Environment & Climate Division

C: 416-899-5752

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, April 3, 2024 9:43 AM

To: Sarah Gingrich <Sarah.Gingrich@toronto.ca>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: City of Toronto comments on the draft Screening Report for the Portlands Energy Centre upgrade project

Hello, Ms. Gingrich.

Thank you for your response, and I hope you have a great day.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Wednesday, March 27, 2024 7:11 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Supporting Documents for 2003 ER Report

Hi Darius,

Would you please supply me with the list of Supporting documents referenced in the 2003 ER Report and let me know which ones are available.

Thanks,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 15, 2024 2:52 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report

Good Afternoon [REDACTED]

I appreciate your continued interest in our PEC upgrade project.

The following documents are referenced in 2003 Environmental Review Report as supporting documentation.

1. Air Quality Assessment
2. Noise Assessment
3. Aquatic Environmental Assessment
4. Terrestrial Environment Assessment
5. Socio-Economic Assessment
6. Archaeological Assessment
7. Human Health and Ecological Effects Assessment
8. Public Consultation

Atura Power has available supporting documentation 1-7 and document 8 public consultation is detailed in the ERR section 6 and tables 1.1 and 1.2.

Thanks!

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: [REDACTED]

Sent: Monday, April 15, 2024 9:39 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Supporting Documents for 2003 ER Report

Good Afternoon Stephen,

Would you supply me with documents 1 to 7.

Thank-you,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 7:06 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Stephen.Smith <Stephen.Smith@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report

Hello [REDACTED]

I will be attaching the (7) *supporting documents* for your review in (7) separate emails, I have attempted a single email but the files size was too large to send properly.

I will number each email 1 to 7 for your tracking. If you do not receive a specific number, please let me know.

Please see attached the supporting document (1).

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

SUPPORTING DOCUMENT 1

AIR QUALITY ASSESSMENT FOR THE PROPOSED PORTLANDS ENERGY CENTRE

FINAL

Prepared for:



Prepared by:



Senes Consultants Limited

121 Granton Drive, Unit 12

Richmond Hill, Ontario

L4B 3N4

November 2003

From: Upgrade project for PEC

Sent: Thursday, April 18, 2024 9:08 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; [REDACTED]

Cc: Stephen Smith <Stephen.Smith@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report Document 2.

Hello [REDACTED]

Please see supporting document (2).

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

SUPPORTING DOCUMENT 2

NOISE IMPACT ASSESSMENT FOR THE PROPOSED PORTLANDS ENERGY CENTRE

FINAL

Prepared for:



Prepared by:



SENES Consultants Limited
121 Granton Drive, Unit 12
Richmond Hill, Ontario
L4B 3N4

November 2003

From: Upgrade project for PEC

Sent: Thursday, April 18, 2024 9:09 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; 'D Smith'
[REDACTED]

Cc: Stephen Smith <Stephen.Smith@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report Document 3.

Hello [REDACTED]

Please see supporting document (3).

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

SUPPORTING DOCUMENT 3

AQUATIC ENVIRONMENT
FOR THE PROPOSED
PORTLANDS ENERGY CENTRE

FINAL

Prepared for:



Prepared by:



Stantec

Stantec Consulting Ltd.

14 Abacus Road
Brampton, Ontario
L6T 5B6

In Association with



SENE Consultants Limited

121 Granton Drive, Unit 12
Richmond Hill, Ontario
L4B 3N4

November 2003

From: Stephen Smith

Sent: Thursday, April 18, 2024 9:10 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; [REDACTED]

Cc: Stephen Smith <Stephen.Smith@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report Document 4.

Hello [REDACTED]

Please see supporting document (4).

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

SUPPORTING DOCUMENT 4

**TERRESTRIAL ENVIRONMENT
FOR THE PROPOSED
PORTLANDS ENERGY CENTRE**

FINAL

Prepared for:



Prepared by:



Stantec

Stantec Consulting Ltd.

14 Abacus Road
Brampton, Ontario
L6T 5B7

In Association With



Senes Consultants Limited

121 Granton Drive, Unit 12
Richmond Hill, Ontario
L4B 3N4

November 2003

From: Upgrade project for PEC

Sent: Thursday, April 18, 2024 9:11 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; [REDACTED]

Cc: Stephen Smith <Stephen.Smith@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report Document 5.

Hello [REDACTED]

Please see supporting document (5).

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

SUPPORTING DOCUMENT 5

**SOCIO-ECONOMIC ASSESSMENT
FOR THE PROPOSED
PORTLANDS ENERGY CENTRE**

FINAL

Prepared for:



Prepared by:



Senes Consultants Limited
121 Granton Drive, Unit 12
Richmond Hill, Ontario
L4B 3N4

November 2003

From: Upgrade project for PEC

Sent: Thursday, April 18, 2024 9:12 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; [REDACTED]

Cc: Stephen Smith <Stephen.Smith@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report Document 6.

Hello [REDACTED]

Please see supporting document (6).

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

SUPPORTING DOCUMENT 6

**ARCHAEOLOGICAL ASSESSMENT
FOR THE PROPOSED
PORTLANDS ENERGY CENTRE**

FINAL

Prepared for:



Prepared by:

**D.R. Poulton & Associates Inc.
Archaeological Resource Management
69 Langarth Street West
London, Ontario
N6J 1P5**

In Association With



**SENES Consultants Limited
121 Granton Drive, Unit 12
Richmond Hill, Ontario
L4B 3N4**

November 2003

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 7:13 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; [REDACTED]

Cc: Stephen.Smith <Stephen.Smith@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report Document 7.

Hello [REDACTED]

Please see supporting document (7).

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

SUPPORTING DOCUMENT 7

HUMAN HEALTH AND ECOLOGICAL EFFECTS ASSESSMENT FOR THE PROPOSED PORTLANDS ENERGY CENTRE

FINAL

Prepared for:



Prepared by:



Senes Consultants Limited
121 Granton Drive, Unit 12
Richmond Hill, Ontario
L4B 3N4

November 2003

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 7:15 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; [REDACTED]

Cc: Stephen.Smith <Stephen.Smith@aturapower.com>

Subject: RE: Supporting Documents for 2003 ER Report Document 2. and Addendum

Hello [REDACTED]

I apologize there is an addendum to the initial Noise Impact Assessment supporting document, I have attached both the assessment and the addendum for your reference.

Please see supporting document (2) and Addendum.

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

SUPPORTING DOCUMENT 2

NOISE IMPACT ASSESSMENT FOR THE PROPOSED PORTLANDS ENERGY CENTRE

FINAL

Prepared for:



Prepared by:



SENES Consultants Limited

121 Granton Drive, Unit 12

Richmond Hill, Ontario

L4B 3N4

November 2003

Note that only the title page of the document is included to save size space of the PDF package. The documents can be provided if necessary.

ADDENDUM REPORT

This report is an addendum to the original Portlands Energy Centre (PEC) Environmental Review Report Supporting Document 2 that was submitted to the Ministry of the Environment November 15, 2003. The report addresses commitments made by PEC responding to concerns raised by the Toronto Waterfront Revitalization Corporation (TWRC) related to noise and future development. TWRC has indicated that future development is expected to be in close proximity to and potentially next to the PEC property boundary. The PEC facility meets the Ministry of the Environment requirements with the commitments in the original report and these commitments are in addition to what is required to obtain a Certificate of Approval given the current circumstances (state of development, planning, and zoning).

In light of the potential for future receptors being closer to the PEC than those originally modeled (existing receptors), noise from the PEC was remodeled to achieve a worst-case noise emission of 45 dBA at the closest assumed potential location of future receptors. The 45 dBA is an absolute number and PEC has not made provisions for tonal penalty in this model. The remodeling uses receptor sound levels for all plant operations without the emergency generator in operation. As noted in the main report, maintenance tests on the emergency generator will be limited to weekday daytime hours (9:00 am to 4:00 pm) when existing/background sound levels are higher. Figure 1 shows the location of the potential future receptors as a noise limit attainment boundary rather than actual receptors as TWRC was not able to provide specific receptors at this stage of development.

The following key conservative assumptions were used in the re-modeling:

- start-up conditions in effect for both gas turbines;
- duct burners operating;
- auxiliary boiler operating; and
- emergency diesel generator on standby.

Note: these assumptions are extremely conservative because it is very unlikely that these conditions would occur simultaneously in actual operation.

The required noise reduction (control) measures for the original submission were enumerated in Appendix C of the original report and are reproduced here as Appendix A. Table 1 below shows the amount of reduction achieved for various implementation measures (insertion loss data).

**TABLE 1
INSERTION LOSS DATA OF CONTROL MEASURES, DB**

Name	ID	Insertion Loss in Octave Band, (dB)								
Frequency Bands		31.5	63	125	250	500	1000	2000	4000	8000

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, March 27, 2024 8:43 AM

To: Station Manager @ Portlands <stationmgr.portlands@aturapower.com>; [REDACTED]

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: Portlands Energy Centre – Toronto

Email Address: [REDACTED]

Enter Your Message Here: Please kindly provide the links, which could have been provided in FAQ, to provincial and federal reports that indicate historical GHG emissions.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, April 3, 2024 11:19 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Station Manager @ Portlands <stationmgr.portlands@aturapower.com>

Subject: FW: Aturapower.com | Contact Form Submission from [REDACTED] about Portlands Energy Centre – Toronto

Good day, [REDACTED]

Links to publicly-available emissions data related to the Portlands Energy Centre are available on pgs. 12 and 13 of the *[PEC Efficiency Upgrades Screening Report for Electricity Projects](#)* which is posted on Atura Power's project webpage here: <https://aturapower.com/our-projects/natural-gas/portlands-energy-centre-upgrades/>.

Thank you for your ongoing interest in our Portlands Energy Centre Efficiency Upgrades project that will help to reliably and affordably meet the growing electricity needs of Torontonians and Ontarians.

Sincerely,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

[Atura](#) Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, March 27, 2024 12:34 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>; [REDACTED]

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic: PEC Upgrade

Email

[REDACTED]

Address:

[REDACTED]

Enter Your
Message
Here:

Please advise if there will be an increase in the emissions of CH4 (methane) as a result of the upgrades and increased output. What steps is Atura Power taking to reduce methane and GHG leakage/emissions in light of new federal legislation?

I accept the
privacy
policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 8, 2024 4:16 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>; [REDACTED]

Cc: Stephen.Smith <Stephen.Smith@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Dear [REDACTED]

Thank you for your recent enquiry on March 27, 2024 regarding our Portlands Energy Centre (PEC) Efficiency Upgrades project.

The planned project will improve the efficiency of the gas turbines and as a result reduce the greenhouse gas intensity (i.e., the ration of CO2 equivalent emissions to total electricity generation) of the facility. PEC will also continue to operate as dictated by the Independent Electricity System Operator (IESO) based on supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to all provincial and federal emissions reporting programs.

The facility will continue to operate within all environmental permitting requirements.

Thank you for your ongoing interest in the PEC Efficiency Upgrades project.

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: [REDACTED]

Sent: Tuesday, April 9, 2024 11:01 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Dear Stephen Smith,

Thank you for your timely response to my question. This appears to be positive information.

I would like to ask for more detail please, specifically the numbers for the improvement in the CO2 ration and any SLCP emissions reduction.

While I understand that per megawatt hour of electricity generated, gas has a lower emission weight than oil and coal, and that Atura Power is following legislated policies, I would like to know how much the new technology and efficiencies at PEC are impacting the overall GHG emitted given the plant is increasing its electricity generation. That is, even though the ration may be better due to the efficiencies, more emissions are occurring simply because more gas is being used to generate more electricity. Is this not the case?

Therefore, my questions more specifically are:

1. What is the difference between the ration before and after the efficiencies? and
2. What will be the difference in emissions produced 2022 vs. 2023 vs. 2024 vs. 2025?

Thank you for your time and efforts to support my understanding.

Sincerely,

[REDACTED]

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 7:26 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: Stephen.Smith <Stephen.Smith@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your continued interest in our project, as I noted below, the IESO regulates how we operate which means the quantity of natural gas consumed after the efficiency upgrades are completed will depend on how often the IESO calls Portlands to operate. In addition to the variability of these operating times the IESO also dictates at what capacity we operate, causing the electricity MW demand ranging from a minimum to full load, it is only at full load where the efficiency upgrades increased plant capacity would be utilized. I state the above to help characterize the difficulty in estimating emission performance if the upgrades are implemented as we do not control when, how often, and what load we operate at.

As for the efficiency improvement compared to current operations, we are looking a roughly a 0.54% efficiency improvement (efficiency is MW divided by fuel input converted from GJ to MW)

I hope this answer your questions.

Thank you!

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: [REDACTED]
Sent: Friday, April 19, 2024 9:34 PM
To: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Gallagher-Murphy, Dawn <dawn.gallaghermurphy@pc.ola.org>; Stephen Smith <Stephen.Smith@aturapower.com>; [REDACTED] leah.taylorroy@parl.gc.ca <leah.taylorroy@parl.gc.ca>; mayor_chow@toronto.ca <mayor_chow@toronto.ca>; tabunssp-qp@ndp.on.ca <tabunssp-qp@ndp.on.ca>; tony.vanbynen@parl.gc.ca <tony.vanbynen@parl.gc.ca>
Subject: Re: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello, Environmental Specialist Smith,

I do appreciate your efforts to respond. Thank you.

Having said that, the last response didn't answer my specific question so I will provide more context to help with clarification.

Kindly please note, I have included Mayor Chow in this email chain now given her call for an environmental study, in the hopes that the data above may prove useful or can be verified another way. Also included because of my concerns for the climate emergency and the impact on climate legislation, are MPP Gallagher Murphy, now assistant to the Minister of Natural Resources in Ontario, MPP Tabuns, Opposition Critic for Climate Action, MP Van Bynen for Newmarket Aurora, and MP Taylor Roy who is on the federal Standing Committee on Environment and Sustainable Development.

I understand that Portlands is a 'peaked plant' and the generation there is based on IESO input. Yet Atura Power is a business and surely doesn't leave its planning, production and control solely up to IESO?

Here are some numbers I was able to locate with sources provided below.

Given that last summer before upgrades, the Portlands plant was running up to 21 hours a day. It is pretty safe to say that until the province moves more to other energy generation methods, that there will be very similar demands asked by IESO for Portlands to provide.

As noted in the Toronto Star, the 9% increase in energy output, 50 megawatt, the upgrade gives with no emissions increase is based on no increase in energy production. Since the plant has typically run for 14 hours per day, the additional 7 hours per day means an increase in GHG emissions despite the upgrade. This is supported by data released by IESO; by 2026 the plants will run at 81%.

Currently, emissions rates for pre-upgrade soared from 2017 188,000 tonnes to 618,000 tonnes in 2021 (federal government national inventory) due to increased generation by fossil gas. That indicates a tripled increase in emissions within 4 years.

Given that 25% of Ontario energy generation by 2030, if this provincial government continues, will come from gas powered generation plants, that's an increase of 21% from only 4% in 2017. For 2023 the increased percentage was 12.8%. Therefore it follows that from 2024 to 2030 another 12.2% increase is projected in gas produced electricity in Ontario. One can conclude then, unless better carbon and methane capture technology is used, or legislation for the regulation of emissions comes sooner in Ontario, the emissions in 2030 will be over 1,200,000 tonnes. An increase of 400% by 2030. We are no longer at 90% of our Ontario emissions target and in fact we are going in the wrong direction.

Rather than assume that Portlands will be responsible for at least a third of all of those emissions, my specific question then, is what is the total of GHG emissions for each additional hour the plant generates electricity from fossil gas after the upgrade?

I am asking for Atura Power to verify this information.

While a 0.54% efficiency improvement you have stated might have had some merit in 2017, based on the above data, this will do very little to abate the air pollution in Ontario that will be produced by this plant, nor support emissions reduction targets by 2030, or 2050 for that matter. Furthermore, given Bill 165's attempt to limit IESO's jurisdiction on future gas projects, one can assume, under this current government, that Atura Power and OPG will be complicit in negatively contributing to the climate emergency when they could be investing and transitioning to cleaner energy source electricity generation and grid infrastructure, as IESO recommended.

To be sure, I value the hard work of Atura Power employees to provide electricity to Ontario and by no means take the task lightly. We were well on the way in 2017. Yet, now, there are still viable, cheaper and cleaner alternatives to meet the current and future demand in electricity in this province without undermining, and in fact negating, our collective efforts to draw down GHG emissions and have a liveable Ontario and planet for our great grandchildren. Please advise on my specific question on hourly emissions rates post-upgrade.

Sincerely,



a member of Climate Action Newmarket Aurora

Sources:

https://www.thestar.com/news/canada/toronto-city-council-voted-against-more-gas-plant-production-the-province-is-making-it-happen/article_b2914732-fb8d-5bb8-97d6-575fd77583a_amp.html

https://www.thestar.com/news/canada/ontario-gas-plants-were-supposed-to-run-only-during-peak-periods-instead-they-re-running/article_8ba52f13-bd5a-541a-b80e-9f497f498be.html

https://www.thestar.com/news/gta/ontario-had-almost-eliminated-electricity-emissions-since-doug-ford-came-to-power-gas-plant-use/article_cac90930-e6e7-11e8-8e6f-9b810be4bf43.html

<https://environmentaldefence.ca/wp-content/uploads/2022/05/Environmental-Defence-Report-Ontario-Climate-Change-2018-to-2022.pdf>

<https://environmentaldefence.ca/nomoregasplants/>

<https://publications.gc.ca/site/eng/9.506002/publication.html>

<https://www.cleansairalliance.org/polluting-gas-25/#:~:text=Clean%20Air%20Alliance-Polluting%20gas%20will%20provide%2025%20of%20Ontario's,in%202030%20%E2%80%99%20up%20from%204%25;text=Accordin%20to%20the%20Independent%20Electricity,up%20from%204%25%20in%202017.https://www.cleansairalliance.org/triple/#:~:text=Ontario%20needs%20to%20embrace%20the,solar%20energy%20by%202035%20will%3A&text=Lower%20our%20electricity%20bills&text=Phase%20Dout%20polluting%20gas%20power>

<https://thenarwhal.ca/ontario-overrules-energy-board-enbridge/>

<https://ero.ontario.ca/notice/019-8307>

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, April 26, 2024 3:29 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Gallagher-Murphy, Dawn
<dawn.gallaghermurphy@pc.ola.org>; Stephen.Smith <Stephen.Smith@aturapower.com>;
[REDACTED] leah.taylorroy@parl.gc.ca; mayor_chow@toronto.ca; tabunssp-
qp@ndp.on.ca; tony.vanbynen@parl.gc.ca

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Dear [REDACTED]

Thank you for your follow-up email on April 22, 2024 regarding our Portlands Energy Centre (PEC) Efficiency Upgrades project and providing us with further context regarding your enquiry.

In response to your specific question, “what is the total of GHG emissions for each additional hour the plant generates electricity from fossil gas after the upgrade?”, as I started in Atura Power’s April 19th, 2024 response we will have a 0.54% efficiency improvement (efficiency is MW divided by fuel input converted from GJ to MW) and that our operation schedule is based on the IESO and grid requirements which do not allow us to determine when, how often, and at what load we operate at. In addition to the schedule and load uncertainty, when Portlands Energy Centre is called upon to operate the ambient air conditions also effects the efficiency of our facilities operations where for example summer vs winter temperatures can influence our facility. We also must consider the gas composition of the natural gas supplied when we determine our GHG emissions from operations. These are some of the variables and uncertainty with supplying a GHG emission total for any future hour we generate electricity. We have and will continue to operate in compliance with the performance limits outlined in our Environmental Compliance Approval and we will continue to report our GHG emissions to both the federal and provincial governments as required.

In addition, in regards to your comment about transitioning to cleaner energy generation and grid infrastructure, we would like to note that the upgrades to improve efficiency at existing facilities such as PEC are just one part of the IESO’s approach to address the predicted energy supply gap and generate an additional 4,000 MW of electricity needed across Ontario. The IESO currently has other procurements in progress that include renewable energy generation and battery storage projects. In addition to pursuing the efficiency upgrades at PEC, Atura Power is continuing to play a leadership role in establishing the supply of low-carbon hydrogen and developing energy storage systems and potentially other clean energy projects to help the province move towards a net-zero carbon future.

Thank you for your ongoing interest in the PEC Efficiency Upgrades project.

Stephen Smith

Environmental Specialist | [Atura Power](#)

289-259-2377 | Stephen.smith@aturapower.com

From: [REDACTED]

Sent: Tuesday, April 2, 2024 3:16 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Cc: Ontario Clean Air Alliance <contact@cleanairalliance.org>; Mayor Olivia Chow <mayor_chow@toronto.ca>; McMahan-CO, Mary-Margaret <mmcmahon.mpp.co@liberal.ola.org>; Stiles-QP, Marit <MStiles-QP@ndp.on.ca>; Councillor Brad Bradford <councillor_bradford@toronto.ca>

Subject: Re: Portlands Energy Centre Efficiency Upgrades Notice of Completion

I spent far too long doing my due diligence reading through your documents, including the final Screening Report, and your responses to all earlier public comments.

Since your consultant only considered the environmental, climate change and other potential impacts **of this small upgrade project**, their conclusion of "No" impacts was obvious. A waste of ratepayers'/taxpayers' money.

- The real issues of CO2 emissions and pollutants from burning fossil gas at the PEC were not recognised.
- Neither was the vote by Toronto City Council to reject the fossil gas powered electricity production to protect us,
 - as local downwind residents from NOx, other pollutants and particulates and
 - as global citizens affected by climate change impact.
- Also ignored: the projected limited overload use of PEC gas fired electric power is now predominant (18 - 21 hours per day/year round).

Renewable sources to power electricity production can work when combined with battery storage for use when "the sun doesn't shine and the wind doesn't blow". You ignore this option as a way to redeploy the PEC facility as a whole.

You conflate the 4,000 MW of electricity needed across Ontario with the addition of a tiny 50 MW to the small 600 MW now produced at PEC. As well, you quote the upgrade equipment supplier's letter that the efficiency upgrade to two turbines is "expected" to increase production by about 2% using the same amount of fossil gas, combined with the third - steam - turbine that recycles the heat from the gas powered turbines. Not much bang for the bucks spent on this Screening Process. Similar to expectations that environmental/climate impacts of the **project** will be minimal.

The current government cancelled over 700 contracts for renewable source projects, and instead brought in fossil gas power to produce more electricity - and more emissions. **As the old saying goes, the best way to get out of a hole is to stop digging. So, stop burning fossil gas, and get going on renewables and battery storage.**

██████████ economist (retired, octogenarian, Toronto joint homeowner/taxpayer/Hydro ratepayer)

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 15, 2024 12:12 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal
<Darius.Sokal@aturapower.com>; [REDACTED]
[REDACTED]

Subject: RE: Portlands Energy Centre Efficiency Upgrades Notice of Completion

Good afternoon, [REDACTED]

Thank you for your email on April 2, 2024, which shared your comments and questions about our Portlands Energy Centre Efficiency Upgrades Screening Report.

Atura Power's responses to your comments and questions are in the attached PDF.

Thank you for your interest in the project.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

April 15, 2024

Dear [REDACTED],

Re: Portlands Energy Centre Efficiency Upgrades Notice of Completion

Thank you for your recent email on April 2, 2024 sharing your comments about our Portlands Energy Centre (PEC) Efficiency Upgrades Screening Report available for review from March 27, 2024, to April 27, 2024.

Please find Atura Power's responses to your comments/questions in the table below.

Atura Power

Comment Number (#)	Comment	Atura Power's Response
1	<p>Since your consultant only considered the environmental, climate change and other potential impacts of this small upgrade project, their conclusion of "No" impacts was obvious. A waste of ratepayers'/taxpayers' money.</p> <ul style="list-style-type: none"> • The real issues of CO2 emissions and pollutants from burning fossil gas at the PEC were not recognised. 	<p>The environmental assessment process requires Atura Power to undertake an Environmental Screening to identify the potential for effects resulting from project activities. The existing PEC facility went through an Environmental Assessment in 2003 and is therefore not the subject of this Screening Report. As such, the scope of this assessment is limited to understanding and identifying any effects <i>of the proposed efficiency upgrades</i>.</p> <p>The project was assessed against each prescribed Screening Criteria as it relates to the potential for the efficiency upgrades to cause negative effects. As noted in the Screening Report, one of the nine Screening Criteria categories relates to the assessment of air and noise effects. Based on the assessment against the Air and Noise criteria, it was determined that there are no negative environmental effects resulting from the project.</p>
2	<ul style="list-style-type: none"> • Neither was the vote by Toronto City Council to reject the fossil gas powered electricity production to protect us, <ul style="list-style-type: none"> ○ as local downwind residents from NOx, other pollutants and particulates ○ and as global citizens affected by climate change impact 	<p>Municipal approval is not required to complete the efficiency upgrades project for the following reasons:</p> <p>As stated in Section 3.3 of the Screening Report, the IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023. The IESO awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades; as such, municipal support resolution for E-LT1 is not required. The IESO's May 2023 Resource Adequacy Update explains the upgrades to existing gas plants approved under the E-LT1 process, while the 'Results Table' link provided in the Resource Adequacy Update (located under the 'Expedited Process' heading) identifies PEC as one of the seven existing facilities approved for efficiency upgrades.</p> <p>While the IESO's E-LT1 process does not require municipal approval, the PEC efficiency upgrades project is subject to the Environmental Screening Process for Electricity Projects subject to Ontario Regulation (O. Reg) 116/01 (now O.Reg 50/24), under the <i>Ontario Environmental Assessment Act</i>, since the project proposes to increase the facility's generation capacity by more than</p>

Atura Power

Comment Number (#)	Comment	Atura Power's Response
		five megawatts (MW). The Environmental Screening Process is a proponent-driven process that Atura Power is carrying out, according to the requirements outlined in O. Reg 50/24. While municipal engagement is an important component of the environmental assessment process, municipal approval is not required.
3	<ul style="list-style-type: none"> Also ignored: the projected limited overload use of PEC gas fired electric power is now predominant (18 - 21 hours per day/year round). 	PEC operations are dictated by the Independent Electricity System Operator (IESO) based on the supply and demand balance. The frequency at which the plant operates will not change going forward and the plant will continue to operate as directed by the IESO.
4	Renewable sources to power electricity production can work when combined with battery storage for use when "the sun doesn't shine and the wind doesn't blow". You ignore this option as a way to redeploy the PEC facility as a whole.	<p>Wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p> <p>Additionally, upgrades to improve efficiency at existing facilities such as PEC are just one part of the IESO's approach to address this supply gap and generate an additional 4,000 MW of electricity needed across Ontario. The IESO has other procurement processes in progress that include renewable energy generation and battery storage projects.</p>
5	You conflate the 4,000 MW of electricity needed across Ontario with the addition of a tiny 50 MW to the small 600 MW now produced at PEC. As well, you quote the upgrade equipment supplier's letter that the efficiency upgrade to two turbines is "expected" to increase production by about 2% using the same amount of fossil gas, combined with the third - steam - turbine that recycles the heat from the gas-powered turbines. Not much bang for the bucks spent on this Screening Process. Similar to expectations that environmental/climate impacts of the project will be minimal.	The Portlands Energy Centre is currently capable of outputting 550 MW to Ontario's electricity grid. Upgrades to improve efficiency at existing facilities such as PEC are just one part of the IESO's approach to address this supply gap and generate an additional 4,000 MW of electricity needed across Ontario. The IESO has other procurement processes in progress seeking additional production that when combined across the province will collectively work towards producing the 4,000 MW of additional electricity needed across Ontario.
6	The current government cancelled over 700 contracts for renewable source projects, and instead brought in fossil gas power to produce more electricity - and more emissions. As the old saying goes, the best way to get out of a hole	[See response to comment #4 above.]

Atura Power

Comment Number (#)	Comment	Atura Power's Response
	is to stop digging. So, stop burning fossil gas, and get going on renewables and battery storage.	

We hope our responses above provide clarification regarding your comments on the PEC Screening Report and associated Environmental Screening Process.

Should you require further clarification on project details, please contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, April 3, 2024 10:43 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email

Address: [REDACTED]

Enter Your Message Good morning!

Message

Here: Have there been any updates to the project timeline for the PEC upgrades, or the planned operation of PEC in general? I haven't seen any major updates since the public engagement last fall. Any information would be great.

Thanks!

I accept the
privacy
policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, April 3, 2024 12:17 PM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good day, [REDACTED]

Thank you for your email.

The PEC Efficiency Upgrades project is essentially on schedule, and there are no changes to the station's planned operations.

There have been a few major events and website updates since the public meeting last fall. Particularly, on March 27, 2024, Atura Power prepared, distributed, and posted a Screening Report pursuant to Ontario Regulation 50/24 that documented the results of the Environmental Screening Process to identify whether any potential environmental effects of the upgrades project would occur. The Environmental Screening Process determined that all Screening Criteria scored 'No' as a result of the PEC upgrades project and, without any mitigation, all regulatory requirements will be met.

Indigenous communities, agencies, municipal staff, elected officials, and members of the public were invited to review the Screening Report online at aturapower.com/portlandsupgrade beginning March 27, 2024. Comments can be submitted until and including April 27, 2024.

Thanks again and let us know if you have any further questions via this email address.

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

Atura Power

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 15, 2024 9:45 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades Notice of Completion

Good morning, [REDACTED]

Thank you for your email received on April 7, 2024.

Your comments are noted, and we appreciate your interest in our proposed efficiency upgrades of the Portlands Energy Centre.

Please visit www.aturapower.com/portlandsupgrade for project details and future updates.

Best regards,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

Atura Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, April 16, 2024 4:04 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>; [REDACTED]

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic: PEC Upgrade

Email

Address:

[REDACTED]

Enter Your
Message
Here:

Given the magnitude of the project and how it negatively affects our health, the local environment and climate mitigation, a full environmental impact assessment is vital. Do not cut corners on this critical issue!

I accept the
privacy
policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 11:45 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello, [REDACTED]

Thank you for your email received on April 16, 2024.

The Environmental Screening Process was undertaken in accordance with Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the associated *Guide to Environmental Assessment Requirements for Electricity Projects*. The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects *of the project* would occur. As such, the scope of this assessment was limited to understanding and identifying any effects of the proposed PEC efficiency upgrades and associated project activities. As noted in Section 3 of the Screening Report, review of the PEC efficiency upgrades against the screening criteria determined that there are no potential negative environmental effects resulting from the project and, without any mitigation, all regulatory requirements will be met.

We can confirm that the Ministry of Environment, Conservation and Parks (MECP) is aware of the scope and assessment process Atura Power undertook for the project.

Your comments are noted, and we appreciate your interest in our proposed efficiency upgrades of the Portlands Energy Centre.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

From: [REDACTED]

Sent: Monday, April 8, 2024 1:16 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Portlands' generation in 2023

Hi Darius,

Could you please tell me the output (GWh) of the Portlands Generating Station in 2023?

Thanks,

[REDACTED]

[REDACTED]
Chair, Ontario Clean Air Alliance
192 Spadina Ave, #406
Toronto, ON M5T 2C2
Ph. 416 260 2080 x 2

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Friday, April 19, 2024 6:55 PM

To: [REDACTED] Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Stephen.Smith
<Stephen.Smith@aturapower.com>

Subject: RE: Portlands' generation in 2023

Hello [REDACTED]

Thank you for your continued interest in our PEC project. All electricity generation is reported by the Independent Electricity System Operator (IESO) and these reports are made available to the public from the link below. I will advise that members of the public will have to make an account to access.

http://reports.ieso.ca/public/GenOutputCapability/PUB_GenOutputCapability.xml

For your specific question PEC net output for 2023 is 2096.46 GWh.

Thank you,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Smythe, Liam (He/Him) (MCM) <Liam.Smythe@ontario.ca>

Sent: Tuesday, April 9, 2024 2:14 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Cc: Barboza, Karla (She/Her) (MCM) <Karla.Barboza@ontario.ca>; EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>

Subject: MCM Response - Portlands Energy Centre Efficiency Upgrades Notice of Completion [MCM File # 0020051]

Good morning Darius,

Thank you for providing the Ministry of Citizenship and Multiculturalism (MCM) with the Notice of Completion for the Portlands Energy Centre project, and for making the final Screening Report available for our review.

Please find MCM's comments on the Screening Report in the attached letter. Do not hesitate to contact us if you have any questions.

Best regards,

Liam Smythe

Heritage Planner | Citizenship, Inclusion and Heritage Division
Ministry of Citizenship and Multiculturalism | Ontario Public Service
416-301-4797 | Liam.Smythe@ontario.ca



Taking pride in strengthening Ontario, its places and its people

**Ministry of Citizenship
and Multiculturalism**

Heritage Planning Unit
Heritage Branch
Citizenship, Inclusion and
Heritage Division
5th Flr, 400 University Ave
Tel.: 416-301-4797

**Ministère des Affaires civiques
et du Multiculturalisme**

Unité de la planification relative au
patrimoine
Direction du patrimoine
Division des affaires civiques, de
l'inclusion et du patrimoine
Tél.: 416-301-4797



April 9, 2024

EMAIL ONLY

Darius Sokal, Senior Communications Advisor
Atura Power
1415 Joshuas Creek Drive, Unit #200
Oakville, ON L6H 7G4
Darius.sokal@aturapower.com

MCM File : **0020051**
Proponent : **Atura Power**
Subject : **Ontario Regulation 116/06 - Environmental Screening Process for
Electricity Projects – Notice of Completion**
Project : **Portlands Energy Centre Efficiency Updates**
Location : **470 Unwin Avenue, Toronto, Ontario**

Dear Darius Sokal:

Thank you for your letter dated March 27, 2024 and for providing the Ministry of Citizenship and Multiculturalism (MCM) with the final Screening Report for our review. MCM's interest in this project relates to its mandate of conserving Ontario's cultural heritage.

We have reviewed the final *Portlands Energy Centre Efficiency Upgrades - Screening Report for Electricity Projects* (prepared by Avaanz Ltd., dated March 2024) and have made the following observations:

Archaeological Resources

Atura Power indicated in previous correspondence that no expansion of the existing facility footprint at 470 Unwin Avenue is proposed. No ground disturbance is anticipated, and the project area was therefore not screened for archaeological potential. MCM previously indicated in our letter dated January 17, 2024 that if any construction-related activities are to occur outside of the existing facility footprint, then the area should be screened using the Ministry's [Criteria for Evaluating Archaeological Potential](#) to determine if an archaeological assessment is needed. We note that this correspondence between Atura Power and MCM has been included in Appendix C3 of the final Screening Report.

Built Heritage Resources and Cultural Heritage Landscapes

In our letter dated January 17, 2024, MCM advised Atura Power to consult with Heritage Planning staff at the City of Toronto to determine if the proposed activities will adversely impact any heritage

attributes of the property, which is designated under Part IV of the Ontario Heritage Act (City of Toronto By-laws #1144-2019 and #936-2020). We note that this correspondence has been undertaken, and a record has been included Appendix B of the Screening Report. City of Toronto Heritage Planning has confirmed that they have no comments on the work being undertaken for the building at 470 Unwin Avenue.

MCM finds that due diligence has been undertaken in the preparation of this final Screening Report, and we have no additional comments at this time.

Thank you for providing MCM with the opportunity to review the final Screening Report for this project. Please do not hesitate to contact me if you have any further questions or need further information.

Sincerely,

Liam Smythe
Heritage Planner
Liam.Smythe@ontario.ca

Copied to: portlandsupgrade@aturapower.com
EA Notices to Central Region, MECP
Karla Barboza, MCM

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. The Ministry of Citizenship and Multiculturalism (MCM) makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MCM be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the *Ontario Heritage Act*. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the *Ontario Heritage Act*.

The *Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33* requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with *Ontario Regulation 30/11* the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the *Ontario Heritage Act*.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Monday, April 15, 2024 11:41 AM
To: Smythe, Liam (He/Him) (MCM) <Liam.Smythe@ontario.ca>
Cc: Barboza, Karla (She/Her) (MCM) <Karla.Barboza@ontario.ca>; EA Notices to CRegion (MECP) <eanotification.cregion@ontario.ca>; Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: MCM Response - Portlands Energy Centre Efficiency Upgrades Notice of Completion [MCM File # 0020051]

Hello, Liam.

Thank you very much for your email and attached letter dated April 9, 2024, confirming that the MCM have no additional comments related to the PEC Efficiency Upgrades Screening Report.

Kindest regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, April 16, 2024 1:41 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>; [REDACTED]

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic: PEC Upgrade

Email

[REDACTED]

Address:

Enter Your
Message
Here:

I am a senior with a heart condition and I am very concerned about the greenhouse gas emissions from the PEC. I am opposed to the planned expansion of this plant. I would like to see much more emphasis on renewable energy sources.

I accept the
privacy
policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 11:47 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello, [REDACTED]

Thank you for your email received on April 16, 2024.

We would like to note that the project was assessed against each prescribed Screening Criteria as it relates to the potential for the efficiency upgrades to cause negative effects. As noted in the Section 3.2 of the PEC Screening Report, one of the nine Screening Criteria categories relates to the assessment of air and noise effects. Based on the assessment against the Air and Noise criteria, it was determined that there are no negative environmental effects resulting from the project. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator “will maintain [air] emissions levels at or below site permit levels”.

In addition, renewable energy sources such as wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that renewable energy sources such as wind and solar generation can be reliably incorporated into the electricity system.

Your comments are noted, and we appreciate your interest in our proposed efficiency upgrades of the Portlands Energy Centre.

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor | [Atura](#) Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, April 16, 2024 8:42 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>; [REDACTED]

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email

Address: [REDACTED]

Enter Your
Message
Here:

We are living in a Climate Crisis. Time to use green energy not "natural gas" aka methane gas. The City of Toronto should not allow the air pollution from the burning of this fossil fuel which is known to have adverse health effects on the population

I accept the
privacy
policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 11:29 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good day, [REDACTED]

Thank you for your email and interest in our proposed efficiency upgrades at the Portlands Energy Centre. Your comments are noted and are part of the project records.

Best regards,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

[Atura](#) Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, April 16, 2024 4:10 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>; [REDACTED]

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic: PEC Upgrade

Email

[REDACTED]

Address:

Enter Your
Message
Here:

I am opposed to the continued operation and proposed expansion of the PEC as it is the largest GhG emitter in Toronto, the largest NOx emitter and releases other airborne toxins. There are safe, inexpensive and available alternatives to this plant

I accept the
privacy
policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 11:32 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good day, [REDACTED]

Thank you for your email and interest in our proposed efficiency upgrades at the Portlands Energy Centre. Your comments are noted and are part of the project records.

Best regards,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

[Atura](#) Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, April 17, 2024 1:52 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic: PEC Upgrade

Email

[REDACTED]

Address:

[REDACTED]

Enter Your Message Here: I am writing to request a full environmental assessment, with particular attention to health impacts, rather than a light and inadequate review.

I accept the privacy policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 11:05 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good afternoon, [REDACTED]

Thank you for your email and interest in our proposed efficiency upgrades at the Portlands Energy Centre. Your comments are noted and are part of the project records.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Thursday, April 18, 2024 11:40 AM
To: [REDACTED]
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello again, [REDACTED]

As a follow-up to my earlier email, as described in the PEC Notice of Completion and in accordance with the *Guide to Environmental Assessment Requirements for Electricity Projects*, the following process is required to submit a formal elevation request:

If an outstanding concern about the project is unable to be resolved, a concerned individual may submit a written request to the Minister, copying the Director of the Environmental Assessment and Approvals Branch, Ministry of the Environment, Conservation and Parks (MECP) and Atura Power, to elevate the project to either an Environmental Review or to a Comprehensive Environmental Assessment. Elevation requests must be made in accordance with the provisions set out in the MECP's Environmental Screening Process for Electricity Projects.

Please note that elevation requests must be submitted to the minister and a copy sent to the director and Atura Power within the 30-day review period between March 27 and April 27, 2024.

MECP Contact Information

	Minister	Director
Mailing Address	Ministry of the Environment, Conservation and Parks 777 Bay St., 5th Floor Toronto, ON M7A 2J3	Environmental Assessment Branch Ministry of the Environment, Conservation and Parks 135 St. Clair Ave. W., 1st Floor Toronto, ON M4V 1P5
Email Address	minister@mecp@ontario.ca	EABDirector@ontario.ca

We appreciate your interest in our proposed efficiency upgrades of the Portlands Energy Centre.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, April 17, 2024 12:52 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name:

[REDACTED]

Last name:

[REDACTED]

Region/Topic: PEC Upgrade

Email Address:

[REDACTED]

Enter Your Message Here: I urge you to voluntarily elevate the Environmental Assessment from a Screening Assessment to an Environmental Review.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 11:26 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good day, [REDACTED]

Thank you for your email.

The environmental assessment process requires Atura Power to undertake an Environmental Screening to understand and identify any potential effects *of the proposed efficiency upgrades*.

The project was assessed against each prescribed Screening Criteria as they relate to the potential for the efficiency upgrades to cause negative effects. And, as noted in the Screening Report, it was determined that there will be no negative environmental effects resulting from the project in all the Screening Criteria categories.

Thank you again for your email and interest in our proposed efficiency upgrades at the Portlands Energy Centre. Your comments are noted and are part of the project records.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | [Atura Power](#)

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Monday, April 15, 2024 5:03 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>; [REDACTED]

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email

Address: [REDACTED]

Enter Your
Message
Here:

I'm concerned that there has not been a full and comprehensive study of the plant's emissions. I would like to see a study of current emissions and, most important, I would like to see the results of this study made public and easily accessible.

I accept the
privacy
policy:

Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 11:52 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello [REDACTED]

Thank you for your email received on April 15, 2024.

The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects *of the project* would occur. The existing PEC facility went through an Environmental Assessment in 2003 and is therefore not the subject of the Screening Report. Reporting completed as part of the Environmental Screening Process was undertaken per the scope and scale of the PEC efficiency upgrades project and associated project activities. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. Further emissions studies are currently not required as part of the Screening Report and assessment process that Atura Power is undertaking for the project.

We would like to note that outside of the requirements of the current screening process being undertaken for the PEC efficiency upgrades, all owners or operators of facilities that meet published reporting requirements must report to the National Pollutant Release Inventory (NPRI) under the authority of the *Canadian Environmental Protection Act* (CEPA). Reviewed NPRI data for PEC is now available up to 2022.

Your comments are noted, and we appreciate your interest in our proposed efficiency upgrades of the Portlands Energy Centre.

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor | [Atura Power](#)

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Sunday, April 21, 2024 11:12 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: To the Atura Power Plant administration,
I think the expansion project needs a full Environmental Review.
Best regards,
[REDACTED]

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 22, 2024 1:02 PM

To: [REDACTED] Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good morning, [REDACTED]

The Environmental Screening Process for the proposed efficiency upgrades of the Portlands Energy Centre was done in accordance with Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the associated *Guide to Environmental Assessment Requirements for Electricity Projects*. The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. As noted in Section 3 of the Screening Report, review of the PEC efficiency upgrades against the screening criteria determined that there are no potential negative environmental effects resulting from the project and, without any mitigation, all regulatory requirements will be met.

The Ministry of Environment, Conservation and Parks is aware of the scope and assessment process Atura Power undertook for the project.

Your comments are noted, and we appreciate your interest in our proposed efficiency upgrades of the Portlands Energy Centre.

Sincerely,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

Atura Power

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Monday, April 22, 2024 11:43 AM
To: [REDACTED]
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Hello again, [REDACTED]

As a follow-up to my earlier email, as described in the PEC Notice of Completion and in accordance with the *Guide to Environmental Assessment Requirements for Electricity Projects*, the following process is required to submit a formal elevation request:

If an outstanding concern about the project is unable to be resolved, a concerned individual may submit a written request to the Minister, copying the Director of the Environmental Assessment and Approvals Branch, Ministry of the Environment, Conservation and Parks (MECP) and Atura Power, to elevate the project to either an Environmental Review or to a Comprehensive Environmental Assessment. Elevation requests must be made in accordance with the provisions set out in the MECP's Environmental Screening Process for Electricity Projects.

Please note that elevation requests must be submitted to the minister and a copy sent to the director and Atura Power within the 30-day review period between March 27 and April 27, 2024.

MECP Contact Information

	Minister	Director
Mailing Address	Ministry of the Environment, Conservation and Parks 777 Bay St., 5th Floor Toronto, ON M7A 2J3	Environmental Assessment Branch Ministry of the Environment, Conservation and Parks 135 St. Clair Ave. W., 1st Floor Toronto, ON M4V 1P5
Email Address	minister@mecp@ontario.ca	EABDirector@ontario.ca

Best regards,
Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Sunday, April 21, 2024 3:07 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: The evaluation should be performed by an independent body. Then we will see the real results of your emissions.

The amount of pollution we live in is extremely high due to your factory. You are silently making us and our children sick, shame on you!

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 22, 2024 12:56 PM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good day, [REDACTED]

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We confirm that the Ministry of Environment, Conservation and Parks is aware of the scope and assessment process Atura Power undertook for the project.

Your comments are noted, and we appreciate your interest in our proposed efficiency upgrades of the Portlands Energy Centre.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: [REDACTED]

Sent: Friday, April 5, 2024 8:16 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Environmental Assessment Elevation Request for Portlands Energy Centre

Hi Darius,

Attached is my Environmental Assessment Elevation Request for the Portlands Energy Centre project.

I look forward to working with you to resolve these issues.

Sincerely,

[REDACTED]

April 5, 2024

Hi Darius,

The Guide indicates that prior to filing an elevation request for an Environment Review with MECP on Atura Energy's Portlands Energy Centre project that I need to work with Atura to resolve my concerns. My desire is to ensure that the EA conforms to the requirements of the Guide to Environmental Assessment for Electricity Projects and ensure a clear and complete public record.

There were a number of items in the draft and, now, Final Screening Report that I am dissatisfied with which I have previously communicated. I had been hoping that, prior to the final screening report (FSR), Atura would voluntarily raise the Environmental Assessment of the project from a Screening to an Environmental Review to address some of the concerns identified by other members of the public and myself. It seems that the points we raised on the draft screening report have not altered Atura's position.

Before I get to my primary concern, I want to raise some secondary concerns on both the Final Screening Report deliverable and Atura's execution of the Guide to Environmental Assessment for Electricity Projects (the Guide) process. My focus has been only on sections of the report dealing with human health.

Screening Report Deliverable and Process Execution

I find the Final Screening Report deliverable lacking in Section 3.1 Existing Conditions; Table 3.1 MECP's Areas of Interest on Climate Change: Air Quality, Consultation and Environmental Screening Process; Section 3.4 Screening Criteria on Air; Section 4 – Engagement; Life Cycle and missing information.

There are some words that have become problematic during this exercise. One of them is "project". I sense that Atura is defining it as only the work required to upgrade it's turbines. I, and others in the public, see the Portlands Energy Centre (PEC), as the project. The Guide uses the term in both contexts. Another word is "upgrade". I see Atura using the word to describe changing it's turbines. I, and others in the public, refer to "expansion" because PEC is expanding it's ability to generate electricity.

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I suggest that, going forward, Atura broaden the stakeholders they engage, how they engage them, provide direct answers to questions, hold in person public meetings, maintain an updated list of commitments from the 2003 ER report and measure CSAT.

Life Cycle.

Atura’s answers to questions on the quantity of pollutants that will be generated during the lifetime of the facility are deflected to the IESO. The Goreway Power Station EA does calculate lifetime emissions and the 2003 ER report for PEC does calculate some lifetime emissions. Atura needs to provide lifetime emissions – at full capacity as in modelling studies.

The 2003 ER report for PEC does provide some insight into the modelling that was done but does not provide full disclosure of the study. The MECP requirements for modelling have changed significantly since 2003. Atura provided the Executive Summary of the EDSM as of December 31, 2020 but declined to provide further details on the modelling (according to MECP guidelines the report is supposed to be current to December 31 of the previous year). Not having a current study is a concern because some of the parameters (for example, Calms Processing) and meteorological data can have a significant impact on the outcome of the modelling. If default meteorological data for the Toronto area is provided by MECP, it is from 1996-2000 and, since that time, the climate has changed. There is no indication if the worst-case scenario is in the meteorological data where pollutants would build up at ground level over a prolonged period to time. Halton Hills, Goreway Power and St. Clair Energy, all provided details of modelling in their EA reports. For these reasons, it is important for Atura to include modelling details in the PEC FSR.

In answer to some questions, Atura did provide references to Canada’s Emissions Inventory, Ontario’s Emissions Inventory and the IESO Demand-Supply reports but accessing the data is not straight forward. With some work, the public can put together a picture of PEC’s emissions and generation history. In the interests of facilitating public understanding Atura could have provided this information. The picture

shows that there are differences between the Canada and Ontario inventory numbers. There is no attempt to reconcile or explain the differences in emissions between the Federal and Provincial inventories for a given year. Atura needs to provide some explanation of this.

The Guide indicates “In describing the project, proponents must include all phases and components of the project, including construction, operation, and retirement of the project.” The Project Description in the FSR describes the construction of the project but not the operation or retirement. Goreway Power Station and St. Clair Energy Centre EA reports do provide a full life cycle description of the projects. The FSR needs to be changed to include operation and retirement.

Primary Concern

My primary concern with the FSR is to the answers in section 3.4.6 dealing with Socio-Economic questions. AVAANZ Ltd. prepared the screening report for Atura. The AVAANZ website indicates that they specialize in Socio-Economics. I expect that a firm which specializes in socio-economics would have completed a process and provided some rationale for the decisions that were made on socio-economic screening criteria, but none is provided. This is basically a risk assessment which is driven by a list of threats and a measure of impact severity and probability. The public is not privy to this assessment. The FSR indicates that there is no potential for any negative environmental effects resulting from the project. I do not believe that the public can take from this statement that Atura is 100% confident that the project has zero percent chance of causing or contributing to any negative environmental effect.

The answers to the socio-economic questions are not surprising if the project is considered as the work on the turbines. I, and other members of the public, see the project as the entire facility and the turbine work is just enabling Atura to generate more electricity to satisfy demands from the IESO. A bit like Jevons Paradox where increased efficiency leads to increased demand.

I find it difficult to believe that a consulting company located in Guelph (AVAANZ) and Atura (located in Oakville) can assess community level impacts in east Toronto without extensive on-the-ground research. Based on the answers to the Socio-Economic Criteria it does seem they are out of touch with community sentiments.

Here are the socio-economic criteria that concern me:

Will the project have negative effects on neighbourhood or community character? As a result of the media attention that PEC has received because of the proposed work on the turbines, I believe that the project has potential for negative effects on neighbourhood or community character. There may be perception from outside the area that East Toronto is polluted, again. The community risks damage to our reputation – like chemical valley in Sarnia or Grassy Narrows.

Will the project have the potential for negative effects on local businesses, institutions or public facilities? I believe there is potential for people to avoid the area which impacts local businesses. There is no measurement baseline of before and after the media reports on the turbine work of people deciding not to patronize local businesses. It is arguable that the IESO ignoring two City of Toronto motions against the turbine work has weakened the City of Toronto authority.

Will the project have the potential for negative effects related to increases in the demands on community services and infrastructure? The 2003 ER report for PEC recognises that PEC will increase the number of pollutants in the airshed and that air pollution adds to the burden of illness. Toronto Public Health, Ontario Public Health and Public Health Canada all recognize that air pollution leads to morbidity and mortality. There is no way to attribute a specific illness or death to PEC but there is a contribution which will result in the use of ambulances, doctors, lab tests, nursing, hospitals, pharmacies and other health care resources. I expect to hear from AVAARZ that a qualified medical practitioner has agreed to their assessment. The FSR does not discuss this or even conclude that the risk to the public is negligible. There are studies from the United States and European Union which link illness to long-term exposure from pollutants down wind of a gas electrical plant.

Will the project have the potential for negative effects on the economic base of a municipality or community? There is a possibility that employers will move out of the area because of air pollution levels. Is there a possibility that employers will not move into the area because of air pollution levels? It may well factor into business decisions. There is a possibility that people will decide not to purchase homes in the area because of PEC's reputation. There is a possibility that people will decide to move from the area because of PEC's reputation. One study out of the United States indicates houses close to gas fired power plants are 3-7% less expensive (in the range of 3 to 7 percent within about 2 miles from the plant) than comparable houses in areas without a gas fired power plant.

Will the project have the potential for negative effects on local employment and labour supply? Anyone who gets sick from or dies as a result of air pollution will impact the local labour supply. Once again, attributing such illness or death to a single source would be difficult but every source of air pollution would be partially responsible.

Will the project have the potential for negative effects to cause public concerns related to public health and safety? I do not need to hypothesize on this particular screening criteria. Prior to obtaining a copy of the 2003 ER for PEC, I collected almost 200 news articles, blog posts and other artifacts in the history of PEC leading up to the current turbine work. The two primary concerns of these artifacts were health and climate change. The 2003 ER for PEC showed the screening criteria for this particular item (and others) with an answer of 'Yes'. While the other screening criteria with 'Yes' each had portions of the report with analysis and mitigation, the Public Health and Safety criteria did not. No mitigation is proposed in the 2003 ER despite Public Health being identified as one of the key issues for the public. The FSR also identifies Public Health as one of the key issues for the public although in Table 4-2, Public Health concerns are translated into categories identified by Atura not related to health.

Up to the PEC FSR, Atura reports that 480 comments and questions were received from the public and Atura indicates that more than 100 people attended the virtual public meeting. In contrast zero comments were received for the Goreway Power Station EA, the St. Clair Energy Centre EA identified less than 10 public comments and the Halton Hills Upgrade EA received questions/comments from three individuals. Clearly, there is significant public interest in the PEC facility.

In conclusion, I ask that Atura:

- Voluntarily elevate the EA to an Environmental Review
- Correct the points brought out under the Deliverable and Process heading (above) in the ER report – with particular attention to missed answers on MECP’s Areas of Interest and where the requirements of the Guide are not met.
- Include in the ER Report the detail behind the risk assessment related to the Socio-Economic Screening Criteria in the ER report including process used, threats, assessed impact and probability.
- Change the Screening Criteria for Public Concerns Related to Health and Safety to “Yes”, conduct an analysis and propose mitigation measures.
 - o As a mitigation measure, I hope Atura considers putting together a plain language presentation, in partnership with Toronto Public Health, on public health which explains in detail the process Atura is required to go through for an EDSM and identifies the various regulatory bodies that Atura reports to. Said presentation would be posted to the Atura PEC webpage until the site is decommissioned and updated every five years and the requirement would be transferred with any change in ownership.
- Consider re-assessing answers to other Socio-Economic Screening Criteria
- Consider putting together a presentation on GHG emissions which describes, in plain language, the various measurements Atura takes, the regulations on GHG that Atura operates under and the reporting on GHG that Atura does. Again, the presentation would be posted to the Atura PEC webpage until the site is decommissioned and updated every five years.
- Re-balance the Environmental Advantages and Disadvantages of the Project (Table 5-1) to show concerns over Public Health and Safety as a disadvantage

I think we would agree that clean air, a stable climate and reliable, low cost electricity are valuable things to have. I look forward to working with you to resolve these points.

Your truly,

A solid black rectangular box used to redact the signature of the sender.

From: [REDACTED]

Sent: Friday, April 12, 2024 12:27 PM

To: [REDACTED]

Subject: Fw: Environmental Assessment Elevation Request for Portlands Energy Centre

Hi [REDACTED]

Any news on this request?

Thanks,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, April 15, 2024 4:27 PM
To: Minister.MECP@ontario.ca <minister.mecp@ontario.ca>
Cc: EABDirector@ontario.ca <eabdirector@ontario.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: Environmental Assessment Elevation Request for Portlands Energy Centre

Elevation Request delivered via e-mail

April 15, 2024

Dear Minister Khanjin,

No one likes government agencies making decisions for them which negatively impact them. Even less so when a business that the government entrusts with a process reaches conclusions on community concerns which are counter to the sentiments of the public where the project is sited.

As a private citizen, and resident of the community in close proximity to Portlands Energy Centre (PEC), I am asking you to require Atura Energy to conduct an Environmental Review of the Portlands Energy Centre proposed project, which will address process and deliverable flaws related to MECP's Guide to Environmental Assessments for Electricity Projects outlined in the attached Elevation Request.

Apparently, Atura Energy is not planning on discussing my concerns, as suggested by the Guide, as I have received no communication from them since my elevation request was submitted to them on April 5th, 2024. Bearing that in mind, with the violations outlined in my elevation request, I ask that you require Atura Energy to complete an Environmental Review.

I look forward to cleaner air and a healthier environment.

Sincerely,

[REDACTED]

c.c.

- Director, Environmental Assessment Branch, Ministry of the Environment, Conservation and Parks
- Atura Energy, Portlands Energy Centre Project

Name of the project and proponent:

Project: Portlands Energy Centre Efficiency Upgrade

Proponent: Atura Power

Basis of Request:

There are a number of points from the Consultation Process and in the Final Screening Report deliverable which do not conform to the requirements of MECP's Guide to Environmental Assessment of Electricity Projects and MECP's Areas of Interest.

For certain Socio-Economic Screening Criteria, the decisions made by Atura Energy (located in Oakville) and AVAANZ (located in Guelph) are not explained and are counter to the historical record of East Toronto or the current opinions of the residents.

Whether request is that the project be elevated to an Environmental Review or to an individual EA

Requesting elevation to an Environmental Review

The specific nature of the environmental concerns on which the request is based

My objective, in requesting an elevation to an Environmental Review, is to ensure that Atura Energy's Environmental Assessment for the Portlands Energy Centre project conforms to the requirements of MECP's Guide to Environmental Assessment for Electricity Projects and ensure a clear and complete public record.

There were a number of items in the draft (DSR) and, now, Final Screening Report (FSR) that I am dissatisfied with which I have previously communicated to Atura Energy.

Before I get to my primary concern, I want to raise some secondary concerns on both the Final Screening Report deliverable and Atura's execution of the Guide to Environmental Assessment for Electricity Projects (the Guide) process. My focus has been only on sections of the report dealing with human health.

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Atura’s answers to questions on the quantity of pollutants that will be generated during the lifetime of the facility are deflected to the IESO. The Goreway Power Station EA does calculate lifetime emissions and the 2003 ER report for PEC does calculate some lifetime emissions. Atura needs to provide lifetime emissions – at full capacity as in modelling studies.

The 2003 ER report for PEC does provide some insight into the modelling that was done but does not provide full disclosure of the study. The MECP requirements for modelling have changed significantly since 2003. Atura provided the Executive Summary of the EDSM as of December 31, 2020 but declined to provide further details on the modelling (according to MECP guidelines the report is supposed to be current to December 31 of the previous year). Not having a current study is a concern because some of the parameters (for example, Calms Processing) and meteorological data can have a significant impact on the outcome of the modelling. If default meteorological data for the Toronto area is provided by MECP, it is from 1996-2000 and, since that time, the climate has changed. There is no indication if the worst-case scenario is in the meteorological data where pollutants would build up at ground level over a prolonged period to time. Halton Hills, Goreway Power and St. Clair Energy, all provided details of modelling in their EA reports. For these reasons, it is important for Atura to include modelling details in the PEC FSR.

In answer to some questions, Atura did provide references to Canada’s Emissions Inventory, Ontario’s Emissions Inventory and the IESO Demand-Supply reports but accessing the data is not straight forward. With some work, the public can put together a picture of PEC’s emissions and generation history. In the interests of facilitating public understanding Atura could have provided this information. The picture shows that there are differences between the Canada and Ontario inventory numbers. There is no attempt to reconcile or explain the differences in emissions between the Federal and Provincial inventories for a given year. Atura needs to provide some explanation of this.

The Guide indicates “In describing the project, proponents must include all phases and components of the project, including construction, operation, and retirement of the project.”

The Project Description in the FSR describes the construction of the project but not the operation or retirement. Goreway Power Station and St. Clair Energy Centre EA reports do provide a full life cycle description of the projects. The FSR needs to be changed to include operation and retirement.

Primary Concern

My primary concern with the FSR is to the answers in section 3.4.6 dealing with Socio-Economic questions. AVAANZ Ltd. prepared the screening report for Atura. The AVAANZ website indicates that they specialize in Socio-Economics. I expect that a firm which specializes in socio-economics would have completed a process and provided some rationale for the decisions that were made on socio-economic screening criteria, but none is provided. This is basically a risk assessment which is driven by a list of threats and a measure of impact severity and probability. The public is not privy to this assessment. The FSR indicates that there is no potential for any negative environmental effects resulting from the project. I do not believe that the public can take from this statement that Atura is 100% confident that the project has zero percent chance of causing or contributing to any negative environmental effect.

The answers to the socio-economic questions are not surprising if the project is considered as the work on the turbines. I, and other members of the public, see the project as the entire facility and the turbine work is just enabling Atura to generate more electricity to satisfy demands from the IESO. A bit like Jevons Paradox where increased efficiency leads to increased demand.

I find it difficult to believe that a consulting company located in Guelph (AVAANZ) and Atura (located in Oakville) can assess community level impacts in east Toronto without extensive on-the-ground research. Based on the answers to the Socio-Economic Criteria it does seem they are out of touch with community sentiments.

Here are the socio-economic criteria that concern me:

Will the project have negative effects on neighbourhood or community character? As a result of the media attention that PEC has received because of the proposed work on the turbines, I believe that the project has potential for negative effects on neighbourhood or community character. There may be perception from outside the area that East Toronto is polluted, again. The community risks damage to our reputation – like chemical valley in Sarnia or Grassy Narrows.

Will the project have the potential for negative effects on local businesses, institutions or public facilities? I believe there is potential for people to avoid the area which impacts local businesses. There is no measurement baseline of before and after the media reports on the turbine work of people deciding not to patronize local businesses. It is arguable that the IESO ignoring two City of Toronto motions against the turbine work has weakened the City of Toronto authority.

Will the project have the potential for negative effects related to increases in the demands on community services and infrastructure? The 2003 ER report for PEC recognises that PEC will increase the number of pollutants in the airshed and that air pollution adds to the burden of illness. Toronto Public Health, Ontario Public Health and Public Health Canada all recognize that air pollution leads to morbidity and mortality. There is no way to attribute a specific illness or death to PEC but there is a contribution which will result in the use of ambulances, doctors, lab tests, nursing, hospitals, pharmacies and other health care resources. I expect to hear from AVAARZ that a qualified medical practitioner has agreed to their assessment. The FSR does not discuss this or even conclude that the risk to the public is negligible. There are studies from the United States and European Union which link illness to long-term exposure from pollutants down wind of a gas electrical plant.

Will the project have the potential for negative effects on the economic base of a municipality or community? There is a possibility that employers will move out of the area because of air pollution levels. Is there a possibility that employers will not move into the area because of air pollution levels? It may well factor into business decisions. There is a possibility that people will decide not to purchase homes in the area because of PEC's reputation. There is a possibility that people will decide to move from the area because of PEC's reputation. One study out of the United States indicates houses close to gas fired power plants are 3-7% less expensive (in the range of 3 to 7 percent within about 2 miles from the plant) than comparable houses in areas without a gas fired power plant.

Will the project have the potential for negative effects on local employment and labour supply? Anyone who gets sick from or dies as a result of air pollution will impact the local labour supply. Once again, attributing such illness or death to a single source would be difficult but every source of air pollution would be partially responsible.

Will the project have the potential for negative effects to cause public concerns related to public health and safety? I do not need to hypothesize on this particular screening criteria. Prior to obtaining a copy of the 2003 ER for PEC, I collected almost 200 news articles, blog posts and other artifacts in the history of PEC leading up to the current turbine work. The two primary concerns of these artifacts were health and climate change. The 2003 ER for PEC showed the screening criteria for this particular item (and others) with an answer of 'Yes'. While the other screening criteria with 'Yes' each had portions of the report with analysis and mitigation, the Public Health and Safety criteria did not. No mitigation is proposed in the 2003 ER despite Public Health being identified as one of the key issues for the public. The FSR also identifies Public Health as one of the key issues for the public although in Table 4-2, Public Health concerns are translated into categories identified by Atura not related to health.

Up to the PEC FSR, Atura reports that 480 comments and questions were received from the public and Atura indicates that more than 100 people attended the virtual public meeting. In contrast zero comments were received for the Goreway Power Station EA, the St. Clair Energy Centre EA identified less than 10 public comments and the Halton Hills Upgrade EA received questions/comments from three individuals. Clearly, there is significant public interest in the PEC facility.

In conclusion, I ask that:

- The Environmental Assessment be elevated to an Environmental Review
- Atura correct the points brought out under the Deliverable and Process Execution heading (above) in the ER report – with particular attention to missed answers on MECP’s Areas of Interest and where the requirements of the Guide are not met.
- Atura include in the ER Report the detail behind the risk assessment related to the Socio-Economic Screening Criteria in the ER report including process used, threats, assessed impact and probability.
- Atura changes the Screening Criteria for Public Concerns Related to Health and Safety to “Yes”, conduct an analysis and propose mitigation measures.
 - o As a mitigation measure, I hope Atura considers putting together a plain language presentation, in partnership with Toronto Public Health, on public health which explains in detail the process Atura is required to go through for an EDSM and identifies the various regulatory bodies that Atura reports to. Said presentation would be posted to the Atura PEC webpage until the site is decommissioned and updated every five years and the requirement would be transferred with any change in ownership.
- Atura considers re-assessing answers to other Socio-Economic Screening Criteria
- Atura considers putting together a presentation on GHG emissions which describes, in plain language, the various measurements Atura takes, the regulations on GHG that Atura operates under and the reporting on GHG that Atura does. Again, the presentation would be posted to the Atura PEC webpage until the site is decommissioned and updated every five years.
- Atura re-balances the Environmental Advantages and Disadvantages of the Project (Table 5-1) to show concerns over Public Health and Safety as a disadvantage

The benefits of requiring the proponent to undertake an Environmental Review or an individual EA

The benefits of elevation to an Environmental Review include:

- Compliance with requirements of MECP Guide to Environmental Assessments for Electricity Projects
- Satisfaction of requests from MECP on Areas of Interest
- Correction of the public record and Inclusion in the public record of how decisions on certain Socio-Economic criteria were arrived at.
- Addressing community concerns on health/safety and climate change including possible mitigation

Information about any efforts to discuss/resolve these concerns/environmental effects with the proponent:

From December 8, 2023 to January 5, 2024, I submitted a number of questions to Atura Energy on the Portlands Energy Centre draft Screening Report, the PEC Facility and the 2003 PEC Environmental Review. Atura provided a response on January 29, 2024. On January 31, 2024 I indicated my dissatisfaction with their response and asked some additional questions. On March 15, 2024, Atura provided updated responses to my questions. On March 18, 2024, I responded to Atura with follow-up questions and identifying responses which did not answer the question posed. On March 28, 2024, Atura published their Final Screening Report. I have received no further responses or clarifications to my questions. On April 4, 2024, I provided my Elevation Request to Atura. As of April 15, 2024 I have received no communication from Atura Energy on my Elevation Request.

Details of any correspondence between the party and the proponent.

Attached is a Zip file containing the correspondence between myself and Atura Energy

Any other matters considered relevant by the requesting party

Apart from the content of Atura's PEC Screening report I wish to comment further on the Public Consultation process that Atura employed.

(1) This is likely not the first Screening report that either Atura or OPG has produced. That they seem so ill prepared to answer questions on health and air quality suggests an inadequate project risk analysis for the screening process. I suggest that proponents be required to be prepared for most likely areas of concern in future environmental assessments to minimize public concerns.

(2) I suggest that proponents conduct a focus group of area residents to review their draft screening reports prior to releasing them to the general public.

(3) I suggest public disclosure on performance objectives and compensation tied to the proponent's project team and management related to a project.

(4) I suggest either a local or provincial public health official be required to provide an opinion of health impacts in an EA during the review period. There is no indication in the screening report that any of the Atura project team had health qualifications to render an opinion on public health.

(5) I suggest that a proponent examine local media for local concerns as an indicator for whether the Screening report needs to be raised to an ER.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Thursday, April 18, 2024 1:38 PM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Environmental Assessment Elevation Request for Portlands Energy Centre

Good afternoon, [REDACTED].

The attached PDF is a response to your email and letter from April 5, 2024, requesting that Atura Power voluntarily elevate the Portlands Energy Centre (PEC) Efficiency Upgrades (upgrades) project to an Environmental Review, complete associated activities to change sections of the PEC Upgrades Screening Report, and prepare additional public engagement materials regarding the PEC facility.

I hope you find that our responses satisfactorily answer and address your questions and concerns.

Best regards,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

[Atura](#) Power

April 18, 2024

██████████,

Re: Environmental Assessment Elevation Request for Portlands Energy Centre

The following letter is a response to your letter dated April 5, 2024, regarding your request that Atura Power voluntarily elevate the Portlands Energy Centre (PEC) Efficiency Upgrades (upgrades) project to an Environmental Review and complete associated activities to change sections of the PEC Upgrades Screening Report and prepare additional public engagement materials regarding the PEC facility.

Upon reviewing your letter, we note you shared comments in four different sections including:

- 1. Screening Report Deliverable and Process Execution,**
- 2. Life Cycle,**
- 3. Primary Concern, and**
- 4. Conclusions.**

Through our ongoing correspondence with you from Dec. 8, 2024, to today, we believe we responded to your comments raised in sections 1 (Screening Report Deliverable and Process Execution) and 2 (Life Cycle) of your April 5, 2024, letter. Additionally, we acknowledge that you provided further comments on March 18, 2024, to our previous responses to your comments; we are preparing responses to your additional enquiries shared on March 18, 2024. Please note we also recently, on April 15, 2024, responded to your enquiry regarding supporting documentation associated with the 2003 PEC Environmental Review Report that we provided to you on March 15, 2024, per your request.

We note that the comments raised in section 3 (Primary Concern) and section 4 (Conclusions) of your April 5, 2024, letter note additional comments regarding the project that were not explicitly covered in our previous responses to date. Therefore, we offer the following responses to these comments:

Primary Concern (PDF pages 4 and 5, April 5, 2024, letter)

The Environmental Screening Process was undertaken in accordance with Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the associated *Guide to Environmental Assessment Requirements for Electricity Projects*. Reporting completed as part of the Environmental Screening Process was undertaken per the scope and scale of the upgrades project and associated project activities. Additionally, at this time, there are no outstanding concerns/comments from agencies that we are aware of regarding how Atura Power undertook the Environmental Screening Process or the results of the Environmental Screening.

Conclusions (PDF page 6, April 5, 2024, letter)

As mentioned above, Sections 3.1: Existing Conditions (which includes Table 3.1: Consideration of MECP's Areas of Interest), Section 3.4: Review of Screening Criteria (which includes assessment of Socio-Economic criteria), and Section 5: Environmental Advantages and Disadvantages of the PEC Screening Report were prepared in accordance with Ontario Regulation 50/24 and the associated *Guide to Environmental Assessment Requirements for Electricity Projects*. At this time, there are no

outstanding concerns/comments from agencies regarding how Atura Power undertook the Environmental Screening Process or the results of the Environmental Screening. Additionally, correspondence from the Ministry of Environment, Conservation and Parks (MECP) stated that, "MECP's Toronto District staff have also reviewed the draft ESR from the lens of the district and do not have any further comments" and recent correspondence from the Ministry of Citizenship and Multiculturalism (MCM) stated that, "MCM finds that due diligence has been undertaken in the preparation of this final Screening Report, and we have no additional comments at this time". As such, Atura Power will be leaving the existing text unchanged in the aforementioned sections of the PEC Screening Report.

In conclusion, since:

- i) The Environmental Screening Process found that all Screening Criteria scored 'No' as a result of the PEC Upgrades project and, without any mitigation, all regulatory requirements will be met,
- ii) There are no outstanding concerns/comments from agencies about how Atura Power undertook the Environmental Screening Process or the results of the Environmental Screening Process at this time, and
- iii) Activities to complete the upgrades will occur within the existing facility; the process will improve operational efficiency, improve grid resiliency in Ontario, and bring economic benefits to the area through procurement of local labour and materials; and the facility will continue to operate within all environmental permitting requirements,

Atura Power will not be voluntarily elevating the project to an Environmental Review. Similarly, Atura Power believes the project webpage currently includes all the information related to the PEC Upgrades project that is available to date, and does not require any further materials to be developed. The current webpage includes copies of all project-related materials including copies of project notices, public engagement materials, and copies of the draft and final Screening Reports.

Thank you for your continued interest in the PEC Upgrades project.

Sincerely,

Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: [REDACTED]

Sent: Friday, April 19, 2024 8:04 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: EABDirector@ontario.ca <eabdirector@ontario.ca>

Subject: Re: Environmental Assessment Elevation Request for Portlands Energy Centre

Hi Darius,

I see from Atura's response that they have declined voluntarily elevating the PEC EA to an Environmental Review. After I received no response to my request of April 5th, and bearing in mind the 30 day review period, I elevated to MECP. I now look to the Minister and MECP to decide if an elevation is warranted.

The Atura responses indicate no movement on any of the points of concern which I have raised and only promises future responses to just my questions. While I appreciate that MECP had no further comment on the draft screening report, the only input they were receiving at that time was from Atura.

I am copying the Director, Environmental Assessment Branch, Ministry of the Environment, Conservation and Parks to ensure that MECP is aware that we appear to be at a stalemate.

Thank-you for your note.

[REDACTED]

On Friday, April 26, 2024 at 04:37:07 p.m. EDT, Upgrade project for PEC <portlandsupgrade@aturapower.com> wrote:

Hello [REDACTED],

Thank you for your continued interest in our Portlands Energy Centre project, please see the attached which includes Atura Power's responses to your comments and questions.

If there are any additional questions let me know.

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

Apr. 26, 2024

Dear [REDACTED]

Re: Atura Power PEC Efficiency Upgrades Project

Thank you for your recent letter on Mar. 18, 2024 sharing follow-up comments to our previous responses to your enquiries about the Portlands Energy Centre (PEC) Efficiency Upgrades project.

Please find Atura Power' responses to your comments/questions in the table below.

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
55	Efficiency Upgrades vs. Expansion, and Scope of Assessment	Section 3.1 of the draft Screening report identifies current conditions as a description of the physical facility. The EA Guide for Electricity Projects suggests a description of the local environment and conditions. Would you modify this section to reflect local environment and conditions?	The project will take place entirely within the facility; the facility footprint will not change. Section 3.1 of the draft Screening Report includes a description of the local environment and conditions relative to the PEC Efficiency Upgrades project. As such, text in this section remains accurate as is.	The PEC DSR mainly talks about land use while the PEC 2003 ER report covers many more topics including Climate, Air Quality and Socio-Economics - is there some reason the PEC DSR limits itself to land use?	Atura Power cannot comment on the 2003 Environmental Review Report (ERR) nor compare the ERR to the draft PEC Screening Report. Please see Atura Power's response on Mar. 15, 2024 to comment #55.
59	Efficiency Upgrades vs. Expansion, and Scope of Assessment	Has a Climate Change Impact Assessment been completed for PEC? (as per Ontario's Considering climate change in the environmental assessment process) If so, would you please provide a copy of it.	A separate Climate Change Impact Assessment was not completed for the PEC Upgrades project.	Has MECP waived the requirement for a Climate Change Impact Assessment?	<p>Atura Power undertook the Environmental Screening Process according to Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the associated Guide to Environmental Assessment Requirements for Electricity Projects.</p> <p>Additionally, as noted in correspondence to the project team in Appendix B6a (page 535 of PEC Screening Report, MECP confirmed that "MECP's Toronto District staff have also reviewed the draft ESR from the lens of the district and do not have any further comments. It is understood that the proposed efficiency upgrades are occurring within the facility, will not require works beyond the footprint of the facility and are projected to cause no additional negative affects to the natural environment or species at risk."</p>
2	Emissions and Air Quality	Air Quality - a number of people express concerns about air quality health impacts and the Atura response seems to be that we are operating within environmental permitting requirements. Would you add a note indicating the name of the organization that concerns on air quality health should be addressed to? It would	Details of PEC's Environmental Compliance Approval (ECA) (Air/Noise) are provided in Appendix B3a in the response to public comments under the air quality sub-category. The response can be expanded by noting that air standards under O. Reg. 419/05 are set by the MECP's Standards Development Branch to protect against	Does Atura have a reference case for a region that had a similar load of pollution which showed no impact on health?	This question is beyond the scope of the PEC Efficiency Upgrades project.

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
		<p>also help if Atura pointed to a study for a region that had a similar load of pollution which showed no impact on health - does such a study exist?</p>	<p>health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP currently requires to be assessed for contaminants released to the air, 5,099 are health based. PEC's Emission Summary and Dispersion Modelling (ESDM) report must be updated on an annual basis to reflect changes such as sources no longer in operation, updates to MECP's Air Contaminants Benchmarks List: standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants, as well as updates to the MECP approved air dispersion model versions.</p>		
9	Emissions and Air Quality	<p>Am I to take it that Atura is absolving itself from future increases in demand from IESO for more electricity that will lead to more GHG and NO from the facility? If so, isn't this counter to the Ontario approach of producer responsibility? I understand that PEC is already the biggest source of GHG and NO in Toronto while only operating for an average of 14 hours per day so far in 2023.</p>	<p>The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects <i>of the project</i> would occur. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades.</p> <p>As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades.</p>	<p>Would you send me correspondence with MECP on ""MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. ... Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".</p>	<p>The correspondence referenced is available in Appendix B6a of the PEC Screening Report, on page 535. You can access a copy of the Screening Report on the project webpage at: aturapower.com/portlandsupgrade.</p>

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
			<p>In recent correspondence to the project team, it was confirmed that, "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".</p>		
60	Emissions and Air Quality	<p>The Emissions Limits (e.g. NO_x, CO, Sulphur Dioxide) that PEC operates under - when these limits were determined, what were the assumptions made in the modelling? Was there an assumption that these gases would be dispersed? What would happen if the gases were not dispersed or built up in the area surrounding PEC?</p>	<p>See response to comment #1. Note that the emissions limits are determined based on calculations completed in accordance with MECP's Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines.</p>	<p>What would happen if the gases were not dispersed or built up in the area surrounding PEC?</p>	<p>Please see Atura Power's Response on Mar. 15, 2024 to comment #2. The response can be expanded by noting that the PEC air dispersion model is updated on an annual basis as required to reflect changes captured in the annual ESDM update.</p>
13	Emissions and Air Quality / Socio-economic	<p>Have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants? In view of the fact that the Toronto Star has reported that PEC is the largest source of GHG and nitrous oxides in Toronto based on the plant producing electricity for less than 24 hours per day, would you add a note to indicate this fact in the answer to this item.</p>	<p>Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the Canadian Environmental Protection Act (CEPA). The NPRI tracks over 300 pollutants.</p> <p>Greenhouse gas emissions are regulated by the Emissions Performance Standards Regulation (O. Reg. 241/19) under the Environmental Protection Act. Furthermore, information on GHG emissions from facilities across Canada</p>	<p>The question in the criteria doesn't ask if Atura meets the regulatory criteria - it asks if there will be negative effects. Apparently, we do not agree on what a negative effect is and that is an issue.</p> <p>For example, on public health and safety concerns: With Atura located in Oakville and MECP representatives location unknown, there is no community presence to know what the community concerns are. Certainly any minimal review of online posts and news pieces in the area would reveal the long history of community</p>	<p>Your comment is noted. Please see Atura Power's response on Mar. 15, 2024 to comment #9 as well as Atura Power's response on Apr. 26, 2024 to comment #59.</p>

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
			<p>who meet the requirements is collected under section 46 of the Canadian Environmental Protection Act.</p> <p>The net heat rate of the gas turbine generators (i.e., kilojoules/kilowatthours (kJ/kWh) higher heating value (HHV)) following the upgrades is expected to reduce by 2% at baseload and 15°C ambient temperature. The greenhouse gas intensity (i.e., the ratio of CO2 equivalent emissions to total electricity generation) of the facility is also expected to reduce by 2%.</p> <p>PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to all provincial and federal emissions reporting programs.</p> <p>As such, text in this section remains accurate as is.</p>	<p>concerns with PEC. Consequently, the criteria dealing with public concerns on health and safety should be "Yes".</p>	
16	Emissions and Air Quality / Socio-economic	<p>Cause negative effects from the emission of greenhouse gases (carbon dioxide (CO2), methane)? I find the answer to this question, again, focuses just on the project rather than the full facility after the expansion project is completed. A further complication is the requests from the IESO to operate more hours per day. The answer does not identify any negative effects from GHG on people nor it's contribution to Canada's GHG inventory. Would you add a note to indicate these</p>	<p>See response to comment #13.</p>		

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
		additional points in the answer to this item?			
17	Emissions and Air Quality / Socio-economic	Have negative effects related to increases in the demands on community services and infrastructure? There have been a number of public health studies - including from Toronto Public Health - which show that air pollution causes respiratory illness, hospitalizations and death. Since the exhaust from PEC will add to the level of pollution in the neighbourhood, would you add a note to indicate that overall exhaust from PEC increases the risk related to respiratory illness, hospitalizations and death as it relates to our health care system?	See response to comment #2.		
40	Emissions and Air Quality / Socio-economic	Indicates: "If there are sensitive receptors in the surrounding area of this project, a quantitative air quality/odour impact assessment will be useful to evaluate alternatives, determine impacts and identify appropriate mitigation measures. The scope of the assessment can be determined based on the potential effects of the proposed alternatives, and typically includes source and receptor characterization and a quantification of local air quality impacts on the sensitive receptors and the environment in the study area. The assessment. It seems to me that humans are sensitive receptors. Given the many studies which indicate the link between air pollution and respiratory illness, hospitalizations and death in humans and that PEC (while operating on average 14 hours per day this year and	See response to comment #9.		

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
		expected to operate more in the future) - did Atura conduct such a study? will compare to all applicable standards or guidelines for all contaminants of concern.			
7	Engagement Process, Requirements and Project Contact List	Did PEC/Atura conduct a communications test to determine if area residents/businesses were aware of the plan to expand PEC's generating capability?	Atura Power is undertaking the Environmental Screening Process according to Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the Guide to Environmental Assessment Requirements for Electricity Projects.	I take it that the answer to my question is No?	Atura Power undertook the Environmental Screening Process according to Ontario Regulation 50/24 and the associated Guide to Environmental Assessment Requirements for Electricity Projects, neither of which require a proponent to conduct a communications test.
20	Engagement Process, Requirements and Project Contact List	Is there some reason that the Beaches MP was left off the list? Is there some reason that the Members of Provincial Parliament was left off the list? Why was York region put on the list? Is there some reason that the Ontario Ministry of Health and Public Health Ontario were left off the list? Why was the Ministry of Mines put on the list? Is there some reason that Toronto Public Health and Community Health Centres (e.g. South Riverdale Community Health, East End Community Health, others) were left off the list? Why were Cherry Beach Park and Cherry Beach Sports Field included on the list? Is there some reason that Anishnabeg, Chippewa, Wendat Indigenous groups were left off the list? Is there some reason that local BIAs and Residents Associations were left off the list?	The project contact list was generated based on the requirements of Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the Guide to Environmental Assessment Requirements for Electricity Projects and updated over the course of the project based on engagement with the agencies, updates to the Environmental Assessment Government Review Team Master Distribution List, and as communications developed with project contacts over the course of the Environmental Screening Process to date.	The Atura response does not answer the questions asked. Further, the 2003 ER report identifies groups that were not on the list of groups consulted with for the 2023 DSR.	Atura Power cannot comment on the 2003 ERR nor compare the ERR to the draft PEC Screening Report. The project contact list was generated based on the requirements and resources referenced in Atura Power's response on Mar. 15, 2024 to comment #20.
23	Engagement Process, Requirements and Project Contact List	Was the PEC Community Liason Committee asked to provide input to Table 5-1?	A committee has not been set up for this upgrades project.	Is the PEC Community Liaison Committee still meeting? If not, when did it stop meeting?	Please see Atura Power's response on Mar. 15, 2024 to comment #23. Atura Power has not set up a PEC Community Liaison Committee nor is Atura Power aware of

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
					any such PEC Community Liaison Committee.
36	Engagement Process, Requirements and Project Contact List	Is there some reason Atura did not engage Councilor Brad Bradford, MPP Mary-Margaret McMahon and MP Nathaniel Erskine-Smith?	See response to comment #20.	The Atura response does not answer the questions asked. Further, the 2003 ER report identifies groups that were not on the list of groups consulted with for the 2023 DSR.	Please see Atura Power's response on Apr. 26, 2024 to comment #20.
37	Engagement Process, Requirements and Project Contact List	Is there some reason the Ontario Ministry of Health and Toronto Public Health were not included in correspondence? Also, Ontario Ministry of Economic Development, Job Creation and Trade, Ministry of Education, Ministry of Indigenous Affairs, Ministry of Municipal Affairs and Housing.	See response to comment #20.	The Atura response does not answer the questions asked. Further, the 2003 ER report identifies groups that were not on the list of groups consulted with for the 2023 DSR.	Please see Atura Power's response on Apr. 26, 2024 to comment #20.
39	Engagement Process, Requirements and Project Contact List	Once again why was York Region included?	See response to comment #20.	The Atura response does not answer the questions asked. Further, the 2003 ER report identifies groups that were not on the list of groups consulted with for the 2023 DSR.	Please see Atura Power's response on Apr. 26, 2024 to comment #20.
47	Engagement Process, Requirements and Project Contact List	Did Atura consider attempting to engage with the public through social media (e.g. Facebook, Instagram, X, etc.) or other means?	See response to comment #7.	I take it that the answer to my question is No?	Atura Power undertook the Environmental Screening Process according to Ontario Regulation 50/24 and the associated Guide to Environmental Assessment Requirements for Electricity Projects, neither of which require a proponent to engage with the public via social media.
29	IESO Procurement Process, Project Need, and Consideration of Alternatives	IESO Procurement Process: Did Atura Power lobby for the plant?	Atura Power responded to the IESO's call for efficiency upgrades under the E-LT1 process.	The Atura response does not answer the question asked.	Comment noted.

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
30	IESO Procurement Process, Project Need, and Consideration of Alternatives	Would you change the answer to point out that renewable energy can be used to reduce the demand for electricity from gas generation?	The current messaging in Appendix B3a of the draft Screening Report noting the role of gas in Ontario energy supply is accurate and reflects Atura Power's perspective on this topic.	Does the Screening process allow for reporting of dissenting opinions? I do not agree with the Atura response.	As noted in Section 4.1.1 of the PEC Screening Report, anyone wishing to share their opinions has several options to do so, including participating in the public meeting, commenting on the draft Screening Report, commenting on the final Screening Report, and/or submitting questions/comments to the project team via the project email address. All comments, regardless of whether they are considered positive or negative opinions, are recorded and made public in the engagement record. Public engagement records are available in Appendix B4b of the PEC Screening Report.
33	IESO Procurement Process, Project Need, and Consideration of Alternatives IESO Procurement Process, Project Need, and Consideration of Alternatives	When PEC was first built it was seen as a temporary solution until renewables matured. While some people oppose off-shore wind because they don't like the interrupted view of the natural environment, it does not produce emissions and renewable energy has definitely matured. Would you provide a better response to the questions asking why renewable energy is not being used?	See response to comment #30.		
12	Municipal Support	Be inconsistent with municipal land use policies, plans and zoning bylaws? In view of the fact that Toronto City Council voted against the PEC expansion, would you add a note to indicate this fact in the answer to this item?	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades. As such, text in this section remains accurate as is.		

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
50	Operations	Does Atura recognise that the public perception of and concerns about PEC have changed since it moved from being a peaker plant to a baseload plant?	PEC is a peaker plant and not a baseload plant. It can be operated as needed, during periods of peak demand or when intermittent energy sources like wind and solar are not available or cannot meet the electricity demands of Torontonians and the province.	The Atura response does not answer the question asked. "Peaking combustion turbine means a stationary combustion turbine that is operated for 1,500 hours or less within a calendar year." https://www.ontario.ca/page/guideline-5-atmospheric-emissions-stationarycombustion-turbines#section-4 Since PEC operated for an average of 14 hours per day in 2023 - this means it is operating as a baseload plant. 1,500 hours per year averages to 4 hours per day, 365 days a year.	Your comment is noted.
58	Out of Scope	Have any commitments been made from previous EAs?	This question is beyond the scope of the PEC Efficiency Upgrades project.	Commitments from previous EAs are relevant if they impact some portion of the current EA. Have there been any commitments from previous EAs?	Please see Atura Power's response on Apr. 26, 2024 comment #55. Atura Power has nothing more to share on this item.
61	Out of Scope	I have some additional concerns based on my readings on dispersion modelling. Do you have any information which addresses the following: Dispersion modelling does not identify the chemical reactions or transformations that may result when the pollutants released from the stacks mix with elements already in the atmosphere	This question is beyond the scope of the PEC Efficiency Upgrades project.	Since PEC's Dispersion Modelling may have influenced the answers to some of MECP's Areas of Interest and the Screening Criteria, questions on Dispersion Modelling are relevant to this EA. Responses from Atura do not answer the question.	This Emission Summary and Dispersion Modelling (ESDM) report was prepared in accordance with s.26 of Ontario Regulation 419/05 (O. Reg. 419/05). In addition, guidance in the Ontario Ministry of the Environment, Conservation and Parks (the Ministry) publication "Procedure for Preparing an Emission Summary and Dispersion Modelling Report, Version 4.1" [1] dated March 2018 (the ESDM Procedure Document) was followed, as appropriate.
62	Out of Scope	If the metrological data input to the model does not heavily favour inversion layers then the results will not show what happens when there is an inversion. Did the modelling conducted include a	This question is beyond the scope of the PEC Efficiency Upgrades project.		

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
		scenario where there is an extended inversion event?			
63	Out of Scope	The terrain down-wind of the stacks influences dispersion - did the modelling done for PEC take into account the slope to the north rising from the lake?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
64	Out of Scope	I gather that the impacts on tall buildings - of which there are a growing number in the neighbourhood - are not accurately portrayed in the results	This question is beyond the scope of the PEC Efficiency Upgrades project.		
65	Out of Scope	Third party review of modelling results increases confidence in results	This question is beyond the scope of the PEC Efficiency Upgrades project.		
66	Out of Scope	Given that the modelling done for PEC is now more than 20 years old, would Atura consider re-running the modelling with more recent metrological data? Since the study was done we have gone from "heat waves" and introduced the new term "heat domes".	This question is beyond the scope of the PEC Efficiency Upgrades project.		
72	Out of Scope	I appreciate that Atura is not obliged to send the full Air Dispersion Modelling study. Would you answer these questions: - Was "Shoreline fumigation" ruled out as a possibility?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
73	Out of Scope	- Were there any additional components used in the AERMON model, other than standard components (e.g. BPIP PRIME)?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
74	Out of Scope	- Was "Calms Processing" invoked during the execution of the model?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
75	Out of Scope	- What station's ground and atmospheric observations were used in the execution of the model?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
76	Out of Scope	- What years were the ground and atmospheric observations from?	This question is beyond the scope of the PEC Efficiency Upgrades project.		

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77	Out of Scope	- What are the characteristics of the 'receptors' used in the model?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
78	Out of Scope	- The "Procedure for Preparing an Emissions Summary and Dispersion Modelling" indicates that it is to be updated annually. Is there some reason the Executive Summary that Atura provided references an EDSM from December 31, 2020 rather than December 31, 2023?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
79	Out of Scope	-What is the reason that the Executive Summary only lists NOx in the Emissions Summary Table and not CO (indicated in the ECA 3557-BUJKWR)?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
80	Out of Scope	- Media reports from the 2003 ER suggested that PM10 and PM2.5 were also concerns - what did the modelling show for them and in comparison to the current air shed levels?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
81	Out of Scope	- What area did the modelling cover and how was the local terrain described?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
82	Out of Scope	- The "Procedure for Preparing an Emissions Summary and Dispersion Modelling" indicates "The assessment of all contaminants that are discharged from the facility regardless of whether or not a ministry POI Limit is available." Given that PEC is the largest source of GHG in Toronto, why isn't CO2e listed in the table?	This question is beyond the scope of the PEC Efficiency Upgrades project.		
68	Out of Scope	The Goreway Power Station Environmental Review report included a forecast of the lifetime emissions of the plant. Is there some reason that the Goreway ER was able to calculate lifetime emissions and PEC does not?	This question is beyond the scope of the PEC Efficiency Upgrades project. Atura Power cannot comment on a project belonging to another proponent.	Is there some reason PEC cannot forecast total demand to end of life and estimate lifetime emissions?	As noted previously, forecasting total demand to end of life and estimating lifetime emissions are beyond the scope of the PEC Efficiency Upgrades project.

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69	Out of Scope	The Goreway Power Station ER flags GHG emissions as one of the reasons for raising the review to an ER. The St. Clair Energy Station ER flags some emissions being close to the limit for raising the review to an ER. Given that PEC has been flagged as having the highest GHG emissions in Toronto (with an expectation that they will increase even more) and, from media and other reports from PEC's 2003 ER, that local NOx and particulate matter were high - is there some reason Atura did not upgrade the PEC EA to an Environmental Review?	This question is beyond the scope of the PEC Efficiency Upgrades project. Atura Power cannot comment on a project belonging to another proponent.	Response from Atura does not answer the question.	Please see Atura Power's response on Mar. 15, 2024 to comment #9 as well as Atura Power's response on Apr. 26, 2024 to comment #59.
34	Project Documentation, Resources and Materials	Gwh supplied to the IESO grid - this link leads to a page that requires a login id of a market participant. Would you provide the data requested on pg 129 - Gwh supplied to the IESO controlled grid for each year from 2017 to 2022?	The following link: https://ieso.ca/en/Power-Data/Data-Directory indicates that all reports found through the IESO's public reports website can be accessed using the tabs on that webpage.	Thank-you this works.	
70	Project Documentation, Resources and Materials	Would you also send me the - Emissions Summary - Guideline A-5 calculations based on proposed facility and equipment parameters	The ESDM and A5 guideline calculations are currently being assessed by the MECP as part of the ECA amendment referenced in Section 2 of the draft Screening Report. The Executive Summary of the ESDM can be made available once approved by the MECP.	Would you please send me a copy of the most recent EDSM Executive Summary when it becomes available.	As noted in Atura Power's response on Mar. 15, 2024 to comment #70, the Executive Summary of the ESDM can be made available once approved by the MECP upon request.

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21	Project Notification	A number of people that I know that attended the initial public meeting did not receive notice that the draft Screening report was available. What distribution list was used to send out the notification that the draft Screening report was available?	Notice that the draft PEC Screening Report is available was shared with key agencies and organizations, Indigenous communities and interested members of the public. Interested members of the public included individuals who requested to be added to the project contact list as well as any member of the public who contacted the project email inbox (portlandsupgrade@aturapower.com) during the Environmental Screening Process. The draft PEC Screening Report was also made available on the project webpage.	Would you note that the Public Presentation did not indicate that in order to be notified that the draft Screening report was available, people had to specifically ask to be added to the distribution list?	Section 4 of the Screening Report notes members of the public received frequent notification regarding project updates and that the draft Screening Report was shared with key agencies and municipal staff/elected officials, Indigenous communities, and interested members of the public. Atura Power defined interested members of the public as individuals who requested to be added to the project contact list as well as any member of the public who contacted the project email inbox (portlandsupgrade@aturapower.com) during the Environmental Screening Process. The draft and final Screening Reports were also made publicly-available on the project webpage for anyone else wishing to review them.
51	Project Notification	Was the Notice of Commencement mailed to households in the immediate vicinity of PEC? If so, what streets or neighbourhoods?	The Notice of Commencement was distributed according to the requirements set out in the Guide to Environmental Assessment Requirements for Electricity Projects. As noted in Section 4.2 of the draft PEC Screening Report, the Notice was shared with adjacent property owners/tenants, provincial and federal ministries, regional and municipal contacts, a variety of other agencies/utilities, and several Indigenous communities.	The Atura response does not answer the question.	As mentioned, Section 4.2 of the Screening Report provides all the details related to the distribution of the Notice of Commencement. Atura Power has nothing more to share on this item.
56	Project Notification	Which libraries, municipal offices or recreation centres are you planning on making the Screening report available in?	Based on the current project contact list, Atura Power will be sharing the Notice of Completion with the same project contacts	The Guide suggests "convenient location(s) in the project area, such as a public library, municipal or band office, or	Atura Power sought to provide the draft Screening Report and final Screening Report in the most convenient and

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			<p>who received the Notice of Commencement in September 2023 (see Section 4.2 of the draft PEC Screening Report), as well as project contacts who received the draft Screening Report in early December 2023. Additionally, it will be advertised in the same publications used to share the Notice of Commencement in September 2023, including the Toronto Sun, Toronto Star, and Beach Metro newspapers. Anyone who has contacted the project team via the project email (portlandsupgrade@aturapower.com) will also receive a copy of the Notice of Completion. Finally, a copy of the Notice of Completion will also be posted on the project webpage.</p>	<p>community centre" Does this change the Atura answer to this question?</p>	<p>accessible format for potential reviewers and interested parties. Based on the project location and that project comments and enquiries received during the project to date have been received via electronic means, the project team's priority was to provide electronic access to project materials. Additionally, Atura Power offered to provide project documents in an alternate format to anyone who requested such accommodations.</p>
57	Project Notification	<p>What residents, businesses and local interest groups are you planning on sending the EA Completion notice to?</p>	<p>See response to comment #56.</p>	<p>The Guide suggests "other potentially interested or affected parties (such as local interest groups, businesses, and members of the public that may be directly affected by some aspect of the project)." Does this change the Atura answer to this question?</p>	<p>Section 4.9 of the Screening Report details how the Notice of Completion was distributed. Atura Power has nothing more to share on this item.</p>
52	Review of draft Screening Report	<p>Where is the summary of public and agency concerns or issues in the Screening report?</p>	<p>This information is available in Section 4.3: Public Engagement and Section 4.5: Agency Engagement of the draft Screening Report.</p>	<p>The list in section 4.3 is just a list. There is no indication how concerns were addressed or issues were resolved or how public input was used in the screening process.</p>	<p>Section 4.3: Public Engagement and Section 4.5: Agency Engagement of the PEC Screening Report summarize engagement with these contacts and how comments on the project were addressed throughout the process. Copies of all correspondence with these contacts are available in Appendices B4 and B6, respectively, should reviewers like to learn more. Additionally, comments on the draft PEC Screening Report and how they were</p>

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
					addressed are provided in Appendix C1 through C3.
10	Screening Criteria	What detailed criteria were used to assess each of these items?	Per the Guide to Environmental Assessment Requirements for Electricity Projects, the project was assessed against each Screening Criteria as it relates to the potential for the efficiency upgrades to cause negative effects.	The response provided by Atura does not answer the question. Would Atura confirm that whoever did the screening criteria assessment was able to say with 100% confidence that there is 0% chance that emissions from PEC:	Your comment is noted. Please see Atura Power's response on Apr. 26, 2024 to comment #13. Atura Power has nothing more to share on this item.
18	Screening Criteria	Have negative effects on the economic base of a municipality or community? Since business and residents may decide not to move into a neighbourhood that has Toronto's largest source of GHG and nitrous oxides in it, would you add a note to this effect in the answer?	The Environmental Screening Process determined that all Screening Criteria scored 'No' as a result of the PEC Upgrades project, and without any mitigation, all regulatory requirements will be met. Further, the manufacturer of the equipment being installed for the upgrades provided a letter stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels." Given the facility will continue to operate within all environmental permitting requirements, text in this section remains accurate as is.	<ul style="list-style-type: none"> - would not cause or contribute to respiratory issues with young children - would not cause or contribute to respiratory illness or heart attacks in adults - would not cause or contribute to people missing work - would not cause or contribute to an increase in use of health care resources - would not inhibit a business or a homeowner from locating in the area <p>What checklist or process did Atura follow to come to the conclusion that there was no impact for all of these criteria?</p> <p>What would cause Atura to indicate "Yes" for the criteria "cause public concerns related to health and safety"?</p> <p>The Guide: In some cases, the proponent may indicate that no negative environmental effects are anticipated but feel it is necessary to provide additional information in its Screening Report to explain or support the "no negative effects" conclusion.</p>	
19	Other	Cause public concerns related to public health and safety? Would you add a note to the answer to this item to indicate that various individuals, groups and municipal representatives and offices have expressed concern relating to public health? Would you also add a note that concerns have been expressed since the inception of PEC? Would you also add a note to indicate that cumulative air pollution from all sources in the area is a concern? Would you add a note to indicate that area monitoring stations for pollution are located far from the PEC site? Would	See response to comment #35 above. The remainder of the questions provided are beyond the scope of the PEC Efficiency Upgrades project.		

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		you add a note to indicate that a study on the high incidence of respiratory illness in the East End of Toronto was completed in the mid-2000s and no follow-up study has been completed since.		The Guide indicates: "A Screening can be based primarily on existing or readily obtainable information. It is expected that a proponent will consult with relevant federal and provincial agencies and municipal authorities, appropriately qualified persons, potentially affected or interested individuals, Indigenous communities and the public when completing the Screening to ensure the identification of potential effects, proposed mitigation and impact management measures, and assessment of net effects are accurate and acceptable."	
24	Other	<p>While illness from pollution is difficult to attribute to a single facility, there are numerous studies identified by Toronto Public Health which link illness to pollution</p> <p>> I would suggest that one of the disadvantages that should be identified is that of increased GHG and NO that will come as a result of the requests from the IESO to operate more hours as a result of the nuclear power plants being shut down.</p> <p>> I would suggest that one of the disadvantages that should be identified is the potential for increased respiratory illness from residents as a result of increased pollution - especially the young whose lungs are still developing and the very old.</p> <p>> I would suggest that one of the disadvantages that should be identified is the potential for increased morbidity and mortality of the residents (as well as the difficulties that will introduce to their lives and the lives of their families) as a result of increased pollution</p> <p>> I would suggest that one of the disadvantages that should be identified is lost time from work for residents and the impact to employers from illness due to increased pollution</p> <p>> I would suggest that one of the</p>	<p>The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades.</p> <p>As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades.</p> <p>Additionally, please see response to #13.</p>	<p>Consultation in Ontario's EA Process (The Code) indicates: "To focus on and address real public concerns rather than regulatory procedures and administration"</p>	

Comment Number (#)	Topic	Original Comments	Atura Power's Response on Mar. 15, 2024	Follow-Up Comments on Mar. 18, 2024	Atura Power's Response on Apr. 26, 2024
		<p>disadvantages that should be identified is the increased in health care costs from illness due to pollution</p> <p>> I would suggest that conservation, wind and solar power are more cost effective solutions but are not currently available to expand the electrical supply</p> <p>> I would suggest that the increased GHG emissions expected from PEC will add to Canada's GHG emissions inventory which is counter to public policy of reducing emissions</p> <p>> I would suggest that businesses looking to locate in a region that has clean power will be dissuaded from locating in a region that uses burned methane to create electricity</p>			
11	Screening Criteria	It seems that many of the answers in this section reflect a 'more of the same' response -which of the previous Screening reports answered these questions fully?	See response to comment #10.	The 2003 PEC Environmental Review report - the screening criteria related to "cause public concerns related to health and safety" is answered with a "Yes" and then does not seem to have been analyzed or mitigation actions identified. I suggest that this omission be added to the reasons to change the answer in the current screening report to "Yes"	Atura Power cannot comment on the 2003 ERR nor compare the ERR to the draft PEC Screening Report. Your comment is noted. Please see the responses above which detail Atura Power's approach to the Environmental Screening Process for the PEC Efficiency Upgrades project.

We hope the responses above provide clarification regarding the comments raised about the PEC Screening Report and associated Environmental Screening Process.

Thank you for your continued interest in the project.

Sincerely,



Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: [REDACTED]

Sent: Saturday, April 27, 2024 9:41 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Stephen Smith <Stephen.Smith@aturapower.com>; EABDirector@ontario.ca

Subject: Re: Atura Power PEC Efficiency Upgrades Project

Hi Stephen,

I acknowledge Atura's note. I find that the answers do not provide direct answer my questions. I am pausing further action on getting my questions answered pending the decision by Minister Khanjin on my escalation request.

I am copying the Director, Environmental Assessment Branch, Ministry of the Environment, Conservation and Parks to ensure that MECP is aware of Atura's latest correspondence with me.

Yours truly,

[REDACTED]

From: [Upgrade project for PEC](#)
To: [REDACTED] [Upgrade project for PEC](#)
Cc: [Darius Sokal](#); [Stephen Smith](#); EABDirector@ontario.ca
Subject: RE: Atura Power PEC Efficiency Upgrades Project
Date: April 29, 2024 4:32:57 PM

Hello [REDACTED]

Thank you for your email and acknowledgement of our response.

Atura Power now waits for the Minister of Environment, Conservation and Parks' guidance and response regarding your elevation request.

We thank you for your continued interest in our project.

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: [REDACTED] <[REDACTED]@[REDACTED]>

Sent: Wednesday, April 10, 2024 4:49 PM

To: Minister.MECP@ontario.ca <Minister.MECP@ontario.ca>; EABDirector@ontario.ca <EABDirector@ontario.ca>

Cc: mayor_chow@toronto.ca <mayor_chow@toronto.ca>; Councillor_Fletcher@toronto.ca <Councillor_Fletcher@toronto.ca>; tabunsp-qp@ndp.on.ca <tabunsp-qp@ndp.on.ca>;

'McMahon, Mary-Margaret' <mmcmahon.mpp@liberal.ola.org>; 'Mike Schreiner'

<mikeschreiner@gpo.ca>; [REDACTED] <[REDACTED]@[REDACTED]>
<[REDACTED]@[REDACTED]> [REDACTED] <[REDACTED]@[REDACTED]>
<[REDACTED]@[REDACTED]>
<[REDACTED]@[REDACTED]>
<[REDACTED]@[REDACTED]> [REDACTED] <[REDACTED]@[REDACTED]>
[REDACTED] <[REDACTED]@[REDACTED]>

<[REDACTED]@[REDACTED]> 'Oved, Marco' <moved@thestar.ca>; Darius Sokal

<Darius.Sokal@aturapower.com>; Upgrade project for PEC

<portlandsupgrade@aturapower.com>

Subject: Request for a Comprehensive Environmental Assessment of Atura's proposal to increase the capacity of the Portlands gas plant by 50 MW

Dear Minister Khanjin,

Please find attached our request for a Comprehensive Environmental Assessment of Atura Power's proposal to increase the capacity of its Portlands Energy Centre by 50 MW.

I am also attaching our December 14, 2023 letter to Atura with respect to its Draft Screening Report.

Yours sincerely,

[REDACTED]
Chair, Ontario Clean Air Alliance
192 Spadina Ave, #406
Toronto, ON M5T 2C2
Ph. 416 260 2080 x 2



April 10, 2024

BY EMAIL: Minister.MECP@ontario.ca

EABDirector@ontario.ca

The Honourable Andrea Khanjin
Minister of the Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto M7A 2J3

Dear Minister Khanjin:

Re: Request for a Comprehensive Environmental Assessment of Atura Power’s proposal to increase the capacity of the Portlands Energy Centre (PEC) by 50 megawatts (MW)

Introduction

I am writing on behalf of the Ontario Clean Air Alliance (OCAA) to request a Comprehensive Environmental Assessment of Atura Power’s proposal to increase the capacity of its Portlands gas-fired power plant, on the Toronto waterfront, by 50 MW.

On December 14, 2023 we wrote to Mr. Darius Sokal, Senior Communications Advisor, Atura Power to provide Atura Power with our comments and recommendations with respect to its *Draft Screening Report* re: its proposal.

Unfortunately, Atura’s March 2024 report, *Portlands Energy Centre Efficiency Upgrades: Screening Report for Electricity Projects* (SR) has not addressed our concerns and has not demonstrated that the proposed project is in the public interest.

Concerns

The OCAA has the following concerns about Atura Power's SR.

1. **The SR fails to acknowledge that Atura Power must obtain a municipal support resolution from the City of Toronto for its proposed project to proceed.**

According to Ontario's Minister of Energy, Todd Smith, municipal support resolutions from the host municipalities are a prerequisite for electricity generation and storage projects.

Specifically, according to the Minister's December 23, 2022 letter to the Independent Electricity System Operator (IESO):

"In recent months, as project proponents look for sites to develop approximately 4,000 megawatts of generation and energy storage, I have heard from multiple municipal councils and other stakeholders that they would like the IESO to be explicit that municipal council support is required for the approval of projects proposed on sites that are located within their boundaries...

Recognizing that... it is the IESO which is responsible for implementing the [October 6, 2022] Directive, it is my expectation that the IESO will be clear about the requirement for a resolution from municipal council supporting a proponent or counterparty with a proposed project located in that municipality, separate and apart from that municipality's permitting and regulatory requirements.

I believe that the submission of a council resolution by a proponent or counterparty to the IESO demonstrating support for the project would be the only basis from which to conclude that an elected council's support on behalf of the municipality has been obtained."¹

As the above quote makes clear, Minister Smith's letter is with respect to the IESO's procurement of 4,000 MW of generation and energy storage. Atura Power's contract with the IESO to expand the capacity of its PEC by 50 MW is one component of the IESO's plan to acquire an additional 4,000 MW of generation and energy storage. Therefore it requires a municipal support resolution from the City of Toronto to proceed.

2. The SR fails to note that on May 12, 2023 and June 15, 2023 the City of Toronto passed resolutions opposing Atura Power's proposal to increase the capacity of PEC by 50 MW.

¹ <https://www.ieso.ca/en/Corporate-IESO/Ministerial-Directives>

3. The SR fails to explain why Atura believes that the Minister of Energy, Conservation and Parks should approve its proposed PEC project despite the fact that that it does not have the support of Toronto City Council as required by the Minister of Energy.
4. Atura has not quantified PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide *emission rates per kWh* in 2022.
5. Atura has not quantified the *changes* in PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide *emission rates per kWh* which will occur if the project proceeds.
6. Atura has not provided PEC's *total* emissions of nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), and sulphur dioxide in 2022.
7. Atura has not provided a forecast of PEC's total emissions of carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.
8. Atura has not quantified adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature deaths) of proceeding with its proposed project.
9. Atura has not provided PEC's total greenhouse gas (GHG) emissions in 2022.
10. Atura has not provided a forecast of PEC's total GHG emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.
11. Atura's SR does not examine *alternatives* to its proposed project. Specifically, there is no analysis with respect to the existence of cleaner and lower cost options to meet Ontario's electricity needs even though there are many commercially available alternatives.

For example, according to the Royal Bank of Canada, Ontario could completely avoid the need for new gas-fired generation and save \$500 million per year by investing in energy efficiency and demand management.²

² <https://thoughtleadership.rbc.com/power-shift-how-ontario-can-cut-its-450b-electricity-bill/>

Ontario's demand for electricity peaks on hot summer days when our air-conditioners are running full out. On the other hand, Quebec's demand for electricity peaks on cold winter nights since most of its homes have electric resistance (baseboard) heating. As a result, Quebec has a huge surplus of hydro-electricity capacity available for export to Ontario during our summer peak demand hours.³ By increasing our imports of Quebec waterpower, Ontario can avoid the need for new gas-fired generation to power our air conditioners.

In addition, the SR provides no analysis of the potential for wind⁴ and solar energy (including solar PV on Toronto roofs) combined with energy storage (including EV batteries) to avoid the need to increase the generation capacity of PEC.

In this context, it is also important to note that that Hydro Quebec is proposing to meet [100% of its future electricity needs by investing in energy efficiency and renewables](#) (wind, solar, waterpower and biogas).

12. The SR does not propose any mitigation measures to ensure that the project will **not** have a negative net impact on public health and our climate.

Conclusion

Atura's SR has failed to demonstrate that its proposal to increase PEC's capacity by 50 MW is in the public interest.

Therefore, OCAA recommends that the proposed project be elevated to a Comprehensive Environmental Assessment to:

- a) determine if it would be in the public interest for the Minister of the Environment, Conservation and Parks to approve Atura's proposal to increase PEC's generating capacity by 50 MW despite the fact that it does not have a municipal support resolution from the City of Toronto;
- b) quantify PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide *emission rates per kWh* of electricity generation in 2022;
- c) quantify PEC's *total* carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide emissions in 2022;
- d) quantify PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide *emission rates per kWh* of electricity generation in each year from 2024 to 2035 inclusive if the proposed project proceeds;

³ <https://news.ontario.ca/en/release/1003444/the-governments-of-ontario-and-quebec-support-new-electricity-trade-agreement>

⁴ https://www.cleanairalliance.org/wp-content/uploads/2023/04/Great-Lakes-Wind-Report-apr-17-v_01.pdf

- e) quantify PEC's *total* forecast carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.
- f) quantify PEC's greenhouse gas emission rate per kWh of electricity generation in 2022;
- g) quantify PEC's greenhouse gas emission rate per kWh of electricity generation if the proposed project proceeds;
- h) quantify PEC's total greenhouse gas emissions in 2022;
- i) quantify PEC's *total* forecast greenhouse gas emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved;
- j) quantify PEC's *total* adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature deaths) in each year from 2024 to 2035 inclusive if the proposed project proceeds;
- k) evaluate alternatives to the proposed project (e.g., energy efficiency and demand management, Quebec waterpower, Made-in-Ontario wind and solar energy, storage projects including the use of Hydro Quebec's reservoirs and electric vehicle batteries as storage options for Ontario wind and solar energy); and
- l) evaluate the benefits and costs of measures to mitigate the adverse health and climate impacts of the proposed project.

Yours sincerely,



Chair

cc. Mayor Olivia Chow
Councillor Paula Fletcher
Peter Tabuns, M.P.P.
Mary-Margaret McMahon, M.P.P.
Mike Schreiner, M.P.P.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 15, 2024 11:31 AM

To: [REDACTED] [REDACTED] <[REDACTED]@[REDACTED].[REDACTED]>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Request for a Comprehensive Environmental Assessment of Atura's proposal to increase the capacity of the Portlands gas plant by 50 MW

Good day, [REDACTED] [REDACTED]

Thank you for including my and our project email addresses in your message to Minister Khanjin.

Best regards,

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Tuesday, April 23, 2024 7:18 PM

To: [REDACTED] <[REDACTED]@[REDACTED]>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Request for a Comprehensive Environmental Assessment of Atura's proposal to increase the capacity of the Portlands gas plant by 50 MW

Good day, [REDACTED]

The attached PDF contains Atura Power's responses to your letter sent to Minister Khanjin on behalf of the Ontario Clean Air Alliance on April 10, 2024, requesting that the Portlands Energy Centre Efficiency Upgrades project be elevated to a Comprehensive Environmental Assessment.

Best regards,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor | [Atura Power](#)

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

April 23, 2024

Ontario Clean Air Alliance
160 John St., Suite 300
Toronto, ON M5V 2E5

Mr. [REDACTED]

Re: Request for a Comprehensive Environmental Assessment of Atura's proposal to increase the capacity of the Portlands gas plant by 50 MW

The following is in response to your letter sent on behalf of the Ontario Clean Air Alliance (OCAA) dated April 10, 2024, regarding your request that the Portlands Energy Centre (PEC) Efficiency Upgrades project be elevated to a Comprehensive Environmental Assessment.

In response to each of the comments raised in your letter, we offer the following:

OCAA Letter Section (page #)	OCAA Comment	Atura Power's Response
#1 (p2)	The SR fails to acknowledge that Atura Power must obtain a municipal support resolution from the City of Toronto for its proposed project to proceed.	<p>As mentioned to you more than once before, Atura Power does not require municipal approval to complete the efficiency upgrades project for the following reasons:</p> <p>i) As stated in Section 3.3 of the Screening Report, the Independent Electricity System Operator (IESO) is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023. The IESO awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades; as such, municipal support resolution for ELT1 is not required. The IESO's May 2023 Resource Adequacy Update explains the upgrades to existing gas plants approved under the ELT1 process, while the 'Results Table' link provided in the Resource Adequacy Update (located under the 'Expedited Process' heading) identifies PEC as one of the seven existing facilities approved for efficiency upgrades.</p> <p>ii) While the IESO's E-LT1 process does not require municipal approval, the PEC efficiency upgrades project is subject to the Environmental Screening Process for Electricity Projects subject to Ontario Regulation (O. Reg.) 50/24 (previously O. Reg. 116/01), under the Ontario <i>Environmental Assessment Act</i>, since the project proposes to increase the facility's generation capacity by more than five megawatts (MW). The Environmental Screening Process is a proponent-driven process that Atura Power is carrying out, according to the requirements outlined in O. Reg. 50/24. While municipal engagement is an important component of the environmental assessment process, municipal approval is not required.</p>
#2 (p2)	The SR fails to note that on May 12, 2023, and June 15, 2023 the City of Toronto passed resolutions opposing Atura Power's proposal to increase the capacity of PEC by 50 MW.	See response to #1 above.

OCAA Letter Section (page #)	OCAA Comment	Atura Power's Response
#3 (p3)	The SR fails to explain why Atura believes that the Minister of Energy, Conservation and Parks should approve its proposed PEC project despite the fact that that it does not have the support of Toronto City Council as required by the Minister of Energy.	See response to #1 above.
#4 (p3)	Atura has not quantified PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide <i>emission rates per kWh</i> in 2022.	Section 3.3 of the PEC Efficiency Upgrades Screening Report notes that there was no uncertainty associated in determining the potential for effects on air quality as the efficiency upgrades equipment manufacturer provided a letter to Atura Power stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, Atura Power determined that no further studies were required. In recent correspondence to the project team, it was confirmed that, "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".
#5 (p3)	Atura has not quantified the <i>changes</i> in PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide <i>emission rates per kWh</i> which will occur if the project proceeds.	See response to #4 above.
#6 (p3)	Atura has not provided PEC's <i>total</i> emissions of nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), and sulphur dioxide in 2022.	Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the <i>Canadian Environmental Protection Act</i> (CEPA). Facilities are also required to report on the Greenhouse Gas Reporting under the authority of CEPA and the provincial <i>Environmental Protection Act</i> (EPA). Reviewed 2021 data for both the NPRI and GHG reports are publicly available through the regulatory data search with 2022 data waiting to be posted by Environment and Climate Change Canada (ECCC).
#7 (p3)	Atura has not provided a forecast of PEC's total emissions of carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.	PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to all provincial and federal emissions reporting programs.
#8 (p3)	Atura has not quantified adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature	See response to #4 above.

OCAA Letter Section (page #)	OCAA Comment	Atura Power's Response
	deaths) of proceeding with its proposed project.	
#9 (p3)	Atura has not provided PEC's total greenhouse gas (GHG) emissions in 2022.	GHG emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Canadian Environmental Protection Act</i> . Furthermore, information on GHG emissions from facilities across Canada that meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i> . Reviewed 2021 GHG data is currently available. 2022 GHG data was submitted as per the reporting requirements and has been reviewed by the regulatory bodies and is waiting for posting by ECCC.
#10 (p3)	Atura has not provided a forecast of PEC's total GHG emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.	See response to #7 above.
#11 (p3, p4)	Atura's SR does not examine <i>alternatives</i> to its proposed project. Specifically, there is no analysis with respect to the existence of cleaner and lower cost options to meet Ontario's electricity needs even though there are many commercially available alternatives.	The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project. Given the recommendations of the IESO and government initiatives, other alternatives were not considered as part of the project, nor are they required as part of the Screening Process followed by the project.
#12 (p4)	The SR does not propose any mitigation measures to ensure that the project will not have a negative net impact on public health and our climate.	See response to #4 above. Additionally, Section 3.5 of the PEC Efficiency Upgrades Screening Report notes that, "the Screening identified that, without any mitigation, all regulatory requirements will be met, and no other impact management commitments will be required".

Given the responses above and that,

- i) The Environmental Screening Process found that all Screening Criteria scored 'No' as a result of the PEC Upgrades project, and without any mitigation, all regulatory requirements will be met,
- ii) There are no outstanding concerns/comments from agencies regarding how Atura Power undertook the Environmental Screening Process or the results of the Environmental Screening Process at this time, and
- iii) Activities to complete the upgrades will occur within the existing facility; the process will improve operational efficiency, improve grid resiliency in Ontario, and bring economic benefits to the area through procurement of local labour and materials; and the facility will continue to operate within all environmental permitting requirements,

Atura Power will not be elevating this project to a Comprehensive Environmental Assessment.

Thank you for your continued interest in the PEC Upgrades project.

Sincerely,

Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

Ministry of the Environment,
Conservation and Parks

Ministère de l'Environnement, de la
Protection de la nature et des Parcs



Environmental Assessment
Branch

Direction des évaluations
environnementales

7th Floor
135 St. Clair Avenue W
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7ème étage
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél.: 416 314-8001
Télééc.: 416 314-8452

357-2024-719

May 23, 2024

██████████
Chair, Ontario Clean Air Alliance
Email: ██████████

Dear ██████████

Thank you for your email to Minister Khanjin requesting that a comprehensive environmental assessment (EA) be required for Atura Power's proposed changes to its Portlands Energy Centre (the Project). I am responding on behalf of the minister.

Your request will be forwarded to Atura Power, and they will be directed to review it and provide any documentation or other relevant information that may assist the minister in her review.

The concerns raised in your request will be reviewed and considered by the minister, together with the Project documentation and information provided by the proponent, before deciding whether additional environmental assessment work will be required for the Project. You will be notified in writing of the minister's decision once it has been made.

I encourage you to keep the ministry updated on any further discussions you may have with Atura Power. If you have any questions or concerns, please contact Simon Zhao, Project Officer with the ministry's Environmental Assessment Branch, by email at Simon.Zhao@ontario.ca.

Thank you again for writing.

Sincerely,

Nick Colella

Nick Colella
A/Manager, Environmental Assessment Services
Environmental Assessment Branch

c: Darius Sokal, Senior Communications Advisor, Atura Power
Simon Zhao, Project Officer, Ministry of Environment, Conservation and Parks

From: TERRE <terrecoalition@gmail.com>

Sent: Monday, April 22, 2024 5:04 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: nathaniel.erskine-smith@parl.gc.ca <nathaniel.erskine-smith@parl.gc.ca>;
mmcMahon.mpp.co@liberal.ola.org <mmcMahon.mpp.co@liberal.ola.org>;
Councillor_Bradford@toronto.ca <Councillor_Bradford@toronto.ca>; transform@toronto.ca
<transform@toronto.ca>; Mayor_Chow@toronto.ca <Mayor_Chow@toronto.ca>;
councillor_fletcher@toronto.ca <councillor_fletcher@toronto.ca>; publichealth@toronto.ca
<publichealth@toronto.ca>; James.Nowlan@toronto.ca <James.Nowlan@toronto.ca>;
[REDACTED]@ [REDACTED] < [REDACTED]@ [REDACTED] customer.relations@ieso.ca <customer.relations@ieso.ca>;
[REDACTED]@ [REDACTED] < [REDACTED]@ [REDACTED] [REDACTED]@ [REDACTED] [REDACTED]
< [REDACTED]@ [REDACTED] [REDACTED] ministerenergy@ontario.ca <ministerenergy@ontario.ca>;
minister.mecp@ontario.ca <minister.mecp@ontario.ca>; EABDirector@ontario.ca
<EABDirector@ontario.ca>; sylvia.jones@ontario.ca <sylvia.jones@ontario.ca>;
julie.dabrusin@parl.gc.ca <julie.dabrusin@parl.gc.ca>; tabunsp-co@ndp.on.ca <tabunsp-
co@ndp.on.ca>

Subject: Elevation Request from TERRE

Attached is TERRE's (Toronto East Residents for Renewable Power) Elevation Request on Atura Power's project for the proposed 50 megawatt expansion of the Portlands Energy Centre.

We look forward to your response.

Sincerely,

[REDACTED] [REDACTED] - On Behalf of TERRE

Supported by:

[350.org](https://www.350.org) Toronto

Canadian Association of Physicians for the Environment - Ontario Regional Committee

Citizens Climate Lobby Toronto East Chapter

Citizens Climate Lobby Toronto Yonge Street Chapter

Climate Action for Lifelong Learners

Climate Fast

For Our Grandchildren

For Our Kids - Toronto

Grandmothers Act to Save the Planet (GASP)

Green 13

Ontario Clean Air Alliance

Ontario Climate Emergency Campaign

Parkdale-High Park 4 Climate Action

Pocket Change Project

Seniors for Climate Action Now! SCAN!

South Riverdale Community Health Centre

Toronto East End Climate Collective (TEECC)

Toronto Environmental Alliance (TEA)

Elevation Request

TERRE (Toronto East Residents for Renewable Energy) is requesting an Environmental Review of the Portland Energy Centre (PEC) expansion project. This request is being made because there are several areas of concern that are outstanding at the conclusion of Atura Power's Environmental Screening Process. These areas of concern, as detailed below, are: 1) Health, environment, and the climate crisis; 2) Inadequate public consultation; 3) Unmet regulatory requirements; and, 4) Lack of consideration of socio-economic impacts and lack of municipal support for the project. We have participated from the start in an environmental screening process that we hoped would address community concerns about health risks and GHG emissions. Now, with the release of Atura's final screening report (FSR), it seems that this was a process with a predetermined outcome.

Introduction

According to the Ministry of the Environment, Conservation, and Parks' (MECP) Guide to Environmental Assessment Process for Electricity Projects (the Guide), Atura determined that it met the criteria to undertake a Category B environmental assessment. The MECP process describes a Category B project as one that "generates 5 MW of electricity or more and has potential environmental effects that can be mitigated" and that these projects require an Environmental Screening Process or a Class EA.

There is a recognition that such a project "has potential environmental effects that can be mitigated". Unfortunately, a Category B project triggers an Environmental Screening Process which is a "proponent-driven, self-assessment process." Atura in its 'self-assessment' has dismissed any "potential environmental effects" by recasting their project as a simple equipment upgrade that is of no consequence. Numerous community residents are of a different view.

Our community has not been well served by Atura's refusal to address potential health risks from methane fuelled electricity generation. The only reason that Atura is expanding its generating capacity is to be able to produce more electricity. Whether or not the new components will lead to greater efficiency, the following fact remains: the more methane fuelled electricity the plant produces the greater the health risks on our community. A plant increasing its capacity to produce more electricity in a context of the IESO procuring more methane powered electricity means that Toronto neighbourhoods will be exposed to more contaminants such as nitrogen oxides and fine particulate matter. It also means that the air we share will be burdened by more and unnecessary greenhouse gas (GHG) emissions.

In 2024, six years out from Canada's 2030 target to reduce climate emissions by 40-45 percent, and on the heels of the most recent UN Conference of the Parties (COP) which called for transitioning away from fossil fuels and tripling renewable energy, the plan to increase methane fired electrical generation at the PEC is short-sighted and wrong-headed.

In its final report, Atura provides a summary assessment of the impact of its project. Section 5 of the FSR "...provides an overall conclusion as to whether the negative net environmental effects of the project are acceptable, based on a balanced assessment against the positive benefits." (p53) Atura concludes that there are 'no disadvantages' with its project and that there are only advantages. The FSR failed, however, to provide a balanced assessment of the project. The FSR failed to adequately address resident concerns, to consider the health risks associated with greater gas fired generation, to consider the environmental consequences of more GHG emissions, and to consider alternatives to the project. The FSR demonstrates an overall failure by Atura to engage in a serious and balanced environmental screening process.

Having participated in the screening process and after reviewing Atura's Final Screening Report, **TERRE is asking that Atura voluntarily elevate the Environmental Screening Process to a comprehensive Environmental Review.**

Failing immediate voluntary agreement by Atura to our request, we are asking the Minister of Environment, Conservation, and Parks to require Atura to proceed to the Environmental Review Stage of the Environmental Assessment Process. As required, we are submitting our request within the 30 day review period.

Areas of Concern

Our reasons for this elevation request include the following areas of concern:

1. Health, Environment, and the Climate Crisis - The Atura Portland Energy Centre is a major polluter responsible for dispersing chemical contaminants into the air and water and emitting hundreds of thousands of tonnes of GHG annually. There are ongoing environment, climate, and health concerns that were not adequately addressed in the screening report.
2. Inadequate Public Consultation - The Atura screening process failed to properly engage the public, did not respond to specific questions and requests made by local residents and citizen groups, and appeared to be more focussed on checking boxes to show that the public had opportunities for input rather than a commitment to genuine public consultation. There remains much public concern and many unanswered questions about the project that were not reflected in the FSR.
3. Unmet Regulatory Requirements - An Environment Screening Process is subject to a number of regulatory requirements as outlined in the MECP Guide and the Code of Practice Consultation in Ontario's Environmental Assessment Process. Shortcomings and omissions in the Atura screening report point to an inadequate process and a flawed result that needs to be remedied by a comprehensive Environmental Review.
4. Lack of Consideration of Socio-Economic Impacts & Lack of Municipal Support - The project poses new socio-economic impacts in a context of a revitalized waterfront. These impacts need to be addressed in a full Environmental Review.

In addition, Municipal authorities have clearly and repeatedly expressed their opposition to the project.

1. Health, Environment, And The Climate Crisis

Since 2009 PEC's gas fired turbines have been discharging hundreds of thousands of tonnes of chemical contaminants into the air and water at Toronto's east-end waterfront.

When the plant was being designed in 2003, an Environmental Review was conducted to assess the impact on the environment and the health of community residents. The 2003 Environmental Review Report, sections dealing with humans were mainly a modelling exercise. As the report notes:

“Since the proposed gas-fired operation is currently in the design stage, It is not possible to directly measure emissions from the station, their impact on the ground air concentrations or possible health outcomes in the community. Therefore, the risk assessment used various mathematical models to predict emission rates, rates of exposure and potential impacts on various human and ecological receptors considered to be representative of the community.”

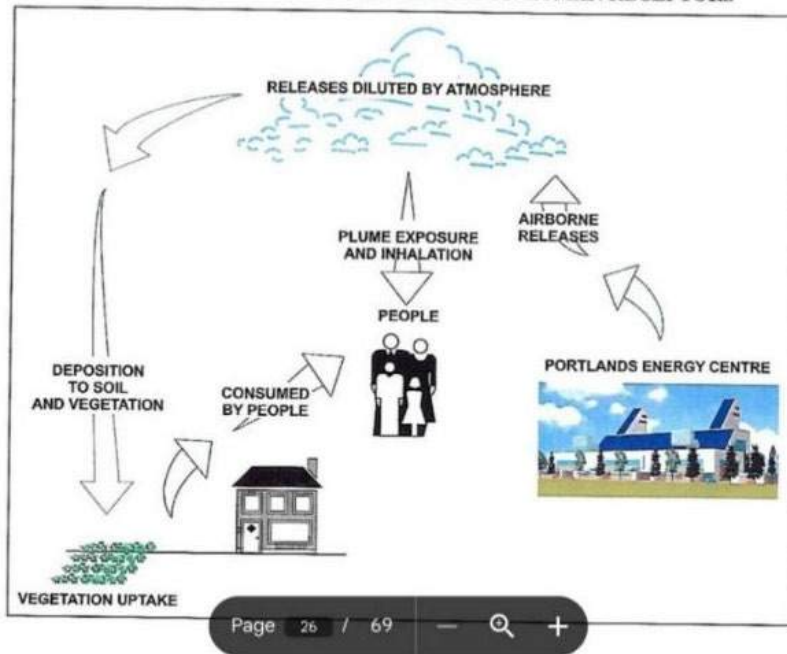
Even so, enough was known at the time about pollutants from gas fired plants to identify potential hazards. The section of the 2003 Environmental Review Report that addressed health risks provides a list of the combustion gases, volatile organic compounds, particulate matter and polycyclic aromatic hydrocarbons that would be released by the plant (see below). It is a long list of carcinogens and other chemicals of concern to local residents.

**TABLE 2.1
CHEMICALS OF CONCERN SELECTED FOR THIS ASSESSMENT**

<p align="center">Combustion Gases Carbon monoxide (CO) Nitrogen oxides (as NO₂) Sulphur dioxide (SO₂)</p> <p align="center">Volatile Organic Compounds Benzene Toluene Ethylbenzene Xylenes Propylene Propylene oxide 1,3-butadiene Formaldehyde Acetaldehyde Acrolein 1,4-dichlorobenzene n-Hexane</p>	<p align="center">Particulate Matter Suspended particulate matter (SPM) Particulate matter (PM_{2.5}, PM₁₀)</p> <p align="center">Polycyclic Aromatic Hydrocarbons Naphthalene Acenaphthylene Acenaphthene Fluorene Phenanthrene Anthracene Fluoranthrene Pyrene Benzo(a)anthracene Chrysene Benzo(b)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenzo(a,h)anthracene Benzo(g,h,i)perylene 2-methylnaphthalene</p>
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The 2003 Environmental Review Report further provides the following graphic to illustrate the potential pathways of exposure to humans.

**FIGURE 3.1
POTENTIAL PATHWAYS OF EXPOSURE FOR HUMAN RECEPTORS**



The 2003 Environmental Review Report highlighted concerns with the overall concentrations of Nitrogen Oxides and noted that fine particulate matter (PM_{2.5}) levels were high and close to regulatory limits. Even so, it concluded that, based on the emissions summary, all the toxins were below regulated guidelines. This allowed the report's authors to conclude there would be "no measurable adverse health impacts". The conclusion of "no measurable adverse health impacts" unfortunately reinforced the decision, made at the time, to forgo the installation of 'scrubbers' that could have reduced the pollutants dispersed to the air.

Just a few years earlier Toronto Public Health (TPH) expressed concern about the elevated background concentrations of NO₂ and the potential human health impacts. TPH concluded that levels of NO₂ in Toronto were associated with morbidity and mortality.

They concluded "the current levels of air pollution contribute to the 'burden of illness' in Toronto even at concentrations below existing air quality standards." They further

argued that “any proposed development in Toronto needs to be considered in the context “of an already burdened airshed.”

The 2003 PEC Environmental Review did acknowledge that “predicted concentration of combustion gases and particulate matter from the proposed PEC will incrementally add to existing air quality levels which currently add to the burden of illness in Toronto.”

There is an important difference between ‘regulatory’ limits for any particular pollutant from any individual source and the concept of ‘burden of illness’. Regulatory limits are at the intersection of health science and economic trade-offs and political pressure. That is why regulatory limits often change over time. For example, the limit for nitrogen oxides is now lower than when the plant was built. It is also why other jurisdictions have lower limits on a number of contaminants such as the WHO limits for fine particulate matter. In addition, the concept of burden of illness recognizes that human exposure is not one contaminant at a time nor at only one point in time. It recognizes multiple contaminants and concentrations over time.

In summary, there are three points to be made. First, modelling is only ever modelling. Admittedly there can be better or worse modelling approaches. But we now have years of actual emissions to replace the modelling data used in 2003. Second, carcinogens and other harmful chemicals released which are below existing air quality standards *still* contribute to the ‘burden of illness’. The third is the realization that an already burdened air-shed should not be even more burdened.

The phase out of coal fired electricity plants, completed by 2014, resulted in dramatic air quality improvements in Southern Ontario. But air quality is now deteriorating as the province ramps up more gas fired electricity plants and as the emissions from buildings and the transportation sector continue to rise. (Government of Ontario “Air Quality in Ontario 2021 Report” and TAF - The Atmospheric Fund 2021 “2019-2020 Carbon Emissions Inventory for the GTHA”) In 2024, we once again face ‘an already burdened airshed’ and we know more about what contributes to the ‘burden of illness.’

It is widely recognized that the PEC is one of the major sources of air pollution and GHG emissions in Toronto. (EnvironmentalDefence.ca, OCAA - Ontario Clean Air Alliance) It is essential that an Environmental Review be conducted to ensure that the

plant does not further worsen Toronto's already burdened air-shed and jeopardize the health of the city's residents.

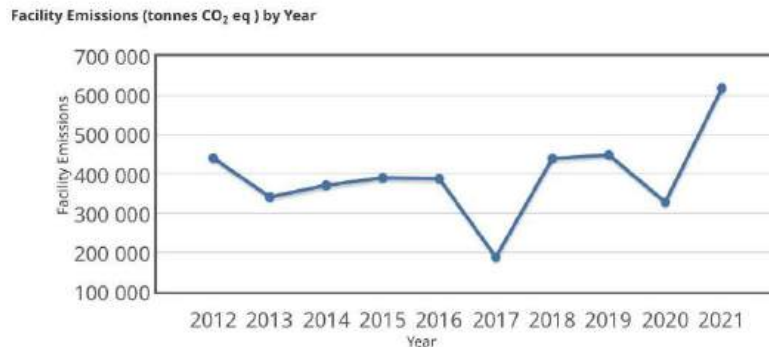
Atura's FSR is silent on these issues. The report is a compendium of documents of close to 700 pages. But despite that volume Atura's screening report comes down to three assertions repeated again and again. The first is General Electric's (the company providing the turbine technology) assurances that the changes to the turbine generators will "maintain (air) emissions levels at or below site permit levels". The second is Atura's statement that, "the facility will continue to operate in accordance with all environmental permitting requirements". And the third is that the PEC will follow the production orders given by the Independent Electricity System Operator (IESO).

Many community residents' questions about Atura's emissions, its power generating plans and the health impacts of its pollutants were effectively sidelined by the repetition of the preceding refrain rather than responded to directly. A review of the questions raised by the community and the answers provided by Atura reinforce the need for a more comprehensive Environmental Review. (see Appendix B4b of Atura's Final Screening Report)

Climate Crisis and the PEC

The IESO's procurement plans include an additional 1500 MW of electricity from expanded or new gas-fired stations across Ontario. To date, the IESO has a considerable shortfall. While the cities of Windsor and Napanee have agreed to new gas-fired plants, the cities of Thorold, Halton Hills and Loyalist Township have opposed their construction or expansion. Given this shortfall, the PEC – originally designed as a 'peaker' plant – will likely be pressed into service more often. In turn this means more health risks and more GHG emissions. Over the last five years, the plant has been run more frequently than originally planned. In 2023 it was operating an average of 14 hours a day. Last summer the plant operated most days for 21 hours a day. This is not at all consistent with its supposed role as a "peaker" plant. The graph below from Climate Change Canada shows the trajectory of GHG emissions from the PEC.

Annual Reported Emissions



In 2009 the plant produced 284,261 tonnes of GHGs. By 2021 (latest data) the plant emitted a staggering 618,211 tonnes of climate wrecking emissions. Since then, emissions have continued to rise. (Government of Canada - Greenhouse Gas Reporting Program Data Search: Facility Information)

In 2023 Toronto Public Health published “Toronto’s Population Health Profile: Insight on the Health of Our City (2023). The report notes (page 4) “Climate change presents a significant and growing health risk, despite improvements in Toronto’s natural and built environment.”

The Toronto Atmospheric Fund (TAF) in a recent study has concluded that natural gas makes up about 41% of the GTHA’s emissions. PEC alone was responsible for a 10% increase in Toronto’s emissions in 2021 (latest data). TAF’s report concludes that “we are not on track to reduce emissions in line with local or international 2030 climate commitments.” The report goes on to argue that “achieving net zero by 2050 will require phasing out virtually all natural gas from both heating and power production.” (TAF Carbon Emissions Inventory Report, 2022)

The Pembina Institute has noted that 41% or more of the reductions in emissions of greenhouse gases and smog precursors achieved through the coal phase out could be lost by ramping up gas fired plants. (Pembina Institute, From Coal to Clean, 2021)

The Ontario Clean Air Alliance (OCAA) has estimated that emissions from gas plants are set to increase dramatically from existing and new gas plants. “GHG emissions from

existing gas-fired power plants will increase by more than 300% by 2030 and by 700% by 2043.” (Phasing Out Ontario’s Gas-fired Power Plants: A Roadmap, OCAA)

PEC is the largest emitter of greenhouse gases in Toronto. It is the largest emitter of nitrogen oxides in Toronto. (environmentaldefence.ca)

In addition to the concerns listed above, TERRE has a number of related concerns:

1.a. Modelling Problems

In the 2023 Final Screening Report Atura notes that it has applied for an amended Environmental Compliance Approval (ECA) for air and noise emissions. In section 2.1 of the report, it notes “The ECA amendment application included the facility’s current Emission Summary and Dispersion modelling (ESDM) report...”

PEC’s sister station, Halton Hills, and peer stations, Goreway and St. Clair, all included an Emissions Summary and Air Dispersion Modelling in their reports related to upgrades. Halton Hills indicated this information was included because they were applying for an amendment to their ECA. The PEC report also indicated they are applying for an amendment to their ECA and yet the Emissions Summary and Air Dispersion Modelling were not included in the PEC report. Excluding these items from the screening report is a serious omission, based on the following:

- Significant changes have been made to MECP’s Air Dispersion Modelling requirements since PEC’s 2003 ER report. Without the modelling study, there is no way of knowing how close the recent modelling is to current requirements or whether or not Atura used appropriate parameters in their most recent air dispersion modelling.
- We further do not know if Atura used recent meteorological data in their most recent air dispersion modelling. The 2003 Environmental Review report indicated that ground observations from Toronto Island Airport and atmospheric observations from Buffalo were used. Both sets of observations were said to be from 1996 to 2000. What current meteorological data for Toronto did Atura use?

Did it account for the changes in weather patterns and events such as heat domes, atmospheric rivers, arctic vortex and derechos?

- Similarly, we do not know if Atura used a worst-case scenario in the meteorological data. Did the current modelling account for a prolonged temperature inversion during hot, windless weather, or a period of smoke from wildfires or even high concentrations of pollen in the air? All of these put an additional load on the air we breathe.

1.b. No Risk Assessment From The Point Of View Of The General Public

Atura held a virtual public meeting on October 5, 2023. The public comments made at that meeting together with the concerns raised in follow-up questions demonstrate a high level of public concern about the potential risk to health and the climate consequences of its GHG emissions. Atura failed to address these issues, preferring instead to conclude repeatedly that PEC operates within regulated requirements. This has not alleviated public concerns.

Environmental Assessments are done to protect the health and safety of humans, not to show that a proponent is within regulated limits. An adequate assessment would have addressed those risks and made an effort to mitigate them. While Atura has offered millions of dollars in inducements to municipalities to approve gas plant projects, they have failed to spend the requisite money to provide evidence that their operations are not only within regulated limits but warrant a social licence to continue operation.

The PEC expansion is in response to the IESO's request for additional gas-fired electricity production. As part of the same procurement process the Goreway Power Station and the St. Clair Energy Station were contracted to expand operations. The Goreway Power Station assessment flags GHG emissions as one of the reasons for raising the review to an ER. The St. Clair Energy Station raised their assessment to an Environment Review because some emissions were close to the limit. Given that PEC has been identified as having the highest GHG emissions in Toronto (with an

expectation that they will increase even more) and given what we know about high levels of nitrogen oxides and particulate matter, it is only prudent to upgrade Atura's screening process to an Environmental Review.

1.c. Atura Did Not Adequately Complete The Screening Criteria On Air And Noise

In the 2023 screening report Atura identified screening criteria that were used to identify potential negative effects of the project. In section 3.2 of the report Atura concludes that "there will be no potential for negative effects associated with the screening criteria..." We know that the Atura plant has impacts on air quality, on the volume of GHG and on issues of public health, as indicated above. Atura's assertion that there is no potential for negative effects is clearly problematic.

The Portlands Energy Centre 2003 Environmental Review report indicates (amongst others) impacts to Air Quality, Greenhouse Gases and Public Health and Safety. Those impacts are still present and are compounded by changes in weather patterns and hours of operation of the plant.

A recent report from The Atmospheric Fund on air quality in the GTHA indicates: "Emissions associated with electricity generation are a growing concern, rising by an alarming 26% in 2022 largely due to the increasing use of natural gas plants". PEC is the largest gas electrical plant in Toronto. Atura admits that the plant operated, on average, for 14 hours a day in 2023 and we expect that it will operate more hours as Ontario's nuclear power plants are refurbished.

The FSR is silent on a number of air quality concerns. For example, it does not explain that, while PEC emissions fall within permitted levels, the cumulative emissions make PEC the largest source of GHG in Toronto. It also does not explain that the pollutants listed do not include those from other sources in the area or that emissions combine in reactions to form other pollutants such as ozone.

2. Inadequate Public Consultation

There is a high level of public concern about the Atura screening process and proposed expansion. Local environmental and health groups oppose the proposed PEC project. About 150 people sent individual letters opposing the PEC project. The TERRE letter opposing the project was signed by 17 other groups representing thousands of members. Posts on local social media oppose the proposed PEC project. CBC Radio, Radio Canada, CTV, CITY-TV Toronto, Global News, CBC News, Toronto Star and Beach Metro have covered the proposed PEC project and the local opposition to it. In fact, TERRE is not aware of any local groups that have expressed support for the proposed PEC project.

Atura has a regulatory responsibility to invite, address and resolve issues that arise from public concerns. In the Screening Report FAQ section, Atura indicates "Public and Indigenous engagement describes the continuous, two-way communication of project information and feedback between the proponent (Atura Power) and members of the public and Indigenous communities." This was not the case. The only continuous communication was the availability of the project website and the ability to receive email.

In its final screening report Atura notes: "The goal of the PEC upgrades engagement program is to facilitate information sharing and provide an opportunity for concerns and issues to be raised and responded to as part of the Environmental Screening Process" (p.33) They have failed to meet these goals.

The FSR documents the high level of public concern with the project. For example, it indicates that "Atura Power received approximately 200 questions and/or comments during the virtual public meeting and approximately 280 emails via the project email address between September 6, 2023 and March 8, 2024..."(p.36) While Atura did respond to the questions and comments, they did so in the most perfunctory way possible. A review of those questions and answers confirms a clear pattern in Atura's responses: avoid, evade, mislead and redirect.

For example, in Appendix B4b page 150 of the FSR a resident, obviously concerned about the emissions from the plant, wrote and asked, in part, the following: “Could you please provide me with the following data about the portlands generating Station for each year from 2017 to 2022 inclusive: Total GHG emissions; Total nitrogen oxides emissions; Total fine particulate emissions (PM 2.5).” The response from Atura was revealing: “Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the Canadian Environmental Protection Act (CEPA). Reviewed 2021 NPRI data and preliminary 2022 NPRI data is currently available through the NPRI data search.” (p.125) Although the company has that information and could have supplied it quite readily, it chose instead to tell the local resident, in so many words, to “ go find it yourself.” This does not demonstrate a supposed commitment to information sharing with members of the public.

Another question from a resident concerned the hours of operation of the plant.. A local resident asked this: “I’ve lived in Leslieville since 1997. We were promised limited use of the plant as back-up power only---now it is operating 21 hours a day. After the upgrade will PEC be operating for more hours?” Once again PEC knows how many hours every year the plant has been operating. It knows if there has been a trajectory of more operating hours over time or fewer operating hours. Instead of providing a reasonable response to the concern and question here is how Atura responded: “PEC operations are dictated by the IESO based on supply and demand balance, which fluctuates season by season and year to year. Historically the plant has operated between 1750 and 4500 hours, always at the direction of the IESO.” (p.129)

2.a. Atura Failed To Meet The Requirements Of Public Consultation

The MECP Guide indicates that the public consultation should “document how public input is taken into account in the screening process and in the project planning and development.” The 2024 Screening report lists the public input but does not say how the input impacted the screening process, project planning or development.

The MECP Guide also indicates that the public consultation should “identify public issues and concerns” and “address public issues and concerns”. In the FSR, Atura does provide brief responses to issues and concerns submitted. But rather than answering questions as specific inquiries the responses were grouped into broad ‘themes’ with a generalised answer offered to cover multiple questions. Many of the questions concerned the health risks associated with the operations of the PEC.

The MECP Guide indicates “A Screening Report shall include the following information: ... information on public, Indigenous and agency consultation, including ... a summary of concerns or issues raised, and how they have been resolved or addressed.” Atura has not resolved or addressed the major concerns raised by the public about the project.

2.b. Atura Failed To Facilitate Communication With The IESO To Answer Questions

In the draft Screening Report, Atura repeatedly refers questions asked by the public to the IESO. While some of the questions might be better addressed by the IESO, Atura made no effort to request the IESO to respond or facilitate sharing of information with the public from the IESO. However, for other questions, it seems that the IESO became a convenient way for Atura to avoid providing answers. These include: an evaluation of alternatives to the expansion project and PEC more generally; the amount of electricity to be generated and the hours of operation; how electricity from PEC will be replaced when it is shut-down; and, why Atura is of the view that municipal support is not required for PEC. It seems that the IESO became a convenient way for Atura to avoid providing answers. Even though it was Atura’s own screening process, it seems there was no obligation on Atura’s part to ensure that the answers to questions from the public were forthcoming. Instead Atura simply shifted responsibility to the IESO.

3. Unmet Regulatory Requirements

In the previous sections we have identified a number of shortcomings and omissions that characterize Atura's screening process. An Environmental Screening Process is subject to a number of regulatory requirements as outlined in the MECP Guide and the Code of Practice Consultation in Ontario's Environmental Assessment Process.

In the course of TERRE's research, ongoing requests for information, and numerous written questions we have concluded that the Atura screening process is too limited in concept and execution and suffers from a number of flaws. Shortcomings and omissions in the Atura FSR point to an inadequate process and a flawed result that needs to be remedied by a comprehensive Environmental Review.

3.a. Atura Did Not Complete Sections Of The Screening Report On Operation And Decommissioning Of The Facility As Required In The Guide

MECP's Guide indicates in Section B.2.2 (Conducting a Screening) that ; "In describing the project, proponents must include all phases and components of the project, including construction, operation, and retirement of the project." The Screening report excludes discussion of the operation and retirement of the project. For comparison purposes both Capitol Power Corporation's Goreway Power Station and Invenergy's St. Clair Energy Centre include sections on Operations and Decommissioning.

3.b. Atura Did Not Adequately Complete The Sections On MECP's Areas Of Interest

As part of the environmental screening process, MECP asked that Atura address their 'Areas of Interest'. One of those refers to 'Climate Change'. It asks proponents to "Include a discrete section in the report detailing how climate change was considered in the EA" and "How climate change is considered can be qualitative or quantitative in nature and should be scaled to the project's level of environmental effect. In all

instances, both a project's impacts on climate change (mitigation) and impacts of climate change on a project (adaptation) should be considered”.

Atura's only sentence related to climate change is as follows: “The greenhouse gas intensity (i.e., the ratio of CO2 equivalent emissions to total electricity generation) of the facility is also expected to reduce by 2%.” It is our view that this considers neither the impacts on climate change (mitigation) or impacts of climate change on the project (adaptation) as required by the Ministry. It is important to note that a reduction in greenhouse gas *intensity* does not necessarily imply a reduction in total greenhouse gas emissions.

Any prospects of mitigation, adaptation and future emissions are ignored by Atura, once again, saying they respond to IESO's request for additional power. A more accurate and prudent response would be to report what the emissions will be when the plant is operating at full capacity (which in the current situation seems a reasonable assumption).

MECP's “Areas of Interest” asks whether or not the applicant has reviewed issues of climate change, greenhouse gas emissions, and what alternative solutions were considered. Atura responded that alternatives were not considered nor were they required as part of the screening process.

Residents asked about the alternatives to increasing gas fired electrical generation. Atura's responses to those concerns and questions was at best inadequate and more generally misleading. Here is a typical response (p 135) that is repeated throughout the report: “It is not uncommon to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system”

The ‘wind doesn't blow and the sun doesn't shine’ is a response more appropriate for a decade ago. That it's commitment to fossil fuels blinds Atura to the developments in renewable power and storage technologies is worrying. More problematic is its claims

that generating electricity by burning methane is part of a decarbonizing strategy. In a response to a Global News reporter, Atura provided the following: “Natural gas generation plays a critical role, providing system reliability, and **acting as an enabler of renewable generation.**” (p. 623) (emphasis added).

TERRE strongly believes that alternatives should have been considered as part of the Environmental Screening process. According to the IESO’s Pathways to Decarbonization report (2022) in the “Assessing a Pathway to Decarbonized Future” scenario, the plant is expected to be phased out by 2035. The plant’s contract ends in 2034. TERRE does not support the proposed expansion of the plant and that it should be retired as a peaker plant by 2030; in the interim period, renewable energy alternatives including wind and solar should be brought online. The question remains: do we need to expose our community to thousands of tonnes of pollutants when there are more cost-effective and proven alternative sources of electricity to power our homes and city? In the last few years, the evidence for alternatives has steadily increased:

- The Ontario Electricity Distributors Association in their Power of Local Conservation report (October, 2022) indicates that energy conservation and demand management (CDM) is the most cost-effective mitigation solution. Further, it states "In our estimation, by 2026, the proposed solution will eliminate 94% of the energy supply shortfall identified in the IESO’s 2021 Annual Planning Outlook. By 2032, the energy supply gap will be eliminated, and the peak energy shortfall will be reduced by 55%"
- The Pembina Institute and Rocky Mountain Institute have concluded that solar and wind combined with energy storage and demand side management can largely provide the same service as gas and more cost-effectively. (Reliable, affordable: The economic case for scaling up clean energy portfolios, Pembina Institute, 2019)
- The University of Victoria and Power Advisory (for the Atmospheric Fund) found that the Ontario grid can remain “reliable absent the expansion of gas capacity”.

- The Clean Energy Canada report showed that “pairing four-and eight-hour batteries with solar and wind assets can provide better levelized costs than new gas assets.”
- The Ontario Clean Air Alliance (OCAA) has argued that purchasing electricity from Quebec and investments in renewables combined with conservation and efficiency measures can offset the need for additional gas-fired electricity.
- Environmental Defence has argued that renewables combined with battery storage can reduce and eliminate our gas dependency.
- Toronto City Council has voted to “request the Province of Ontario to immediately invest in programs to deliver energy efficiency, demand management and conservation to meet the capacity and energy needs that would have been fulfilled by expansion of electricity production through burning of fossil fuels.” (p479 FSR)

The City of Toronto in correspondence with Atura has made it clear that alternatives need be on the agenda: “Achieving Toronto’s goal of net-zero GHG emissions community-wide by 2040, as outlined in the TransformTO Net Zero Strategy, among North America’s most ambitious climate plans, requires transitioning buildings and transportation from fossil fuels to clean electricity. A critical step for success is developing a resilient, carbon-free, affordable electricity supply in Ontario and increasing local renewable electricity generation, rather than increasing electricity generation from fossil fuels.” (p479 FSR)

Atura’s screening process completely ignored these and other alternatives. That alternatives are not being explored suggests that an evidence-based planning process has been replaced with one shaped by political directives. This serves to reinforce the need for a full Environmental Review.

3.c. Atura Side Steps Requirements To Report On Air Quality Impacts

The MCEP's Areas of Interest on Air Quality, Dust and Noise indicate; "If a quantitative Air Quality Impact Assessment is not required for the project, the MECP expects that the report contain a qualitative assessment which includes:

- A discussion of local air quality including existing activities/sources that significantly impact local air quality and how the project may impact existing conditions;
- A discussion of the nearby sensitive receptors and the project's potential air quality impacts on present and future sensitive receptors;
- A discussion of local air quality impacts that could arise from this project during both construction and operation; and
- A discussion of potential mitigation measures."

Atura's response in the report is to simply assert: "The facility will continue to operate within all environmental permitting requirements." This clearly does not meet MECP requirements and indicates that these important issues have not been considered.

3.d. Atura Again Side Steps Health Impacts

One of the questions that was posed in the public input session related to the lifetime emission totals from PEC. PEC did not answer the question. Again, for comparison purposes, the same question was answered in the Environmental Review report for the Goreway Power Station. Toronto residents should be able to access the same information. Residents who share the air shed with PEC would like to know how much longer PEC will be around, the quantity of pollutants they will face and what the plans are to replace PEC at the earliest possible opportunity.

4. Lack of Socio-Economic Impacts & Municipal Support

4.a. Socio-Economic Impacts

One screening criteria Atura was required to consider was the socio-economic impact of the expansion. Atura was supposed to investigate and assess whether the plant expansion would: “6.1 Have negative effects on neighbourhood or community character? 6.2 Have negative effects on local businesses, institutions or public facilities? 6.8 Cause public concerns related to public health and safety?”

Atura claims that the expansion is of no consequence to the local neighbourhood, local businesses and public facilities, and local public health and safety. But there is growing evidence to the contrary. U.S. Studies that have focused on long-term downwind health impacts of gas power plants show that impacts can be more severe in the 3 and 5 mile bands from the facilities. They also conclude that property values are lower in areas with gas power plants. It is TERRE’s contention that Atura did not do the requisite assessment to determine the socioeconomic impact of the expansion.

The expansion, whether or not it occurs within the current footprint, changes the nature of the plant. It is that change, rather than the specific aspects of turbine technology, that is consequential. The context for the 50 MW expansion and the need for the IESO to bring more gas-fired electrical generation on line provides evidence that the PEC will, in all likelihood, produce more power, operate for longer daily periods and operate on more days of the year. It will do so in an urban context that has dramatically changed since the plant was first commissioned.

The company contracted to prepare the screening report on Atura’s behalf indicates they specialise in socio-economics. And yet no description is provided in the screening report of the process or the details of its socio-economic assessment. The federal government has a 44-page guide to “Health, Social and Economical Effects under the Impact Assessment Act” (no guide for Ontario was found). Energy sector environmental consulting company, Golder Associates Ltd, has a 62 page “Good Practice in Social Impact Assessment”. The UN Environmental Program has a 61 page “Guidelines and

Checklists to Review Environmental and Social Impact Assessments”. Other guides were found.

The Atura screening process is silent on its socio-economic impact analysis. It has simply concluded that since the work will take place in lands that are built up and industrialized, there will be no effect on neighbourhoods and businesses. It does not consider that air pollution can cause respiratory diseases which impact residents resulting in illness, loss of income, additional expenses, family hardship, employer loss of productivity and burden on the healthcare system. Furthermore, it does not consider that prospective businesses and residents may think twice about moving into an area billed as Toronto’s largest source of air pollution.

Toronto’s waterfront is undergoing major renewal and revitalization. When the plant was being proposed its location was an underutilized and industrial landscape. That is changing quite dramatically. Even Atura’s screening report recognizes some of those developments. The report notes the project is on lands designated as a ‘regeneration area’ and in need of revitalization. According to city plans, the project is in an area that will see new waterfront transit, a Natural Heritage Corridor, open space and urban development. In a letter to Atura, the City of Toronto stressed: “PEC is located in the Port Lands which are currently under development, and near the heart of the City of Toronto that has a population of over three million people. As such, any change in emissions from the facility will occur near a densely populated area. In recent years, PEC’s operating hours have increased significantly beyond what was anticipated when the facility was proposed as a peaking plant.” (p 489 FSR)

Atura also has evidence from its 2003 screening report that its emissions are a concern if neighbouring buildings were to be in excess of 10 stories. The 2003 report notes that such buildings should not have opening windows or air intakes because of the risk from contaminants.

4.b. Municipal Support

As a local citizen group, TERRE is concerned and disappointed in the political sleights of hand that are complicating what should be an evidence-based inquiry. The IESO, in its Request for Proposals which was issued on September 29, 2023, reminds applicants of “the essential role that effective engagement with local communities, including Municipalities, may play in successfully achieving all of the lifecycle phases of the project.” In a section entitled ‘Municipal Support Confirmation’ it lays out a timeframe for achieving such confirmation. The Minister of Energy reinforced the need for municipal confirmation: “To support these procurements, we have empowered local communities for new facilities or expansions to existing facilities require the consent of municipalities that would host them “. ((Sessional Paper No. 133) (Tabled by MPP McMahon, Mary-Margaret (Beaches-East York), 09/28/2023)

The City of Toronto voted on May 10, 2023 and June 14, 2023 against expanding PEC. Rather than respect the city’s right to approve or disapprove of the expansion, the Minister tried to change what had been a very clear directive. In the same order paper question by MPP McMahon the Minister of Energy stated: “The Independent Electricity System Operator also announced efficiency upgrades at some existing facilities including Portlands Energy Centre. These component replacements and tune-ups will ensure those plants operate more efficiently, reducing emissions per megawatt of electricity produced. Consistent with my direction that new facilities or expansions require a supportive municipal council resolution, these efficiency upgrades do not allow for any new construction. All upgrades will take place within the existing facility and there will be no changes or expansion beyond the existing Portlands Energy Centre footprint.”

It is unfortunate that the Minister is trying to change the rules by redefining an expansion as an upgrade and suggesting that different rules apply. The entire Atura screening process rests behind that sleight of hand. At the same time, the Minister did not explicitly exempt “component replacements” from requiring municipal support.

The original Environmental Review is 20 years out of date and the current screening report is little more than preserving a business-as-usual attitude in a rapidly changing world. The climate has changed, Toronto's waterfront has changed, the level of toxins from the plant have changed, the GHG emissions have changed, our understanding of health risks has changed. All of which suggests that a self-assessed screening assessment is not the right process for shaping the next ten years of energy production. Instead, we need a comprehensive Environmental Review.

Closing

In closing, we request that Atura Energy:

- (a) Voluntarily elevate the Environmental Assessment from a Screening Assessment to an Environment Review Assessment.
- (b) Correct the errors and omissions identified in the preceding paragraphs; complete the sections on MECP's Areas of Interest; and conduct and document the analysis and mitigation on socio-economic screening criteria.
- (c) Provide updated responses that directly answer questions posed by the public.
- (d) Include the most recent EDSM (Emissions Summary and Air Dispersion Modeling) report in the ER.
- (e) Address public concerns about the potential risk to health and the climate consequences of PEC's emissions.
- (f) Include a discussion on how the screening criteria on Air and Noise were arrived at.
- (g) Include a discussion of how public (and other stakeholder) input was considered, and how it modified the planning and development of the project.
- (h) Obtain answers from the IESO on questions which referenced them, and include the answers in the Environmental Review report.
- (i) Complete the section dealing with Operation and Decommissioning of the facility.
- (j) Include a section answering MECP's Areas of Interest dealing with Climate Change - including a discussion of alternatives considered.

(k) Include a discussion on how answers to Socio-Economic questions 6.1, 6.2 and 6.8 were arrived at, look at mitigation actions and update the answers to these questions to “Yes.”

[REDACTED]

From: Mayor Chow <Mayor_Chow@toronto.ca>
Sent: April 23, 2024 1:51 PM
To: 'TERRE'; portlandsupgrade@aturapower.com
Cc: nathaniel.erskine-smith@parl.gc.ca; mmcmahon.mpp.co@liberal.ola.org; Councillor Bradford; Transform; Councillor Fletcher; Public Health; James Nowlan; [REDACTED]; customer.relations@ieso.ca; [REDACTED]; [REDACTED]; Energy, Minister (ENERGY); Minister, MECP (MECP); EAB Director (MECP); Jones, Sylvia (MOH); julie.dabrusin@parl.gc.ca; tabunsp-co@ndp.on.ca
Subject: RE: Elevation Request from TERRE

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good afternoon [REDACTED],

Thank you for your email and sharing this letter. At the April 17 meeting of City Council, Councillor Paula Fletcher brought forward a Member Motion to request the Minister of Environment, Conservation and Parks elevate Altura Power's proposal to a comprehensive environmental assessment. Mayor Chow joined the vast majority of her colleagues in supporting this motion, which passed 23-1.

You can see the motion here: [Agenda Item History - 2024.MM17.9 \(toronto.ca\)](#)

Warm regards,

[REDACTED]

[REDACTED]

Constituent Affairs and Outreach - Office of Mayor Olivia Chow



Our office is committed to accountability and transparency. If you are requesting a meeting with the Mayor or a member of the Mayor's staff on behalf of a for-profit group or enterprise or a group that represents for-profit enterprises, you need to confirm that you are in compliance with the Lobbyists' Code of Conduct. Please contact the Office of the Lobbyist Registrar by phone at 416-338-5858 or by email at lobbyistregistrar@toronto.ca

From: TERRE <terrecoalition@gmail.com>
Sent: April 24, 2024 1:00 PM
To: Minister, MECP (MECP); EAB Director (MECP)
Cc: portlandsupgrade@aturapower.com; nathaniel.erskine-smith@parl.gc.ca; mcmahon.mpp.co@liberal.ola.org; Councillor_Bradford@toronto.ca; transform@toronto.ca; Mayor_Chow@toronto.ca; councillor_fletcher@toronto.ca; publichealth@toronto.ca; James.Nowlan@toronto.ca; [REDACTED]; customer.relations@ieso.ca; [REDACTED]; [REDACTED]; Energy, Minister (ENERGY); Jones, Sylvia (MOH); julie.dabrusin@parl.gc.ca; tabunsp-co@ndp.on.ca
Subject: TERRE Elevation Request for Atura Energy Portlands Upgrade Project
Attachments: MECP Environmental Review Request Final.pdf; Correspondence with Atura.zip; Elevation Request Criteria List - TERRE.pdf

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

By email: EABDirector@ontario.ca and minister.mecp@ontario.ca

Ministry of Environment, Conservation, and Parks

April 24, 2024

Dear Minister Khanjin and Director O'Neill,

TERRE (Toronto East Residents for Renewable Energy), along with numerous groups listed below, is writing to request that the Environmental Screening process for the Portlands Energy Centre Efficiency Upgrades project be elevated to a comprehensive Environmental Review.

TERRE has actively participated from the start of the environmental screening process and has raised significant environmental and related concerns. TERRE had hoped that Atura would address community concerns about health risks, socio-economic impacts, and greenhouse gas emissions in its screening process. These concerns have not been adequately addressed in the March 2024 Portlands Energy Centre Efficiency Upgrades Screening Report.

In the attached submission we have provided detailed comments on several areas of concern that are outstanding, including:

- 1) The necessity of a comprehensive and up-to-date assessment of the health and environmental impacts of these projects, particularly in the context of local and global climate change;
- 2) Inadequate public consultation that failed to adequately address concerns of local residents and representative groups;
- 3) Unmet regulatory requirements; and,
- 4) Lack of consideration of socio-economic impacts and lack of municipal support for the project.

This submission is being made within the 30 calendar day review period for the environmental screening report. On April 22, 2024 we requested that Atura voluntarily elevate the screening process to an Environmental Review. We have not received any correspondence from Atura regarding our elevation request and we are therefore submitting this request to your office for consideration. Please also find attached the elevation criteria list for our request as well as a file of all of our correspondence with Atura Power, as required by the MECP Guide to Environmental Assessment Requirements for Electricity Projects.

We look forward to your timely response to our submission.

Sincerely,

██████████ - On Behalf of TERRE

Supported by:

Toronto350

Canadian Association of Physicians for the Environment - Ontario Regional Committee

Citizens Climate Lobby Toronto East Chapter

Citizens Climate Lobby Toronto West Chapter

Citizens Climate Lobby Toronto Yonge Street Chapter

Climate Action for Lifelong Learners

Climate Fast

For Our Grandchildren

For Our Kids - Toronto

Grandmothers Act to Save the Planet (GASP)

Green 13

Ontario Clean Air Alliance

Ontario Climate Emergency Campaign

Parkdale-High Park 4 Climate Action

Pocket Change Project

Seniors for Climate Action Now! SCAN!

South Riverdale Community Health Centre

Toronto East End Climate Collective (TEECC)

Toronto Environmental Alliance (TEA)

Cc:

Atura Power

Beaches East York MP Nathaniel Erskine-Smith

Beaches-East York MPP Mary-Margaret McMahon

City of Toronto - Beaches East York Councillor Brad Bradford

City of Toronto - Chairs of Transform T.O. Climate Advisory Group - Lyn Adamson &

Maggie Chang

City of Toronto - Mayor Olivia Chow

City of Toronto - Toronto Danforth Councillor Paula Fletcher

City of Toronto - Toronto Public Health - Chief Medical Officer - Dr. Eileen de Villa

City of Toronto - Executive Director, Environment & Climate Division - James Nowlan

Haudenosaunee Development Institute

IESO - President and CEO - Lesley Gallinger

Metis Nation of Ontario

Mississaugas of the Credit First Nation

Province of Ontario - Energy Minister Todd Smith
Province of Ontario - Health Minister Sylvia Jones
Toronto Danforth MP Julie Dabrusin
Toronto Danforth MPP Peter Tabuns

**Elevation Request Criteria List
from Toronto East Residents for Renewable Energy (TERRE)
Submitted to the MECP on April 24, 2024**

Project Name and Proponent:

Project Name: Portlands Energy Centre Efficiency Upgrade
Proponent: Atura Power

Basis of Request:

During the review period of the draft screening report we twice requested that Atura alter their report. In both cases, the responses we received were less than satisfactory. In the final screening report, we saw that Atura did not modify their response to address our issues. During the review period of the final screening report we asked Atura to voluntarily raise their Environmental Assessment to an Environmental Review to address the issues we identified.

Request to Elevate Level:

TERRE is requesting an elevation to an Environmental Review.

Specific Nature Of The Environmental Concerns On Which The Request Is Based:

See attached TERRE submission documenting the environmental concerns.

The Benefits Of Requiring The Proponent To Undertake An Environmental Review:

- Conformance with MECP Guide to Environmental Assessments for Electricity Projects requirements
- Completion and full answers to MECP's Areas of Interest
- Addressing community concerns on health/safety and climate change including possible mitigation
- Factual and direct responses to questions posed by the community
- Community understanding of how risk assessment was done for screening criteria

Information About Any Efforts To Discuss/Resolve These Concerns/Environmental Effects With The Proponent:

TERRE sent a note to Atura outlining our concerns on the PEC Draft Screening report

on January 5, 2024. On January 26, 2024 Atura responded to TERRE's note. On February 23, 2024 TERRE indicated their dissatisfaction with Atura's response. Atura again responded on February 29, 2024. On April 22, 2024 TERRE requested that Atura voluntarily raise their EA to an Environmental Review.

Details Of Any Correspondence Between The Party And The Proponent:

See attached Zip file of correspondence between TERRE and Atura

Any Other Matters Considered Relevant By The Requesting Party

None at this time.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Saturday, April 27, 2024 1:53 PM

To: TERRE <terrecoalition@gmail.com>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Elevation Request from TERRE

Good morning, [REDACTED] [REDACTED]

Thank you for sharing TERRE's elevation request on April 22, 2024, and comments about our Portlands Energy Centre (PEC) Efficiency Upgrades project.

Atura Power's responses to TERRE's comments/questions are in the attached PDF.

We hope that you find our responses satisfactory and encourage you to visit the project webpage at aturapower.com/portlandsupgrade for updates.

Best regards,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

Atura Power

April 27, 2024

Dear Toronto East Residents for Renewable Energy (TERRE),

Re: Elevation Request from TERRE

Thank you for sharing your recent elevation request on April 22, 2024, and your comments about our Portlands Energy Centre (PEC) Efficiency Upgrades project.

Before we respond to each of your comments below, we would like to repeat an important clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.

Atura Power's responses to your comments/questions are in the table below:

Comment Number (#)	TERRE Comment	Atura Power's Response
(#1, page 3)	<p>Health, Environment, and the Climate Crisis –</p> <p>The Atura Portland Energy Centre is a major polluter responsible for dispersing chemical contaminants into the air and water and emitting hundreds of thousands of tonnes of GHG annually. There are ongoing environment, climate, and health concerns that were not adequately addressed in the screening report.</p>	<p>Your comments are noted. As mentioned in previous correspondence, the assessment process requires Atura Power to perform an Environmental Screening Process to identify whether any potential environmental effects <i>of the project</i> would occur. The existing PEC facility went through an Environmental Assessment in 2003 and is therefore not the subject of the Screening Report. As such, the scope of this assessment is limited to understanding and identifying any effects <i>of the proposed efficiency upgrades</i>. As noted in Section 3 of the Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the project and that, without any mitigation, all regulatory requirements will be met.</p>
(#2, page 3)	<p>Inadequate Public Consultation –</p> <p>The Atura screening process failed to properly engage the public, did not respond to specific questions and requests made by local residents and citizen groups, and appeared to be more focussed on checking boxes to show that the public had opportunities for input rather than a commitment to genuine public consultation. There remains much public concern and many unanswered questions about the project that were not reflected in the FSR.</p>	<p>Your comments are noted. We encourage you to review Section 4 of the Screening Report as well as Appendices B and C, which demonstrate Atura Power's efforts related to engaging Indigenous communities, agencies, municipal staff and elected officials, and members of the public throughout the Environmental Screening Process. Our engagement approach, methods, and records of communication exceed the engagement requirements of the Environmental Screening Process for a project of this scope and scale.</p>
(#3, page 3)	<p>Unmet Regulatory Requirements –</p> <p>An Environment Screening Process is subject to a number of regulatory requirements as outlined in the MECP Guide and the Code of Practice Consultation in Ontario's Environmental Assessment Process. Shortcomings and omissions in the Atura screening report point to an inadequate process and a flawed result that needs to be remedied by a comprehensive Environmental Review.</p>	<p>The PEC Efficiency Upgrades project is subject to the Environmental Screening Process according to Ontario Regulation 50/24 and the associated Guide to Environmental Assessment Requirements for Electricity Projects (the 'Guide'). Atura Power undertook the Environmental Screening Process according to the requirements in Ontario Regulation 50/24 and the associated Guide.</p>

Comment Number (#)	TERRE Comment	Atura Power's Response
(#4, page 3-4)	<p>Lack of Consideration of Socio-Economic Impacts & Lack of Municipal Support –</p> <p>The project poses new socio-economic impacts in a context of a revitalized waterfront. These impacts need to be addressed in a full Environmental Review. In addition, Municipal authorities have clearly and repeatedly expressed their opposition to the project.</p>	<p>Please see response to comment #1 above. In addition, we would like to note that neither the IESO's Expedited Long-Term Request for Proposal (E-LT1-RFP) process nor the Environmental Screening Process the PEC Efficiency Upgrades project is subject to require municipal approval to proceed.</p>
(A, page 24)	<p>Closing</p> <p>In closing, we request that Atura Power:</p> <p>Voluntarily elevate the Environmental Assessment from a Screening Assessment to an Environmental Review Assessment.</p>	<p>Atura Power will not be voluntarily elevating the project to an Environmental Review.</p> <p>The scope and scale of the assessment are limited to the efficiency upgrades of the existing facility. The Environmental Screening Process found that all Screening Criteria scored 'No' as a result of the PEC Efficiency Upgrades project and, without any mitigation, all regulatory requirements will be met. Activities to complete the upgrades will occur within the existing facility; the process will improve operational efficiency, improve grid resiliency in Ontario, and bring economic benefits to the area through procurement of local labour and materials; and the facility will continue to operate within all environmental permitting requirements.</p> <p>Additionally, there are no outstanding concerns/comments from regulatory agencies about how Atura Power undertook the Environmental Screening Process or the results of the Environmental Screening Process at this time.</p>
(B, page 24)	<p>Correct the errors and omissions identified in the preceding paragraphs, complete the sections on MECP's Areas of Interest; and conduct and document the analysis and mitigation on socio-economic screening criteria.</p>	<p>Atura Power completed the Screening Report according to Ontario Regulation 50/24 and the associated Guide. The Ministry of the Environment, Conservation and Parks is aware of the scope and assessment process that Atura Power undertook for the project and have no outstanding comments or concerns on these sections, to date.</p>
(C, page 24)	<p>Provide updated responses that directly answer questions posed by the public.</p>	<p>Atura Power has made every effort to respond to all comments and questions received from all parties throughout the duration of the project. Please refer to Section 4 of the Screening Report and Appendices B and C for details.</p>
(D, page 24)	<p>Include the most recent EDSM (Emissions Summary and Air Dispersion Modeling) report in the ER.</p>	<p>Per Section 27 of Ontario Regulation 419/05 and as referenced in Section 2.4 of Guideline A-10 (https://www.ontario.ca/document/guideline-10-procedure-preparing-emission-summary-anddispersion-modelling-esdm-report#foot-1), Atura Power is required to provide the most up-to-date executive summary of the ESDM report to any person, without charge, within 15 days after the person requests it. Atura Power will continue to uphold this requirement to any individual who requests a copy of the Executive Summary of the most recent ESDM report for PEC.</p>

Comment Number (#)	TERRE Comment	Atura Power's Response
(E, page 24)	Address public concerns about the potential risk to health and the climate consequences of PEC's emissions.	Please see response to comment #1 above.
(F, page 24)	Include a discussion on how the screening criteria on Air and Noise were arrived at.	<p>As stated in Section 3.3 of the final Screening Report, "The Guide states that, in cases where there is uncertainty about the project's potential for negative effects pertaining to a select criterion within any of the nine categories, further studies may be undertaken to accurately identify and understand the potential for effects". For the PEC Efficiency Upgrades project, there was no uncertainty associated in determining the potential for effects on air quality as the efficiency upgrades equipment manufacturer provided a letter to Atura Power stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels".</p> <p>This rationale was affirmed by MECP in their correspondence with the project team on Jan. 5, 2024, which states, "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre... Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".</p>
(G page 24)	Include a discussion of how public (and other stakeholder) input was considered, and how it modified the planning and development of the project.	Please see response to comment #2 above.
(H, page 24)	Obtain answers from the IESO on questions which referenced them and include the answers in the Environmental Review report.	Atura Power will not comment on behalf of the IESO and as such, anyone with questions for the IESO should contact them via the information available at https://www.ieso.ca/Corporate-IESO/Contact .
(I, page 24)	Complete the section dealing with Operation and Decommissioning of the facility.	Please see response to comment #1 and comment #3 above.
(J, page 24)	Include a section answering MECP's Areas of Interest dealing with Climate Change - including a discussion of alternatives considered.	Please see response to comment #4 and comment B, page 24 above. Atura Power has nothing more to share on this item.
(K, page 25)	Include a discussion on how answers to Socio-Economic questions 6.1, 6.2 and 6.8 were arrived at, look at mitigation actions and update the answers to these questions to "Yes."	Please see response to comment #4 above.

We hope the responses above satisfactorily address the comments raised about the PEC Efficiency Upgrades project and associated Environmental Screening Process.

Please contact us through our project email address at portlandsupgrade@aturapower.com with any additional comments or questions about the project.

Sincerely,
Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: TERRE <terrecoalition@gmail.com>

Sent: Sunday, April 28, 2024 12:03 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: Re: Elevation Request from TERRE

Hi Mr. Sokal,

Attached are TERRE's comments on your response.

Sincerely,

■■■■ ■■■■ - On Behalf of TERRE

TERRE acknowledges Atura's response to our Elevation Request and we feel obligated to comment.

Yesterday, the Chief of the Aamjiwnaang First Nation in Sarnia indicated that if he sprayed benzene into someone's face he would be charged with assault. He was referring to the chemical plant next to his community which was emitting high levels of benzene over his community. As with PEC, the plant normally operates within regulated guidelines. Although "Atura Power is confident that there will be no potential for negative effects associated with the Screening Criteria", TERRE notes that Atura was fined for violation of the Environmental Protection Act for a release at the Napanee Generating Station. Confidence needs to be backed up with detailed study which is absent from the PEC Screening report. Even with confidence, unwelcome events can happen.

Atura claims to comply with regulations although TERRE has pointed out a number of areas which call that claim into question. Atura indicates they have regulatory licence from the various agencies noted in the Screening report. TERRE contends that Atura does not have the social licence as evidenced by the almost 500 public comments consuming half of the almost 700 page screening report. There are no comments supporting PEC in the Screening report.

As indicated on the Atura website, Atura Power employs 160 people total. Less than 20 are employed at PEC. How many PEC employees live in the area is unknown. That such a small group of people, who do not have to live with the day-to-day impacts resulting from their actions, can use their technology to impact a much larger group of people adds emphasis to the need for regulation and oversight.

TERRE counts in excess of 170 local members (and growing) and is supported in our Elevation Request by 19 other health and environmental justice groups whose membership counts in the thousands. Atura claims to have exceeded requirements for public consultation but we see only sending out (as recommended but not required by the Guide) a draft screening report for comment as the only exceedance. For Atura to claim that there are no public concerns with their cursive public engagement is plain, bad, social science and wishful thinking. There is no evidence to support the claim, quite the opposite in fact.

- Atura sweeps aside MECP's Areas of Interest on Climate Change contrary to the public's interest in knowing what Atura is doing to limit its contribution to GHG and to prepare for the severe weather that is forecast for the future. It has been over twenty years since the public last had information on PEC's environmental impacts. The PEC facility design changed between the time the 2003 ER report was published and the time PEC came into full operation

in 2009. Commitments were made and the updated list is missing. Our climate has changed since the 2003 ER report. Despite modelling information being provided in other projects of a similar nature, Atura did not include the details from the most recent study and only indicates their willingness to provide an Executive Summary at some future point, if requested. The details behind the modelling study need to be released to help assuage public concerns. Referencing compliance with regulations to not release the details only creates suspicion.

Following are TERRE's comments on Atura's response to TERRE's elevation request.

(#1, page 3) - we emphatically and strongly disagree that there are no potential negative effects. PEC is Toronto's largest source of GHG and Nitrogen Oxides and those emissions are expected to grow significantly. Atura has provided no explanation that would justify a "NO" answer to the criteria "Cause public concerns related to public health and safety."

(#2, page 3) & (G page 24) - as members of the public, living in the area that will be the dumping ground of PEC's pollutants, we think being mentioned last in your string of groups being consulted reflects Atura's valuing of the public. That Atura considers their responses to concerns raised by the public as exceeding requirements suggests that an independent body needs to review the environmental assessment and how it was done. Atura has not adequately engaged the public and as a result has not calmed public concerns.

(#3, page 3) - Atura's response simply and weakly states the process required to be followed. It does not address the various shortcomings and omissions we identified out of the process.

(#4, page 3-4) & (G page 24) - Atura's response again misdirects attention. The IESO does require municipal support for ELT1 procurement as evidenced by the sample contract posted on their website. The IESO has not posted a sample contract for Efficiency Upgrades so how that is treated is unknown. We maintain that the string of letters and comments from the Ministry of Energy are ambiguous and have never clearly excluded Efficiency Upgrades from municipal support. While Atura has not exceeded requirements to obtain City of Toronto support for their work, it does pose questions whether the screening criteria dealing with impacts to local institutions should be answered "YES" as undermining the authority of the City of Toronto. Atura needs to respond to public concerns over health impacts as TERRE was able to identify many studies, within 30 minutes, indicating long-term exposure to pollutants from fossil fuel electrical plants that impact public health. These studies include (and there are many more):

Association between Residential Proximity to Fuel-Fired Power Plants and Hospitalization Rate for Respiratory Diseases - PMC

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3385425/>

Emergency visits and hospital admissions in aged people living close to a gas-fired power plant

<https://pubmed.ncbi.nlm.nih.gov/22284257/>

Air Quality and Health Impacts of Gas-Fired Power Generation in the EU and the UK

https://www.env-health.org/wp-content/uploads/2022/05/HEAL-Fossil-gas_methodology.pdf

External costs of fossil electricity generation: Health-based assessment in Thailand

<https://www.sciencedirect.com/science/article/abs/pii/S1364032111002073>

Evolution of External Health Costs of Electricity Generation in the Baltic States

<https://www.mdpi.com/1660-4601/17/15/5265>

Long-Term Downwind Exposure to Air Pollution from Power Plants and Adult Mortality: Evidence from COVID-19

<https://www.medrxiv.org/content/10.1101/2020.11.23.20237107v1.full.pdf>

Global site-specific health impacts of fossil energy, steel mills, oil refineries and cement plants

www.nature.com/scientificreports

(A, page 24) - We are aghast that Atura puts more credence in the lack of concern from agencies and other groups than you do to the residents whose lungs will be the recipients of your pollutants. That Atura would not voluntarily raise the EA to address the concerns of the community underlines the need for an independent review to address the egregious shortcomings of the Atura screening report. That the screening report could conclude that there are no negative effects flies in the face of the public comments in the report which take up half of the 700 page weight of the report.

(B, page 24) - TERRE is not disputing that Atura completed a screening report. We are disputing the claim that it addressed the errors and omissions we identified.

(C, page 24) - Atura's assertion that they "made every effort to respond to all comments and questions received from all parties" is blind to basic communication that they need the entity asking the question to agree that the response did in fact answer the question. That Atura did not make that effort suggests a lack of effort rather than an abundance of effort.

(D, page 24) - It seems that rather than making every effort to full public disclosure, and exceeding the screening process requirements, that Atura is again using inside knowledge to keep relevant information out of the public forum. To expect a member of the public to know that they need to ask when the summary could have been added as an appendix suggests a lack of transparency on Atura's behalf.

(H, page 24) - TERRE is not asking Atura to comment on behalf of IESO. We are asking Atura to obtain answers from the IESO.

(I, page 24) - Atura's responses in comment #1 and comment #3 do not address this incomplete section of the report.

(J, page 24) - Atura's responses in comment #4 and comment B, page 24 do not address this item.

(K, page 25) - Atura's response does not answer TERRE's request to include a discussion (as required in the Guide) of the process used to conclude that the answers to these criteria items as "NO". If Atura expects to garner public support without explaining the rationale behind answers to these criteria the expectation is unfounded.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 29, 2024 12:23 PM

To: TERRE <terrecoalition@gmail.com>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Elevation Request from TERRE

Good afternoon, [REDACTED]

Thank you for your email and letter in response to the email we shared with TERRE on April 27, 2024, regarding your elevation request for the Portlands Energy Centre Efficiency Upgrades project.

Atura Power now waits for the Minister of Environment, Conservation and Parks' guidance and response regarding your request.

We thank you for your continued interest in our project.

Sincerely yours,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

Atura Power

Ministry of the Environment,
Conservation and Parks

Ministère de l'Environnement, de la
Protection de la nature et des Parcs



Environmental Assessment
Branch

Direction des évaluations
environnementales

7th Floor
135 St. Clair Avenue W
Toronto ON M4V 1P5
Tel.: 416 314-8001
Fax.: 416 314-8452

7ème étage
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél.: 416 314-8001
Télec.: 416 314-8452

357-2024-831

May 23, 2024

██████████ ██████████
Toronto East Residents for Renewable Energy
Email: terrecoalition@gmail.com

Dear ██████████

The Ministry of the Environment, Conservation and Parks is in receipt of your correspondence requesting that a comprehensive environmental assessment (EA) be required for Atura Power's proposed changes to its Portlands Energy Centre (the Project).

Your request will be forwarded to Atura Power, and they will be directed to review it and provide any documentation or other relevant information that may assist the minister in her review.

The concerns raised in your request will be reviewed and considered by the minister, together with the Project documentation and information provided by the proponent, before deciding whether additional environmental assessment work will be required for the Project. You will be notified in writing of the minister's decision once it has been made.

I encourage you to keep the ministry updated on any further discussions you may have with Atura Power. If you have any questions or concerns, please contact Simon Zhao, Project Officer with the ministry's Environmental Assessment Branch, by email at Simon.Zhao@ontario.ca.

Sincerely,

Nick Colella

Nick Colella
A/Manager, Environmental Assessment Services
Environmental Assessment Branch

c: Darius Sokal, Senior Communications Advisor, Atura Power
Simon Zhao, Project Officer, Environmental Assessment Branch, MECP

[REDACTED]

From: [REDACTED] on behalf of James Nowlan <James.Nowlan@toronto.ca>
Sent: April 26, 2024 1:19 AM
To: Minister, MECP (MECP)
Cc: councilmeeting; EAB Director (MECP); 'portlandsupgrade@aturapower.com'; David Jollimore
Subject: RE: Request to elevate the Portlands Energy Centre Upgrade project to a Comprehensive Environmental Assessment
Attachments: 2024-04-25_City of Toronto PEC Elevation Request Minister.pdf; 2024-01-05_City of Toronto Comments_Portlands Energy Centre upgrade project.pdf

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good day,

I am sending the attached letter on behalf of James Nowlan, Executive Director - Environment & Climate Division, City of Toronto.

Thank you,

[REDACTED]
Support Assistant B
Environment and Climate Division
[City of Toronto](#)

Tel: (416) 397-5789



From: councilmeeting <councilmeeting@toronto.ca>
Sent: April 24, 2024 12:19 PM
To: 'minister.mecp@ontario.ca' <minister.mecp@ontario.ca>
Cc: James Nowlan <James.Nowlan@toronto.ca>; Marco Iacampo <Marco.Iacampo@toronto.ca>
Subject: Correspondence from the City Clerk Ref.: 24-MM17.9

Dear Minister:

Please see attached correspondence from the Toronto City Clerk.

[REDACTED]
Secretariat – City Council
City Clerk's Office
416-392-7841

Environment & Climate Division

Union Station
East Wing, 2nd floor
c/o Metro Hall mailroom
55 John Street
Toronto, Ontario M5V 3C6

Tel: 416-392-6064
James.Nowlan@toronto.ca
www.toronto.ca/environment

April 25, 2024

Sent via e-mail to: minister.mecp@ontario.ca

The Honourable Andrea Khanjin
Minister of the Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto, ON
M7A 2J3

Re: Request to elevate the Portlands Energy Centre Upgrade project to a Comprehensive Environmental Assessment

Dear Minister Khanjin,

I am writing to convey Toronto City Council's request that the Portlands Energy Centre (PEC) upgrade project be elevated to a comprehensive (individual) environmental assessment.

City Council on April 17 and 18, 2024, adopted the following (2024.MM17.9):

1. City Council request the Minister of Environment, Conservation and Parks to elevate Atura Power's proposal to expand the capacity of the Portlands Energy Centre by 50 megawatts to a comprehensive environmental assessment.

(<https://secure.toronto.ca/council/agenda-item.do?item=2024.MM17.9>)

The basis of this request is that the City of Toronto has participated fully in the environmental screening process for the project, yet the City's questions have not been answered, and key information and considerations are absent from the Screening Report issued March 2024. The specific nature of the City of Toronto's concerns, and the benefits of elevating the project, are outlined below.

PEC is a 550 MW (megawatt) fossil natural gas electricity generating station located in the Port Lands. In September 2023, proposed upgrades to the facility were announced, which

would expand its electricity generating capacity by 50 MW. On January 5, 2024, the City provided comment and questions on a draft Screening Report under the environmental assessment process for the PEC Upgrade project (attached). On February 5, 2024, Atura provided a written response that did not answer the questions and concerns raised. In March 2024, a final Screening Report was released that did not address the City's comments or questions.

Elevating the PEC upgrade project beyond the environmental screening process, and requiring the facility to undergo a comprehensive environmental assessment would:

1. Address a lack of information about future greenhouse gas and air pollutant emissions from the facility, and their potential impacts on the local community.

The City's questions about quantities of future greenhouse gas and air pollutant emissions were not answered in the Screening Report. Similarly, the PEC Upgrade Screening Report does not identify the levels of air pollutants to which the surrounding community will be exposed from the proposed, expanded facility at its future level of operations in combination with other sources such as vehicles. We would expect to see these typical elements in an environmental assessment process to determine the impacts of a proposed project.

Understanding these impacts is particularly critical for this facility since it is operating much more than originally intended. Before PEC started operating in 2009, it was proposed as a "peaking" facility that would run only occasionally to satisfy peak electricity demand. However, in summertime PEC is running significantly more days and for longer hours than anticipated, potentially increasing air pollutant-related impacts. The facility has been operating substantially more than a peaking facility, causing concerns regarding the lack of information about how, how often, and how long the facility will operate in future.

2. Enable the assessment of alternatives to the project.

Toronto, and the world, are in the midst of an energy transition away from fossil fuels in order to reduce greenhouse gas emissions and limit climate change. The City is actively supporting Ontario's Independent Electricity System Operator (IESO) in its energy planning for the Toronto region. In April 2024, the IESO indicated that the Integrated Regional Resource Plan for the Toronto region will include examining options to reduce reliance on PEC. Alternatives to the PEC expansion should be considered in the context of the Integrated Regional Resource Planning process taking place to guide the energy transition in the Toronto area, and alternatives include increased energy efficiency, renewable energy, and energy storage to manage peak demand.

3. Be consistent with previous City Council decisions on PEC and electricity generation:

- In May 2023, City Council voted to oppose any new power generation proposal involving increased burning of fossil fuels, including natural gas, in our City (2023.MM6.13).

- In June 2023, City Council requested policy to prohibit increasing the gas-fired generating capacity at the Portlands Energy Centre, effective immediately (2023.MM7.25).
- In October 2023, City Council endorsed the potential use of City-owned lands for large-scale battery storage, including the exploration of utility scale storage in the Port Lands (2023.MM11.25).
- In December 2021, City Council adopted the target of net zero greenhouse gas emissions by 2040 and the TransformTO Net Zero Strategy.

Thank you for your consideration of this request.

Best Regards,



James Nowlan
Executive Director
Environment & Climate Division

Attach:

January 5, 2024 letter from James Nowlan, City of Toronto to Darius Sokal, Atura Power, "City of Toronto comments on the draft Screening Report for the Portlands Energy Centre upgrade project"

Cc:

Kathleen O'Neill, Director, Environmental Assessment Branch, Ministry of the Environment, Conservation and Parks; email: EABDirector@ontario.ca

Darius Sokal, Senior Communications Advisor, Atura Power; email:

portlandupgrade@aturapower.com

David Jollimore, Deputy City Manager, Corporate Services, City of Toronto; email:

David.Jollimore@toronto.ca

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Friday, April 26, 2024 11:02 AM
To: James Nowlan <James.Nowlan@toronto.ca>
Cc: David Jollimore <David.Jollimore@toronto.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: City of Toronto response to the Portlands Energy Centre Upgrade project Screening Report

Good afternoon, [REDACTED].

Thank you for your email and letter informing us of Toronto City Council's request that the Portlands Energy Centre Efficiency Upgrades project be elevated to a comprehensive environmental assessment, the city's feedback on the Screening Report, and council's intent to communicate an elevation request to the Minister of the Environment, Conservation and Parks.

The attached PDFs contain (1) Atura Power's response to Mr. Nowlan's comments, and (2) a record of Atura Power's past correspondence with Mr. Nowlan.

We hope our responses satisfactorily address Mr. Nowlan's comments about the PEC Efficiency Upgrades project and associated Environmental Screening Process.

Please contact us through our project email address at portlandsupgrade@aturapower.com with further project-related comments or questions.

Sincerely,
Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

April 26, 2024

Dear Mr. James Nowlan,

Re: City of Toronto response to the Portlands Energy Centre Efficiency Upgrades project Screening Report

Thank you for your April 25, 2024, letter sharing the Toronto City Council's request that the Portlands Energy Centre (PEC) Efficiency Upgrades project be elevated to a comprehensive environmental assessment, providing the city's feedback on the Screening Report, and sharing that Toronto City Council will be sending a letter communicating their elevation request to the Minister of the Environment, Conservation and Parks (MECP).

Before we respond to your comments below, we would like to respond to the basis of your request. The Atura Power project team responded to the questions raised by the City of Toronto's Environment and Climate Division in a timely manner throughout the environmental assessment process as the correspondence records in the attached PDF show. We ask that you kindly let us know if there are any questions or comments from the city that Atura Power did not respond to and share those questions or comments with us.

Additionally, as detailed in the Screening Report published on March 27, 2024, we wish to highlight that the scope of the project being assessed is limited to efficiency upgrades of the existing PEC facility. Project activities associated with the efficiency upgrades will include replacing rotating and non-rotating parts within the gas turbines (blades, seals, nozzles, etc.). The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. The assessment of effects for these upgrades was completed in accordance with the requirements of the Environmental Screening Process per Ontario Regulation 50/24 and the associated Guide to Environmental Assessment Requirements for Electricity Projects.

Please find Atura Power's responses to your specific comments/questions in the table below:

Comment Number (#)	Comment	Atura Power's Response
(#1, page 2)	<p>Elevating the PEC upgrade project beyond the environmental screening process, and requiring the facility to undergo a comprehensive environmental assessment would:</p> <ol style="list-style-type: none"> 1. Address a lack of information about future greenhouse gas and air pollutant emissions from the facility, and their potential impacts on the local community. <p>The City's questions about quantities of future greenhouse gas and air pollutant emissions were not answered in the Screening Report. Similarly, the PEC Upgrade Screening Report does not identify the levels of air pollutants to which the surrounding community will be exposed from the proposed, expanded facility at its future level of operations in combination with other sources such as vehicles. We would expect to see these typical elements in an environmental assessment process to determine the impacts of a proposed project.</p> <p>Understanding these impacts is particularly critical for this facility since it is operating much more than originally intended. Before PEC started operating in 2009, it was proposed as a "peaking" facility that would run only occasionally to satisfy peak electricity demand. However, in summertime PEC is running significantly more days and for longer hours than anticipated, potentially increasing air pollutant-related impacts. The facility has been operating substantially more than a peaking facility, causing concerns regarding the lack of information about how, how often, and how long the facility will operate in future.</p>	<p>As mentioned in previous correspondence, the assessment process required Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects <i>of the project</i> (i.e., efficiency upgrades) would occur. The existing PEC facility went through an Environmental Assessment in 2003 and is therefore not the subject of the Screening Report. As such, the scope of this assessment is limited to understanding and identifying any effects <i>of the proposed efficiency upgrades</i>.</p> <p>Section 3.3 of the Screening Report discusses the assessment and notes that there was no uncertainty associated in determining the potential for effects on air quality as the efficiency upgrades equipment manufacturer provided a letter to Atura Power stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, Atura Power determined that no further studies were required. In recent correspondence to the project team, it was confirmed that, "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".</p> <p>As noted in the Screening Report, PEC operations are dictated by the Independent Electricity System Operator (IESO) based on the electricity supply and demand balance. The frequency at which the plant operates will not change going forward. Importantly though, following the efficiency upgrades, the existing PEC facility will produce more power for the same amount of fuel used. The total annual quantity of GHGs emitted will still depend on how often the IESO calls on PEC to operate.</p>
(#2, page 2)	<p>Elevating the PEC upgrade project beyond the environmental screening process, and requiring the facility to undergo a comprehensive environmental assessment would:</p> <ol style="list-style-type: none"> 2. Enable the assessment of alternatives to the project. <p>Toronto, and the world, are in the midst of an energy transition away from fossil fuels in order to reduce greenhouse gas emissions and limit climate change. The City is actively supporting Ontario's Independent Electricity System Operator (IESO) in its energy planning for the Toronto region. In April 2024, the IESO</p>	<p>The PEC Efficiency Upgrades project is being undertaken in response to the IESO's Expedited Long-Term Request for Proposal (E-LT1-RFP) process, which is part of a phased approach to address the predicted energy supply gap and generate an additional 4,000 MW of electricity needed across Ontario. The upgrades to improve efficiency at existing facilities such as PEC are one part of the IESO's approach to address the predicted energy supply gap. The IESO currently has other procurements in progress that include renewable energy generation and battery storage projects. In addition to the planned efficiency upgrades at PEC, Atura Power is continuing to play a leadership role in establishing the supply of</p>

Comment Number (#)	Comment	Atura Power's Response
	<p>indicated that the Integrated Regional Resource Plan for the Toronto region will include examining options to reduce reliance on PEC. Alternatives to the PEC expansion should be considered in the context of the Integrated Regional Resource Planning process taking place to guide the energy transition in the Toronto area, and alternatives include increased energy efficiency, renewable energy, and energy storage to manage peak demand.</p>	<p>low-carbon hydrogen and developing energy storage systems and potentially other clean-energy projects to help the province move towards a net-zero carbon future.</p>
<p>(#3, page 2-3)</p>	<p>Elevating the PEC upgrade project beyond the environmental screening process, and requiring the facility to undergo a comprehensive environmental assessment would:</p> <ol style="list-style-type: none"> 3. Be consistent with previous City Council decisions on PEC and electricity generation: <ul style="list-style-type: none"> - In May 2023, City Council voted to oppose any new power generation proposal involving increased burning of fossil fuels, including natural gas, in our City (2023.MM6.13). - In June 2023, City Council requested policy to prohibit increasing the gas-fired generating capacity at the Portlands Energy Centre, effective immediately (2023.MM7.25). - In October 2023, City Council endorsed the potential use of City-owned lands for large-scale battery storage, including the exploration of utility scale storage in the Port Lands (2023.MM11.25). - In December 2021, City Council adopted the target of net zero greenhouse gas emissions by 2040 and the TransformTO Net Zero Strategy. 	<p>The proposed efficiency upgrades refer to increasing the efficiency of the existing PEC facility; they do not include any new power generation at the site. Please see our response to comment #1.</p> <p>Atura Power respects the important role of Toronto City Council and democratic processes in general. However, municipal approval is not a requirement for IESO's E-LT1-RFP process or the Environmental Screening Process to which the PEC Efficiency Upgrades project is subject.</p>

We hope our responses satisfactorily address your comments raised about the PEC Efficiency Upgrades project and associated Environmental Screening Process.

Please contact us through our project email address at portlandsupgrade@aturapower.com with further project comments or questions.

Sincerely,

Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

Ministry of the Environment,
Conservation and Parks

Ministère de l'Environnement, de la
Protection de la nature et des Parcs



Environmental Assessment
Branch

Direction des évaluations
environnementales

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135 St. Clair Avenue W
Toronto ON M4V 1P5
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Fax.: 416 314-8452

7ème étage
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél.: 416 314-8001
Télééc.: 416 314-8452

357-2024-1031

May 23, 2024

James Nowlan
Executive Director
Environment & Climate Division
City of Toronto
Email: James.Nowlan@toronto.ca

Dear James Nowlan:

The Ministry of the Environment, Conservation and Parks (the ministry) is in receipt of your correspondence requesting that a comprehensive environmental assessment (EA) be required for Atura Power's proposed changes to its Portlands Energy Centre (the Project).

Your request will be forwarded to Atura Power, and they will be directed to review it and provide any documentation or other relevant information that may assist the minister in her review.

The concerns raised in your request will be reviewed and considered by the minister, together with the Project documentation and information provided by the proponent, before deciding whether additional environmental assessment work will be required for the Project. You will be notified in writing of the minister's decision once it has been made.

I encourage you to keep the ministry updated on any further discussions you may have with Atura Power. If you have any questions or concerns, please contact Simon Zhao, Project Officer with the ministry's Environmental Assessment Branch, by email at Simon.Zhao@ontario.ca.

Sincerely,

Nick Colella

Nick Colella
A/Manager, Environmental Assessment Services
Environmental Assessment Branch

c: [REDACTED]
David Jollimore, City of Toronto
Darius Sokal, Senior Communications Advisor, Atura Power
Simon Zhao, Project Officer, Environmental Assessment Branch, MECP

From: [REDACTED]
To: Minister.MECP@ontario.ca; EABDirector@ontario.ca; [Upgrade project for PEC](#)
Cc: [REDACTED]
Subject: Request for Comprehensive EA of Portlands EC
Date: April 26, 2024 2:59:50 PM
Attachments: [Request for Comprehensive EA of Portlands EC.pdf](#)

Dear Minister Khanjin,

please find attached a copy of our letter requesting a Comprehensive Environmental Assessment of the Portlands Energy Centre.

Please let me know if you have any questions.

Thank you.

--

[REDACTED]
Ontario Climate Program Manager
Pronouns: he/him

Tel: [REDACTED] | Cell: [REDACTED] | [_environmentaldefence.ca](http://environmentaldefence.ca)
TW: [@envirodefence](#) | FB: [EnvironmentalDefenceCanada](#) | IG: [@envirodefence](#)
33 Cecil Street, 1st Floor, Toronto, ON M5T 1N1

I live, work and play on the traditional territories of the Mississaugas of the Credit, the Anishinaabeg, the Haudenosaunee, and the Wendat. Please see full acknowledgement [here](#).

Defending clean water, a safe climate and healthy communities.
Our work would not be possible without you. Please [donate](#) today.



April 26, 2024

Minister.MECP@ontario.ca

EABDirector@ontario.ca

The Honourable Andrea Khanjin
Minister of the Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto, Ontario
M7A 2J3

Dear Minister Khanjin:

Re: Request for a Comprehensive Environmental Assessment of Atura Power's proposal to increase the capacity of the Portlands Energy Centre (PEC) by 50 megawatts (MW)

After reading your Final Screening Report, we support the requests for a full Environmental Assessment (EA) due to the likelihood that increased capacity will lead to increased greenhouse gases (GHGs) and other air pollutants.

To begin, we are concerned about the cumulative impact of this government's decisions when it comes to electricity generation and their increasing dependency on gas. This proposal to expand the PEC is just one more example of this trend and of the contribution to worsening air quality which will affect the health of all Ontarians.

In your report you stated that air and noise assessments are not needed and are not undertaken.¹ However, we know that the PEC emits significant amounts of nitrogen oxides (NOx) which are hazardous to human health. These increased pollutants are a concern for inhabitants in the nearby neighbourhoods. NOx has been linked to increased incidence of asthma in young children and difficulty breathing for people with respiratory illnesses.²

In addition, the PEC was designed as a peaker plant but as of the summer of 2023, it has been operating more than 21 hours a day.³ More distressing is that it appears the PEC will be used

¹ Atura Power, *Portlands Energy Centre Efficiency Upgrades, Screening Report for Electricity Projects*, March 2024, P. 27, [Link](#).

² Mili Roy, *Growing Gas Plants; a Made-in-Ontario Public Failure*, Toronto Star, thestar.com, November 16, 2023, [Link](#).

³ Marco Chown Ovid, *Ontario Gas Plants were supposed to Run Only During Peak Periods. Instead They're Running Most of the Time, Polluting the Air You Breathe*. Toronto Star, thestar.com, October 2, 2023, [Link](#).





even more based on the Independent Electricity System Operator's Annual Planning Outlook.⁴ This is misaligned with the plans to redevelop the Portlands area and house thousands of people there. Risks from pollution are a factor of exposure, and in this instance, there will be more and more people exposed to a greater pollution burden, which Atura must take into consideration.

Finally, in section 3.4 with respect to negative effects on air quality and emissions of nitrogen dioxide, sulphur dioxide and other pollutants, you state that the upgrades to the turbine generator will maintain emissions levels.⁵ This is worrisome because in 2022, the plant emitted 509 tonnes of NOx emissions.⁶

A full EA should be undertaken to understand and mitigate any adverse impacts that may arise as a result of this capacity expansion for the sake of Torontonians who live in the surrounding areas and beyond. In addition, we support the requests from the Ontario Clean Air Alliance and Toronto East Residents for Renewable Energy for a full EA.

We expect you will take these concerns into consideration and commit to a full Environmental Assessment of the Portlands Energy Centre.

Sincerely,

 
Programs Director

⁴ Independent Electricity Service Operator; *Annual Planning Outlook; Ontario's Electricity System Needs 2025-2050*, March 2024, p.34.

⁵ Atura Power, *Portlands Energy Centre Efficiency Upgrades, Screening Report for Electricity Projects*, p.27.

⁶ Ontario Power Generation, Sustainability Performance Data, Updated October 12, 2023, p.2.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Saturday, April 27, 2024 2:44 PM

To: [REDACTED] <[REDACTED]@[REDACTED]>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Request for Comprehensive EA of Portlands EC

Good morning, [REDACTED]

Thank you for sharing your email and letter to Minister Khanjin on April 26, 2024. Atura Power's responses to Mr. Brooks' concerns about the PEC Efficiency Upgrades project and associated Environmental Screening Process are in the attached PDF.

We hope you find that our responses satisfactorily address [REDACTED] concerns.

Please contact us through our project email address at portlandsupgrade@aturapower.com with any further questions or concerns.

Best regards,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

Atura Power

Apr. 27, 2024

Dear [REDACTED]

Re: Request for a Comprehensive Environmental Assessment of Atura Power's proposal to increase the capacity of the Portlands Energy Centre (PEC) by 50 megawatts (MW)

Thank you for sharing your recent email and letter to Minister Khanjin on April 26, 2024. We understand you are requesting a Comprehensive Environmental Assessment for the PEC Efficiency Upgrades project, and are providing responses to the concerns raised in your letter.

First, we would like to share an important clarification. Atura Power is not proposing an expansion of the existing PEC facility. Rather, Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that we plan to replace are the same parts that would normally be replaced at regular maintenance overhauls but, due to improved technology, will be more efficient.

Please find Atura Power's responses below:

Comment Number (#)	Comment	Atura Power's Response
(#1, page 1)	<p>To begin, we are concerned about the cumulative impact of this government's decisions when it comes to electricity generation and their increasing dependency on gas. This proposal to expand the PEC is just one more example of this trend and of the contribution to worsening air quality which will affect the health of all Ontarians.</p>	<p>Please refer to the text above, noting that Atura Power is not proposing an expansion of the existing PEC facility. Rather, Atura Power is planning upgrades to the existing turbines which will improve the efficiency of the facility so that PEC will be able to produce more power for the same amount of fuel used.</p> <p>In addition, upgrades to improve efficiency at existing facilities such as PEC are just one part of the Independent Electricity System Operator's (IESO) approach to address the predicted energy supply gap and generate an additional 4,000 MW of electricity needed across Ontario. The IESO has other procurement processes in progress that include renewable energy generation and battery storage projects. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and that renewable energy sources, such as wind and solar, can be reliably incorporated into the electricity system.</p>
(#2, page 1)	<p>In your report you stated that air and noise assessments are not needed and are not undertaken. However, we know that the PEC emits significant amounts of nitrogen oxides (NOx) which are hazardous to human health. These increased pollutants are a concern for inhabitants in the nearby neighbourhoods. NOx has been linked to increased incidence of asthma in young children and difficulty breathing for people with respiratory illnesses.</p>	<p>The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects <i>of the project</i> (i.e., efficiency upgrades) would occur. The existing PEC facility went through an Environmental Assessment in 2003 and is therefore not the subject of the Screening Report. As such, the scope of this assessment is limited to understanding and identifying any effects <i>of the proposed efficiency upgrades</i>.</p> <p>As stated in Section 3.3 of the final Screening Report, "The Guide states that, in cases where there is uncertainty about the project's potential for negative effects pertaining to a select criterion within any of the nine categories, further studies may be undertaken to accurately identify and understand the potential for effects". For the PEC Efficiency Upgrades project, there was no uncertainty associated in determining the potential for effects on air quality as the efficiency upgrades equipment manufacturer provided a letter to Atura Power stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels".</p> <p>This rationale was affirmed by MECP in their correspondence with the project team on Jan. 5, 2024, which stated "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre...Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".</p>

Comment Number (#)	Comment	Atura Power's Response
(#3, page 1-2)	<p>In addition, the PEC was designed as a peaker plant but as of the summer of 2023, it has been operating more than 21 hours a day. More distressing is that it appears the PEC will be used even more based on the Independent Electricity System Operator's Annual Planning Outlook. This is misaligned with the plans to redevelop the Portlands area and house thousands of people there. Risks from pollution are a factor of exposure, and in this instance, there will be more and more people exposed to a greater pollution burden, which Atura must take into consideration.</p>	<p>As noted in the Screening Report, PEC operations are dictated by the IESO based on the supply and demand balance. The frequency at which the plant operates will not change going forward; the plant will continue to operate as directed by the IESO. Importantly, following the efficiency upgrades, the existing PEC facility will produce more power for the same amount of fuel. The total annual quantity of GHGs emitted will depend on how often the IESO calls on PEC to operate.</p>
(#4, page 2)	<p>Finally, in section 3.4 with respect to negative effects on air quality and emissions of nitrogen dioxide, sulphur dioxide and other pollutants, you state that the upgrades to the turbine generator will maintain emissions levels. This is worrisome because in 2022, the plant emitted 509 tonnes of NOx emissions.</p>	<p>Please see responses to comments #1 and #2 above.</p>

We hope the responses above provide clarification regarding the comments raised about the PEC Efficiency Upgrades project and associated Environmental Screening Process.

Should you require further clarification on project details, please contact us through our project email address at portlandsupgrade@aturapower.com.

Darius Sokal ([hear it](#))

Sr. Communications & Stakeholder Relations Advisor | Atura Power

Ministry of the Environment,
Conservation and Parks

Ministère de l'Environnement, de la
Protection de la nature et des Parcs



Environmental Assessment
Branch

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Tél.: 416 314-8001
Télééc.: 416 314-8452

357-2024-1031

May 23, 2024

██████████
██████████
Programs Director
Environmental Defence
Email: ██████████@██████████:██████████

Dear ██████████ ██████████

The Ministry of the Environment, Conservation and Parks (the ministry) is in receipt of your correspondence requesting that a comprehensive environmental assessment (EA) be required for Atura Power's proposed changes to its Portlands Energy Centre (the Project).

Your request will be forwarded to Atura Power, and they will be directed to review it and provide any documentation or other relevant information that may assist the minister in her review.

The concerns raised in your request will be reviewed and considered by the minister, together with the Project documentation and information provided by the proponent, before deciding whether additional environmental assessment work will be required for the Project. You will be notified in writing of the minister's decision once it has been made.

I encourage you to keep the ministry updated on any further discussions you may have with Atura Power. If you have any questions or concerns, please contact Simon Zhao, Project Officer, with the ministry's Environmental Assessment Branch, by email at Simon.Zhao@ontario.ca.

Sincerely,

Nick Colella

Nick Colella
A/Manager, Environmental Assessment Services
Environmental Assessment Branch

c: ██████████ ██████████ Environmental Defence
Darius Sokal, Senior Communications Advisor, Atura Power
Simon Zhao, Project Officer, Environmental Assessment Branch, MECP

From: [Tabuns, Peter](#)
To: [Minister, MECP \(MECP\)](#)
Cc: [Kaufman, Rob](#)
Subject: Support the elevation
Date: April 24, 2024 10:46:33 AM

Honourable Andrea Khanjin
Minister
Ministry of the Environment, Conservation and Parks

Dear Minister,

I am writing in support of the request that will be made by TERRE (Toronto East Residents for Renewable Energy), along with other groups that the Environmental Screening process for the Portlands Energy Centre Efficiency Upgrades project be elevated to a comprehensive Environmental Review.

The concerns of my community and others have not been adequately addressed in the March 2024 Portlands Energy Centre Efficiency Upgrades Screening Report.

I note that the City of Toronto also calls for this elevation.

Sincerely,

Peter Tabuns
MPP
Toronto-Danforth

Ministry of the Environment,
Conservation and Parks

Ministère de l'Environnement, de la
Protection de la nature et des Parcs



Environmental Assessment
Branch

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Télééc.: 416 314-8452

357-2024-1126

June 4, 2024

Peter Tabuns, MPP
Toronto—Danforth
Email: tabunsp@ndp.on.ca

Dear MPP Tabuns:

The Ministry of the Environment, Conservation and Parks is in receipt of your correspondence in support of elevation requests for Atura Power's proposed changes to its Portlands Energy Centre (the Project).

Your correspondence will be forwarded to Atura Power, and they will be directed to review it and provide any documentation or other relevant information that may assist the minister in her review of the elevation requests.

The concerns raised in your request will be reviewed and considered by the minister, together with the Project documentation and information provided by the proponent, before deciding whether additional environmental assessment work will be required for the Project. You will be notified in writing of the minister's decision once it has been made.

Sincerely,

Nick Colella

Nick Colella
A/Manager, Environmental Assessment Services
Environmental Assessment Branch

c: Darius Sokal, Senior Communications Advisor, Atura Power
Simon Zhao, Project Officer, Environmental Assessment Branch, MECP

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp up gas burning
Date: April 20, 2024 9:33:03 AM

Ontario's Minister of the Environment, Andrea Khanjin, and ask her to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp up gas burning at our waterfront
Date: April 19, 2024 2:15:18 PM

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a [comprehensive environmental assessment](#).

Thank you very much Andrea,

[REDACTED]
[REDACTED]@ [REDACTED] [REDACTED]

I'll be watching.

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp up gas burning on the Toronto waterfront needs a comprehensive environmental assessment.
Date: April 23, 2024 10:16:01 AM

Burning gas has climate and health consequences. Increasing the burning of gas is moving us in the wrong direction. We need clean air for health.

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp up gas burning on the Toronto waterfront
Date: April 19, 2024 1:17:49 PM

Dear Minister Khanjin,

As a citizen of Ontario, I would like to respectfully ask you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment, as called for by Toronto city council and Mayor Chow. Due to the climate crisis, increasing fossil fuel burning would be a terrible mistake.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp up gas burning on the Toronto waterfront
Date: April 21, 2024 4:52:37 PM

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a thorough environmental review.

Thanks.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp up gas burning on the Toronto waterfront needs a comprehensive environmental assessment.
Date: April 19, 2024 10:01:37 PM

To: Andrea Khanjin, Minister of the Environment:

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Thank you, [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp up gas burning on the Toronto waterfront
Date: April 19, 2024 1:46:35 PM

Andrea Khanjin,

Minister of the Environment,

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

With thanks,

--

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp-up gas burning on Toronto's waterfront
Date: April 20, 2024 12:40:22 PM

Dear Minister Khanjin:

As per the request of Toronto's city council and Mayor Chow, please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a **comprehensive environmental assessment**.

Thank you.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal
Date: April 19, 2024 2:50:30 PM

Dear Minister,

I am very concerned about OPG's proposal to increase gas production at the Portland's plant at a time when we're in a crisis because of such fossil fuel burning. Is there no concern for this crisis in the Ford Government despite the heat, fires, floods and droughts in this country, which are caused by climate change? The costs of these events far outweigh the costs of dealing with the emergency.

In addition this carbon pollution causes enormous health problems and cost. I know that when the former government shut the coal mines, the air improved enormously in the province. I could actually breathe comfortably in the summer. It was so much better. There were no more smog days. I'm concerned that increasing gas production will lead not only to increasing climate change, but also increasingly polluted air.

I don't understand why the Ford Government doesn't reinstate the wind power project which they cancelled. This, as well as solar energy and other sources of clean energy can provide us with enough power. Retrofitting buildings to make them more energy efficient is another way to save energy. Giving incentives to buy electric vehicles is another approach. There is so much that could be done not only provide us with enough energy, but to help solve the climate crisis as well.

Please do what you can to stop this ramping up of the Portland's plant. At least there should be a vigorous environmental assessment.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's plan is a dire one - environmental assessment please
Date: April 19, 2024 6:12:19 PM

Minister Khanjin,

In the throes of a global climate crisis with ever increasing evidence of its threat to our earthly existence, I implore you to stand up and show leadership for our children's and grandchildren's sake. The OPG's plan to increase our electricity by increasing gas burning is irresponsible and must be subjected to a comprehensive environmental assessment. If we can't count on our environment minister to protect our environment now and into the future, what purpose do you really stand for?

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's PORTLANDS GAS FIRED PLANT: PROPOSED EXPANSION
Date: April 20, 2024 7:37:00 AM

Dear Minister: As an asthmatic, I was encouraged when Toronto reduced coal-fired emissions from its electricity format. Unfortunately, the FORD GOVERNMENT continues to promote GAS-FIRED EXPANSION and specifically at the Portlands Plant on our waterfront. The OPG request needs to be met with a firm demand from the City, for an COMPLETE ENVIRONMENTAL ASSESSMENT of the foolish OPG proposal. I trust you will see the merits of a FULL EA.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG'S Propoal
Date: April 19, 2024 4:17:55 PM

Dear Minister Khanjin,

Please [subject OPG's Propoal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.](#)

Sincerely [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal
Date: April 19, 2024 1:49:38 PM

Dear Minister,

I urge you to insist that OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. It must not be rubber stamped.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal
Date: April 19, 2024 1:10:27 PM

Dear Environmental Minister,

The OPG 's proposal to increase the capacity of gas-fired plants must be subjected to a full environmental study. To cause more pollution in the air is totally against all that we know about climate change.

Mayor Chow and the Toronto Council are correct in asking for a full Environmental Assessment and I support them.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal for Toronto Waterfront must have a comprehensive environmental assessment
Date: April 19, 2024 5:15:05 PM

Dear Minister Khanjin

While Premier Ford and OPG both seem oblivious to the growing climate crisis, that is not the case with Toronto Council, which has set the goal of reducing community-wide greenhouse gas emissions in Toronto**to*net zero by 2040*. Councillors understand that more fossil gas burning at the Portlands plant is the last thing we need right now, and have been very clear about saying NO to the expansion.

It is obvious that more burning of gas will damage all of our health, and speed up out-of-control weather.

Please do the responsible thing. OPG's proposal for Toronto Waterfront must have a comprehensive environmental assessment.

[REDACTED] [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal requires environmental assessment
Date: April 19, 2024 1:35:46 PM

Dear Minister Khanjin,

I am writing to ask you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. No one, not even OPG, should be able to bypass this. As a daughter of a retired OPG engineer, this is absolutely necessary to be done for the environment for our and future generations.

Sincerely yours,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's Proposal to increase gas burning
Date: April 19, 2024 9:35:21 PM

Please, Andrea Khanjin, subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [Ontario Clean Air Alliance](#)
Subject: OPG's Proposal to increase polluting Gas Power
Date: April 23, 2024 10:36:30 AM

Dear Minister,

JUST SAY NO! Increasing the burning of fossil fuels is not going to mitigate the climate crisis we are in the midst of. I'm sure you know this. You know, as well, that there are climate saving and just transition options to end our forced dependency on fossil fuels. If you are not willing or able at this time to JUST SAY NO! Then, please, at the very least, [subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.](#)

For the sake of the environment,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Please call for a comprehensive environmental assessment on OPG's proposal to increase gas burning on the Toronto waterfront
Date: April 22, 2024 12:19:39 PM

Dear Andrea Khanjin,

Please subject OPG's proposal to increase gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Toronto Council has set the goal of reducing community-wide greenhouse gas emissions in Toronto to net zero by 2040 under its [TransformTO strategy](#). Councillors understand that more fossil gas burning at the Portlands plant is the last thing we need right now, and have twice [said no](#) to the expansion.

To learn more about the need for a comprehensive environmental assessment of OPG's proposal to ramp up gas burning, [read Toronto's motion here](#).

Thank you for caring about our environment and doing the right thing,

[REDACTED]

[REDACTED]
[REDACTED]@ [REDACTED]
+ [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Please investigate OPG's proposal
Date: April 21, 2024 3:29:32 PM

We are experiencing, daily, and much faster than anticipated, effects of climate change here in Canada. Last year, we watched fires rip through every single province of this country. Our food supply is being affected, our water has been polluted, the air we breathe is toxic, and each year gets hotter and hotter, leading to deaths and illness.

We simply do not have much time to change things before we see a complete collapse of our ecosystem. Projects like OPG's add to this crisis, and directly impact the citizens of Toronto and the province. Lake Ontario and the citizens of Toronto deserve protection and movement in line with the council's 2040 stated goal of net zero. It also makes absolutely no sense to have 25 % of our electricity be produced by burning fossil fuels when in 2017 it was 4 %. That's an outrageous jump and is clearly not in the best interests of anyone but people like Doug Ford, who are completely unwilling to consider the health and safety of Canadians, instead choosing money every single time.

Please thoroughly environmentally assess this latest of OPG's proposals to expand fossil fuel burning on Toronto's waterfront. Our futures depend on these seemingly small decisions.

Thank you very much for your time, Ms. Khanjin.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Please Require a Comprehensive Environmental Assessment For Atura's Proposed Expansion of Portland Energy Centre
Date: April 22, 2024 5:43:59 PM

Dear Minister Khanjin,

I ask you to require a full environmental assessment of Atura's proposed Portland expansion, which will exhaustively examine alternatives. Allowing this expansion to occur flies in the face of previous decisions by Toronto City Council, and is inconsistent with the need to move away from fossil fuels if we are going to defeat the climate crisis. Please be on the right side of history.

Thank you for your consideration.

Sincerely,

[REDACTED]

--

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: please subject OPG gas expansion proposal to a comprehensive environmental assessment
Date: April 21, 2024 2:30:10 PM

Dear Minister Khanjin,

I am writing to ask you to please subject OPG's proposal to increase gas burning on the Toronto waterfront to a comprehensive environmental assessment.

As you know city council has twice adopted motions opposing the expansion. The city does not want more gas being burned to generate electricity. Nor do I.

Moreover, due to the climate crisis, the province should be actively phasing out gas generation and advancing renewable energy more aggressively.

I as a mother and citizen am extremely concerned about climate change. It is essential that Ontario do its part to reduce emissions; we need a 50% reduction of GHG (which include methane) by 2030, as was made clear in the 2018 IPCC (United Nations Intergovernmental Panel on Climate Change) report, and has been corroborated by IPCC reports since. This issue is of top importance.

Thank you for your work.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.
Date: April 19, 2024 3:58:42 PM

Thanks.

[REDACTED]
Cell: [REDACTED]
[REDACTED]@ [REDACTED]

'Silence is Complicity'

[REDACTED] [REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Pls subject OPG's proposal for Toronto's waterfront to an env. assessment
Date: April 19, 2024 5:03:23 PM

Dear Minister,

I hope this finds you well. As you know, Toronto City Council voted overwhelmingly to ask you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. I am writing to heartily endorse their request because I am confident that such an assessment – which by definition examines the alternatives – will show that the alternatives are cheaper and don't diminish our air quality or contribute nearly as much greenhouse gases.

Thanks in advance for your consideration.

[REDACTED]

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] - [REDACTED] - [REDACTED] cell [REDACTED] - [REDACTED] - [REDACTED]
[REDACTED] @ [REDACTED] [REDACTED]

From: [REDACTED]@[REDACTED].com
To: [Minister, MECP \(MECP\)](#)
Subject: Request for environmental assessment of OPG's proposal to ramp-up gas burning on Toronto's waterfront
Date: April 19, 2024 4:59:02 PM

Dear Ms. [Andrea Khanjin](#)

I would like to ask you to place OPG's proposal to the scrutiny of an independent Environmental assessment panel.

Kind regards.

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [Premier of Ontario | Premier ministre de l'Ontario](#)
Subject: Portlands Energy Centre expansion
Date: April 19, 2024 3:21:46 PM

I am writing to support Toronto City Councillors motion M17.9 to request a full environmental assessment on the Portlands Energy Centre upgrade and expansion.

I know your government has no concern whatsoever that we are in the depths of a climate emergency, but the reality is we are. Every international scientist of any worth knows we are, the Government of Canada, and the other 196 Nations making up the United Nations and are signatories to the Paris Accord know we are. Ontario and other Conservative government led provinces in Canada somehow know better. You seem to believe we can continue to burn fossil fuels until there are no more left and expect the planet to accommodate itself to continued emissions.

It amazes me that the floods, fires, expensive climate related damage to our infrastructure, homes and businesses, farms, forests and public spaces means nothing to you as a policy maker responsible for the environment in Ontario.

All the gas plants must be stopped not just Portlands, but as I live in Toronto and will suffer the health affects of more fossil fuel burning I am particularly interested in and support Councillor Fletcher's motion.

You can solve this problem by cancelling these gas infrastructure expansions that will bring us right back to where we were before the coal plants were closed and in fact even worse. What kind of a Minister of the Environment believes it is responsible to increase pollution and destroy our natural and built environment so the Enbridge's of the world can enrich themselves while the planet burns?

At least do not fight the environmental assessment if you are not willing to do the right thing by cancelling the expansion plans.

Yours Sincerely,

A large black rectangular redaction box covering the signature area.

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands Energy Centre
Date: April 19, 2024 1:08:19 PM

Dear Minister

Please submit the expansion to a comprehensive environmental assessment.

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands Gas Burning Environmental Assessment
Date: April 21, 2024 9:19:13 AM

Hello Minister of the Environment of Ontario,

I support Mayor Olivia Chow's proposal to subject Ontario Power Generation to an environmental assessment of its plans to increase gas consumption on Lake Ontario waterfront. In future I would also support any proposals for environmental assessments of any gas plants owned by any companies along the Great Lakes waterfront.

Thank you,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands Gas Electricity plant
Date: April 19, 2024 2:52:38 PM

Please comply with Toronto City Councils motion on an Environmental review considering at times this Peaker site is running at times 21 hours per day. It is crucial we reduce our carbon emissions right now and it certain we don't want to increase. If we don't take steps urgently the consequences will be dire.

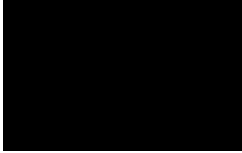
Thank you for your consideration.

[REDACTED]

From: 
To: [Minister, MECP \(MECP\)](#)
Cc: todd.smithco@pc.ola.org; doug.fordco@pc.ola.org; Justin.Trudeau@parl.gc.ca; Steven.Guilbeault@parl.gc.ca
Subject: Portlands Gas plant
Date: April 20, 2024 7:12:57 AM

Dear Ms. Khanjin,

Be sure to do an environmental assessment before continuing with the Portlands Gas Plant. It's not just the normal procedure, it's the safe and responsible one for an elected public servant with the health of present and future citizens in your hands.



From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands Gas Plant
Date: April 19, 2024 2:46:46 PM

Hello,

I wanted to express my concern about the proposed expansion of the Portlands Gas Plant. As a resident living in the neighbouring area and concerned about the health and environmental effects for my family, I ask that this proposal be subject to a comprehensive environmental assessment.

Thank you,

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands" Gas Plant expansion
Date: April 21, 2024 5:18:23 PM

The burning of fossil fuels is the primary contributor to GHG emissions globally and in Canada. Canada is the only G7 country whose emissions are increasing year by year.

The Ford Government's plan to burn polluting gas to produce 25% of Ontario's electricity in 2030 reveals that the Ontario government is in climate denial. It is turning its back on its responsibility to protect people and the environment from the dire consequences of increased GHG emissions.

Natural gas is primarily methane, which is about 85 times worse than carbon dioxide as a green house gas. Fugitive methane leaks occur throughout its life cycle. This is a concern for all Toronto residents but particularly for residents in neighbourhoods around the Portlands' gas plant. Recent studies have found that exposure to methane leaks result in health risks. We have all been warned about the health concerns of using our gas stoves. Increased emissions from gas fired electrical generation is even more troubling.

The proposal to ramp up gas burning capacity at the Portlands' gas plant is very worrying for me.

A comprehensive environmental assessment is needed to determine the risks to residents and the environment.

I urge you to take action.

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [REDACTED]@ [REDACTED]
Subject: Portlands gas plant
Date: April 22, 2024 4:00:40 PM

Minister,

I am calling on you to subject OPG's proposal to ramp up gas burning at the Portlands gas plant to a comprehensive environmental assessment.

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands Generating Station - Environmental assessment
Date: April 19, 2024 11:42:52 PM

Dear Minister Khanjin,

I am writing in support of Mayor Chow and Toronto City Council's call for you to subject Ontario Power Generation's (OPG) proposal to **ramp-up gas burning** at its Portlands Generating Station on the Toronto waterfront to a comprehensive environmental assessment.

Toronto's air quality will be adversely affected by this proposed increase in gas burning, at a time when climate change is increasing wildfires resulting in air quality problems. The increased carbon emissions will contribute to climate change at a time when we should be reducing emissions. You, as Minister of the environment, must know this!

Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: mayor_chow@toronto.ca; councillor_bailao@toronto.ca
Subject: Portlands Generating Station
Date: April 19, 2024 1:08:30 PM

Sir,

Please conduct a comprehensive environmental assessment of OPG's proposal to ramp-up gas burning at the Portlands Generating Station. Canada is supposed to be reducing GHG emissions, not increasing them.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands Generating Station
Date: April 19, 2024 10:00:51 PM

Dear Minister,

I am writing to ask you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. Toronto Council has set the goal of reducing community-wide greenhouse gas emissions in Toronto to net zero by 2040 under its TransformTO strategy. Councillors understand that more fossil gas burning at the Portlands plant is the last thing we need right now, and have twice said no to the expansion.

We need to reduce the burning of gas, not increase it.

Thankyou,

[REDACTED]
[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Problems for Governments
Date: April 19, 2024 6:44:36 PM

Dear Minister MECP@ontario.ca,

I am a citizen, who has been asked to contact Ontario's Minister of the Environment, Andrea Khanjin, and ask her to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Reading the local newspapers, *The Waterloo Record* and *The Observer*, Elmira's excellent articles this morning, I noticed that the both are worried about gas, water, electricity, and the proposal for Elmira biogas pipeline project (my worry, it might rip up my street). I am an environmentalist, and I notice a lot of complaints about these necessities of how that we all live in. I am sure the person who asked me to contact you is thinking about your gas burning problem as well as the water, which was in another article today. Have you any ideas of what to do about them? I have gone through the biogas company horror, and I know there has to be support for all these difficulties.

Hoping for support for all of us,

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [Crawford, Stephen](#); Steven.Guilbeault@parl.gc.ca
Subject: Proper environmental assessment is required for OPG's proposed increase in gas-fired electricity
Date: April 20, 2024 8:52:10 AM

Please ensure that a comprehensive environment assessment is conducted for each proposal increase the production of gas-fired electricity in Ontario, particularly the one on the Toronto waterfront.

The carbon emission reductions achieved by Ontario's historic elimination of coal-fired generation will be totally reversed by the Ford Government plan to increase gas-fired power instead of provide more support to climate-friendly sources.

Ontario's current environmental assessment process is grossly outdated, ignoring modern science and the world's climate crisis. If you do not conduct a comprehensive modern EA, our federal government must step in and do so — a process that must urgently be effected by updating the current federal EA Act.



From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: ramping up gas burning
Date: April 19, 2024 4:50:02 PM

Minister Andrea Khanijh

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive assessment.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Ramping up of fossil fuels
Date: April 19, 2024 4:33:52 PM

Good afternoon

I understand that OPG is proposing to ramp up the use of fossil fuels in Toronto. In light of the global climate crisis I find this decision extremely disturbing and I would like to see this proposal be subject to a comprehensive environmental study. I do not understand the provincial government's complete ignorance when it comes to renewable energy and I want them to stop increasing the use of fossil fuels.

Thank you for your consideration

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: re gas power on waterfront
Date: April 19, 2024 12:44:46 PM

dear Andrea Khanjin

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

yours truly

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: re OPG's proposal to ramp up gas burning on the Toronto waterfront
Date: April 19, 2024 2:46:45 PM

Ontario's Minister of the Environment, Andrea Khanjin

Please, it is crucially important that OPG proposal (Atura Power's proposal) to ramp up gas burning on the Toronto waterfront be subjected to a Comprehensive Environmental Assessment. This facility is operating at a much higher level than was intended when it was to be run only occasionally as a peaking facility to satisfy peak demands.

Toronto and the world are in the midst of a climate change crisis and are attempting to transition away from fossil fuels in order to reduce greenhouse gases. We cannot keep on going forward with plans without having a Complete Environmental Assessment of those plans and then limiting/stopping them when necessary.

For the sake of our children and grandchildren and all who are concerned.

Thank you.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Re OPG's proposal
Date: April 19, 2024 3:36:18 PM

As provincial Minister of the Environment, I am respectfully asking - urging - you to please ensure the protection of our lands, water and air from the risks of OPGs proposed ramp-up of gas burning on the Toronto waterfront. As you must know, with your background, fossil fuel emissions from gas are major contributors to serious and long-lasting air pollution which also contributes to the warming of our climate. This is not healthy for flora, fauna, and we humans. At the very least, it makes sense to first have a "comprehensive environmental assessment" before any starting any proposal such as this one. PLEASE, ensure this is done first and preferably share the results with all residents of Ontario, including Toronto....as we know that air pollution has a way of spreading far beyond its immediate starting location. As Minister of the Environment, please champion this cause to protect and secure a healthy future for all of us now and far into the future. Sincerely,

[REDACTED]

From: 
To: [Minister, MECP \(MECP\)](#)
Subject: Request for an Environmental Assessment on the Expansion of the Portlands Energy Centre
Date: April 19, 2024 2:34:06 PM

Dear Minister Khanjin;

I would like to add my voice to those of so many others, including Toronto City Council and many of the facility's neighbours, who are calling for a comprehensive and impartial environmental assessment of plans by Atura Power to expand the Portlands Energy Centre. Any claims that this expansion, or even the expanded use of the existing plant beyond periods of peak demand, do no harm are clearly disingenuous and motivated largely by business interests regardless of environmental and health costs.

There are less polluting but equally dependable ways to provide the power we need now and in the future without resorting to the expanded burning of fossil fuels in the midst of a climate crisis.

Please initiate an environmental assessment that looks not only at the impact of Atura's plans, but also at the very viable and far more sustainable alternatives to these plans.

The people of this city and this province will thank you.

Sincerely,



From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Request for assessment
Date: April 19, 2024 4:50:04 PM

I have become aware that OPG wants to expand its gas plant in Toronto. Personally I think it is absurd that gas is being used at all for electric power generation instead of using green sources such as wind and solar. But at the very least as Minister of Environment I urge you to implement an environmental assessment with regard to the proposed expansion. I suspect an honest assessment will advise against this proposed expansion.

We really need to stop burning fossil fuels. Most certainly burning fossil fuels to generate electricity is just wrong.

[REDACTED] # [REDACTED]
[REDACTED]@ [REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Request for environmental assessment of OPG proposal
Date: April 19, 2024 8:13:10 PM

Dear Minister Khanjin,

I am writing to express my support for the City of Toronto's request to subject Ontario Power Generation's (OPG) proposal to ramp-up gas burning at its Portlands Generating Station on the Toronto waterfront to a comprehensive environmental assessment. I hope and expect that the government of Ontario will approve this request and conduct this assessment in a timely, thorough and transparent manner.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: doug.fordco@pc.ola.org; MStiles-OP@ndp.on.ca; KMCCrimmon-co@liberal.ola.org
Subject: Request for environmental assessment of OPG's proposal to ramp-up gas burning on Toronto's waterfront
Date: April 20, 2024 11:05:49 AM

Dear Ms Andrea Khanjin

Would you please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment by an Independent panel?

Regards

--

[REDACTED]

'Wise men speak because they have something to say;
fools because they have to say something'
Attributed to PLATO but I am not sure

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: RE: OPG's proposal to ramp-up gas burning on Toronto's waterfront
Date: April 19, 2024 1:16:16 PM

ATTN: Minister Andrea Khanjin,

I urge you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a **comprehensive environmental assessment.**

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: RE: To the Ontario's Minister of the Environment, Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.
Date: April 19, 2024 3:04:43 PM

Dear Ms. Khanjin,

I completely agree with the City of Toronto's Council decision to request a comprehensive environmental assessment on the proposal to vastly increase gas burning on the waterfront.

It is a disastrous proposal that will severely damage the environment with large amounts of pollution.

I have included a reference to the Council's decision for your information.

I look forward to both your decision to implement the environmental assessment immediately as well as getting a reply on this matter from you in short order.

Many thanks,

Best regards,

[REDACTED]

MM17.9 - Portlands Energy Centre: Request for Environmental Assessment - by Councillor Paula Fletcher, seconded by Councillor Dianne Saxe

Status: Adopted

Ward: 14 - Toronto - Danforth

Caution: Motions and votes are shown below. Any motions or votes should not be considered final until the meeting is complete, and the City Clerk has confirmed the decisions for this meeting.

Recommendations

Councillor Paula Fletcher, seconded by Councillor Dianne Saxe, recommends that:

1. City Council request the Minister of Environment, Conservation and Parks to elevate Atura Power's proposal to expand the capacity of the Portlands Energy Centre by 50 megawatts to a comprehensive environmental assessment.

Background Information (City Council)

Member Motion MM17.9

<https://www.toronto.ca/legdocs/mmis/2024/mm/bgrd/backgroundfile-245002.pdf>

Motions (City Council)

Motion to Waive Referral **(Carried)**

Speaker Nunziata advised Council that the provisions of Chapter 27, Council Procedures, require that Motion MM17.9 be referred to the Infrastructure and Environment Committee. A two-thirds vote of the Council Members present is required to waive referral.

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands
Date: April 24, 2024 9:55:17 AM

Dear Ms. Khanjin,

Given that the Ontario Power Generation wants to ramp up gas burning at Toronto's Portlands Generating Station, I would ask that this proposal be subject to an environmental assessment.

This assessment follows what has been agreed by Mayor Olivia Chow and Toronto City Council, and is part of their plan to go net zero by 2040 under the TransformTO strategy.

Respectfully,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Request for EA for Fossil Gas Upgrade in Toronto
Date: April 24, 2024 2:19:13 PM

To Minister Khanjin

I am writing to ask you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. With global warming at an unprecedented rate and the consequences so dire to the human race, it behooves all of us to act in as precautionary a way as possible. Ontarians need to reduce our fossil fuel consumption immediately.

With urgency

[REDACTED]
[REDACTED] # [REDACTED] [REDACTED] [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Date: April 26, 2024 6:56:08 PM

To: Ontario's Minister of the Environment,

Dear Andrea Khanjin,

I'm writing to ask you to please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Ontario is moving in the wrong direction if we want to fight climate change and help curb the health impacts of gas burning.

Please support Toronto's Mayor Chow and City Council in the call for a comprehensive environmental assessment of this project.

Thanks,

[REDACTED]

From: [REDACTED]@[REDACTED].ca
To: Minister.MECP@ontario.ca
Subject: a request for an environmental assessment
Date: April 23, 2024 2:08:00 PM

Dear Minister Khanjin,

I am a citizen of Toronto and I am very concerned about the OPG proposal to ramp up gas burning on the Toronto waterfront and request that these plans be submitted to a comprehensive environmental assessment.

Sincerely

[REDACTED]
[REDACTED] - [REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Comprehensive EA at Portlands
Date: April 26, 2024 6:05:54 PM

Dear Minister Khajin,

Given that one's health is the most important feature in each person's quality of life, I urge you to subject to a FULL environmental assessment the plans to increase burning of fossil gas at the Portlands Generating Station. I would then ask that your government takes into account the GHG emissions that will contribute to the planetary crisis and the impacts on the health of the people for whom your government is responsible.

Respectfully yours,

[REDACTED]

From: [REDACTED]@[REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: a request for an environmental assessment
Date: April 23, 2024 2:08:44 PM

Dear Minister Khanjin,

I am a citizen of Toronto and I am very concerned about the OPG proposal to ramp up gas burning on the Toronto waterfront and request that these plans be submitted to a comprehensive environmental assessment.

Sincerely

[REDACTED]
[REDACTED] - [REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Please order a complete environmental assessment to OPG proposal
Date: May 10, 2024 8:42:07 PM

Hello Minister Andrea Khanjin

I am writing to ask you to please order a complete environmental assessment for OPG's proposal to ramp up gas burning on Toronto's waterfront.

Gas burning is very harmful to health and to the environment. We can easily meet all of Toronto's need for energy with rooftop solar energy and wind energy.

Thank you and kind wishes to you

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Say yes to environmental assessment of OPG's proposal
Date: April 19, 2024 12:50:07 PM

Do the right thing!

WALK THE WALK ON CLIMATE CHANGE

Cheers,

[REDACTED]
[REDACTED] & [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Stop the gas burning at Toronto's waterfront!
Date: April 19, 2024 3:03:02 PM

And subject it to a complete environmental assessment.

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Subject OPG's gas plant proposal to a comprehensive environmental assessment
Date: April 20, 2024 8:53:39 PM

Minister Andrea Khanjin,

I am writing today to ask you to subject Ontario Power Generation's (OPG) proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

I am deeply concerned about OPG's statement that increased fossil gas burning will have minimal climate and health impacts. I'm not sure what planet they are living on, but everything that is being written about climate change says that fossil fuel burning increases it's effects. Cities like Toronto can have a great impact on changing climate change because they are close to the 'ground'. They don't just make policies, but can take action. That's why Toronto Council has twice said no to the expansion. They know they can't achieve their goal of net zero emissions by 2040 with increased gas burning on the Toronto waterfront.

By subjecting OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment, you are taking a step towards Toronto's important goal of net zero emissions by 2040 - a goal that furthers the well-being of all of us.

Warmly,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: subject OPG's proposal to a comprehensive environmental assessment
Date: April 19, 2024 1:58:02 PM

Dear Minister Khanjin,

It is with great dismay and frustration that I've been learning of the Ontario government's plans to ramp-up gas burning to support our electricity grid. This is complete folly at a time when our country and many municipalities in Ontario have made climate emergency declarations. We should be investing in renewable energy sources and not moving in the opposite direction by increasing emissions to support our grid.

And in response to OPG's proposal to ramp-up gas burning at its Portlands Generating Station on the Toronto waterfront, I implore you to subject this proposal to a comprehensive environmental assessment. It would be naive and reckless to assume that OPG's proposal would have minimal climate or health impacts.

I look forward to hearing back from you on this topic.

Sincerely,

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [REDACTED]@ [REDACTED]
Subject: Subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment
Date: April 19, 2024 3:31:27 PM

Dear Honourable Ontario Minister of the Environment, Andrea Khanjin:

I hereby request that your Ministry subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Our planet is in a climate crisis. It is morally wrong to plan to burn polluting natural gas to produce 25% of ON electricity needs in 2030 (up from 4% in 2017) and to ask the federal government to wait until **2050** to completely phase-out gas power.

ON needs more investments in renewable energy projects such as solar, wind and waterpower.

Respectfully,

[REDACTED]

*“We need highest ambition, not point-scoring or lowest common denominator politics. Good intentions won't halve emissions this decade or save lives right now.”
UN Climate Change Executive Secretary Simon Stiell, 6 December 2023.*

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Support Toronto Council's goal to reduce greenhouse gas emissions by subjecting OPG's proposal to ram up gas burning to a comprehensive environmental assessment
Date: April 19, 2024 1:50:45 PM

Dear Minister

Premier Ford and OPG seem oblivious to the growing climate crisis with a plan to burn polluting gas to produce 25% of Ontario's electricity in 2030 (up from 4% in 2017), and by asking the federal government to wait until 2050 to completely phase-out gas power.

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Toronto Council has set the goal of reducing community-wide greenhouse gas emissions in Toronto to net zero by 2040. Please support this goal.

Sincerely

[REDACTED]

[REDACTED]

While Premier Ford and OPG both seem oblivious to the growing climate crisis, that is not the case with Toronto Council, which has set the goal of reducing community-wide greenhouse gas emissions in Toronto to **net zero by 2040** under its [TransformTO strategy](#). Councillors understand that more fossil gas burning at the Portlands plant is the last thing we need right now, and have twice [said no](#) to the expansion.

[As we highlighted earlier this week](#), the Ford Government is on a completely different track with its **plans to burn polluting gas to produce 25% of Ontario's electricity in 2030** (up from 4% in 2017), and by asking the federal government to wait until **2050** to completely phase-out gas power.

To learn more about the need for a comprehensive environmental assessment of OPG's proposal to ramp up gas burning, [read Toronto's motion here](#).

What you can do

Please contact Ontario's Minister of the Environment, Andrea Khanjin, and ask her to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: The Environment and Gas
Date: April 19, 2024 1:29:05 PM

From: [REDACTED]

Dear Minister Khanjin:

I believe your political portfolio puts you in a place where you can have a tremendous impact on the Environment, either in a good way, or in a bad one.

The same can be said for Mayor Chow. Yesterday, she and the Toronto City Council called on you to subject, to a comprehensive environmental assessment, Ontario Power Generation's proposal to ramp up gas burning at its Portland Generating Station on the Toronto waterfront.

While Premier Ford and OPG both seem oblivious to the growing climate crisis, that is not the case with Toronto City Council, which has set the goal of reducing community-wide greenhouse gas emissions in Toronto to **net zero by 2040**.

Councillors have already voted "no" two times to this Portland expansion.

The Ford Government is on a completely different track, with its **plans to burn polluting gas to produce 25% of Ontario's electricity in 2030** (up from 4% in 2017), and by asking the federal government to wait until **2050** to completely phase out gas power.

This is an affront to all of us who support reducing greenhouse gas emissions — which includes the majority of the population of Toronto. The science is available, but I am sure you are well aware of the facts.

I am calling on you to search your soul and support Mayor Chow in her request for a comprehensive environmental assessment. Rather than toe the Ford line, you would be best to remember and abide by the inspirational writing of Henry David Thoreau. In this quotation, you must be "man", "his companions" then refers to the ill-advised Ford government, and "a different drummer" refers to common sense.

"If a man does not keep pace with his companions, perhaps it is because he hears a different drummer. Let him step to the music which he hears, however measured or far away."

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Time to subject any increases in fossil fuel burning in the Portlands to an Environmental Assessment
Date: April 19, 2024 3:58:48 PM

Hi Minister Khanjin

Any expansion of gas (fossil fuel) burning for power generation should be subject to a full environmental assessment. It seems impossible to meet commitments on climate change while expanding the use of fossil fuels. Ontario should be reducing the use of fossil fuels.

Also burning fossil fuels increases particulate matter in the air leading to health problems for Toronto residents.

Please require this and other similar projects to go through a full environmental assessment.

Thanks,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Toronto
Date: April 19, 2024 4:39:17 PM

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Councillors understand that more fossil gas burning at the Portlands plant is the last thing we need right now, and have twice said no to the expansion.

Regards

[REDACTED] [REDACTED] [REDACTED] [REDACTED]@ [REDACTED] [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Toronto OPG Proposal
Date: April 20, 2024 7:25:11 AM

Dear Minister of the Environment, Andrea Khanjin,

I am not inclined to support OPG's proposal to increase natural gas burning on the Toronto waterfront.

A comprehensive environmental assessment should be conducted first, with consideration of alternative power generation sources. Our health and our climate are in danger.

[REDACTED]

From:

██████████

To:

[Minister, MECP \(MECP\)](#)

Date:

April 19, 2024 7:04:50 PM

To Andrea Khanjin, Minister "OUR" Environment:

Please arrange an environmental assessment of OPG's Portlands gas plant prior to ramping up production.

With hope,

██████████ ███████████ ███████████

From:

[REDACTED]

To:

[Minister, MECP \(MECP\)](#)

Date:

April 19, 2024 3:13:33 PM

Dear Minister,

Please respect Toronto City Council's request and have a comprehensive environmental assessment of OPG's proposal to increase gas burning on the Toronto waterfront. Ontario needs to reduce reliance on fossil fuels, not increase it.

I totally agree with Mayor Chow and city council's position.

[REDACTED]

From:

[REDACTED]

To:

[Minister, MECP \(MECP\)](#)

Date:

April 19, 2024 2:24:46 PM

MPP Adrea Khanjin
Ontario Minister of the Environment

Dear Minister,

Please see to it that Ontario Power Generation's proposed increase in fossil fuel burning on the shores of Toronto receives a thorough environmental assessment.

The health and future of my grandsons looks increasingly grim.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Date: April 19, 2024 1:28:58 PM

Good afternoon,

I am writing to ask that you subject the Ontario Provincial Government's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. The decision to increase gas burning as an energy solution during a climate crisis can only be described as grossly irresponsible and, plainly, insane.

As the UN Secretary General, Anonio Guterres, has stated "to waste this opportunity would compromise our last best chance to stop runaway climate change. It would not only be immoral, it would be suicidal."

I hope you make the moral decision,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Date: April 20, 2024 2:21:46 AM

An environmental assessment for Highway 423 and gas burning plan on toronto waterfront is immediately warranted.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Waterfront gas burning
Date: April 19, 2024 2:43:56 PM

This needs to be environmentally assessed before approval. [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: We need a comprehensive assessment of OPG's proposal to increase gas burning
Date: April 19, 2024 4:27:54 PM

Dear Minister Khanjin,

We live near the Portlands Generating Station and are very concerned about OPG's proposal to increase gas burning on Toronto's waterfront.

A public meeting with OPG did not allay our concerns about the impact on residents. Recent long-form evidence-based coverage of climate change by independent journalists such as Gwynne Dyer has underscored in no uncertain terms the need for action.

Please listen to their warnings, and listen to our City.

Please subject the OPG proposal to a comprehensive environmental assessment.

Thank you.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: JAndrew-OP@ndp.on.ca
Subject: we need an environmental review of OPG's Portlands expansion
Date: April 19, 2024 2:11:29 PM

Dear Minister Khanjin,

I am a senior and a concerned Torontonion writing to ask that you heed Mayor Olivia Chow's and Toronto City Council's request for a comprehensive environmental assessment of OPG's proposed gas plant expansion in Toronto's Portlands.

OPG has given assurances that the proposed major increase in fossil gas burning will not have any significant impact on Toronto's air quality or the health of its citizens, but without an independent and comprehensive environmental assessment there is no way to confirm that, or to know what any of the environmental consequences of such a proposal would be.

Citizens have a right to know how proposed projects could potentially harm them, and governments at all levels have a responsibility to keep their citizens safe and to promote their well-being.

I strongly urge you to do the right thing and demand an independent, comprehensive environmental assessment of OPG's Portlands expansion proposal. After all, MPPs at Queen's Park breathe the same Toronto air as the rest of us.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: A proper environmental assessment please
Date: April 19, 2024 1:00:47 PM

Dear Minister

I live in Toronto and I know the last thing this city, this province and indeed this world needs is more fossil fuels being burned. The OPG's plan to do so should be subjected to a proper environmental assessment at the very least, so that scientifically informed decisions can be made, with the well-being of the residents here the primary focus. You were elected to oversee that process. Please ensure that it happens.

Sincerely

[REDACTED]

--

Sent from my Android phone with [mail.com](#) Mail. Please excuse my brevity.

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: An EA is required
Date: April 20, 2024 1:25:02 PM

Hello Minister,

I'm a retired university author and lecturer in Environmental Assessment. I also have honorary Doctorate of Laws from McMaster University.

Of course I'm also deeply concerned about climate change and understand the critical requirement to get off fossil fuels as quickly as possible. Consequently I'm bemused by the current trajectory of Ontario's electrical generating system, and especially it's increasing reliance on 'natural gas' (made up almost entirely of methane - one of the most damaging fossil fuels). Currently there is a proposal to increase the use of gas at the Portlands facility in Toronto that appears extremely unwise. More so I'm led to believe this proposal has not even been subject to an Ontario Environmental Assessment. The City of Toronto Mayor and Council has requested such an EA. That very much should take place.

EA is one of the most widely adopted policy measures of the last half century because it is so imminently sensible and has generated such large benefits. Ontario was a leader in Canada in adopting EA. That was a decision of the Progressive Conservative government of the day. Ignoring the advantages of EA or 'skipping' it, especially for very environmentally significant projects, is foolish. I hope you will respect the request by the City of Toronto and require a comprehensive EA of the Portlands gas plant expansion.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: BAN burning oil
Date: April 19, 2024 7:06:06 PM

To: Minister of the Environment, Andrea Khanjin, for the environment, for the species that rely on clean air, we need to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to an *honest*, unbiased, comprehensive environmental assessment. We must treat the planet and all living creatures with care going forward.
sincerely, [REDACTED]

[REDACTED] & [REDACTED]
[REDACTED]
[REDACTED]@ [REDACTED]
[REDACTED]

Follow our journey on Instagram
[@ \[REDACTED\]](#)

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Burning more gas goes against science and the will and health of your electorate.
Date: April 19, 2024 3:01:29 PM

Respected Minister Khanjin,

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Yours sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Citizens request fir Full enviro impact assessment re port lands gas burning
Date: April 20, 2024 9:09:57 PM

Please do your job, we have your back!

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: comprehensive environmental assessment
Date: April 19, 2024 1:26:34 PM

to; Andrea Khanjin, Ontario Minister of the Environment,

Please subject (OPG) Ontario Power Generation s proposal to ramp up gas burning on the Toronto waterfront, to a comprehensive environmental assessment!

[REDACTED]

From: [REDACTED] & [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Comprehensive environmental assessment and the need for it.
Date: April 19, 2024 4:01:59 PM

Good Afternoon Andrea Khanjin,

Most all of us are concerned with our environment and want to read of a plan that builds an effective, well thought out plan going forward. So I'm asking that the OPG's proposal to ramp up gas burning on the Toronto waterfront be subjected to a comprehensive environmental assessment.

Properly done we can begin to move quickly in the best direction that holds a promising future of all. People make up only 0.1% of life on this planet, it is foolish to think we can survive if we don't take care of the delicate balance that helps us survive: clean water, air and land, it is essential moving forward. Therefore we need more wind, solar and water energy.

I am in my sixties. In high school we were warned of many of these concerns. I listened, I try but where are our leaders. If the majority of the people want a new plan to help correct climate change we need every person holding any seat of power to assist and participate so the democratic will of societal concerns are solved as a unit moving forward. We don't want continual disagreements and stubborn nonsense from our leaders. We need unity as Ontarians, indigenous and Canadians for our leaders to listen and join the brightest minds and work expeditiously to change old energy sources that no longer work to better energy sources; again, solar, wind and water. To be the most successful country on the globe, we must work with all provinces, and act now or fail. Be a person who listens and is an example of how co-operation can build a plan we can all be excited about and overjoyed to finally see in action. Please don't remain silent, or unmoved; insist on a comprehensive environment assessment and let's get started.

Thank you for your time, and your efforts to improve our tomorrows.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [REDACTED]
Subject: Comprehensive environmental assessment essential!!!
Date: April 19, 2024 2:04:33 PM

Dear Minister Khanjin,

It is incumbent on your honourable fulfilment of your role as the steward of Ontario's environment that no efforts be spared to guarantee our air, water and land are pristine. As part of such responsibility you must ensure that OPG's undergoes a comprehensive environmental assessment on its proposal to ramp up gas burning on the Toronto waterfront.

It cannot be delayed and it cannot be fudged.

I'll hold you accountable for you actions. Sincerely,

[REDACTED]

*Personal frugality. Communal abundance.
Live simply so that others can simply live*

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Comprehensive environmental assessment for generating station on the Toronto waterfront!!
Date: April 19, 2024 4:28:56 PM

Toronto Mayor Chow & the City Council appear not impressed with the increased fossil gas burning. It is clearly known that the increased gas burning, increases methane in our environment & also increased the deadly climate crises we are faced with for decades now. The continued push to use gas vs coal or any other fossil fuels is disgraceful, as all these fuels have put our world on the brink of disaster.

Premier Ford is oblivious to the climate crisis, as he has pushed ahead while in power to completely negate anything resulting in an appropriate way to live in Ontario. The fact he has not been recalled is a miracle, due to the stagnant lack of support for removing political players, who are 100% for corporations and zero for the people. In Cuba for example, a politician who deliberately lies to its population is immediately removed and forbidden to run again. You see, in Cuba democracy is the most important reality. Not so in Canada, where Ontario used to be the centerpiece of progress, democracy, health care, education and now due to the right wing expansion of destroying our treasured bureaucracies. I lived in Ontario when I was 17 and had three children there. Nothing could have prepared me for the disgraceful standard of politicking I see coming out of Ontario these days.

Back to the push for polluting gas now:

1. It is absolutely insane the present government believes we have until 2050, the opposite of what all scientists globally have stated is a deadline of 2025, to start. Canada has totally lacked any initiatives, impetus to start downsizing all of the fossil fuel enterprises & acts as if we are not affected by climate change. This year alone three large watersheds in Alberta are drying up. The Prairies are in a state of drought. BC will begin to have forest fires, due to the long term of not conducting controlled burning of dead trees from pine & spruce beetle killed trees. These fires will be a holocaust of such proportion, as they will go across the northern sphere of Canada and will not ever go out. The forests in northern Canada are at such great risk, our watersheds have been treated like a toilet & are becoming unattainable for water use for human beings.

As a person, who has lived in BC, AB, YK, NT, SK, MN, ON and drove across Canada across the north to find my home in [REDACTED] - I have seen it from the air, water, land & sea. I worked in [REDACTED] [REDACTED] [REDACTED] [REDACTED] northern BC, where the beetle-killed trees were red, like a crayon, which brought tears to my eyes. All those northern communities will not be able to contain any fire that will roar through these communities in the near future.

Now your ignorant government thinks it will be safe in Ontario. Have you ever flown or driven to the most northern parts of Ontario, where it is wilderness? Have you have any idea of the climate impacting wild spaces just limping along? Probably no - because as a northern my whole life, I find the people that make these decisions have no idea, no interest, no understanding of the statement made by scientists the world over: "Canada will

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Comprehensive Environmental Assessment needed at OPGs gas plant at the Portlands waterfront in Toronto
Date: April 20, 2024 12:40:59 PM

I am appalled Ontario is gearing up their gas powered plants that are big polluters of GHGs and will worsen our Climate and produce more air pollution!

Ontario is going backwards. We are antiquated in respect to energy production. What about wind and solar or other Cleaner Technologies.

Other countries have adopted better Cleaner energy technologies. Ontario is going backwards and creating more GHGs not reducing them.

I think the government is antiquated in their thinking!

[REDACTED]

Sent from my Galaxy

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Comprehensive environmental assessment needed
Date: April 19, 2024 11:03:41 PM

Hello Minister Andrea Khanjin,

I am writing to you to request that you subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. As I understand it , the city of Toronto has already said no twice to expanding gas burning on Toronto's waterfront. As a resident of the city of Toronto, I along with a large percentage of other tax paying residents voted for a mayor who is aware of the climate crisis and whose council has set a goal of reducing greenhouse gas emissions in Toronto to net zero by 2040. Premier Ford and his conservative colleagues are going down another road. It is not one that the majority of Torontonians support. I certainly hope that you will hear the voice of Torontonians and subject OPG's proposal to a comprehensive Environmental Assessment.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Comprehensive Environmental Assessment on OPG's Proposal
Date: April 19, 2024 8:12:14 PM

Dear Minister Khanjin,

I am kindly asking you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. What the Ford government wants to do is sheer madness and totally disregards the need for more eco-sensitive policies.

Kind Regards,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: comprehensive environmental assessment OPG's proposal
Date: April 19, 2024 1:27:30 PM

Dear Minister Khanjin

I am writing to ask that you subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment as per the request put forth by Toronto City Councillors - Paula Fletcher and Dianne Saxe.

thank you in advance for supporting this.

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: comprehensive environmental assessment
Date: April 19, 2024 4:48:08 PM

Dear Minister of the Environment,

Please practice generational foresight, and therefore good governance, and subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

There is no other respectful, scientifically grounded and moral decision other than this.

respectfully,

[REDACTED]

he/him

[REDACTED]

I honour and acknowledge the traditional caretakers of the land and water where I live - the Mississaugas of the Credit, the Haudenosaunee Confederacy, the Anishinaabe, and the Huron-Wendat.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Comprehensive Environmental Scan - OPG proposal
Date: April 20, 2024 10:01:06 AM
Attachments: [Outlook-bcmb3wl0.png](#)
[Outlook-Descriptio.png](#)

Dear Andrea Khanjin,

I am a concerned citizen about the climate crisis. Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment as soon as possible.

Please consider how we can make better decisions that are harmonized with the plans to lower carbon now.

Thank you,

[REDACTED] (she/her)

We would like to acknowledge that the land on which we have an office is located on the traditional territory of the Huron-Wendat and Petun First Nations, the Seneca, and most recently, the Mississaugas of the Credit River. To learn more about the history of the land, the story of the Mississauga people and the challenges they face to today, please see this website: <https://mncfn.ca/about-mncfn/community-profile/>.

In an effort to grow our online presence please consider leaving a google review [REDACTED]

[REDACTED] # [REDACTED]
[REDACTED] [REDACTED]

[REDACTED] is privileged and may contain confidential information intended only for the person(s) named above. Any other distribution, copying or disclosure is strictly prohibited. Unless you advise us to the contrary, by accepting communications that may contain your personal information from us via e-mail, you are deemed to provide your consent to our transmission of the contents of this message in this manner. If you are not the intended recipient, please notify us immediately and permanently delete the original transmission from us, including any attachments, without reading or making a copy of it.

Please consider the environment before printing this e-mail.

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: concern for climate
Date: April 19, 2024 7:51:20 PM

Hello Minister Khanjin ,

I am a retired senior who has worked in Environmental Services Programs for 35+ years . I have always been concerned about our shared environment...even more so now .

I hate the way that the Climate Crisis has been politicized – the crisis that we are all in rises far above any particular party – it affects everything on this great planet . Burning more fossil fuels is the absolutely wrong way to go – the present Ontario government needs to change so many of it’s approaches to all the problems we hear about every day . Sprawl is not the answer . Using natural gas to generate electricity is not the answer . Carbon pricing does work .

As Minister of the Environment please get a full environmental assessment in place for the proposed OPG increase of gas burning to generate power – it’s just a bad idea in this time of Climate Crisis . I have never understood why Ontario does not seek an arrangement with the Province of Quebec for their surplus clean power – such a no-brainer .

Best regards

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Concerned about the OPGs proposal to increase gas burning at the Toronto Waterfront
Date: April 19, 2024 4:35:31 PM

To Andrea Khanjin, our Ontario Minister of the Environment,
Please have this proposal reviewed by a **comprehensive Environmental Assessment**.
There is a global concern about climate change, global warming and the crisis that it will
inflict upon us.

If the OPG proposal to increase gas burning at the Toronto Waterfront is affirmed,
the immediate quality of living, the health and the sustainability of our almost **3,000,000**
Toronto residents will be grossly impacted

With our Transform TO Strategy, our 25 elected Toronto Councillors and Toronto Mayor
have established
the goal of reducing community-wide greenhouse gas emissions in Toronto to **net zero by**
2040.

Our Toronto residents and our elected Toronto Councillors understand that more fossil gas
burning
at the Portlands plant is a Provincial government disastrous commitment!
Once. Then twice, our elected Councillors and Mayor on behalf of our 3,000,000 Toronto
residents have refused the expansion

This Ontario government decision will result in **burning polluting gas to produce 25% of**
Ontario's electricity in 2030.

Please Reconsider!

The end of this Ontario Provincial government term is approaching..

Please subject the proposal to a comprehensive Environmental Assessment for our
collective existence, not the wallets of a few.

[REDACTED]

[REDACTED]

Home number: [REDACTED]

E-mail: [REDACTED]

*Lord, I expect to pass this way but once. Any goodness I can do, any kindness I can show,
let me do it now for I may never pass this way again.*

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: councillor_fletcher@toronto.ca; mayor_chow@toronto.ca; councillor_bradford@toronto.ca;
councillor_nunziata@toronto.ca; councillor_holyday@toronto.ca
Subject: Conservatives Adding to the Growing Climate Crisis in Toronto
Date: April 21, 2024 9:16:11 AM

I urge you to hold your government to account for their myopic decision to increase fossil gas burning on the Toronto Waterfront. At a minimum you are duty bound to subject OPG's proposal to ramp up gas burning on the shore of Lake Ontario to a comprehensive environmental assessment. Why not take a proactive approach instead of your standard governmental process of fiddling while Rome burns and then reversing decisions? Imagine the time and money your government wastes and doesn't put in my pocket with your self-inflicted injury approach: trying to right a ship you managed to fill with holes.

[REDACTED], another failed citizen of Ontario

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Don't allow more air pollution in Toronto
Date: April 19, 2024 3:39:46 PM

Re: Portland gas plant
Please subject this to a full environmental assessment.
Best, [REDACTED]

--
[REDACTED]
[REDACTED]@ [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: EA Request
Date: April 19, 2024 1:33:24 PM

Good afternoon Andrea,

Today I learned about Mayor Chow and Toronto City Council calling on Ontario's Environment Minister to subject Ontario Power Generation's (OPG) proposal to ramp-up gas burning at its Portlands Generating Station on the Toronto waterfront to a comprehensive environmental assessment.

I would like to echo this assessment necessity. If it is functional, this environmental review will assert how unconscionable this action is.

Toronto Council has set the goal of reducing community-wide greenhouse gas emissions in Toronto to net zero by 2040 under its TransformTO strategy. That is **16 years away**. Councillors understand that more fossil gas burning at the Portlands plant is the last thing we need right now, and have twice said no to the expansion.

As a concerned citizen of Ontario, I trust that you will act according to the climate emergency that threatens so much.

Thank you,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: End Nuclear
Date: April 22, 2024 4:08:16 PM

Please **subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.**

Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environment assessment desperately needed!
Date: April 19, 2024 3:25:13 PM

Dear Minister,

The Ontario government is going the wrong way about stopping climate change. They are found to guilty of increasing fossil fuel use by contracts with Enbridge. Therefore, I ask that you subject the OPG'S proposal to ramp up gas burning on the waterfront to a comprehensive environmental assesment.

Yours Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment
Date: April 22, 2024 1:40:49 PM

Dear Minister,

I am writing to urge you to request a full environmental assessment of OPG's proposal to ramp up gas burning at the Portlands generating station.

This ramp up of fossil fuel burning is exactly the opposite action needed in a global climate crisis.

Please do the full assessment for the sake of all children.

Sincerely,

[REDACTED]

Sent from my iPad

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment
Date: April 19, 2024 3:24:07 PM

Dear Ms. Andrea Khanjin,
Ontario Minister of the Environment

I am requesting that you subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

This is necessary if Ontario is serious about the climate crisis we face.

Thank you,

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment
Date: April 19, 2024 3:07:46 PM

Dear Minister,

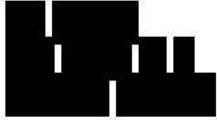
In order to meet the goal of reducing community-wide greenhouse gas emissions in Toronto to net zero by 2040 under its TransformTO strategy, I am requesting that you subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. Councillors understand that more fossil gas burning at the Portlands plant is the last thing we need right now, and have twice said no to the expansion. It's time to replace old energy sources with newer ones that do not harm the environment.

Thank you.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment
Date: April 19, 2024 2:00:59 PM

Please reconsider allowing OPG to increase fossil fuel emissions. It's completely contrary to our sustainability goals as a province, and does nothing to mitigate climate change. An environmental assessment as requested by Toronto Mayor is literally the LEAST you can do. I implore you to do that, and more for future generations.



From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: environmental assessment
Date: April 19, 2024 12:42:02 PM

Good afternoon Ms. Khanjin,

It is absolutely necessary for you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. The idea of burning more fossil fuels is abhorrent to me and deadly to our planet.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment
Date: April 20, 2024 1:35:15 AM

A comprehensive environmental assessment is absolutely needed for the Toronto Waterfront before vamping up gas burning plant expansions!

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental Assessment before Gas Burning, please.
Date: April 19, 2024 12:54:44 PM

Dear Minister Khanjin,

I live in Beaches-East York. Historically, this is one of the south-eastern lake-front communities with elevated respiratory illness.

Now Ontario wants to burn yet more fossil-fuel here, put more micro-particles in the air? NO!

And then there's the climate issue. STOP THIS. There are safer ways to provide our energy needs: safer for the climate, and safer for me and my neighbours!

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Sincerely,

[REDACTED]

[REDACTED]

coaching change leaders who want to lead themselves first
at [REDACTED]

[REDACTED] @ [REDACTED] | + [REDACTED] | @ [REDACTED]
schedule a call: [REDACTED]

"It's amazing what a little phone coaching can accomplish."

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: mayor-chow@toronto.ca; [Gord Perks](#); [Bhutila Karpoche-CO](#)
Subject: Environmental Assessment for Gas Burning on Toronto Waterfront
Date: April 19, 2024 6:08:36 PM

Dear Hon. Khanjin,

Gas burning has no place on our waterfront. Please conduct a comprehensive environmental assessment.

Thank you!

--

[REDACTED]

Moving home, office or business call [REDACTED] & [REDACTED] [REDACTED] [REDACTED] [REDACTED] Owned and operated by my son [REDACTED] [REDACTED]

Cantala is a joyful, artistic home to find inspiring and uplifting choral experiences www.cantalachoir.com

Wikitree is a community of genealogists connecting the human family on a free family tree.

From: [REDACTED]'s [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment for OPG's gas plant
Date: April 21, 2024 8:26:02 AM

Dear Minister Khanjin -

I am writing to ask that you please ensure that OPG's proposal to [ramp up gas burning on the Toronto waterfront](#) is subjected to a comprehensive environmental assessment.

Thanks



Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment for Portlands Generating Station
Date: April 20, 2024 12:05:22 PM

Minister Khanjin,

I am requesting that you order that a comprehensive environmental assessment be completed before the Ontario Power Generation's plan to increase gas burning at the Portlands Generating Station is implemented.

As you know, the City of Toronto has already said no twice to this expansion. I expect that our provincial government will listen to the voices of other elected officials, who also speak on behalf of Ontarians. If the provincial government chooses to support OPG's plan despite those voices, it should at a minimum ensure that the policy it is choosing to support is environmentally sound.

I look forward to your response.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment for the Waterfront
Date: April 20, 2024 12:25:49 PM

Dear Minister:

I have been informed of the OPG proposal to increase gas as a source of energy and am oppsed. Would like to see an environmental assessment done.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: environmental assessment needed for OPG's proposal to increase burning gas for power
Date: April 19, 2024 2:59:57 PM

Dear Minister of the Environment, Andrea Khanjin,

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

As a citizen and a parent, I'm very concerned about any increase in fossil fuel burning, for any reason, and especially where are other options already available. We don't need increases in gas-power.

The science is clear. We need action for a liveable future prioritized, over profits for vested interests, and over ideologies.

I hope to receive a response.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [REDACTED]
Subject: Environmental Assessment needed for Toronto Waterfront
Date: April 19, 2024 10:14:27 PM

Please do your proper job of requiring a full Environmental Assessment for any proposed Gas burning power plants in Toronto area.

Our City is focused on eliminating fossil energy, and Ontario's should be too.

Thanks for following up to meet our Clean Energy needs his half century.

Stay Safe & Healthy, [REDACTED] [REDACTED]

[REDACTED]
Sent from my iPad

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment needed
Date: April 19, 2024 4:28:46 PM

Dear Minister Khanjin,

Can your office subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment?

I appreciate all you do for the environment,
Best regards,

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: doug.fordco@pc.ola.org; mayor_chow@toronto.ca
Subject: Environmental Assessment of OPG's proposal to ramp-up gas burning on Toronto's waterfront
Date: April 20, 2024 2:55:02 PM

Dear Minister Khanjin,

Like Toronto Mayor Chow, I strongly urge you to subject Ontario Power Generation's (OPG) proposal to ramp up gas burning at its Portlands Generating Station on the Toronto waterfront to a comprehensive environmental assessment.

Premier Ford and OPG both seem oblivious to the growing climate crisis, however that is not the case with the Mayor and Toronto Council who have set a goal of reducing community-wide greenhouse gas emissions in Toronto to net zero by 2040. More fossil gas burning at the Portlands plant is the last thing we need right now.

We must ensure a safe, liveable future for future generations and more gas burning plants is **NOT** the way to achieve this.

Yours truly,

[REDACTED] (a concerned grandmother)
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: environmental assessment please
Date: April 19, 2024 1:15:28 PM

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental Assessment
Date: April 21, 2024 5:21:19 PM

Greetings Minister:

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment as per Mayor Chow's suggestion.

Regards,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental Assessment: Toronto Portlands
Date: April 20, 2024 9:51:26 AM

Good day Minister Khanjin,

I am writing to you today to add my voice to the body of residents in the region of Toronto concerned about further development of gas burning at the Portlands Generating Station.

The City's questions about quantities of future greenhouse gas emissions and air pollutin emissions have not been answered. Further, where this facility was intended to operate as a peaking facility. It has already been operating at significantly higher levels without data regarding associated effects and emissions.

The City and the IESO are actively working together on the Integrated Regional Resource Planning specifically includes examining options to reduce reliance on the Portlands Energy Centre.

It is well known that investments in conservation, including sustainability features in new housing (heat pumps should be mandatory) and commercial builds, can eliminate the new for new energy production, create jobs and save the voting public money. From the UN: <https://www.un.org/en/climatechange/raising-ambition/renewable-energy>

The City has adopted a net zero greenhouse gas emmissions target, voted against ~~further development of any~~ fossil fuel burning energy generation in our city, and specifically requested policy to prohibit increasing the gas-fired generating capacity at the Portlands Energy Centre.

I am calling on you to end any development of fossil fuel burning at the Portlands Energy Centre. In support of the City council I am calling on you to ensure a thorough environmental assessment as a very least measure of responsible leadership.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental review necessity
Date: April 19, 2024 1:58:12 PM

Hello Minister,

I am writing in support of Mayor Chow's request for a comprehensive environmental review of proposed increased gas fuelled electricity generation in the Portlands Generating Station. The Toronto City Council has already wisely said no to such a proposal. With climate change escalating exponentially, increasing use of fossil fuels is the opposite of what we should be doing.

[REDACTED]
Sent from my iPad

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmentalists Assessment needed for new expanded gas electricity generation plan
Date: April 19, 2024 6:51:20 PM

Dear Minister,

Please ensure that the above inappropriate proposal is subjected to a complete environmental assessment.

Thank you.

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment critical prior to gas burning increases
Date: April 22, 2024 2:19:48 PM

Dear Minister

It's unconscionable to approve increases in gas on the Toronto waterfront without a comprehensive environmental assessment. We're seeing first hand the costly and devastating consequences of climate change in Toronto and around the world.

Currently our electric grid is quite green. Our low emissions grid is attracting international interest and investment as multinational companies look to produce low emissions products (ie electric vehicles) in a low emissions grid bringing good jobs to the province.

Increasing our grid emissions are a disincentive for attracting new business, not to mention undermining our international commitments to meet emissions targets.

In the context of our warming climate, I can't comprehend how any government can resurrect old solutions which have contributed to our current climate crisis. Alternate low emissions and low cost solutions exist. Look to the future and transition away from from the inertia of past solutions. You've already started with the electricity swap with Quebec. Keep going and continue moving forward with new models.

Sincerely

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: re: OPG's proposal for increased burning at the Portlands plant
Date: April 19, 2024 3:15:27 PM

Hi Ms. Khanjin,

Please do an environmental assessment on plan to increase gas burning at the Portland plant.

Burning more fossil fuels to provide electricity is the wrong way to go, especially with a myriad of other options.

Ford doesn't seem to be going in the right direction - please don't follow him into the black pages of history.

Regards,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Fossil fuels
Date: April 19, 2024 2:18:41 PM

If an environmental assessment is not done on the proposal to burn more at our waterfront it will mean two

things

1-You are being paid off

2-You don't care about the lives that will be harmed by such a disastrous plan.

Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Fwd: OPG
Date: April 19, 2024 3:12:23 PM

> Please ensure a thorough environmental assessment is completed before ramping up of gas production on the Toronto waterfront. This will be a travesty if allowed to proceed with no respect for our seriously degrading environment.

>

> Sincerely,

>

> [REDACTED]

>

>

>

>

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas Burning
Date: April 19, 2024 4:39:33 PM

Dear Environmental Minister,

Please do an environmental assessment re the gas burning near the Portlands. This is something Mayor Chow would like. I actually hope you can stop burning gas.

Citizen of Toronto,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas Burning in Southern Ontario
Date: April 19, 2024 2:38:25 PM

Minister of the Environment for Ontario

Dear Minister Khanjin:

I believe it very important to the environment of southern Ontario that OPG's proposal to ramp up gas burning on the Toronto waterfront be subject to a comprehensive environmental assessment, and ask that you make this assessment mandatory.

Thank-you,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas burning increase
Date: April 19, 2024 1:07:06 PM

Dear Minister,

I am writing to request that the Ontario Power Generation's proposal to increase burning gas at the Portlands Generating Station be subjected to a thorough environmental assessment review.

The Ontario government currently shoulders a credibility deficit that it understands and attends to the risks of burning of fossil fuels.

Ordering an environmental assessment of OPG's proposal would demonstrate the government takes seriously this environmental issue.

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas Burning on the Toronto Waterfront
Date: April 21, 2024 1:38:28 AM

Kindly respect Toronto city council's recent motion to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

I recall the smog-alert days in Toronto. They will be much worse with the hotter temperatures in summer months that are to come with climate change.

Thank you for your attention.

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [REDACTED]
Subject: gas burning on the Toronto waterfront
Date: April 19, 2024 3:06:47 PM

Dear Ms. Khanjin,

I very much object to any increase in the use of natural gas in Ontario, contrary to Premier Ford's ideas, and I understand there is a proposal by OPG to ramp up gas burning on the Toronto waterfront. Mayor Chow has asked for a comprehensive environmental assessment and I completely concur with her. We must, for the sake of future generations, and the planet, phase out the use of all fossil fuels as soon as possible. It is unconscionable to consider this project without a comprehensive environmental assessment.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas burning on the Toronto waterfront
Date: April 21, 2024 11:18:05 AM

Dear Honourable Minister:

I understand that the Ontario Provincial Government plans to increase gas burning on the Toronto waterfront.

I ask you to subject this proposal to a comprehensive environmental assessment. It is unconscionable that gas burning, which was at 4% in 2017, would be increased to 25%, particularly as the planet suffers more and more from the ravages of climate change.

Thank you for your attention to this matter.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas burning on Toronto Waterfront
Date: April 20, 2024 4:58:23 PM

Minister,

As a resident of Toronto's East End for all but fifteen of my ninety years I urge you to implement a comprehensive environmental assessment before permitting OPG to ramp up the burning of natural gas on our waterfront.

Your government should rather be doing the opposite, working to reduce and eliminate the burning of fossil fuels in the face of the growing threat to our climate and our planet.

I pray that you find the courage to stand up to your premier and urge him to get on the right side of history for the sake of our future.

Grandkids and great grand kid, including yours and mine, are counting on you.

Urgently,

[REDACTED]

Sent from Yahoo Mail for iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: gas burning on Toronto waterfront
Date: April 19, 2024 3:50:11 PM

Dear Minister,

I respectfully ask you to subject the proposed increase of natural gas fired electricity on the Toronto waterfront to a comprehensive environmental assessment. This increase will affect the air quality in Toronto. Also, Toronto has a plan to reduce their greenhouse gas emissions. This proposed increase flies in the face of all calls for reducing our emissions. In fact, your government's lack of action in reducing our greenhouse gas emissions since coming into office is glaring, starting with Ontario's getting out of the cap and trade system (and costing the taxpayers the price of abandoning that system).

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: gas burning on Toronto Waterfront
Date: April 21, 2024 10:16:39 AM

Andrea Khanjin,

Please subject OPG's proposal to ramp up gas burning at it's Portlands
Generating Station on the Toronto Waterfront to a comprehensive
environmental assessment.

--

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas burning on Toronto's waterfront
Date: April 22, 2024 1:25:46 PM

Dear Minister Khanjin,

Please [subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.](#)

Thank you,

[REDACTED] (a Toronto resident who and whose children breathe this air)

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: GAS BURNING ON TORONTO'S WATERFRONT
Date: April 19, 2024 6:49:11 PM

PLEASE make sure all environmental assessments are made before any increase in gas burning is implemented!

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: gas burning, Toronto waterfront
Date: April 19, 2024 1:43:17 PM

Please, Honorable Minister,
subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a
comprehensive environmental assessment.

This must not be the time to burn more gas and to further pollute our air and land and
water!

Please consider the environmental assessment.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas plant expansion
Date: April 19, 2024 8:33:43 PM

Dear Minister Khanjin,

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Could a comprehensive environmental assessment also be done on the proposed gas plant expansion on Lake Ontario, which Napanee council approved in return for accepting, basically, bribe money? It was disheartening to hear of their decision, especially when so many other cities declined the big buck bribe.

I am hopeful that gas plant expansions can be curtailed with your intervention.

Sincerely,

[REDACTED]

Sent from my iPad

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: gas plant ramp up
Date: April 19, 2024 3:35:48 PM

Dear Andrea Khanjin,

I write you today as a patient with lung disease and mother of a child with asthma. I and many Torontonians remember last summer's terrible smog and are being told by experts not to expect anything different this coming summer. This is not acceptable and we must do everything in our power to bring down the toxic air quality. This means that before anything, we cannot risk using a polluting technology knowing that it can't but add to the noxious air quality.

I ask that you do the right thing and subject OPG's proposal to ramp up gas burning on Toronto's waterfront to a thorough and comprehensive environmental assessment!

Respectfully yours,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas plant
Date: April 20, 2024 9:31:57 PM

Sent from my iPad. Gas plants will harm the people of Toronto. I request that the government get a full environmental assessment of this project before constructing the plant. We need cleaner air and clean energy.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas power plants Ontario
Date: April 21, 2024 4:05:27 PM

Dear Minister Khanjin,

The OPG is planning to ramp up the use of gas burning facilities to produce electricity in Ontario. This decision is an expensive and unclean method of power generation for the province, especially at a time when our needs can be met using wind and solar.

I am asking you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Thank you,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Gas powered electricity generation
Date: April 19, 2024 11:11:58 PM

Hello Minister Khanjin,

Please do the right thing and ensure that a comprehensive environmental assessment on OPG's proposal to ramp up gas burning on the Toronto waterfront is completed prior to any decision to develop more gas fired electricity generation. Toronto has said clearly that they do not want this pollution in their city. You must listen to them.

I don't want any gas powered electricity. There is no need for it. Spend our tax dollars on clean energy alternatives like wind, solar and battery storage. I produce as much energy as I use with a 6kw solar array. It will pay for itself in about 10 years. What we need your government to do is support development of innovative ways to make clean electricity. Allow distributed power generation and neighbourhood electricity grids.

Climate change is real and the effects are getting more and more dangerous every year.

I don't know if you experienced the smoke from the Quebec forest fires last year, but here in Ottawa the air quality was at the hazardous level. Everyone was wearing masks and not for Covid! This is not the way I want to live and I certainly don't want my children and grandchildren to suffer from asthma and other respiratory problems caused by wildfire smoke.

You were elected to make hard choices, not to follow like a sheep and not to cater to the opinion polls. You have to tell people the truth about climate change. Try telling people how much their taxes will go up to prevent climate change and to adapt to climate change compared to what their future will be like if humanity continues to allow levels of CO2 to continue to rise. Find ways to limit costs to our health and damage to our homes by reducing carbon dioxide, methane, and other pollution caused by burning fossil fuels. It is your responsibility to make decisions to prevent harm to Ontario: its environment, its wildlife and its people.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: I support a comprehensive environmental assessment before OPG's proposal to ramp up gas burning on the Toronto waterfront.
Date: April 19, 2024 2:20:53 PM

Good afternoon Minister Khanjin,

I support a comprehensive environmental assessment before OPG's proposal to ramp up gas burning on the Toronto waterfront.
We are in a climate emergency. Environmental assessments, protect all Ontarions, and help us to reach climate change targets.
Without environmental assessments, the provincial government is subjecting Ontarions to destructive, unhealthy environments. Please respond.

Respectfully,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Increase in burning natural gas for electricity
Date: April 19, 2024 2:29:32 PM

To the minister:

I request that you subject OPG's proposal to ramp up gas burning on the Toronto Waterfront to a complete Environmental Assessment. We need to keep a close eye on what contributes to climate change and burning Natural Gas is a significant problem. I have installed a Heat Pump to assist in heating my home and have cut my use of natural gas by close to two thirds. Our Province needs to use other methods to create electricity and reduce the use of Natural Gas. [REDACTED] [REDACTED] [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Increase in gas-generated electricity
Date: April 20, 2024 12:43:20 PM

To Minister Andrea Khanjin,
Minister of the Environment

Please reconsider the proposal to increase gas-powered electricity generation at the Portlands Generating Station in Toronto. Mayor Olivia Chow and Council have made a reasonable request for a comprehensive environmental assessment. Many Ontarians outside Toronto support their request.

Increasing the use of gas undermines all attempts to mitigate climate change and confirms the idea that the present Ontario government is not interested in reducing the immediate or long-term effects of greenhouse gas emissions.

The economy, as well as the health and well-being of all citizens, is at risk because of decisions like this one.

Please take the time for an environmental assessment and public consultation before making this decision.

Thank you.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: increased burning of gas
Date: April 20, 2024 2:43:14 PM

Dear Minister:

I understand that the OPG wants to increase the use of gas to generate power, despite the negative effects on the environment. This is going in the wrong direction.

Please insist on a comprehensive environmental assessment, before this is allowed.

[REDACTED]
Toronto

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Increased Gas Burning on Toronto's Waterfront
Date: April 19, 2024 1:45:09 PM

Dear Minister Khanjin,

Please subject the latest OPG proposal to ramp up **gas burning** on Toronto's waterfront to an **environmental assessment** for the sake of all citizens and future generations. We're in a **climate emergency** and the air quality is predicted to be much worse this year than in 2023.

Thank you,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: More renewables, Less Gas.
Date: April 22, 2024 11:13:33 AM

Dear Minister Khanjin,

I write to inform you that I object to increasing the burning of fossil gas and to ask you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Thank you,

[REDACTED]
[REDACTED]@ [REDACTED]. [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: My opposition to Gas-fired electricity generation in Ontario
Date: April 21, 2024 6:46:25 AM

Dear Minister of the Environment, Andrea Khanjin

I am writing to advise that I support Toronto City Council's subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. I also support the Ontario Clean Air Alliance's campaign in this regard. You can learn more about the OCCA's campaign by going to:-

<https://www.cleanairalliance.org/polluting-gas-25/>

Yours truly

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Natural Gas Ramp Up on Toronto Waterfront
Date: April 21, 2024 9:50:12 AM

Hello Ms. Khanjin:

It is apparent that Premier Ford and Ontario Power Generation are both oblivious or choose to be oblivious to the growing climate crisis but we Ontarians are not and do not! As a concerned Ontario citizen, I am asking you in your role as Minister of the Environment to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment so that we all can do our part to address positively our climate crisis together. Thank you for your kind attention.

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Need an environmental assessment at the Portlands!!!!!!
Date: April 19, 2024 2:28:06 PM

No additional gas-fired plants!

Voter in Ontario

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Need for a Full Environmental Assessment
Date: April 19, 2024 12:54:59 PM
Importance: High

Dear Ms. Khanjin,

I am shocked to hear that OPG is planning to increase gas burning on the Toronto waterfront at the Portlands Generating Station.

It is bad enough that Ontario is becoming increasingly reliant on gas-fired power generation at a time of accelerating climate change, especially when cleaner and more cost-effective alternatives clearly exist.

To increase the burning of gas in the midst of Ontario's largest urban centre, however, is nothing short of insane. With the increased burning of gas, negative health effects for those with respiratory ailments will also increase, resulting in suffering and increased healthcare costs.

Before moving any further, this proposal should be subjected to a comprehensive environmental assessment.

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Ontario Power Generation's (OPG) proposal
Date: April 23, 2024 10:37:17 AM

Good day Minister Khanjin,

I am writing to you today to ask (actually beg) that the Ontario Power Generation proposal to INCREASE the burning of fossil fuel at the Portlands plant in Toronto be subjected to a FULL environmental assessment.

It is incomprehensible to me how Premier Ford and his government have been irresponsible with respect to all aspects of the climate crisis and this possible expansion is yet one more example!!

I hope and pray that YOU will do the right thing for our children and grandchildren.

Respectfully, [REDACTED]
Citizen of Ontario

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG - Environmental Assessment
Date: April 19, 2024 1:27:28 PM

As a voter living in Toronto I am asking for an Comprehensive Environmental Assessment of OPG intention to increase output at Toronto Waterfront station. Your party has opposed environmental assessments, to this date.

Say “yes” to move our province forward to real Long Term Solutions and not be afraid of the results of a Comprehensive Environmental Assessment - get real ti e facts something to be proud of! To own the best outcome and to be proud of your work!

Thank you for reading my email, [REDACTED]
Ontario Voter, Resident

Shirking responsibility

Sent from my iPad

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG
Date: April 19, 2024 2:22:52 PM

Dear Minister Khanjin,

Please require OPG's proposal to increase gas burning to a comprehensive environmental assessment.

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG and gas burning
Date: April 20, 2024 4:52:36 PM

We should not be increasing fossil gas burning in Ontario. Gas burning means a rise in health and climate problems.

There should be a comprehensive environmental assessment of the OPG proposal to boost fossil gas burning at the Portlands gas plant.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG and gas ramp up
Date: April 22, 2024 6:00:31 PM

NEEDED. a comprehensive environmental assessment for OPG's proposal to ramp up gas (methane) burning on Toronto's waterfront. Please. Respectfully
Blessings. [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG Assessment
Date: April 19, 2024 2:09:20 PM

Hello Minister,

I strongly urge you to submit the OPG waterfront proposal to a full environmental assessment.

Yours truly,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG Environmental Assessment
Date: April 19, 2024 4:09:47 PM

Minister Khanjin

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Thank you,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG environmental assessment
Date: April 21, 2024 11:44:52 AM

Greetings,

I strongly urge you to please subject Ontario Power Generation's proposal to burn gas at Toronto Portlands Generating Station to a comprehensive environmental assessment.

Thank you,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG gas plant at Portlands
Date: April 19, 2024 2:04:33 PM

Minister,

I would respectfully ask you to require an environmental assessment of the plan to increase the burning of fossil fuels at the Portlands gas plant. Even though the province seems to be out of step with its energy planning and climate change, you as the Minister, have a responsibility to the people of Ontario.

Please do the right thing rather than kowtow to the wishes of the Premier.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG Gas Plant
Date: April 19, 2024 3:51:06 PM

Hello

As a resident of Toronto I ask that you request a comprehensive environmental assessment of the proposed expansion of the Portlands Generating Station.

It is imperative that there be no increase in gas burning which would only worsen the already dire climate crisis. This past March was the hottest in recorded history.

This summer is expected to be as hot as last year. We need to do everything in our power to reduce emissions.

Please ensure that a full scale environmental assessment is done.

Sincerely

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG interest in new gas plants in Toronto
Date: April 19, 2024 12:59:45 PM

To allow such a project without thorough environmental assessment would be a travesty exemplifying poor governance!! Voters will not such a lapse.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG issue
Date: April 20, 2024 5:36:01 PM

Dear Minister,

I am concerned about fossil fuel emissions and climate change. As an Ontarian, I don't think the solution is to burn more fossil fuels. Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.
Thanks,

[REDACTED]

Sent from my rotary phone

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG proposal - environmental assessment
Date: April 21, 2024 12:56:14 PM

Dear Minister

I support Toronto City Council's request to submit OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment. More fossil gas burning at the Portlands plant is not what the planet needs. Toronto has twice rejected this option.

I'm adding my request to theirs. Ensure a comprehensive environmental assessment is done on this proposal.

Thank you.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG Proposal - Gas Burning on Toronto Waterfront
Date: April 19, 2024 2:17:58 PM

Madame Minister,

I am writing to you to express my strong concern about the Ontario Power Generation proposal to dramatically increase the amount of gas combustion for power generation on the Toronto Waterfront. This proposal seems to me to be far from prudent. It does not align with our essential need to reduce the emission of gases that cause climate change, forest fires and severe drought conditions in numerous parts of Canada.

It is clear that we are in a situation of crisis with respect to these emissions. In light of that situation I strongly urge you to subject this proposal to a comprehensive environmental assessment prior to any implementation. It is absolutely essential that we reduce the amount of carbon entering the atmosphere from the combustion of natural gas.

Thank you for your attention.

Sincerely,

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG proposal needs full environmental assessment
Date: April 19, 2024 8:04:50 PM

Dear Minister Khanjin.

After the summer of smoke we had last year and the obvious threat to human health from the growing climate crisis, we absolutely need a full environmental assessment of OPG's proposal to burn more fossil gas at the Portlands power generating station in Toronto.

I support the Toronto City Council motion calling for full EIA.

I beg you to require the same – a comprehensive environmental assessment.

Yours sincerely,

[REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [REDACTED]
Subject: OPG Proposal re: Toronto
Date: April 21, 2024 10:51:42 AM

April 21

Dear Minister Khanjin

Please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG proposal to burn more gas
Date: April 19, 2024 1:41:50 PM

Dear Minister,

I am writing to ask that you to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

We cannot afford to get this wrong. Our planet is burning!!

Regards

[REDACTED]

[REDACTED]

"All that is required for evil to prevail is for good men to do nothing." - Edmund Burke

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG Proposal
Date: April 19, 2024 10:14:38 PM

Dear Minister;

The current proposal by the OPG for an increase in gas fired power plant in Toronto should be subject to a full environmental assessment. This is not the time to be adding to fuel burning power. The current administration has been very resistant to any shift toward renewable energy in spite of the fact that renewables are quicker to deploy and supply cheaper energy. Ontario has spent a lot of taxpayer money on industrial support for EV battery plants but refuses to take any steps toward renewable generation. Attempting to add capacity in Toronto is just continuing the policy of fossil fuel generation at the detriment of the environment.

Regards,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG ramp-up
Date: April 19, 2024 1:15:46 PM

Ontario Power Generation's proposal to **ramp up gas burning** at its Portlands Generating Station is a bad idea. Either put an end to the proposal or submit it to a full environmental assessment. We do not need more fossil fuel use. We need much less!

Thank you for your consideration

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG Waterfront Proposal
Date: April 19, 2024 3:11:20 PM

Please Minister Andrea Khanjin, subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Salud,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG
Date: April 19, 2024 6:51:54 PM

OPG's project needs environmental assessment. Its being proven in courts that we have human rights to protection from polluted air

[REDACTED]

Sent from my Galaxy

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's proposal to ramp up gas burning on the Toronto waterfront
Date: April 19, 2024 5:57:41 PM

Andrea Khanjin, Ontario's Minister of the environment,
Please require OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

Respectfully,

[REDACTED]

Sent from my iPad

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Concern
Date: April 27, 2024 2:17:23 PM

I am writing to ask you to subject the Portlands gas expansion to a full environmental assessment of its GHG emissions and health impacts.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Concern
Date: April 27, 2024 2:17:23 PM

I am writing to ask you to subject the Portlands gas expansion to a full environmental assessment of its GHG emissions and health impacts.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment for OPG ramp up, please
Date: April 24, 2024 5:07:16 AM

Dear Andrea Khanjin, Minister of the Environment:

Please know that as a citizen of Ontario and a resident in Toronto, I appreciate and support Mayor Chow's request to subject OPG's proposal to ramp up gas burning on the Toronto Waterfront to a comprehensive environmental assessment.

That means "yes" I do want my Ontario tax dollars spent on estimating the environmental effect of the ramp up.

Thank you.

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental Assessment for proposed OPG ramp-up of gas power on Toronto's waterfront
Date: April 23, 2024 9:26:16 PM

Minister Khanjin,

I am writing to you today to ask you, as Ontario's Minister of the Environment, to subject Ontario Power Generation's proposal to ramp-up gas burning at its Portlands Generating Station on the Toronto waterfront to a comprehensive environmental assessment.

We can't wait until 2050 to completely phase-out gas power. I agree with Toronto City Council in saying no to expansion.

Thank you for your consideration.

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: environmental assessment of Portlands Generating Station Expansion
Date: April 26, 2024 11:08:39 AM
Attachments: [image001.png](#)
Importance: High

Dear Minister of the Environment, Andrea Khanjin,

I am asking you as a public servant and as a concerned citizen of the City of Toronto to please subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

We cannot afford to burn more fossil fuels in this current climate crisis. This expansion is not what the people of Toronto want. Please subject it to a comprehensive environmental assessment so we can know what the consequences of such an expansion will be.

Thank you,

[REDACTED] (she/her)
[REDACTED]
P: + [REDACTED]
E: [REDACTED]@ [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Environmental assessment
Date: April 23, 2024 8:01:58 PM

Minister, I am writing to request that you direct your department to conduct an environmental assessment of your government's proposal to ramp up the use of polluting gas plants to provide electricity, instead of achieving a greater benefit for all Ontarians through sustainable and non-polluting power sources.

In February, your government overruled an Ontario Energy Board decision to stop subsidizing fossil gas hookups for new Ontario home builds.

The OEB ruling would have allowed new homeowners to save on energy bills while helping our province move away from fossil fuels toward cheaper, cleaner renewables.

But instead of heeding the advice of an independent advisory board, your government doubled down on legislation to keep Ontario's homeowners hooked on fossil gas and stuck in the past.

Recently released internal records show that this was done to benefit the profit margins of Enbridge which will, of course, in turn support your government. This is not in the interests of our society. Honour your responsibility to the crucially important position to which you are, in trust, appointed. Order an environmental assessment of this proposal. Thank you.- [REDACTED]
[REDACTED]

Sent from [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [Councillor Gord Perks](#); BKarpoche-CO@ndp.on.ca
Subject: OPG and gas burning on Toronto waterfront.
Date: April 23, 2024 5:12:41 PM

Dear Minister Khanjin,

As per Mayor Chow and Toronto City Council's request, I fully support their call to subject OPG's proposal to ramp up gas burning on the Toronto waterfront to a comprehensive environmental assessment.

I believe that as a Minister of the Environment, it is your responsibility to do due diligence and carefully examine its impact before allowing this to move forward. Our City Council and our Mayor are doing their due diligence in protecting our city and its citizens. We expect the same from our provincial government.

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG proposal to ramp up gas burning
Date: April 25, 2024 11:34:52 AM

Dear Minister Khanjin

With the climate crisis already upon us, and 2023 seeing record high temperatures across the planet, it is very concerning to me that Ontario Power Generation (OPG) has a proposal to ramp-up gas burning at its Portlands Generation Station on the Toronto waterfront.

Toronto, and the world, are in the midst of an energy transition away from fossil fuels, in order to reduce greenhouse gases and limit climate change.

Last week, [Mayor Chow and Toronto City Council called on you](#) to subject OPG's proposal to a comprehensive environmental assessment. I support Mayor Chow and Toronto City Council. Please move forward with a comprehensive environmental assessment.

Kind regards,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG proposal
Date: April 26, 2024 9:32:05 AM

Hello Minister Khanjin,

I am writing to ask you to subject OPG's proposal of ramping up gas burning on the Toronto waterfront to a comprehensive environmental assessment. Please do the right thing. This proposal is in complete contradiction with Toronto council objectives.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: OPG's gas burning proposal - full EA needed.
Date: April 26, 2024 8:18:42 PM

Dear Minister,

I am calling on you to ensure that OPG's proposal to ramp up gas burning on the Toronto waterfront is subject to a comprehensive environmental assessment.

This proposal makes no sense for the environment, nor for the people of Toronto and Ontario.

Please act immediately to subject OPG's proposal to the scrutiny it requires.

Thank you.

[REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portland gas expansion
Date: April 26, 2024 6:03:16 PM

Minister of the Environment Andrea Khajin

There is only one way to stave off extreme increases in temperature: cut emissions that result from burning natural gas. There are alternative energy sources. Please undertake, as requested by the City of Toronto, the full environmental assessment of the Portlands gas expansion for the GHG emissions and health impacts.

[REDACTED]

Toronto resident.

--

~~~~~  
[REDACTED] i [REDACTED] . [REDACTED] @ [REDACTED] . [REDACTED] Tel: [REDACTED] [REDACTED] [REDACTED]  
~~~~~


From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portland Gas Extension should not be allowed and subject to an Environmental Assessment
Date: April 27, 2024 8:29:36 AM

Dear Minister, we are going backwards and need to get off of Natural Gas reliance.

We need more Energy Friendly Sustainable Alternatives like Solar and Wind.

Regards

[REDACTED]

From: [REDACTED]@ [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Cc: [REDACTED]
Subject: Portlands Energy Centre Capacity Expansion
Date: April 27, 2024 4:36:43 PM
Importance: High

Minister Khanjin,

We are writing to support the Toronto Mayor and City Council's call for a comprehensive environmental assessment of the Atura Power proposal to expand the capacity of the Portlands Energy Centre by 50 megawatts.

The world is moving away from fossil fuels and toward alternatives that will help reduce CO2 and other harmful emissions. The Independent Electricity Systems Operator supports the need to examine these alternatives. Expanding the Portlands Energy Centre's capacity runs counter to these directions and puts the Province of Ontario on the wrong side of history in this regard.

The City of Toronto has repeatedly expressed its opposition to the proposed expansion. It has also urged the Province to explore more climate-friendly alternatives to meet peak energy demands. These include increased energy efficiency, renewable energy, and energy storage. The City has even offered to make City-owned lands available for large-scale battery storage.

We are both in our 80s and will not likely suffer the worst effects of the climate emergency. But we – and you – are responsible for protecting our descendants from a disastrous future.

We therefore join Toronto in urging you to initiate a comprehensive environmental assessment that will include examining alternative solutions to our energy needs.

Hopefully yours,

[REDACTED]
[REDACTED]

[REDACTED]



From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands gas expansion
Date: April 27, 2024 1:15:37 PM

Dear Minister Khajin,

I urge that you subject the Toronto Portlands gas expansion to a full environmental assessment of its GHG emissions and health impacts.

The people of Toronto need protection from this unnecessary pollution.

Think of the children, and think 7 generations.

Sincerely,

[REDACTED]
[REDACTED] Clair [REDACTED] # [REDACTED]
[REDACTED]

--

"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has." Margaret Mead

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Portlands gas expansion
Date: April 27, 2024 9:13:40 PM

Dear Minister of the Environment Andrea Khajin,

Please subject the Ontario Power Generation's (OPG) proposal to ramp-up gas burning at its Portlands gas expansion to a full environmental assessment of its GHG emissions and health impacts.

thank you, [REDACTED] [REDACTED]

From: [REDACTED]
To: [Minister, MECP \(MECP\)](#)
Subject: Comprehensive Environmental Assessment
Date: May 9, 2024 6:54:24 PM

To: Andrea Khanjin

We all know that climate change is causing suffering in many parts of our world. We also know that every geological section of the Earth is intertwined and what happens in one area affects the other. If our GHG emissions ramp up, it affects the GHG emissions as a whole.

Please conduct a Comprehensive Environmental Assessment on the OPG's proposal to ramp up gas burning on Toronto's waterfront.

As a long time resident in Ontario, I'm finding it incomprehensible that educated, intelligent people cannot see that this would not only affect Canada's target for net zero by 2030 but also increase GHG everywhere. When we do this, we are complicit in the suffering of people.

Thank you,

[REDACTED]

[REDACTED]

*We never know when we will blossom
into what we're supposed to be. It might
be early. It might be late. It might be after
thirty years of failing at a misguided way.
Or the very first time we dare to shed
our mental skin and touch the world.*

— Mark Nepo

From: [REDACTED]@ [REDACTED]
To: Minister.MECP@ontario.ca
Subject: Environmental assessment of OPG gas plant
Date: May 16, 2024 5:49:00 PM

We believe a comprehensive environmental assessment is required before ramping up gas burning on the Toronto waterfront.

[REDACTED] & [REDACTED]

**Ministry of the Environment,
Conservation and Parks**

**Ministère de l'Environnement, de la
Protection de la nature et des Parcs**



Environmental Assessment
Branch

Direction des évaluations
environnementales

7th Floor
135 St. Clair Avenue W
Toronto ON M4V 1P5
Tel.: 416 314-8001
Fax.: 416 314-8452

7ème étage
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél.: 416 314-8001
Télec.: 416 314-8452

357-2024-1031

May 23, 2024

Good afternoon,

The Ministry of the Environment, Conservation and Parks (the ministry) is in receipt of your elevation request for Atura Power's proposed upgrades to its Portlands Energy Centre (the Project).

Your request will be forwarded to Atura Power, and they will be directed to review it and provide any documentation or other relevant information that may assist the minister in her review.

The concerns raised in your request will be reviewed and considered by the minister, together with the Project documentation and information provided by the proponent, before deciding whether additional environmental assessment work will be required for the Project. You will be notified in writing of the minister's decision once it has been made.

If you have any questions, please contact Simon Zhao, Project Officer with the ministry's Environmental Assessment Branch, by email at Simon.Zhao@ontario.ca.

Sincerely,

Nick Colella

Nick Colella
A/Manager, Environmental Assessment Services
Environmental Assessment Branch

c: Darius Sokal, Senior Communications Advisor, Atura Power
Simon Zhao, Project Officer, Ministry of Environment, Conservation and Parks

**Ministry of the Environment,
Conservation and Parks**

**Ministère de l'Environnement, de la
Protection de la nature et des Parcs**



Environmental Assessment
Branch

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Toronto ON M4V 1P5
Tél.: 416 314-8001
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357-2024-1032

May 23, 2024

Good afternoon:

The Ministry of the Environment, Conservation and Parks (the ministry) is in receipt of your elevation request for Atura Power's proposed upgrades to its Portlands Energy Centre (the Project).

Although your request was submitted outside the formal 30-day review period that followed the issuance of the Notice of Completion, the ministry received other elevation requests within the review period that raise similar concerns to the ones in your request. Accordingly, the ministry will be reviewing the concerns you have raised in conjunction with those requests that were received during the formal review and comment period as part of the minister's decision. You will be notified in writing of the minister's decision once it has been made.

If you have any questions or concerns, please contact Simon Zhao, Project Officer with the ministry's Environmental Assessment Branch, by email at Simon.Zhao@ontario.ca.

Sincerely,

Nick Colella

Nick Colella
A/Manager, Environmental Assessment Services
Environmental Assessment Branch

c: Darius Sokal, Senior Communications Advisor, Atura Power
Simon Zhao, Project Evaluator, Environmental Assessment Branch, MECP

Appendix B9b: Correspondence Since the 30-Day Review Period

From: Jackie Ho <Jackie.Ho@trca.ca>

Sent: Monday, April 29, 2024 12:30 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Cc: Zack Carlan <Zack.Carlan@trca.ca>; Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>

Subject: RE: Portlands Energy Centre Efficiency Upgrades Notice of Completion

Good morning,

TRCA staff have completed our review of the Screening Report and Notice of Completion for the above-noted project. Please see the attached response letter.

If you have any questions, please let me know.

Best,
Jackie

Jackie Ho (she/her)

Planner I

Infrastructure Planning and Permits | Development and Engineering Services

T: [437-880-2147](tel:437-880-2147)

E: jackie.ho@trca.ca

A: [101 Exchange Avenue, Vaughan, ON, L4K 5R6](https://www.trca.ca/101-Exchange-Avenue-Vaughan-ON-L4K-5R6) | [trca.ca](https://www.trca.ca)



April 26, 2024

CFN 69952

BY E-MAIL ONLY (portlandsupgrade@aturapower.com)

Krishana Gnanachandran, Project Manager
Atura Power
1415 Joshuas Creek Drive, Unit #101
Oakville, ON
L6H 7G4

Dear Krishana Gnanachandran,

**Re: No Objection in Principle – No Permit Required
Notice of Completion and Screening Report – Portlands Energy Centre
Efficiency Upgrades
Environmental Screening Process for Electricity Projects – Category B**

These comments respond to the Notice of Completion and final documents received by Toronto and Region Conservation Authority (TRCA) on March 27, 2024.

OVERVIEW

This project involves efficiency upgrades to the Portlands Energy Centre (PEC) at 470 Unwin Avenue, in the City of Toronto. This site is located within the Toronto Waterfront Screening Area. Upgrading the equipment at the PEC will increase its generating capacity by 50 MW to an output of 600 MW. The efficiency upgrades will be limited to replacing parts of the existing natural gas fired combustion turbines. All upgrade activities will take place within the existing facility and there will be no changes or expansion beyond the existing PEC footprint. TRCA staff understand that any equipment stored outside of the facility will be temporarily stored on tractor trailer/flatbeds located on existing paved or gravel areas. No changes to the facility's existing stormwater management are expected.

Due to the 50 MW increase in output capacity of the PEC, Atura Power is undergoing a Screening Stage assessment, originally under the Environmental Screening Process for Electricity Projects subject to Ontario Regulation 116/01 under the Ontario Environmental Assessment Act, and subsequently the "*Guide to Environmental Assessment Requirements for Electricity Projects*". Since the draft Screening Report released in December 2023, Ontario Regulation 116/01 has been revoked and replaced with Ontario Regulation 50/24. The requirement to undertake an Environmental Screening Process did not change. Public engagement for this project occurred from June to December 2023 including the release of a Draft Screening Report and 30-day review period. TRCA provided a response on

January 17, 2024. A Notice of Completion and final Screening Report was received by TRCA on March 22, 2024. A listing of documents reviewed is included/provided in Appendix A: Documents Reviewed by TRCA.

TRCA REVIEW

1. Staff have completed the review of this submission and have no objection in principle to the proposed efficiency upgrade works.
2. This site is located within the Toronto Waterfront Screening Area. As such, the project is not subject to permits under the Conservation Authorities Act. Please note TRCA offers the TRCA Voluntary Project Review (VPR) process to be followed as appropriate. Through the VPR, TRCA would undertake a review of the proposed project at the detailed design stage in lieu of a permit. This review is voluntary at the discretion of the proponent.
3. Staff advise that based on the information submitted in this proposal, a permit in accordance with the Conservation Authorities Act is not required. If the scope of work changes, consultation with TRCA should be reinitiated prior to project construction.

Should you have any questions or comments, please contact the undersigned.

Regards,



Jackie Ho
Planner I

Infrastructure Planning and Permits | Development and Engineering Services

Telephone: 437-880-2147

Email: Jackie.Ho@trca.ca

/jh

Attached: Appendix A: Documents Reviewed by TRCA

BY E-MAIL

cc: TRCA: Zack Carlan, Senior Planner, Infrastructure Planning and Permits

APPENDIX A: DOCUMENTS REVIEWED BY TRCA

DOCUMENTS REVIEWED

1. Letter; Re: Atura Power - Portlands Energy Centre Efficiency Upgrades - Draft Screening Report - TRCA Response (CFN 69952); prepared by Atura Power; dated January 22, 2024; received by TRCA on January 22, 2024;
2. Letter; Notice of Completion of a Screening Report; prepared by Atura Power; dated March 27, 2024; received by TRCA on March 27, 2024;
3. Portlands Energy Efficiency Upgrades; Screening Report for Electricity Projects; prepared by Atura Power; dated March, 2024; received by TRCA on March 27, 2024.

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 29, 2024 9:49 AM

To: Jackie Ho <Jackie.Ho@trca.ca>

Cc: Zack Carlan <Zack.Carlan@trca.ca>; Corinna Thomassen-Darby <Corinna.Thomassen-Darby@trca.ca>; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Portlands Energy Centre Efficiency Upgrades Notice of Completion

Good morning, Jackie.

Thank you for your email and letter confirming that the TRCA reviewed the Screening Report and Notice of Completion for Atura Power's proposed efficiency upgrades at our Portlands Energy Centre, and that:

- the TRCA has no objection in principle to the project,
- the project is not subject to permits under the Conservation Authorities Act, and
- that Atura Power should re-engage with the TRCA if the scope of the project changes.

We appreciate your review of the project documents and ongoing engagement with us.

Sincerely,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

[Atura](#) Power

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Monday, April 29, 2024 2:33 PM

To: [REDACTED]; Upgrade project for PEC <portlandsupgrade@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Stephen.Smith <Stephen.Smith@aturapower.com>; EABDirector@ontario.ca

Subject: RE: Atura Power PEC Efficiency Upgrades Project

Hello [REDACTED]

Thank you for your email and acknowledgement of our response.

Atura Power now waits for the Minister of Environment, Conservation and Parks' guidance and response regarding your elevation request.

We thank you for your continued interest in our project.

Thanks,

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Wednesday, May 1, 2024 7:27 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

First name: [REDACTED]

Last name: [REDACTED]

Region/Topic: PEC Upgrade

Email Address: [REDACTED]

Enter Your Message Here: I am still very concerned even after the study you have completed!

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, May 8, 2024 11:51 AM

To: [REDACTED]

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Contact Form Submission from [REDACTED] about PEC Upgrade

Good morning, [REDACTED]

The Environmental Screening for the efficiency upgrades of the Portlands Energy Centre was done in accordance with Ontario Regulation 50/24 and the associated *Guide to Environmental Assessment Requirements for Electricity Projects*. The assessment process required Atura Power to execute an Environmental Screening Process to identify if the project would have any potential environmental effects. As noted in Section 3 of the Screening Report, review of the PEC efficiency upgrades against the screening criteria determined that there are no potential negative environmental effects resulting from the project and, without any mitigation, all regulatory requirements will be met. The Ministry of Environment, Conservation and Parks is aware of the scope and assessment process Atura Power undertook for the project.

Your comment is noted, and we appreciate your interest in our proposed efficiency upgrades of the Portlands Energy Centre.

Sincerely,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

Atura Power

Sent: Friday, May 10, 2024 4:04 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade

First Name: Amanda Boyce

Last Name: Boyce

Topic: Upgrade and Expansion Projects

Upgrade and Expansion Project
Portlands Energy Centre Upgrade Project

Topics:

Email: aboyce@ola.org

Enter Your Message Here: Hello,

I am a Research Officer with the Legislative Research group at the Legislative Assembly of Ontario. Our group provides confidential, non-partisan research services to MPPs of all parties, their staff, legislative committees, and officials of the Legislative Assembly. We also prepare research papers on key public policy topics of interest to parliamentarians.

I am looking for information on environmental assessments or any other environmental studies done on the Portlands Energy Centre before it was approved back in 2005 or so. I am particularly interested in whether the radius of impact of the emissions from the plant was studied under different temperature and weather conditions.

Would you be able to provide copies of any such environmental assessments or other studies done before or at the time the Portlands Energy Centre was approved?

I would appreciate a response at your earliest opportunity. Thank you for your assistance.

I accept the privacy policy: Checked

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Sent: Sunday, May 12, 2024 10:41 AM
To: Boyce, Amanda <ABoyce@ola.org>
Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>
Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade

Good morning, Amanda.

Thanks for your email. I'll forward your request to those within Atura Power who manage/retain these documents and will respond to you once I hear back from them.

Can you tell me which MPP(s) or party(ies), their staff, legislative committee(s), and/or official(s) of the Legislative Assembly requested this information?

Best regards,

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

1415 Joshuas Creek Dr., Unit 200, Oakville, ON L6H 7G4

E: darius.sokal@aturapower.com

M: 289-795-6573

From: Boyce, Amanda <ABoyce@ola.org>

Sent: Monday, May 13, 2024 9:06 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade

Hello Darius,

Thank you for your quick reply, and on the weekend too. I really appreciate it. Our service is confidential and non-partisan. So when we make third-party requests for information like this, we only communicate on our own behalf and we don't reveal the parties who commission research from our service.

I look forward to hearing back from you.

Best,
Amanda

From: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Sent: Wednesday, May 15, 2024 3:38 PM

To: Boyce, Amanda <ABoyce@ola.org>

Cc: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade

Hi Amanda.

You're very welcome, and thanks for the clarification.

The team is compiling the documents and we will forward them soon.

Regards,

Darius

From: Stephen Smith

Sent: Thursday, May 23, 2024 4:00 PM

To: ABoyce@ola.org

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 1 of 8

Hello Amanda,

Thank you for your patience, I am attaching the Environmental Review Report (“ERR”) supporting the 2003 Environmental Assessment conducted prior to Portlands Energy Centre receiving its Environmental Compliance Approval to operated.

Note there are supporting documentation referenced within the report which I will be sending in separate emails due to the size. You should be receiving the following:

1. Air Quality Assessment
2. Noise Assessment
3. Aquatic Environmental Assessment
4. Terrestrial Environment Assessment
5. Socie-Economic Assessment
6. Archaeological Assessment
7. Human Health and Ecological Effects Assessment

If you do not receive the ERR or the 7 follow-up emails containing the items listed above, please let me know. I will be identifying the emails Part 1 to 8 for ease of organization.

Thanks!

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Stephen Smith

Sent: Thursday, May 23, 2024 4:06 PM

To: 'ABoyce@ola.org' <ABoyce@ola.org>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 2
of 8

Hey Amanda, Please see attached Air Quality Assessment.

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Stephen Smith

Sent: Thursday, May 23, 2024 4:07 PM

To: 'ABoyce@ola.org' <ABoyce@ola.org>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 3 of 8

Hello Amanda, Please see attached Noise Assessment and Addendum.

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Stephen Smith

Sent: Thursday, May 23, 2024 4:13 PM

To: 'ABoyce@ola.org' <ABoyce@ola.org>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 4 of 8

Hello Amanda, Please see attached Aquatic Assessment.

Stephen Smith

Environmental Specialist **Power Power**

289-259-2377 Stephen.smith@aturapower.com

From: Stephen Smith

Sent: Thursday, May 23, 2024 4:15 PM

To: 'ABoyce@ola.org' <ABoyce@ola.org>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 5 of 8

Hello Amanda, Please see attached Terrestrial Assessment.

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

To: ABoyce@ola.org

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 6
of 8

Hello Amanda, Please see attached Socio Economic Assessment.

Stephen Smith

Environmental Specialist **Atura Power**

289-259-2377 Stephen.smith@aturapower.com

From: Stephen Smith

Sent: Thursday, May 23, 2024 4:19 PM

To: 'ABoyce@ola.org' <ABoyce@ola.org>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 7 of 8

Hello Amanda, Please see attached Archaeological Assessment.

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Stephen Smith <Stephen.Smith@aturapower.com>

Sent: Thursday, May 23, 2024 4:21 PM

To: Boyce, Amanda <ABoyce@ola.org>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 8 of 8

Hello Amanda, Please see attached Human Health & Ecological Effects Assessment.

This is the final email, Please let me know if you failed to received any of the 8 emails containing the 2003 PEC assessments.

Thanks!

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Boyce, Amanda <ABoyce@ola.org>
Sent: Friday, May 24, 2024 11:09 AM
To: Stephen Smith <Stephen.Smith@aturapower.com>
Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>
Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 8 of 8

Hi Stephen,

Thank you so much for all of this – it is very helpful. I received the seven follow up email/documents.

Would you be able to re-send the Environmental Review Report you mentioned in your first email? It's the only document I'm not seeing attached, unless I'm missing it somehow.

Best,
Amanda



Amanda Boyce
Research Officer, M.A., J.D.
Legislative Research
Legislative Assembly of Ontario
2520-99 Wellesley Street West
Toronto, Ontario M7A 1A2
Telephone: 416-325-3687
Email: aboyce@ola.org

*Looking Back – Moving Forward.
Celebrating 50 Years of Dedicated
Service to Ontario's Parliament.*

From: Stephen Smith <Stephen.Smith@aturapower.com>

Sent: Friday, May 24, 2024 11:17 AM

To: Boyce, Amanda <ABoyce@ola.org>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC

<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 8 of 8

Hey Amanda, I'm glad to help. I've zipped file so hopefully it sends correctly.

Can you confirm receipt, if received I will follow up with the appendices.

Thanks

Stephen Smith

From: Stephen Smith <Stephen.Smith@aturapower.com>

Sent: Friday, May 24, 2024 4:24 PM

To: Boyce, Amanda <ABoyce@ola.org>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 8
of 8

Thanks Amanda, please see final file the ERR appendices.

If there is anything else please let me know!

Stephen Smith

Environmental Specialist | **Atura Power**

289-259-2377 | Stephen.smith@aturapower.com

From: Boyce, Amanda <ABoyce@ola.org>

Sent: Friday, May 24, 2024 12:20 PM

To: Stephen Smith <Stephen.Smith@aturapower.com>

Cc: Darius Sokal <Darius.Sokal@aturapower.com>; Upgrade project for PEC
<portlandsupgrade@aturapower.com>

Subject: RE: Aturapower.com | Inquiry from Amanda Boyce Boyce about portlands_upgrade Part 8
of 8

Thanks Stephen – I have received it!

Amanda

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Monday, August 5, 2024 8:51 AM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Inquiry from [REDACTED] about portlands_upgrade

First Name: [REDACTED]

Last Name: [REDACTED]

Topic: Upgrade and Expansion Projects

Upgrade

and

Expansion Portlands Energy Centre Upgrade

Project

Topics:

Email: [REDACTED]

Enter Your Message Here: I was a resident engineer during construction of the PEC 2007-2009. Can I get a tour of the plant? The Alstom technical rep who supervised the installation of the steam turbine will be in Toronto August 15-16. We would love to see the plant again. Is a tour possible??

I accept the privacy policy: Checked

From: [Upgrade project for PEC](#)
To: [REDACTED]; [Upgrade project for PEC](#)
Subject: RE: Aturapower.com | Inquiry from [REDACTED] about portlands_upgrade
Date: August 6, 2024 9:37:49 AM

Good morning, [REDACTED]

Unfortunately, we do not offer tours to the public outside of Doors Open Toronto in late May of most years.

Thanks for your message.

Darius Sokal

Sr. Communications & Stakeholder Relations Advisor

1415 Joshuas Creek Dr, Unit 200, Oakville, ON L6H 7G4

E: darius.soka@aturapower.com

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, August 20, 2024 3:45 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Inquiry from [REDACTED] about portlands_upgrade

First Name:

[REDACTED]

Last Name:

[REDACTED]

Topic:

Upgrade and Expansion Projects

Upgrade and Expansion Project Topics: Portlands Energy Centre Upgrade

Email:

[REDACTED]

Enter Your Message Here:

Please add me to your email list

I accept the privacy policy:

Checked

From: [Darius Sokal](#)
To: [REDACTED] [Upgrade project for PEC](#)
Subject: RE: Aturapower.com | Inquiry from [REDACTED] about portlands_upgrade
Date: August 21, 2024 8:56:04 AM

Hello, [REDACTED]

Thanks for your email and we will add you to the project email list.

Best regards,

Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: Atura Power <no-reply@sendgrid.opg.com>

Sent: Tuesday, September 17, 2024 12:02 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>; Darius Sokal <Darius.Sokal@aturapower.com>

Subject: Aturapower.com | Inquiry from [REDACTED] about portlands_upgrade

First Name: [REDACTED]

Last Name: [REDACTED]

Topic: Power Generation

Power

Generation Portlands Energy Centre

Topics:

Upgrade and

Expansion

Project Portlands Energy Centre Upgrade

Topics:

Email: [REDACTED]

Enter Your Message Here: I am writing a report on the potential for parking lot solar installations to offset generation from the Portlands Energy Centre. Can you tell me how many GWh of electricity the Portlands Energy Centre generated in 2023?

I accept the

privacy policy: Checked

policy:

From: [Upgrade project for PEC](#)
To: [REDACTED] [Upgrade project for PEC](#)
Subject: RE: Aturapower.com | Inquiry from [REDACTED] about portlands_upgrade
Date: September 18, 2024 2:51:30 PM

Hello, [REDACTED]

As Portlands Energy Centre plant manager Jose Garcia responded, the station generated 2,097,133 megawatt hours of electricity in 2023.

Best regards,
Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: [REDACTED]

Sent: Tuesday, September 17, 2024 12:11 PM

To: Upgrade project for PEC <portlandsupgrade@aturapower.com>

Subject: electricity generation at Porlands

Hello,

I have been asked to model renewable alternatives to power generation from the Portlands Energy Centre. Can you tell me how much electricity (GWh) was generated from the centre in 2023?

Best,

[REDACTED]

--

[REDACTED]

From: [Upgrade project for PEC](#)
To: [REDACTED] [Upgrade project for PEC](#)
Subject: RE: electricity generation at Portlands
Date: September 18, 2024 2:52:17 PM

Hello again, [REDACTED]

As Portlands Energy Centre plant manager Jose Garcia responded, the station generated 2,097,133 megawatt hours of electricity in 2023.

Best regards,
Darius Sokal
Sr. Communications & Stakeholder Relations Advisor
Atura Power

From: [REDACTED]
To: [Upgrade project for PEC](#)
Subject: Re: electricity generation at Porlands
Date: September 18, 2024 3:11:24 PM

Many thanks,

[REDACTED]

Appendix B10: Notice of Completion (November 2024)

Notice of Completion of a Screening Report

Portlands Energy Centre Upgrades

Atura Power, a subsidiary of Ontario Power Generation, is planning to make efficiency upgrades at the Portlands Energy Centre (PEC) that will allow the station to generate more electricity using the same amount of fuel.

Project Description

PEC is a combined-cycle natural gas-fueled electricity generating station with an electrical output capacity of 550 megawatts (MW). The station is in the Port Lands industrial area at 470 Unwin Ave., Toronto.

The upgrades project is not an expansion of the existing facility. The upgrades will involve replacing internal parts of the natural gas-fired combustion turbines with more efficient parts. This will increase the facility's generating contract capacity by an average of 50 MW to achieve a total average contract capacity of 600 MW. All upgrades will take place within the existing facility, and there will be no changes beyond the existing PEC footprint.

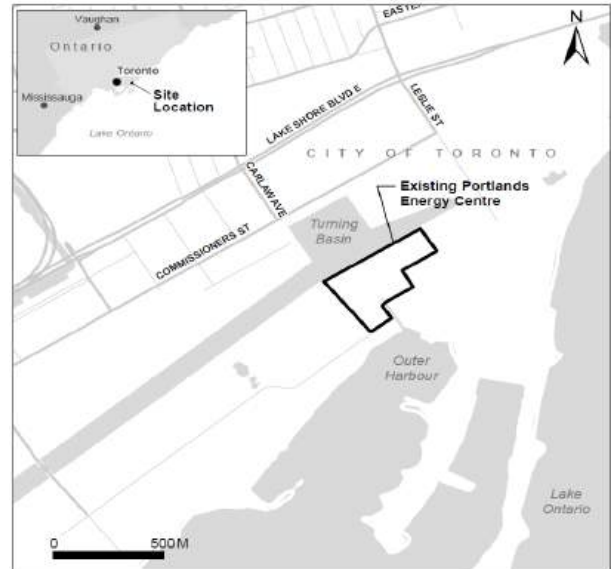
The Independent Electricity System Operator (IESO) quantified the near-term additional electricity supply need in Ontario, stating that an additional 4,000 MW of new capacity is required by May 2027. Procurements for projects capable of meeting the increased electricity demand in 2027 will need to be completed in the short term. Atura Power is prepared to help meet that need and support Ontarians through upgrades that will optimise and increase electricity generation at PEC.

Environmental Screening Process

Given that the upgrades will result in a 50 MW increase in the nameplate capacity (electrical output) of PEC, the upgrades are subject to the Environmental Screening Process for Electricity Projects pursuant to Ontario Regulation (O.Reg.) 50/24, under the Ontario *Environmental Assessment Act*.

Atura Power prepared and released a Screening Report according to the Environmental Screening Process for Electricity Projects (pursuant to O.Reg. 50/24) in March 2024. The purpose of this Notice of Completion is to share that Atura Power prepared a revised copy of the March 2024 Screening Report for public review. This revised November 2024 report contains additional information, specifically a new Appendix D: Air Quality Assessment Information.

Atura Power



For more information: <https://aturapower.com/>

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

The Screening Report documents the results of the Environmental Screening Process taken to identify whether any potential environmental effects of the PEC upgrades project would occur ('Yes' or 'No'). The Environmental Screening Process determined that all Screening Criteria scored 'No' and, without any mitigation, all regulatory requirements will be met. Atura Power intends to move forward with the upgrades subject to other approvals.

Indigenous communities, agencies, municipal staff, elected officials, and members of the public are invited to review the revised November 2024 Screening Report beginning Nov. 13, 2024, online at aturapower.com/portlandsupgrade. The last day comments can be submitted is Dec. 13, 2024.

Any outstanding concerns about the project should be shared with Atura Power by emailing portlandsupgrade@aturapower.com. If the matter cannot be resolved, the concerned individual may submit a written request to the Minister, copying the Director of the Environmental Assessment and Approvals Branch, Ministry of the Environment, Conservation and Parks (MECP) and Atura Power, to elevate the project to either an Environmental Review or to a Comprehensive Environmental Assessment. Elevation requests must be made in accordance with the provisions set out in the MECP's Environmental Screening Process for Electricity Projects.

MECP Contact Information

	Minister	Director
Mailing Address	Ministry of the Environment, Conservation and Parks 777 Bay St., 5 th Floor Toronto, ON M7A 2J3	Environmental Assessment Branch Ministry of the Environment, Conservation and Parks 135 St. Clair Ave. W., 1st Floor Toronto, ON M4V 1P5
Email Address	minister.mecp@ontario.ca	EABDirector@ontario.ca

Note that elevation requests must be submitted to the Minister and a copy sent to the Director and Atura Power within the 30-day review period. The last day to submit an elevation request is Dec. 13, 2024.

Project Contact Information

More information including other project-related documentation is available online at aturapower.com/portlandsupgrade.

If you require assistance regarding accessibility concerns or wish to share questions or comments, please email us at portlandsupgrade@aturapower.com.

For more information: <https://aturapower.com/>

Comments and information regarding this project are being collected in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of meeting environmental assessment requirements.

Appendix C

Comments on the Draft Screening Report

- **Appendix C1: Comments from Members of the Public**
- **Appendix C2: Comments from Municipal Staff and Elected Officials**
- **Appendix C3: Comments from Agencies**

Since the draft Screening Report was released in December 2023, the Government of Ontario has revoked O. Reg. 116/01, replacing it with O. Reg. 50/24. O. Reg. 50/24 applies to a broader classification of projects but still requires Atura Power to undertake an Environmental Screening Process according to the directives in the Guide.

As the project commenced under O. Reg. 116/01, many of the early project materials referenced in the following appendices reference O. Reg. 116/01, however it is important that readers understand O. Reg. 50/24 has since replaced O. Reg. 116/01, as of February 2024. See Note to Readers on page iv of the Screening Report for more information.

Appendix C1: Comments from Members of the Public

Summary of Draft Screening Report Comments from the Public

The following table captures questions and comments received from the public during the draft Screening Report review period from December 5, 2023, to January 7, 2024. Copies of the emails containing the comments referenced in the table below can be viewed in **B4b: Correspondence Records with Members of the Public**.

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Waterfront Toronto	2023-12-06	<p>This report states that the PEC is on Villiers Island, which is incorrect. Villiers Island is the small island we are creating as part of the Port Lands Flood Protection project. It is bound by the Keating Channel to the north, the future river valley (just west of Don Roadway) to the east, the new river valley (north of the Ship Channel) to the south, and the inner harbour to the west.</p> <p>page i and repeated on page 1 - PEC is a combined-cycle natural gas-fuelled electricity generating station (GS) with an average electrical output contract capacity of 550 megawatts (MW). The station is located on Villiers Island just south of the mainland part of the City of Toronto on approximately 11.4 hectares (ha) of land.</p>	Section 1.1: Background (also repeated in Executive Summary)	Thank you for your email and the information within it. We appreciate your outreach and interest in our project.	Executive Summary and Section 1.1: Background
n/a	2023-12-07	What is the cost of the upgrade? Will Atura ever publish this?	n/a	At this time, Atura Power is unable to share commercially sensitive financial information related to its efficiency upgrades at the Portlands Energy Centre (PEC). Additionally, Atura Power is not planning to produce, store, nor consume hydrogen at PEC. Thank you for your email and interest in our project. You can find more information and project updates at www.aturapower.com/portlandupgrade .	n/a
n/a	2023-12-07	What percent blend of hydrogen will be able to be used at PEC with these upgrades?	n/a	Additionally, Atura Power is not planning to produce, store, nor consume hydrogen at PEC. Thank you for your email and interest in our project. You can find more information and project updates at www.aturapower.com/portlandupgrade .	n/a
n/a	2023-12-08	Would you please send me a copy of the draft EA Screening report. Is there a place where I can find the original EA report for PEC?	n/a	See response to comment #25. [Response #25: Atura Power recently acquired a copy of the SENES Consultants Limited (2003) Environmental Review Report for the Portlands Energy Centre. Please find it attached to this email.]	n/a
n/a	2023-12-08	This project improves the electricity output from the plant, yet I am greatly concerned about the climate emergency, meeting emissions reduction targets. Atura must be a greater leader transitioning away from fossil gas. Please advise when you will.	n/a	Thank you for your email and interest in our project. As you may know, Ontario is entering a period of growing electricity system demand and actions are needed to ensure the continued reliability of the electricity grid and supply. To close this gap and meet the projected demand, the Independent Electricity System Operator (IESO) is moving forward with a procurement process to meet near, medium, and long-term	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>energy needs while maintaining the province’s focus on cost-effective reliability. The efficiency upgrades to Portlands Energy Centre (PEC) are part of Atura Power’s efforts to address this supply gap. The upgrades to PEC also play a role in Ontario’s ability to rely on renewable energy sources. Wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity. However, other resources are required to maintain system reliability. It is common to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system. Thank you again, and please visit our project webpage at www.aturapower.com/portlandupgrade for more information.</p>	
n/a	2023-12-11	<p>Thank you for your timely email response to my brief comment about the gas plans. While I appreciate that transitions are a needed component, the rate and degree of that transition is key. I would like to take this opportunity to respond in more detail with supporting sources to be included in my feedback about the project:</p> <p>\$287 billion invested across Canada in wind and solar, in addition to energy efficiency management programs and back up storage units would mean no need for expanding fossil gas usage. The days of ‘what if it isn’t windy or sunny’ are gone. The technology exists now to store energy for those days and other countries are well ahead of the curve on that. OPG and Atura are already investigating this, they just need to spend the dollars in that area rather than gas expansions. Many studies, reports and scientific as well as economic agencies attest to this. Frankly, this is simply the decision making of a certain number of people who either are looking for the path of least resistance, have personal gains from maintaining the energy status quo, or who aren’t informed well enough about what is now possible and what is needed for climate goals so that there is a future beyond</p>	n/a	<p>Your comment is noted and will be included in the record of engagement for the PEC efficiency upgrades project. In response to your comment, I’d just offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. Thank you again for your continued interest in the project. Please feel free to share further questions or comments here or visit the project webpage (https://aturapower.com/aturaoverview/our-stations/portlands-energy-centre-upgrade/) for more information.</p>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
		<p>2050 and 2100. Furthermore, investing in fossil gas is harmful to the economy on the world stage - even RBC gets this; investors and buyers are moving away from fossil fuel producing countries, countries that are deforesting and those supporting the dirtier hydrogen productions. Canada is doing all three, though now we have some traction with methane emissions and start to caps on fossil fuel production. As noted previously, and by OPG, Atura Power is in a position to be a leader. Hopefully one day, while it's still not too late, it will be.</p> <p>Sources: https://policyalternatives.ca/sites/default/files/uploads/publications/BC%20Office/2023/02/Spending%20What%20It%20Takes.pdf https://www.iisd.org/articles/deep-dive/canada-energy-future-guided-by-credible-scenarios https://www.opg.com/projects-services/projects/energy-storage/?gclid=EAIaIQobChMIw5_Si92HgwMVNRmtBh2EOQhcEAAYAiAAEgKy- D_BwE https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive_en</p>			
Waterfront Toronto	2023-12-11	One other question/comment raised by one of our colleagues was whether the upgrades proposed will result in an increase in discharge water temperature conditions, or whether the thermal impacts will remain relatively consistent with current operations. There is some discussion about that in the screening, but nothing about whether there will be a change over existing thermal impacts.	n/a	The PEC efficiency upgrades to the gas turbines will have no impact on the cooling water discharged by the facility. Cooling water temperatures will remain within compliance of the existing ECA and thus no change to the Industrial Sewage Works ECA or limits are required.	n/a
n/a	2023-12-13	I would appreciate it if you could send me a digital copy of the report which came out recently, thank you. I understand the time to review and respond is quite short.	n/a	I attached a PDF of the draft Portlands Energy Centre Efficiency Upgrades screening report as per your request. You may also find project details and additional materials on the project webpage here: https://aturapower.com/atura-overview/our-stations/portlands-energy-centre-upgrade/	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	The DSR fails to acknowledge that Atura Power has not obtained a municipal support resolution from the City of Toronto for its proposed project.	n/a	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote provided on page 2 of the OCAA letter refers to Independent Electricity System Operator's (IESO's) current Long-Term	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				(LT1) Request for Proposals (RFP) process. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades.	
Ontario Clean Air Alliance (OCAA)	2023-12-14	The DSR fails to note that on May 12, 2023, and June 15, 2023, the City of Toronto passed resolutions opposing Atura Power's proposal to increase the capacity of PEC by 50 MW.	n/a	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote provided on page 2 of the OCAA letter refers to Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades.	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	The DSR fails to explain why Atura believes that the Minister of Energy, Conservation and Parks should approve its proposed PEC project despite the fact that it does not have the support of Toronto City Council as required by the Minister of Energy.	n/a	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote provided on page 2 of the OCAA letter refers to Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades.	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	Atura has not quantified PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide emission rates per kWh in 2022.	Chapter 3: Environmental Screening	As demonstrated in Section 3.3 and 3.4 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Ontario Clean Air Alliance (OCAA)	2023-12-14	Atura has not quantified the changes in PEC's carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide emission rates per kWh which will occur if the project proceeds.	Chapter 3: Environmental Screening	See response to #4. [Response #4: As demonstrated in Section 3.3 and 3.4 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.]	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	Atura has not provided PEC's total emissions of nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), sulphur dioxide in 2022.	Chapter 3: Environmental Screening	Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the <i>Canadian Environmental Protection Act</i> (CEPA). Reviewed NPRI data is now available up to 2022.	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	Atura has not provided a forecast of PEC's total emissions of carbon monoxide, nitrogen oxides, particulate matter (PM 2.5) and sulphur dioxide in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved.	Chapter 3: Environmental Screening	PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year and will continue to report annual emissions to the NPRI.	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	Atura has not quantified adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature deaths) of proceeding with its proposed project.	Chapter 3: Environmental Screening	See response to #4. [Response #4: As demonstrated in Section 3.3 and 3.4 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.]	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Ontario Clean Air Alliance (OCAA)	2023-12-14	Atura has not provided PEC's total greenhouse gas (GHG) emissions in 2022.	Chapter 3: Environmental Screening	Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i> . Furthermore, information on GHG emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i> . Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements; it is currently under review.	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	Atura has not provided a forecast of PEC's total GHG emissions in each year from 2024 to 2035 inclusive if: a) the proposed project proceeds; and b) the project is not approved	Chapter 3: Environmental Screening	See response to #7. [Response #7: PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to the NPRI.]	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	Atura's SR does not examine alternatives to its proposed project. Specifically, there is no analysis with respect to the existence of cleaner and lower cost options to meet Ontario's electricity needs even though there are many commercially available alternatives.	n/a	The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.	n/a
Ontario Clean Air Alliance (OCAA)	2023-12-14	The draft SR does not propose any mitigation measures to ensure that the project will not have a negative net impact on public health and our climate.	Chapter 3: Environmental Screening	See response to #4. [Response #4: As demonstrated in Section 3.3 and 3.4 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.]	n/a
n/a	2023-12-19	Do the emissions limits that PEC is supposed to conform to include the emissions from production of the natural methane gas that it burns?	n/a	PEC's Environmental Compliance Approval (ECA) specifies facility-specific NO _x , SO ₂ , and CO emission concentration limits for the undiluted gases emitted from the heat recovery steam	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				generator stacks which are based on MECP's <i>Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines</i> .	
n/a	2023-12-19	A number of people express concerns about air quality health impacts and the Atura response seems to be that we are operating within environmental permitting requirements. Would you add a note indicating the name of the organization that concerns on air quality health should be addressed to? It would also help if Atura pointed to a study for a region that had a similar load of pollution which showed no impact on health - does such a study exist?	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	Details of PEC's Environmental Compliance Approval (ECA) (Air/Noise) are provided in Appendix B3a in the response to public comments under the air quality sub-category. The response can be expanded by noting that air standards under O. Reg. 419/05 are set by the MECP's Standards Development Branch to protect against health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP currently requires to be assessed for contaminants released to the air, 5,099 are health based. PEC's Emission Summary and Dispersion Modelling (ESDM) report must be updated on an annual basis to reflect changes such as sources no longer in operation, updates to MECP's Air Contaminants Benchmarks List: standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants, as well as updates to the MECP approved air dispersion model versions.	Appendix B4a: Summary of Public Questions/Comments by Category, and Atura Power's Responses
n/a	2023-12-19	Emissions of Greenhouse Gases - there are several questions in this section which are not answered by the response provided by Atura - would you answer them? (e.g., On the Environmental Effects slide, I noticed CO2 was not listed (just NO, NO2, and CO) under the emissions that were not supposed to increase as per GE. Was that a mistake, or is there reason to expect CO2 emissions will increase?)	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	The statement on the slide was referring to emission concentrations of contaminants with facility-specific emission concentration limits (see response to comment #1). [Response #1: PEC's Environmental Compliance Approval (ECA) specifies facility-specific NOx, SO2, and CO emission concentration limits for the undiluted gases emitted from the heat recovery steam generator stacks which are based on MECP's <i>Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines</i> .]	Appendix B4a: Summary of Public Questions/Comments by Category, and Atura Power's Responses
n/a	2023-12-19	Engagement Process - Would you add a note to the question "Could you clarify what public and Indigenous engagement means?" that the MECP publishes a guide (<i>Consultation in Ontario's Environmental Assessment Process</i>) on the EA Consultation process and provide the link to it (https://www.ontario.ca/page/consultation-ontarios-environmental-assessmentprocess)?	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	The <i>Guide to Environmental Assessment Requirements for Electricity Projects</i> outlines the purpose and requirements associated with engagement for each type of project and associated environmental assessment process. Atura Power also considers Ontario's guidance on the environmental assessment consultation process, but it is more general when compared to the specific requirements outlined in the Guide referenced above. For this reason, we will not be providing the link to the Consultation in Ontario's Environmental Assessment Process you have referenced. As such, text in this section remains accurate as is.	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
n/a	2023-12-19	Operating Capacity - would you add to your response a clarification on the frequency of operation - does your response mean that you operate every day but just not at 100% capacity? That the plant is "on" every day but the number of hours that it produces electricity varies? I find this response unclear.	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	PEC operates as dictated by the IESO to meet the electricity demands of Torontonians and Ontarians, based on the supply and demand balance. PECs operations fluctuate season by season and year to year.	n/a
n/a	2023-12-19	There is a record from the Ontario Energy Board that indicates that PEC is licensed to operate until 2024. There is reference in the project materials that PEC is contracted to operate until 2029 and plans to extend this until 2034. What licenses and approvals does PEC need to operate to 2029 and 2034? Does 'contracted to operate' mean that PEC has a contract with a customer to produce electricity?	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	PEC is contracted to operate until April 2034.	n/a
n/a	2023-12-19	Did PEC/Atura conduct a communications test to determine if area residents/businesses were aware of the plan to expand PEC's generating capability?	n/a	Atura Power is undertaking the Environmental Screening Process according to Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i> .	n/a
n/a	2023-12-19	Are PEC's emissions limits based on the most recent guideline or have they been grandfathered from a previous guideline?	n/a	The PEC combustion turbines following the efficiency upgrades do not meet the Guideline A-5 (2021) definition of a modified combustion turbine and therefore, as verified by the MECP, Guideline A-5 (1994) applies. As per Guideline A-5 (2021), "this approach is meant to encourage upgrades in thermal efficiency and technology modernization of Existing SCTs that are intended to increase efficiency or reduce emissions but without expecting the more stringent emission limits of New SCTs to be met."	n/a
n/a	2023-12-20	Am I to take it that Atura is absolving itself from future increases in demand from IESO for more electricity that will lead to more GHG and NO from the facility? If so, isn't this counter to the Ontario approach of producer responsibility? I understand that PEC is already the biggest source of GHG and NO in Toronto while only operating for an average of 14 hours per day so far in 2023.	n/a	The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades.</p> <p>As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades.</p> <p>In recent correspondence to the project team, it was confirmed that, "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".</p>	
n/a	2023-12-20	What detailed criteria were used to assess each of these items?	Section 3.4: Review of Screening Criteria	Per the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i> , the project was assessed against each Screening Criteria as it relates to the potential for the efficiency upgrades to cause negative effects.	n/a
n/a	2023-12-20	It seems that many of the answers in this section reflect a 'more of the same' response - which of the previous Screening reports answered these questions fully?	Section 3.4: Review of Screening Criteria	<p>See response to comment #10.</p> <p>[Response #10: Per the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i>, the project was assessed against each Screening Criteria as it relates to the potential for the efficiency upgrades to cause negative effects.]</p>	n/a
n/a	2023-12-20	Be inconsistent with municipal land use policies, plans and zoning bylaws? In view of the fact that Toronto City Council voted against the PEC expansion, would you add a note to indicate this fact in the answer to this item?	Section 3.4: Review of Screening Criteria	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades. As such, text in this section remains accurate as is.	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
	2023-12-20	Have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants? In view of the fact that the Toronto Star has reported that PEC is the largest source of GHG and nitrous oxides in Toronto based on the plant producing electricity for less than 24 hours per day, would you add a note to indicate this fact in the answer to this item.	Section 3.4: Review of Screening Criteria	<p>Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the <i>Canadian Environmental Protection Act</i> (CEPA). The NPRI tracks over 300 pollutants.</p> <p>Greenhouse gas emissions are regulated by the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on GHG emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>.</p> <p>The net heat rate of the gas turbine generators (i.e., kilojoules/kilowatt-hours (kJ/kWh) higher heating value (HHV)) following the upgrades is expected to reduce by 2% at baseload and 15°C ambient temperature. The greenhouse gas intensity (i.e., the ratio of CO2 equivalent emissions to total electricity generation) of the facility is also expected to reduce by 2%.</p> <p>PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to all provincial and federal emissions reporting programs. As such, text in this section remains accurate as is.</p>	n/a
n/a	2023-12-20	If IESO requests PEC to operate 24 hours per day, what would the total of various gases and particulates be over an entire year? Understanding that with the shut down of Ontario's nuclear plants that the current plan is to use gas powered plants to make up much of the difference.	n/a	This question is beyond the scope of the PEC Efficiency Upgrades project.	n/a
n/a	2023-12-20	The draft Screening report seems to indicate that only the expansion project is being considered against the MECP's Areas of Interest and Screening criteria. Do you have agreement from MECP that it is only the project to be considered or whether the full PEC facility (after the expansion) needs to be considered?	n/a	<p>Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The advanced materials allow a higher power output per gigajoule (GJ) of fuel consumed.</p> <p>Please also see response to comment #9.</p>	Section 3.3: Environmental Effects Assessments

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>[Response #9: The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades.</p> <p>As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades.</p> <p>In recent correspondence to the project team, it was confirmed that, "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".]</p>	
n/a	2023-12-20	Cause negative effects from the emission of greenhouse gases (carbon dioxide (CO2), methane)? I find the answer to this question, again, focuses just on the project rather than the full facility after the expansion project is completed. A further complication is the requests from the IESO to operate more hours per day. The answer does not identify any negative effects from GHG on people nor it's contribution to Canada's GHG inventory. Would you add a note to indicate these additional points in the answer to this item?	Section 3.4: Review of Screening Criteria	<p>See response to comment #13.</p> <p>[Response #13: Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the <i>Canadian Environmental Protection Act</i> (CEPA). The NPRI tracks over 300 pollutants.</p> <p>Greenhouse gas emissions are regulated by the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on GHG emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>.</p>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>The net heat rate of the gas turbine generators (i.e., kilojoules/kilowatthours (kJ/kWh) higher heating value (HHV)) following the upgrades is expected to reduce by 2% at baseload and 15°C ambient temperature. The greenhouse gas intensity (i.e., the ratio of CO₂ equivalent emissions to total electricity generation) of the facility is also expected to reduce by 2%.</p> <p>PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to all provincial and federal emissions reporting programs.</p> <p>As such, text in this section remains accurate as is.]</p>	
n/a	2023-12-20	Have negative effects related to increases in the demands on community services and infrastructure? There have been a number of public health studies - including from Toronto Public Health- which show that air pollution causes respiratory illness, hospitalizations, and death. Since the exhaust from PEC will add to the level of pollution in the neighbourhood, would you add a note to indicate that overall exhaust from PEC increases the risk related to respiratory illness, hospitalizations, and death as it relates to our health care system?	Section 3.4: Review of Screening Criteria	<p>See response to comment #2.</p> <p>[Response #2: Details of PEC's Environmental Compliance Approval (ECA) (Air/Noise) are provided in Appendix B3a in the response to public comments under the air quality sub-category. The response can be expanded by noting that air standards under O. Reg. 419/05 are set by the MECP's Standards Development Branch to protect against health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP currently requires to be assessed for contaminants released to the air, 5,099 are health based. PEC's Emission Summary and Dispersion Modelling (ESDM) report must be updated on an annual basis to reflect changes such as sources no longer in operation, updates to MECP's Air Contaminants Benchmarks List: standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants, as well as updates to the MECP approved air dispersion model versions.]</p>	n/a
n/a	2023-12-20	Have negative effects on the economic base of a municipality or community? Since business and residents may decide not to move into a neighbourhood that has Toronto's largest source of GHG and nitrous oxides in it, would you add a note to this effect in the answer?	Section 3.4: Review of Screening Criteria	The Environmental Screening Process determined that all Screening Criteria scored 'No' as a result of the PEC Upgrades project, and without any mitigation, all regulatory requirements will be met. Further, the manufacturer of the equipment being installed for the upgrades provided a letter	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				stating that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels." Given the facility will continue to operate within all environmental permitting requirements, text in this section remains accurate as is.	
n/a	2023-12-20	Cause public concerns related to public health and safety? Would you add a note to the answer to this item to indicate that various individuals, groups and municipal representatives and offices have expressed concern relating to public health? Would you also add a note that concerns have been expressed since the inception of PEC? Would you also add a note to indicate that cumulative air pollution from all sources in the area is a concern? Would you add a note to indicate that area monitoring stations for pollution are located far from the PEC site? Would you add a note to indicate that a study on the high incidence of respiratory illness in the East End of Toronto was completed in the mid-2000s and no follow-up study has been completed since.	Section 3.4: Review of Screening Criteria	See response to comment #35. The remainder of the questions provided are beyond the scope of the PEC Efficiency Upgrades project. [Response #35: Appendix B contains copies of all comments from members of the public, municipal staff and elected officials, and agencies shared over the course of the project, from the date the project commenced on September 6, 2023, to early November 2023, when the draft Screening Report was being finalized. A full record of the comments and emails provided over the duration of the entire project will be provided in the final Screening Report.]	n/a
n/a	2023-12-20	Is there some reason that the Beaches MP was left off the list? Is there some reason that the Members of Provincial Parliament was left off the list? Why was York region put on the list? Is there some reason that the Ontario Ministry of Health and Public Health Ontario were left off the list? Why was the Ministry of Mines put on the list? Is there some reason that Toronto Public Health and Community Health Centres (e.g. South Riverdale Community Health, East End Community Health, others) were left off the list? Why were Cherry Beach Park and Cherry Beach Sports Field included on the list? Is there some reason that Anishinaabeg, Chippewa, Wendat Indigenous groups were left off the list? Is there some reason that local BIAs and Residents Associations were left off the list?	Section 4.2: Notice of Commencement	The project contact list was generated based on the requirements of Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i> and updated over the course of the project based on engagement with the agencies, updates to the Environmental Assessment Government Review Team Master Distribution List, and as communications developed with project contacts over the course of the Environmental Screening Process to date.	n/a
n/a	2023-12-20	A number of people that I know that attended the initial public meeting did not receive notice that the draft Screening report was available. What distribution list was used to send out the notification that the draft Screening report was available?	Section 4.8: Draft Screening Report	Notice that the draft PEC Screening Report is available was shared with key agencies and organizations, Indigenous communities and interested members of the public. Interested members of the public included individuals who requested to be added to the project contact list as well as any member of the public who contacted the project email inbox (portlandsupgrade@aturapower.com) during the	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				Environmental Screening Process. The draft PEC Screening Report was also made available on the project webpage.	
n/a	2023-12-20	I see Atura is planning on answering questions on the draft Screening report after the comment period has closed. What opportunity will I have to ask follow-up questions after you have published the answers to the questions? I understand that this is supposed to be a collaborative effort. Will the 30 day review period be interactive (with more than one cycle of questions and answers) with clarifications made to the final report?	Section 4.8: Draft Screening Report Section 4.9: Notice of Completion	The project email inbox (portlandsupgrade@aturapower.com) will continue to be available throughout the duration of the project. Comments on the draft PEC Screening Report that were provided by Mar. 8, 2024, will be incorporated and reflected in the final PEC Screening Report. Comments on the final PEC Screening Report will be responded to via email and are welcome until the end of the mandated 30-day review period. The Notice of Completion, which is released at the same time as the final Screening Report, marks the beginning of the 30-day mandated review period.	n/a
n/a	2023-12-20	Was the PEC Community Liaison Committee asked to provide input to Table 5-1?	Section 5: Environmental Advantages and Disadvantages	A committee has not been set up for this upgrades project.	n/a
n/a	2023-12-20	While illness from pollution is difficult to attribute to a single facility, there are numerous studies identified by Toronto Public Health which link illness to pollution > I would suggest that one of the disadvantages that should be identified is that of increased GHG and NO that will come as a result of the requests from the IESO to operate more hours as a result of the nuclear power plants being shut down. > I would suggest that one of the disadvantages that should be identified is the potential for increased respiratory illness from residents as a result of increased pollution -especially the young whose lungs are still developing and the very old. > I would suggest that one of the disadvantages that should be identified is the potential for increased morbidity and mortality of the residents (as well as the difficulties that will introduce to their lives and the lives of their families) as a result of increased pollution > I would suggest that one of the disadvantages that should be identified is lost time from work for residents and the impact to employers from illness due to increased pollution	Section 5: Environmental Advantages and Disadvantages	The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades. Additionally, please see response to #13. [Response #13: Owners or operators of facilities that meet published reporting requirements are required to report to the National Pollutant Release Inventory (NPRI) under the authority of the <i>Canadian Environmental Protection Act</i> (CEPA). The NPRI tracks over 300 pollutants.	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
		<p>> I would suggest that one of the disadvantages that should be identified is the increased in health care costs from illness due to pollution</p> <p>> I would suggest that conservation, wind, and solar power are more cost-effective solutions but are not currently available to expand the electrical supply</p> <p>> I would suggest that the increased GHG emissions expected from PEC will add to Canada's GHG emissions inventory which is counter to public policy of reducing emissions</p> <p>> I would suggest that businesses looking to locate in a region that has clean power will be dissuaded from locating in a region that uses burned methane to create electricity</p>		<p>Greenhouse gas emissions are regulated by the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on GHG emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>.</p> <p>The net heat rate of the gas turbine generators (i.e., kilojoules/kilowatt-hours (kJ/kWh) higher heating value (HHV)) following the upgrades is expected to reduce by 2% at baseload and 15°C ambient temperature. The greenhouse gas intensity (i.e., the ratio of CO₂ equivalent emissions to total electricity generation) of the facility is also expected to reduce by 2%.</p> <p>PEC will continue to operate as dictated by the IESO based on the supply and demand balance, which fluctuates season by season and year to year, and will continue to report annual emissions to all provincial and federal emissions reporting programs.</p> <p>As such, text in this section remains accurate as is.]</p>	
n/a	2023-12-20	Would you provide me with a copy of the SENES Consultants Limited (2003). Environmental Review Report for the Portlands Energy Centre. Prepared for TransCanada Energy Limited. Prepared for TransCanada Energy and Ontario Power Generation.	n/a	Atura Power recently acquired a copy of the SENES Consultants Limited (2003) Environmental Review Report for the Portlands Energy Centre. Please find it attached to this email.	n/a
n/a	2023-12-20	Other documents. These documents are no longer available at the indicated location - would you provide me with a copy of them: http://www.portlandsenergycentre.com/docs/nov2003/PEC_Air_Impact_Assessment-Final.pdf and http://www.portlandsenergycentre.com/docs/nov2003/PEC_Human_Health_Risk-Final.pdf	n/a	The documents you reference relate to the 2003 Environmental Review Report by SENES. Please see response to #25. [Response #25: Atura Power recently acquired a copy of the SENES Consultants Limited (2003) Environmental Review Report for the Portlands Energy Centre. Please find it attached to this email.]	n/a
n/a	2023-12-20	Is there some reason that the project to boost efficiency is also increasing the generating capability of PEC by 50 mw?	n/a	As stated in Section 3.3 of the draft Screening Report, the IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
		Could the upgrade have been done without increasing the generating capability of PEC beyond 550 mw?		the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023.	
n/a	2023-12-21	Do you know if IESO even considered some new renewable energy projects to partially account for the increase in demand? As the people who live with the consequences of other people's decisions, it is difficult to accept that no attempt was made to reduce the amount of gas being burned	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	Atura Power will not comment on the IESO regarding their process for determining the types of and/or alternatives to energy projects required to meet the province's energy demands in the future. You may wish to review the IESO's latest Request for Proposal (RFP) referred to as the Long-Term 2 (LT2) RFP process, which includes the IESO's recent call for renewable energy production to support Ontario's electricity sector: https://www.ieso.ca/Sector-Participants/Resource-Acquisitionand-Contracts/Long-Term-2-RFP .	n/a
n/a	2023-12-21	Good question that did not get answered - IESO Procurement Process: Did Atura Power lobby for the plant?	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	Atura Power responded to the IESO's call for efficiency upgrades under the E-LT1 process.	n/a
n/a	2023-12-21	Would you change the answer to point out that renewable energy can be used to reduce the demand for electricity from gas generation?	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	The current messaging in Appendix B3a of the draft Screening Report noting the role of gas in Ontario energy supply is accurate and reflects Atura Power's perspective on this topic.	n/a
n/a	2023-12-21	What is a P2 plan and why doesn't PEC have one? It sounds like it has to do with pollution reduction	n/a	This question is beyond the scope of the PEC Efficiency Upgrades project.	n/a
n/a	2023-12-21	Does PEC's draft Screening report adhere to the guidance from the Ontario Energy Board - Environmental Guidelines	n/a	Ontario Regulation 50/24 (previously Ontario Regulation 116/01) defines the type of environmental assessment (EA) to	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
		for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario?		be undertaken under the Ontario <i>Environmental Assessment Act</i> (the Act). Ontario Regulation 50/24 notes that any applicable facility undergoing a change that would increase the name plate capacity of the facility by five megawatts or more must undergo an Environmental Screening Process. Atura Power has undertaken the Environmental Screening Process according to the guidance in the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i> .	
n/a	2023-12-21	When PEC was first built it was seen as a temporary solution until renewables matured. While some people oppose off-shore wind because they don't like the interrupted view of the natural environment, it does not produce emissions and renewable energy has definitely matured. Would you provide a better response to the questions asking why renewable energy is not being used?	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	See response to comment #30. [Response # 30: The current messaging in Appendix B3a of the draft Screening Report noting the role of gas in Ontario energy supply is accurate and reflects Atura Power's perspective on this topic.	n/a
n/a	2023-12-21	Gwh supplied to the IESO grid - this link leads to a page that requires a login id of a market participant. Would you provide the data requested on pg. 129 - Gwh supplied to the IESO controlled grid for each year from 2017 to 2022	Appendix B3a: Summary of Public Questions/Comments by Category, and Atura Power's Responses	The following link: https://ieso.ca/en/Power-Data/Data-Directory indicates that all reports found through the IESO's public reports website can be accessed using the tabs on that webpage.	n/a
n/a	2023-12-21	Did Atura have any response from Mayor Chow, Councillor Fletcher, or MP Dabrusin?	Appendix B4: Correspondence Records with Municipal Staff and Elected Officials	Appendix B contains copies of all comments from members of the public, municipal staff and elected officials, and agencies shared over the course of the project, from the date the project commenced on September 6, 2023, to early November 2023, when the draft Screening Report was being finalized. A full record of the comments and emails provided over the duration of the entire project will be provided in the final Screening Report.	Appendix B5: Correspondence with Municipal Staff and Elected Officials
n/a	2023-12-21	Is there some reason Atura did not engage Councillor Brad Bradford, MPP Mary-Margaret McMahon, and MP Nathaniel Erskine-Smith?	Appendix B4: Correspondence Records with Municipal Staff	See response to comment #20. [Response #20: The project contact list was generated based on the requirements of Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the <i>Guide to Environmental</i>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
			and Elected Officials	<i>Assessment Requirements for Electricity Projects</i> and updated over the course of the project based on engagement with the agencies, updates to the Environmental Assessment Government Review Team Master Distribution List, and as communications developed with project contacts over the course of the Environmental Screening Process to date.]	
n/a	2023-12-21	Is there some reason the Ontario Ministry of Health and Toronto Public Health was not included in correspondence. Also, Ontario Ministry of Economic Development, Job Creation and Trade, Ministry of Education, Ministry of Indigenous Affairs, Ministry of Municipal Affairs and Housing	Appendix B5c: Correspondence Records with Other Agencies	See response to comment #20. [Response #20: The project contact list was generated based on the requirements of Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i> and updated over the course of the project based on engagement with the agencies, updates to the Environmental Assessment Government Review Team Master Distribution List, and as communications developed with project contacts over the course of the Environmental Screening Process to date.]	n/a
n/a	2023-12-21	Is there some reason that correspondence with all agencies listed were not included in the section starting on page 239?	Appendix B5a: List of Agency Contacts	See response to comment #35. [Response #35: Appendix B contains copies of all comments from members of the public, municipal staff and elected officials, and agencies shared over the course of the project, from the date the project commenced on September 6, 2023, to early November 2023, when the draft Screening Report was being finalized. A full record of the comments and emails provided over the duration of the entire project will be provided in the final Screening Report.]	n/a
n/a	2023-12-21	Once again why was York Region included?	Appendix B5a: List of Agency Contacts	See response to comment #20. [Response #20: The project contact list was generated based on the requirements of Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i> and updated over the course of the project based on engagement with the agencies, updates to the Environmental Assessment Government Review Team Master Distribution List, and as communications developed with project contacts over the course of the Environmental Screening Process to date.]	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
n/a	2023-12-21	<p>"If there are sensitive receptors in the surrounding area of this project, a quantitative air quality/odour impact assessment will be useful to evaluate alternatives, determine impacts and identify appropriate mitigation measures. The scope of the assessment can be determined based on the potential effects of the proposed alternatives, and typically includes source and receptor characterization and a quantification of local air quality impacts on the sensitive receptors and the environment in the study area. The assessment will compare to all applicable standards or guidelines for all contaminants of concern. " It seems to me that humans are sensitive receptors. Given the many studies which indicate the link between air pollution and respiratory illness, hospitalizations and death in humans and that PEC (while operating on average 14 hours per day this year and expected to operate more in the future) - did Atura conduct such a study?</p>	Appendix B5b: Correspondence Records with MECP	<p>See response to comment #9.</p> <p>[Response #9: The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades.</p> <p>As noted in Section 3.4 of the draft Screening Report, review of the PEC Efficiency Upgrades - which is limited to replacing parts of the existing turbines with more efficient parts - determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the activities associated with the efficiency upgrades.</p> <p>In recent correspondence to the project team, it was confirmed that, "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking".]</p>	Section 3.3: Environmental Effects Assessments
n/a	2023-12-21	<p>"Please include in the report a list of all subsequent permits or approvals that may be required for the implementation of the project" Why is this missing from the draft Screening report?</p>	Appendix B5b: Correspondence Records with MECP	<p>This information is available in Section 2: Permits and Approvals of the draft Screening Report.</p>	n/a
n/a	2023-12-21	<p>What response did you receive from Waterfront Toronto?</p>	Appendix B5c: Correspondence Records with Other Agencies	<p>In December 2023, Waterfront Toronto shared two comments with Atura Power regarding the PEC Efficiency Upgrades project.</p> <p>i. One comment was to share a clarification regarding the description of the project location in the draft Screening Report. Atura Power thanked Waterfront Toronto for the information and took steps to update the description of the project location in the final Screening Report.</p>	Appendix B6b: Correspondence with Other Agencies

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>ii. The second comment Waterfront Toronto shared was to ask whether the upgrades proposed will result in an increase in discharge water temperature conditions, or whether the thermal impacts will remain relatively consistent with current operations. In response, Atura Power confirmed that the PEC efficiency upgrades to the gas turbines will have no impact on the cooling water discharged by the facility. Cooling water temperatures will remain within compliance of the existing ECA and thus no change to the Industrial Sewage Works ECA or limits are required.</p> <p>Please note a full record of the comments provided over the duration of the entire project up to Mar. 8, 2024 will be provided in the final Screening Report.</p>	
n/a	2023-12-21	Are there additional responses from stakeholders listed in the contact list for which no correspondence is provided?	Appendix B: Engagement Records	<p>See response to comment #35.</p> <p>[Response #35: Appendix B contains copies of all comments from members of the public, municipal staff and elected officials, and agencies shared over the course of the project, from the date the project commenced on September 6, 2023, to early November 2023, when the draft Screening Report was being finalized. A full record of the comments and emails provided over the duration of the entire project will be provided in the final Screening Report.]</p>	Appendix B: Engagement Records
n/a	2023-12-21	What response was provided to the TRCA questions?	Appendix B5c: Correspondence Records with Other Agencies	<p>In December 2023, Atura Power provided responses to TRCA's comments received in October 2023. Atura Power's response included:</p> <p>i. Confirming that the upgrades will take place within the existing facility and associated paved areas, the existing facility footprint will not change, and acknowledging that further engagement with TRCA should be initiated should the project extend beyond the building footprint and associated paved areas,</p> <p>ii. Recognizing the Highly Vulnerable Aquifer in the surrounding region, confirming that the upgrades will take place within the existing facility footprint and will not require excavation, and acknowledging that further engagement with</p>	Appendix B6b: Correspondence with Other Agencies

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>TRCA should be initiated should the project require excavation,</p> <p>iii. Confirming that all critical equipment is to be stored inside the facility, any equipment stored outside will be temporarily stored on tractor trailer/flatbeds located on existing paved or gravel parking areas and driveways, and Atura Power does not expect to affect or change the facility's existing stormwater management plan/program nor are effects to erosion or sediment anticipated, and</p> <p>iv. Acknowledging that the project is located within the Toronto Waterfront Screening Area and that while future permits under the Conservation Authorities Act regulations are not required, TRCA will continue to be involved in the PEC Efficiency Upgrades project throughout the EA process, and confirming that Atura Power will continue to notify the TRCA of EA milestones including the release of the draft Screening Report as well as the Notice of Completion and publication of the final Screening Report.</p>	
n/a	2023-12-21	Do your Indigenous contacts include both traditional and elected leadership?	n/a	Atura Power has communicated with the consultation departments of elected leadership for the Six Nations of the Grand River, Mississaugas of the Credit and Métis Nation of Ontario. Atura Power has also engaged with and communicated with the Haudenosaunee Development Institute. Atura Power has engaged Indigenous communities regarding the PEC Efficiency Upgrades project as guided by the MECP.	n/a
n/a	2023-12-21	Did Atura identify any environmental effect or issue in the screening process that will be addressed under another environmental approval (e.g., an approval under the Environmental Protection Act)?	Section 3: Environmental Screening	<p>See response to comment #41.</p> <p>[Response #41: This information is available in Section 2: Permits and Approvals of the draft Screening Report.]</p>	n/a
n/a	2023-12-21	Did Atura consider attempting to engage with the public through social media (e.g. Facebook, Instagram, X, etc.) or other means?	Section 4: Engagement	<p>See response to comment #7.</p> <p>[Response #7: Atura Power is undertaking the Environmental Screening Process according to Ontario Regulation 50/24 (previously Ontario Regulation 116/01) and the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i>.]</p>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
n/a	2023-12-21	Did Atura identify any environment effects from the project that require mitigation or managing?	Section 3: Environmental Screening	As noted in Section 3.5 of the draft Screening Report, "the Screening identified that, without any mitigation, all regulatory requirements will be met, and no other impact management commitments will be required. Atura Power will continue to manage air emissions from PEC through ongoing continuous emissions monitoring per the terms and conditions of the facility's ECA."	n/a
n/a	2023-12-21	Will Atura conduct an Air Quality Test in the neighbourhoods surrounding PEC before and after project completion? Antidotally, I heard that a previous study was reviewed as being conducted in the fall rather than in the summer when pollution levels are higher and that monitoring stations were too far away from the neighbourhoods surrounding PEC.	n/a	This question is beyond the scope of the PEC Efficiency Upgrades project.	n/a
n/a	2023-12-21	Does Atura recognise that the public perception of and concerns about PEC have changed since it moved from being a peaker plant to a baseload plant?	n/a	PEC is a peaker plant and not a baseload plant. It can be operated as needed, during periods of peak demand or when intermittent energy sources like wind and solar are not available or cannot meet the electricity demands of Torontonians and the province.	n/a
n/a	2023-12-21	Was the Notice of Commencement mailed to households in the immediate vicinity of PEC? If so, what streets or neighbourhoods?	Section 4.2: Notice of Commencement	The Notice of Commencement was distributed according to the requirements set out in the <i>Guide to Environmental Assessment Requirements for Electricity Projects</i> . As noted in Section 4.2 of the draft PEC Screening Report, the Notice was shared with adjacent property owners/tenants, provincial and federal ministries, regional and municipal contacts, a variety of other agencies/utilities, and several Indigenous communities.	n/a
n/a	2023-12-21	Where is the summary of public and agency concerns or issues in the Screening report?	Section 4: Engagement	This information is available in Section 4.3: Public Engagement and Section 4.5: Agency Engagement of the draft Screening Report.	n/a
n/a	2023-12-21	Is there other supporting documentation or correspondence related to the Screening Report that was not included in the Screening Report?	n/a	All information relevant to the screening is included in the report and associated appendices. With respect to records of correspondence between Atura Power and Indigenous communities, these are only being shared directly with each respective Indigenous community. All other documentation has been provided and made available in the screening report.	n/a
n/a	2023-12-21	Would you send me copies of previous Screening reports done for PEC. I understand that Atura does not have a copy of the original EA - is it available from OPG or TransCanada?	n/a	See response to comment #25. [Response #25: Atura Power recently acquired a copy of the	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				SENES Consultants Limited (2003) Environmental Review Report for the Portlands Energy Centre. Please find it attached to this email.]	
n/a	2023-12-21	Section 3.1 of the draft Screening report identifies current conditions as a description of the physical facility. The <i>EA Guide for Electricity Projects</i> suggests a description of the local environment and conditions. Would you modify this section to reflect local environment and conditions?	Section 3.1: Existing Conditions	The project will take place entirely within the facility; the facility footprint will not change. Section 3.1 of the draft Screening Report includes a description of the local environment and conditions relative to the PEC Efficiency Upgrades project. As such, text in this section remains accurate as is.	n/a
n/a	2023-12-21	Which libraries, municipal offices or recreation centres are you planning on making the Screening report available in?	Section 4.1: Engagement Program	Based on the current project contact list, Atura Power will be sharing the Notice of Completion with the same project contacts who received the Notice of Commencement in September 2023 (see Section 4.2 of the draft PEC Screening Report), as well as project contacts who received the draft Screening Report in early December 2023. Additionally, it will be advertised in the same publications used to share the Notice of Commencement in September 2023, including the Toronto Sun, Toronto Star, and Beach Metro newspapers. Anyone who has contacted the project team via the project email (portlandsupgrade@aturapower.com) will also receive a copy of the Notice of Completion. Finally, a copy of the Notice of Completion will also be posted on the project webpage.	n/a
n/a	2023-12-21	What residents, businesses and local interest groups are you planning on sending the EA Completion notice to?	Section 4.9: Notice of Completion	See response to comment #56. [Response #56: Based on the current project contact list, Atura Power will be sharing the Notice of Completion with the same project contacts who received the Notice of Commencement in September 2023 (see Section 4.2 of the draft PEC Screening Report), as well as project contacts who received the draft Screening Report in early December 2023. Additionally, it will be advertised in the same publications used to share the Notice of Commencement in September 2023, including the Toronto Sun, Toronto Star, and Beach Metro newspapers. Anyone who has contacted the project team via the project email (portlandsupgrade@aturapower.com) will also receive a copy of the Notice of Completion. Finally, a copy of the Notice of Completion will also be posted on the project webpage.]	n/a

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n/a	2023-12-21	Have any commitments been made from previous EAs?	n/a	This question is beyond the scope of the PEC Efficiency Upgrades project.	n/a
n/a	2023-12-21	Has a Climate Change Impact Assessment been completed for PEC? (As per Ontario's Considering climate change in the environmental assessment process) If so, would you please provide a copy of it.	n/a	A separate Climate Change Impact Assessment was not completed for the PEC Upgrades project.	n/a
n/a	2024-01-02	Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant. I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support.	n/a	It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.	n/a
n/a	2024-01-02	The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers.	n/a	At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.	n/a
n/a	2024-01-02	We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.	n/a	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>	n/a

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n/a	2024-01-02	And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.	n/a	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p> <p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i>. Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.</p>	n/a
n/a	2024-01-02	<p>I have asthma, and so do some of my children and grandchildren. Toronto smog makes it worse.</p> <p>Thus, I do NOT support the expansion of the Portlands gas plant. Toronto City Council also doesn't support the expansion.</p> <p>The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers - AND the impact on our health (which will increase costs to our healthcare system, such as it is these days).</p> <p>Cleaner and lower cost renewables, conservation and load shifting are better alternatives. The final screening report should include an analysis of the costs and benefits of cleaner alternatives, and this MUST include the costs to our health (including work and school absenteeism and</p>	n/a	<p>Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached. Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.</p> <p>Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record. Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. In response to</p>	n/a

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		<p>healthcare costs).</p> <p>Do not inflict more pollution on the struggling people of Toronto.</p> <p>Fossil fuels are the technology of the last century. Renewables will help us survive the rising climate catastrophe of this century. Have the courage and integrity to act accordingly.</p>		<p>each of the questions/comments raised in your email, we offer the following responses in the table below.</p> <p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p> <p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p> <p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project. Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p> <p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the</p>	

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				<p>footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>	
n/a	2024-01-02	<p>I totally support the points in the letter below!!</p> <p>Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant. I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support. The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers. We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives. And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure. Thank you.</p>	n/a	<p>Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached. Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.</p> <p>Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record. Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. In response to each of the questions/comments raised in your email, we offer the following responses in the table below.</p> <p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p>	n/a

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				<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p> <p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province’s focus on cost-effective reliability. Part of this process is the province’s request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project. Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p> <p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator “will maintain [air] emissions levels at or below site permit levels”. As such, an air quality assessment is not required and has not been undertaken for the project.</p>	
n/a	2024-01-02	In responding to the invitation to address the draft screening report for the expansion of the Portlands gas plant, I wish to express my opposition to the expansion in strongest terms. Not only are there less polluting options but strong opposition to the plans has also emerged from Toronto City	n/a	Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached. Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.	n/a

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		Council. Atura must respect our right to a clean environment.		<p>Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record. Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. In response to each of the questions/comments raised in your email, we offer the following responses in the table below.</p> <p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p> <p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p> <p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project. Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to</p>	

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				<p>have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p> <p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>	
n/a	2024-01-02	<p>The science shows the health hazards to those who live within the air shed of such plants. It is breach of public trust to put at risk the health of those who reside within that air shed. And, of greatest concern, the most recent reports by IPCC, IEA and more sound the alarm on the use of fossil fuels to generate electricity. Surely the unprecedented, record-breaking fires of 2023, floods of 2023, heat waves of 2023 must give us all pause and trigger a rapid end to such profligate use of fossil fuels. We must not further endanger the security and health of those young people and our companion species who come after us. Continuing to use natural gas in this way is intergenerational betrayal.</p>	n/a	<p>Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached. Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.</p> <p>Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record. Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. In response to each of the questions/comments raised in your email, we offer the following responses in the table below.</p>	n/a

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				<p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p> <p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p> <p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project. Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p> <p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of</p>	

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				the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.	
n/a	2024-01-03	It is incomprehensible to me that an Environmental Screening Process would conclude that there are no potential negative environmental effects from the project by looking narrowly at the mechanics of the capacity upgrade installation with no acknowledgement of the negative environmental and health impacts of the facility when in operation	Section 3: Environmental Screening	<p>As per Section 3.2 of the draft Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project.</p> <p>In recent correspondence to the project team, it was confirmed that "[Ministry of Environment, Conservation and Parks] MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.</p>	Section 3.3: Environmental Effects Assessments
n/a	2024-01-03	The report notes that in 2003 an Environmental Review Report concluded that the negative net effects of the proposed PEC were "temporary or negligible" (p 1). There has never been a full environmental assessment of this facility. Given that PEC is reported to be the largest emitter of greenhouse gases in Toronto, the largest emitter of nitrogen oxides in Toronto (Environmental Defence) and on the list of Ontario's largest industrial emitters (CBC Oct 5, 2023), a full environmental assessment is needed.	Section 1.1: Background	The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. The existing PEC facility went through an Environmental Assessment and is therefore not the subject of the Screening Report. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. We can confirm that Ministry of the MECP is aware of the scope and assessment process that Atura Power is undertaking for the project.	n/a

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n/a	2024-01-03	The report should be expanded to provide specific quantitative data regarding the impact of PEC's operation on air quality because of emissions from the facility before and after the proposed capacity expansion. Information should also be provided regarding any potential adverse impacts on public health and climate of these emissions	n/a	<p>See Response #1.</p> <p>[Response #1: As per Section 3.2 of the draft Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project.</p> <p>In recent correspondence to the project team, it was confirmed that "[Ministry of Environment, Conservation and Parks] MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.]</p>	Section 3.3: Environmental Effects Assessments
n/a	2024-01-03	The report states that the proposed project, "allows PEC to continue to provide electricity system reliability by operating on demand in times when intermittent energy sources (e.g., wind and solar) alone cannot meet energy demand" (Table 5-1 p. 48), giving the impression of an infrequently used "peaker plant". In light of the recent media report (Toronto Star, Oct 2, 2023) that many of the province's gas plants have effectively been transformed, "from rarely used peaker plants into baseload power plants" and that PEC ran "nearly 21 hours a day all summer long", the report needs to provide more transparent and complete information regarding the current extent of operation, the expected date of closure and the extent of operation projected to be	Section 5: Environmental Advantages and Disadvantages	<p>As stated in Appendix B3a of the draft Screening Report, PEC operations are dictated by the Independent Electricity System Operator (IESO) based on the electricity supply and demand balance, which fluctuates season by season and year to year. Historically, the plant has operated between 1,750 to 4,500 hours per year, always at the direction of the IESO.</p> <p>The following link https://ieso.ca/en/Power-Data/Data-Directory indicates that all reports found through the IESO's public reports website can be accessed using the tabs on that webpage, should you like more information regarding the IESO's operations.</p>	n/a

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		ordered by the Independent Electricity Systems Operator until the expected closure.		PEC is contracted to operate until April 2034. It is unknown at this time if PEC will continue to operate beyond 2034.	
n/a	2024-01-03	This capacity expansion does not have the support of Toronto City Council. In May and June of 2023, the City of Toronto passed resolutions opposing Atura's proposal to increase PEC's capacity. This information was omitted from the draft report. This is especially relevant considering the recent cancellation of proposed plants in Halton Hills and Thorold when opposed by local councils. Damage to the environment from the operation of an expanded existing plant is not different from the damage that would have resulted from these proposed plants. An explanation is required justifying this disregard for local government.	n/a	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The IESO has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) Request for Proposal (RFP), results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades.	n/a
n/a	2024-01-03	No consideration was given to possible alternative renewable energy sources such as wind, solar and hydro power from Quebec. These sources might assist in meeting the province's demand for electricity in a manner which is less harmful to health and climate and ultimately more cost effective. The report requires a more fulsome analysis of the cost and benefits of operating this facility compared to alternative renewable energy sources and this should take into consideration the cost of mitigating any adverse health and climate impacts.	n/a	The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive E-LT1-RFP, in May 2023. Given the recommendations of the IESO and government initiatives, other alternatives were not considered as part of the project, nor are they required as part of the Screening Process being followed for the project.	n/a
n/a	2024-01-05	The Emissions Limits (e.g. NOx, CO, Sulphur Dioxide) that PEC operates under - when these limits were determined, what were the assumptions made in the modelling? Was there an assumption that these gases would be dispersed? What would happen if the gases were not dispersed or built up in the area surrounding PEC?	Section 2: Permits and Approvals	See response to comment #1. Note that the emissions limits are determined based on calculations completed in accordance with MECP's <i>Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines</i> . [Response #1: PEC's Environmental Compliance Approval (ECA) specifies facility-specific NOx, SO2, and CO emission concentration limits for the undiluted gases emitted from the heat recovery steam generator stacks which are based on MECP's <i>Guideline A-5 Atmospheric Emissions from Stationary Combustion Turbines</i> .]	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
n/a	2024-01-05	<p>Let us not move backward! Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant. I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support. The final screening report should include the financial cost of the proposed expansion and the expected impact on electricity costs to consumers. We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives. And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	n/a	<p>Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached. Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.</p> <p>Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record. Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. In response to each of the questions/comments raised in your email, we offer the following responses in the table below.</p> <p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p> <p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p> <p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is</p>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project. Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p> <p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment is not required and has not been undertaken for the project.</p>	
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	<p>A full environmental assessment that:</p> <ul style="list-style-type: none"> - Examines the smog, climate, and health impacts of the PEC at present and until its expected closure. - Evaluates the cost and benefits of cleaner alternatives (e.g. energy efficiency, demand management, and renewables). 	Chapter 3: Environmental Screening	<p>See response to comment #3, #4 and #6.</p> <p>[Response #3: For a detailed response to public comments on Emissions of Greenhouse Gases please refer to the sub-category provided in Appendix B3a.</p> <p>Similarly, details of PEC's Environmental Compliance Approval (ECA) (Air/Noise) are provided in Appendix B3a in the response to public comments under the air quality sub-category. The response can be expanded by noting that air standards under O.Reg. 419/05 are set by the MECP's Standards Development Branch to protect against health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP</p>	<p>Section 3.3: Environmental Effects Assessments</p> <p>Appendix B4a: Summary of Public Questions/Comments by Category, and Atura Power's Responses</p>

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>currently requires to be assessed for contaminants released to the air, 5,099 are health based.]</p> <p>[Response #4: As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project.</p> <p>In recent correspondence to the project team, it was confirmed that "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.]</p> <p>[Response #6: The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023.]</p>	
Toronto East Residents for	2024-01-05	The expected closure date of PEC.	n/a	PEC is contracted to operate until April 2034. As Atura Power responds to Ontario energy needs as directed by the IESO,	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Renewable Energy (TERRE)				plans beyond PEC's contract period are not certain at this time.	
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	The projected power generation to be ordered by the IESO from 2024 through to PEC's expected closure.	n/a	PEC operations are dictated by the IESO based on the province's supply and demand balance. The plant will continue to operate as directed by the IESO.	n/a
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	The plans for PEC's replacement after its expected closure.	n/a	See response #8. [Response #8: PEC is contracted to operate until April 2034. As Atura Power responds to Ontario energy needs as directed by the IESO, plans beyond PEC's contract period are not certain at this time.]	n/a
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	The financial cost of the proposed expansion and the expected impact on electricity costs to consumers.	n/a	See response #5. Atura Power does not dictate the price that customers pay for electricity, nor do we set government policies. Our business is to safely, reliably, and affordably generate electricity to meet the needs of Ontarians. [Response #5: At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades. Additionally, the IESO sets the price of electricity in Ontario. Therefore, please direct your question regarding electricity costs for consumers to the IESO here: https://www.ieso.ca/en/Corporate-IESO/Contact .]	n/a
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	In light of the above, it is clear that Atura Power's public consultation process and subsequent DSR has failed to provide key information about their proposal which has direct and immediate impacts on the community. The DSR fails to include any socio-economic impact or environmental disadvantages the proposed upgrades will have on the community. There is no evidence provided in the DSR to indicate that the proposed expansion would be a benefit to the local community, or that the proposed expansion would not pose a danger to the climate or public health. We are therefore demanding an immediate halt to the proposed expansion and that the DSR be revised to include:	n/a	See Response #1. [Response #1: A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) Long-Term (LT1) Request for Proposals (RFP) process which is not related to the PEC Efficiency Upgrades project. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023 and for which the IESO awarded a contract to PEC.]	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
		-An explanation why Atura believes PEC should be expanded without explicit support from Toronto City Council.			
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	By excluding the data on PEC's current greenhouse gas emissions, nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), and sulphur dioxide, and the increases in these emissions that the proposed expansion will have, the DSR fails to address local health and ongoing climate impacts of the proposed expansion.	Section 3: Environmental Screening	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project.</p> <p>In recent correspondence to the project team, it was confirmed that "MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rationale provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.</p>	Section 3.3: Environmental Effects Assessments
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	PEC is the largest emitter of greenhouse gasses and nitrous oxides in Toronto. In addition to worsening the climate crisis, these pollutants have immediate health impacts on local residents, hindering lung development in children, and contributing to respiratory illness that can lead to hospitalization and death. Many studies have shown increased asthma rates in areas with persistent air pollution.	n/a	<p>For a detailed response to public comments on Emissions of Greenhouse Gases please refer to the sub-category provided in Appendix B3a.</p> <p>Similarly, details of PEC's Environmental Compliance Approval (ECA) (Air/Noise) are provided in Appendix B3a in the response to public comments under the air quality sub-category. The response can be expanded by noting that air standards under O. Reg. 419/05 are set by the MECP's Standards Development Branch to protect against health and environmental effects. Of the 5,208 air contaminant standards, guidelines and screening levels which the MECP currently requires to be assessed for contaminants released to the air, 5,099 are health based.</p>	Appendix B4a: Summary of Public Questions/Comments by Category, and Atura Power's Responses

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	The Draft Screening Report (DSR) fails to address why this expansion should be approved despite the explicit opposition of Toronto City Council. In 2023 Toronto City Council passed two separate resolutions opposing Atura Power's plans to increase PEC's output capacity. This is directly counter to a 2022 directive by Energy Minister Todd Smith to the Independent Electricity Systems Operator (IESO) that municipal approval is required for Ontario's proposed energy procurement of 4,000 megawatts. As the PEC expansion is part of this procurement effort, it requires the support of Toronto City Council to proceed. The DSR fails to indicate why this expansion should proceed without the required support of Toronto City Council.	n/a	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) Long- Term (LT1) Request for Proposals (RFP) process which is not related to the PEC Efficiency Upgrades project. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023 and for which the IESO awarded a contract to PEC.	n/a
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	The Draft Screening Report (DSR) fails to indicate alternatives to the proposed expansion.	n/a	The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023.	n/a
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	<p>The DSR fails to provide the financial cost of the proposed expansion.</p> <p>The cost of living for all Torontonians is increasing, which amplifies the economic impact of the proposed upgrade as a pressing issue. As seen in the correspondence from your community outreach, Atura Power is unwilling to provide any information about the cost of the upgrade despite receiving many questions from the community about this matter. Since Atura Power is a wholly owned subsidiary of the crown corporation Ontario Power Generation, these costs should be made public, as the operational costs of PEC are ultimately borne by the taxpayer. There can be no meaningful discussion about the economic impact of the upgrade without this information, which Atura Power has declined to provide in the DSR.</p>	n/a	<p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades. Additionally, the IESO sets the price of electricity in Ontario. Therefore, please direct your question regarding electricity costs for consumers to the IESO here: https://www.ieso.ca/en/Corporate-IESO/Contact.</p>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	<p>The DSR fails to address the climate and health impacts of the proposed expansion and increased operation.</p> <p>When PEC was first built it was communicated to the City of Toronto that it was a 'peaker plant', operating only during peak hours to top up baseload supply; however, recent studies found that the plant was operating up to 21 hours a day. Since 2018, emissions from PEC have increased 550 percent with further announced plans to increase output and emissions by 700 percent by 2043. It is clear that PEC is no longer intended to operate exclusively during peak hours, and it has instead become a base-load power plant without community consultation or the stated support of the City of Toronto.</p>	n/a	The purpose of the draft Screening Report is to assess the effects of the proposed efficiency upgrades (see Section 1.4: Project Description of the draft Screening Report). As such, this comment is beyond the scope of the draft Screening Report and associated Environmental Screening Process.	n/a
Toronto East Residents for Renewable Energy (TERRE)	2024-01-05	<p>The DSR fails to indicate alternatives to the proposed expansion.</p> <p>We are in a global climate crisis. Despite available alternatives to meet Ontario's power needs, Atura Power's DSR fails to indicate carbon neutral alternatives to its proposed expansion. Wind, solar and storage are among the most affordable on the market. Additionally, Ontario has the ability to import surplus hydro-electricity from Quebec. Atura Power's DSR fails to indicate alternatives to their proposal, and in doing so fails to justify the need for its proposed expansion.</p>	n/a	The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023.	n/a
n/a	2024-01-07	I have read the draft screening report and find it lacking in several places: it should include definite figures of GHG emitted over the past 4-5 years (not "historical" amounts); it should include the financial cost of the proposed expansion; it should include the expected impact on electricity costs to consumers.	n/a	<p>Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient.</p> <p>All PEC emissions reports are publicly available on the provincial and federal government websites. At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades. Additionally, it is the</p>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>IESO which sets the price of electricity in Ontario, therefore, please direct your question regarding electricity costs for consumers to the IESO here: https://www.ieso.ca/en/Corporate-IESO/Contact.</p>	
n/a	2024-01-07	<p>We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives.</p>	n/a	<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province’s focus on cost-effective reliability. Part of this process is the province’s request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project.</p> <p>Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p>	n/a
n/a	2024-01-07	<p>The screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure.</p>	Chapter 3: Environmental Screening	<p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator “will maintain [air] emissions levels at or below site permit levels”. As such, an air quality assessment is not required and has not been undertaken for the project.</p> <p>Greenhouse gas emissions from PEC are regulated under the Emissions Performance Standards Regulation (O. Reg. 241/19) under the <i>Environmental Protection Act</i>. Furthermore, information on greenhouse gas (GHG) emissions from facilities</p>	Section 3.3: Environmental Effects Assessments

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				across Canada who meet the requirements is collected under section 46 of the <i>Canadian Environmental Protection Act</i> . Reviewed 2021 GHG data is currently available. 2022 GHG data has been submitted as per the reporting requirements and is under review.	
n/a	2024-01-07	Thank you for inviting comments on your draft screening report for the expansion of the Portlands gas plant. I do not support the expansion of the Portlands gas plant. Toronto City Council does not support the expansion either. I ask Atura to explain how they can expand a polluting gas plant in our community without support from our municipal officials, since Minister Smith has required municipal resolutions of support. I have read the draft screening report and find it lacking in a number of places: it should include definite figures of GHG emitted over the past 4-5 years (not "historical" amounts); it should include the financial cost of the proposed expansion; it should include the expected impact on electricity costs to consumers. We know there are alternatives to increasing fossil gas burning, including cleaner and lower cost renewables, conservation and load shifting. The final screening report should include an analysis of the costs and benefits of cleaner alternatives. And finally, the screening report should include an analysis that examines the smog, climate, economic and health impacts of the Portlands Energy Centre at present and until its expected closure. Thank you.	n/a	<p>Thank you for your recent email sharing your comments about the proposed Portlands Energy Centre (PEC) Efficiency Upgrades project (below). A letter with our responses to your comments is attached. Thank you and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.</p> <p>Thank you for your recent email sharing your comments about our proposed Portlands Energy Centre (PEC) Efficiency Upgrades project. Your comments are noted and part of the project record. Before we respond to your comments, we would like to offer one clarification. Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls, but due to improved technology, will be more efficient. In response to each of the questions/comments raised in your email, we offer the following responses in the table below.</p> <p>It should be noted that a municipal support resolution is not required for the PEC Efficiency Upgrades project. The Minister of Energy's quote noting the requirement for a municipal support resolution refers to the Independent Electricity System Operator's (IESO's) current Long-Term (LT1) Request for Proposals (RFP) process which is not related to the upgrade projects for which the IESO has already awarded a contract to PEC. The PEC Efficiency Upgrades project was part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023.</p> <p>At this time, Atura Power is unable to share commercially sensitive financial details related to its efficiency upgrades.</p>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				<p>The IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province’s focus on cost-effective reliability. Part of this process is the province’s request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project. Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity; however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and, for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.</p> <p>As per Section 3.2 of the draft PEC Efficiency Upgrades Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the equipment being installed for the upgrades, state that the upgrades to the turbine generator “will maintain [air] emissions levels at or below site permit levels”. As such, an air quality assessment is not required and has not been undertaken for the project.</p>	
Toronto East Residents for Renewable Energy (TERRE)	2024-02-23*	Counter to a letter from Energy Minister Todd Smith in December of 2022 indicating explicit directives to the Independent Electricity Systems Operator (IESO) requiring municipal approval for new power procurements, Atura Power has stated that this procurement of 50 MW does not require municipal support as it falls under “Expedited Long-Term (E-LT1) RFP [Requests For Proposals]”, which they claim the Minister was not referring to. TERRE found no	n/a	<p>Atura Power does not require municipal approval to complete the efficiency upgrade project for the following reasons:</p> <p>i) As stated in Section 3.3 of the draft Screening Report, the IESO is moving forward with a procurement process to meet near, medium, and long-term energy needs while maintaining the province’s focus on cost-effective reliability. Part of this process is the province’s request for upgrades to increase</p>	n/a

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
		subsequent communication which absolves Atura from complying with the Minister’s directive to obtain municipal support. Atura has provided no evidence which justifies disregarding the Minister’s statement.		<p>electricity production at existing facilities. Atura Power is responding to this need identified by the IESO through the contract awarded by the IESO as part of the competitive Expedited Long-Term Request for Proposal (E-LT1-RFP), in May 2023. The IESO awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) RFP, results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades; as such, municipal support resolution for E-LT1 is not required. The IESO’s May 2023 Resource Adequacy Update explains the upgrades to existing gas plants approved under the ELT1 process, while the ‘Results Table’ link provided in the Resource Adequacy Update (located under the ‘Expedited Process’ heading) identifies PEC as one of the seven existing facilities approved for efficiency upgrades.</p> <p>ii) While the IESO’s E-LT1 process does not require municipal approval, the PEC efficiency upgrades project is subject to the Environmental Screening Process for Electricity Projects subject to Ontario Regulation (O. Reg) 116/01, under the Ontario <i>Environmental Assessment Act</i>, since the project proposes to increase the facility’s generation capacity by more than five megawatts (MW). The Environmental Screening Process is a proponent-driven process that Atura Power is carrying out, according to the requirements outlined in O. Reg 116.01. While municipal engagement is an important component of the environmental assessment process, municipal approval is not required.</p>	
Toronto East Residents for Renewable Energy (TERRE)	2024-02-23*	In response to questions about greenhouse gas, nitrogen oxides, and other harmful emissions from the PEC, Atura Power has indicated that questions about emissions are “beyond the scope of the draft screening report and associated Environmental Screening Process.” TERRE feels that if the environmental screening process does not take into account greenhouse gas and other harmful emissions related to the expansion then the screening process is not able to properly assess the project’s health and environmental risks.	n/a	<p>Several of your comments refer to the project as the “PEC expansion”; however, as we communicated to you, Atura Power is not proposing an expansion of the existing PEC facility. Atura Power is planning efficiency upgrades to the existing turbines during a scheduled maintenance period.</p> <p>The assessment process requires Atura Power to undertake an Environmental Screening Process to identify whether any potential environmental effects of the project would occur. The existing PEC facility went through an Environmental Assessment and is therefore not the subject of the Screening</p>	Section 3.3: Environmental Effects Assessments

Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
				Report. As such, the scope of this assessment is limited to understanding and identifying any effects of the proposed efficiency upgrades. We can confirm that Ministry of the Environment, Conservation and Parks (MECP) is aware of the scope and assessment process that Atura Power is undertaking for the project. This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.	
Toronto East Residents for Renewable Energy (TERRE)	2024-02-24*	In response to questions about the financial cost of the expansion, Atura Power has not shared any information, stating they are "unable to share commercially sensitive financial details" about the expansion. TERRE feels that this information must be provided in order to assess the socio-economic impacts of the expansion. Atura Power is a crown corporation and therefore taxpayers are entitled to this information.	n/a	As noted previously, Atura Power is not sharing commercially sensitive financial details related to its efficiency upgrades. As the IESO sets the price of electricity in Ontario, please direct your question regarding electricity costs for consumers to the IESO here: https://www.ieso.ca/en/Corporate-IESO/Contact .	n/a

*Notes correspondence that began during the draft Screening Report review period from December 5, 2023 to January 7, 2024, and after the review period concluded.

Appendix C2: Comments from Municipal Staff and Elected Officials

Summary of Draft Screening Report Comments from Municipal Staff and Elected Officials

The following table captures questions and comment received from municipal staff and elected officials during the draft Screening Report review period from December 5, 2023, to January 7, 2024. Copies of the emails containing the comments referenced in the table below can be viewed in **B5: Correspondence Records with Municipal Staff and Elected Officials**.

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Support Assistant B on behalf of James Nowlan, Executive Director, Environment & Climate Division	City of Toronto	2024-01-05	<p>The planned upgrade would increase PEC's electricity generation capacity from 550 MW to 600 MW, counter to Toronto City Council's recent statements:</p> <ul style="list-style-type: none"> • In June 2023, Toronto City Council requested, "the Government of Canada to issue Clean Electricity Regulations that prohibit increasing the gas-fired generating capacity at the Portlands Energy Centre, effective immediately" (2023.MM7.25, Part 1). • In May 2023, Toronto City Council voted to "oppose any new power generation proposal involving increased burning of fossil fuels, including natural gas, in the City" (2023.MM6.13, Part 1). • City Council voted to "request the Province of Ontario to immediately invest in programs to deliver energy efficiency, demand management and conservation to meet the capacity and energy needs that would have been fulfilled by expansion of electricity production through burning of fossil fuels" (2023.MM6.13, Part 2). 	n/a	A municipal support resolution is not required for the PEC Efficiency Upgrades project. The Independent Electricity System Operator (IESO) has already awarded a contract for the PEC Efficiency Upgrades project as part of the competitive Expedited Long-Term (E-LT1) Request for Proposal (RFP), results for which were announced in May 2023, including contracts for natural gas electricity generation facility upgrades.	n/a
Support Assistant B on behalf of James Nowlan, Executive Director, Environment & Climate Division	City of Toronto	2024-01-05	<p>The draft Screening Report does not provide the following quantitative information, and we request that it be included in the final Screening Report to provide clarity about the project:</p> <p>1. If the upgrade is undertaken, is the quantity of natural gas consumed annually expected to increase, decrease, or stay the same? What quantity of natural gas will be consumed and how does this compare to PEC's current state?</p>	n/a	The quantity of natural gas consumed after the efficiency upgrades are completed will depend on the how often the IESO calls on PEC to operate. As stated in Appendix B3a of the draft Screening Report, PEC operations are dictated by the IESO based on the electricity supply and demand balance, which fluctuates season by season and year to year. Also note that, as per Section 3.3 in Table 3-1 of the draft PEC Efficiency Upgrades Screening Report, the same amount of fuel used will produce more power after the upgrades.	n/a
Support Assistant B on behalf of James Nowlan, Executive Director, Environment & Climate Division	City of Toronto	2024-01-05	What emission intensity and total annual quantity of each relevant air pollutant (carbon monoxide, nitrogen oxides, particulate matter (PM2.5) and sulphur dioxide) would be emitted, and how do these compare to PEC's current state?	Section 3: Environmental Screening	As per Section 3.2 of the draft Screening Report, Atura Power is confident that there will be no potential for negative effects associated with the screening criteria. All planned project activities will occur within the footprint of the existing facility. Additionally, letters from General Electric (GE) Gas Power Services, the manufacturer of the	Section 3.3: Environmental Effects Assessments

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
			The required Screening Criteria Checklist, question 3.1 asks if the project would, "have negative effects on air quality due to emissions of nitrogen dioxide, sulphur dioxide, suspended particulates, or other pollutants?" A quantitative analysis of how the upgrade project would impact PEC emissions would answer this question.		equipment being installed for the upgrades, state that the upgrades to the turbine generator "will maintain [air] emissions levels at or below site permit levels". As such, an air quality assessment was deemed to be not required and has not been undertaken for the project. In recent correspondence to the project team, it was confirmed that" [Ministry of Environment, Conservation and Parks'] MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational[e] provided, the ministry concurs that an air quality impact assessment is not needed for this undertaking". This instruction from the MECP will be included as part of the record of engagement in the final Screening Report.	
Support Assistant B on behalf of James Nowlan, Executive Director, Environment & Climate Division	City of Toronto	2024-01-05	<p>What total annual quantity of greenhouse gases (GHGs) would be emitted, and how does this compare to PEC's current state?</p> <p>The draft Screening Report, page 18, indicates that the upgrade project is expected to lower the facility's GHG intensity by two percent. What is not clear is how the upgrade project would impact total, annual GHG emissions.</p>	Section 3.3: Environmental Effects Assessment	The text on page 18 of the draft Screening Report indicating that the greenhouse gas intensity of the facility is expected to reduce by two per cent relates to the fact the same amount of fuel used will produce more power after the upgrades. The total annual quantity of GHGs emitted will depend on the how often the IESO calls on PEC to operate. As stated in Appendix B3a of the draft Screening Report, PEC operations are dictated by the IESO based on the electricity supply and demand balance, which fluctuates season by season and year to year.	n/a
Support Assistant B on behalf of James Nowlan, Executive Director, Environment & Climate Division	City of Toronto	2024-01-05	Achieving Toronto's goal of net-zero GHG emissions community-wide by 2040, as outlined in the TransformTO Net Zero Strategy, among North America's most ambitious climate plans, requires transition buildings and transportation from fossil fuels to clean electricity. A critical step for success is developing a resilient, carbon-free, affordable electricity supply in Ontario and increasing local renewable electricity generation, rather than increasing electricity generation from fossil fuels.	n/a	The IESO is moving forward with a procurement process to meet near, medium and long-term energy needs while maintaining the province's focus on cost-effective reliability. Part of this process is the province's request for upgrades to increase production at existing facilities. Atura Power is responding to this need identified by the IESO through the contracted PEC Efficiency Upgrades project. Additionally, it should be noted that wind and solar generation are important resources and will continue to play an increasing role in supplying clean electricity;	n/a

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
					however, other resources are required to maintain system reliability. It is not uncommon to have a week or more of low wind or overcast conditions and for these periods of time, it is critical to have generation resources available that can operate on demand. Natural gas generation operates on demand regardless of weather conditions to ensure electricity system reliability and ensures that wind and solar generation can be reliably incorporated into the electricity system.	
Support Assistant B on behalf of James Nowlan, Executive Director, Environment & Climate Division	City of Toronto	2024-01-05	As we think ahead, we are interested to hear if Atura plans to capture and store emissions from PEC, including emissions from any increased capacity by 2040. We look forward to discussions in the years to come, with Atura, other facility operators, utilities, other levels of government and their agencies, about collectively transitioning Ontario's electricity sector.	n/a	Atura Power is playing a leadership role in establishing the supply of low-carbon hydrogen in Ontario to help the province move towards a net-zero future with plans for low-carbon hydrogen facilities in Niagara, Windsor, and Nanticoke. We are also developing a 250 MW battery energy storage system (BESS) in Napanee, and have submitted proposals to develop additional BESS projects in Nanticoke, Napanee and Peterborough.	n/a

Appendix C3: Comments from Agencies

Summary of Draft Screening Report Comments from Agencies

The following table captures questions and comments received from agencies during the draft Screening Report review period from December 5, 2023, to January 7, 2024. Copies of the emails containing the comments referenced in the table below can be viewed in **B6: Correspondence Records with Agencies**.

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Liam Smythe, Heritage Planner Citizenship, Inclusion and Heritage Division	Ministry of Citizenship and Multiculturalism	2023-12-11	MCM recommends that a Heritage Impact Assessment (HIA), prepared by a qualified consultant, be completed to assess potential project impacts to the properties at 440 and 470 Unwin Avenue. Please send the HIA to MCM and the City of Toronto heritage planning staff for review and comment and make it available to local organizations or individuals who have expressed interest in review.	n/a	The upgrades will involve replacing the same parts that would normally be replaced at regular maintenance overhauls. All project activities will take place within the existing facility, and the existing facility footprint will not change in any way (no ground disturbance). For these reasons, we do not anticipate any effects to the MCM interests identified, and, as such, do not anticipate the need to conduct a Heritage Impact Assessment (HIA) or technical cultural heritage studies.	n/a
Liam Smythe, Heritage Planner Citizenship, Inclusion and Heritage Division	Ministry of Citizenship and Multiculturalism	2024-01-03	All technical cultural heritage studies and their recommendations are to be addressed and incorporated into EA projects. Please advise MCM whether any technical cultural heritage studies will be completed for this EA project and provide them to MCM before issuing a Notice of Completion and commencing any work on the site.	n/a	Thank you again for your letter to Atura Power dated Jan. 3, 2024, acknowledging our plans to make efficiency upgrades at our Portlands Energy Centre (PEC) and noting the Ministry of Citizenship and Multiculturalism's guidance for consideration during the Environmental Assessment process. Please find a copy of our response, as well as a copy of our draft PEC Screening Report referenced in the letter, in the attached PDFs.	n/a
Liam Smythe, Heritage Planner Citizenship, Inclusion and Heritage Division	Ministry of Citizenship and Multiculturalism	2024-01-03	The properties at 440 and 470 Unwin Avenue have been designated under Part IV of the <i>Ontario Heritage Act</i> (City of Toronto <i>By-laws #1144-2019 and #936-2020</i>). MCM recommends that a Heritage Impact Assessment (HIA), prepared by a qualified consultant, be completed to assess potential project impacts to the properties at 440 and 470 Unwin Avenue.	n/a	The upgrades will involve replacing the same parts that would normally be replaced at regular maintenance overhauls. All project activities will take place within the existing facility, and the existing facility footprint will not change in any way (no ground disturbance). For these reasons, we do not anticipate any effects to the MCM interests identified, and, as such, do not anticipate the need to conduct a Heritage Impact Assessment (HIA) or technical cultural heritage studies. Further details regarding project activities are documented in our draft Screening Report, a copy of which is attached to this email. Note that we shared this draft report with Indigenous communities, key agencies who have responded to the Notice of Commencement, and interested members of the public. The report was shared to offer those interested with an additional opportunity to review the project details, the Environmental Screening Process undertaken, and	n/a
Liam Smythe, Heritage Planner Citizenship, Inclusion and Heritage Division	Ministry of Citizenship and Multiculturalism	2024-01-03	This project may impact archaeological resources and should be screened using the Ministry's Criteria for Evaluating Archaeological Potential to determine if an archaeological assessment is needed. MCM archaeological sites data are available at archaeology@ontario.ca .	n/a		n/a

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
					<p>assessment findings. Atura Power is voluntarily providing this opportunity so that comments can be incorporated into the final Screening Report. The report outlines the results of the Environmental Screening Process undertaken to identify whether any potential environmental effects of the project would occur ("Yes" or "No"). Notably, the Environmental Screening Process determined that the response to all questions is "No", indicating that there are no potential negative environmental effects resulting from the project. We invite you to review the draft report and share any comments via our project email address, portlandsupgrade@aturapower.com. We will accept comments until Jan. 19, 2024, after which we will prepare and publish the final version of the Screening Report for a mandatory 30-day review period per the requirements of the screening process under Ontario Regulation 116/01. Thank you very much and please do not hesitate to contact us at portlandsupgrade@aturapower.com with any questions.</p>	
<p>Liam Smythe, Heritage Planner</p> <p>Citizenship, Inclusion and Heritage Division</p>	<p>Ministry of Citizenship and Multiculturalism</p>	<p>2024-01-17*</p>	<p>As no expansion of the existing facility footprint is proposed, and no ground disturbance is anticipated, it is understood that the project area was not screened for archaeological potential. Please be advised however, that if any construction-related activities are to occur outside of the existing facility footprint, including temporary storage, staging and working areas, etc., that may cause land-disturbance, then the area should be screened using the Ministry's Criteria for Evaluating Archaeological Potential to determine if an archaeological assessment is needed.</p>	<p>n/a</p>	<p>Thank you for confirming that Ministry of Citizenship and Multiculturalism (MCM) staff completed their review of the draft Screening Report for our Portlands Energy Centre (PEC) Efficiency Upgrades project and sharing the letter detailing MCM's response. We would like to make a note of clarification as we noticed that your letter refers to the property at 440 Unwin Ave., namely, the Richard L. Hearn Generating Station. Please note that PEC, the site of the proposed efficiency upgrades, is located in the Port Lands industrial area at 470 Unwin Ave. The former Richard L. Hearn Generating Station is located to the southwest of PEC.</p> <p>In response to your feedback regarding Archaeological Resources, we understand that if the project description changes and any construction-</p>	<p>n/a</p>

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
					related activities are to occur outside of the existing facility footprint at 470 Unwin Ave. that may cause land-disturbance, the area should be screened using the Ministry's Criteria for Evaluating Archaeological Potential to determine if an archaeological assessment is needed.	
Liam Smythe, Heritage Planner Citizenship, Inclusion and Heritage Division	Ministry of Citizenship and Multiculturalism	2024-01-17*	While it is understood that all proposed activities associated with the upgrades will take place within the existing facility, we would like to reiterate that the Portlands Energy Centre property is designated under Part IV of the <i>Ontario Heritage Act</i> (City of Toronto <i>By-laws #1144-2019 and #936-2020</i>), and therefore activities associated with upgrades and maintenance may still have the potential to impact heritage attributes of the property. Atura Power is advised to consult with Heritage Planning staff at the City of Toronto to determine if the proposed activities will adversely impact any heritage attributes of the property. If adverse impacts to any heritage attributes are anticipated, then MCM recommends that a Heritage Impact Assessment (HIA), prepared by a qualified consultant, be completed to assess potential project impacts to the property.	n/a	In response to your feedback regarding Built Heritage Resources and Cultural Heritage Landscapes, please note we have shared the Notice of Commencement and draft Screening Report with the City Planning department and have not received any comments or questions to date. However, we will reach out to Heritage Planning staff within the City Planning department, to confirm that no Heritage Impact Assessment is required. Thank you again for your review of our draft Screening Report and project materials. As stated in your letter, we will reach out with further questions.	n/a
Sarah Bale, Regional Planner Land Use Planning Unit	Ministry of Natural Resources and Forestry	2023-12-11	Thank you for sending the draft Screening Report. Based on the information contained in the report, we do not have any concerns or further comment at this time. Please continue to circulate us on key stages/milestones in the process. You can send future circulations directly to me at sarah.bale@ontario.ca .	n/a	Thank you for your message and quick review, Sarah. They are very much appreciated.	n/a
Sarah Bale, Regional Planner Land Use Planning Unit	Ministry of Natural Resources and Forestry	2023-12-11	The Ministry of Natural Resources and Forestry (MNRF) received the Notice of Commencement for the Portlands Energy Centre Efficiency Upgrades on September 6, 2023. Thank you for circulating this to our office. Please note the ministry has not completed a screening of natural heritage, natural hazards, other natural resource values, or applicable ministry permits or approvals at this time. This response provides information to guide you in identifying ministry interests and engaging the ministry	n/a	Thank you for confirming receipt of the Notice of Commencement for the Portlands Energy Centre Efficiency Upgrades and sharing the information to guide us in identifying ministry interests and engaging the ministry for advice as needed over the course of the Environmental Screening Process. We will review the materials and reach out with any questions or concerns.	n/a

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
			<p>for advice as needed. MNRF has prepared the attached to provide proponents an overview of MNRF mandated interests and the ministry's commenting role in respect of external requests for comment for projects subject to the Environmental Assessment Act. Please note it is the proponent's responsibility to be aware of, and comply with, all relevant federal or provincial legislation, municipal by-laws and/or other agency approvals.</p> <p>After reviewing the information provided, if you have identified that your project would not impact any MNRF interests there is no need to circulate any subsequent notices to our office. If you have identified MNRF interests and/or may require permit(s) or further technical advice, please direct your specific questions to the undersigned.</p> <p>If you have any questions or concerns, please feel free to contact me.</p>			
<p>Chunmei Liu, Regional Environmental Planner</p> <p>Environmental Assessments Branch</p>	<p>Ministry of Environment, Conservation and Parks</p>	<p>2023-12-11</p>	<p>The ministry is requesting the full record of indigenous consultation information including emails, call logs, meeting notes, etc. for the review of the draft ESR for this project.</p> <p>If the requested information is not available at the draft ESR review stage, the ministry will request the full record of indigenous consultation information for our review when a Notice of Completion and the final ESR for the project is released during the 30-day public review period.</p>	<p>Section 4.6: Indigenous Engagement</p>	<p>In response to the MECP's request for the full record of Indigenous engagement information, we would like to note that the draft Environmental Screening Report (Section 4) summarizes our engagement with Indigenous communities during the Environmental Screening Process to date. We have not included the detailed correspondence records in the draft Screening Report as we are sharing these records with each Indigenous community first. And, as noted in your email, we will provide the correspondence with Indigenous communities to the MECP with the Notice of Completion and final Screening Report. Thank you again, and please let us know if you have further questions.</p>	<p>n/a</p>
<p>Chunmei Liu, Regional Environmental Planner</p>	<p>Ministry of Environment, Conservation and Parks</p>	<p>2024-01-05</p>	<p>MECP's technical staff have reviewed Table 3-1 and Section 3.4.3 of the draft environmental screening report (ESR) for the proposed upgrades at the Portland's Energy Centre. The proposed upgrades to the turbine generator will maintain air emissions levels at or below site permit levels. Based on the rational provided, the</p>	<p>Section 3.3: Environmental Effects Assessments</p>	<p>Thank you for your email dated Jan. 5, 2024. We appreciate the MECP's confirmation that an air quality impact assessment is not needed for the PEC Efficiency Upgrades project, and that the MECP's Toronto District staff have reviewed the draft Screening Report and do not have further comments.</p>	<p>Section 3.3: Environmental Effects Assessments</p>

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Environmental Assessments Branch			ministry concurs that an air quality impact assessment is not needed for this undertaking.			
Chunmei Liu, Regional Environmental Planner Environmental Assessments Branch	Ministry of Environment, Conservation and Parks	2024-01-05	MECP's Toronto District staff have also reviewed the draft ESR from the lens of the district and do not have any further comments. It is understood that the proposed efficiency upgrades are occurring within the facility, will not require works beyond the footprint of the facility and are projected to cause no additional negative affects to the natural environment or species at risk.	n/a		n/a
Chunmei Liu, Regional Environmental Planner Environmental Assessments Branch	Ministry of Environment, Conservation and Parks	2024-01-05	Initial concerns with this project were centered around visible emissions as MECP's district staff regularly receive complaints regarding plumes originating from the plant due to the startup/shutdown procedures. In the report, the equipment manufacturer has demonstrated that the upgrades will maintain [air] emissions levels at or below site permit levels. Similarly, the manufacturer has stated that the upgrades are not expected to increase noise levels from the facility. This was previously assured through discussions with Atura Power representatives in June 2023 when the Environmental Compliance Approval amendment was submitted.	n/a	Thank you for your email dated Jan. 5, 2024. We appreciate the MECP's confirmation that an air quality impact assessment is not needed for the PEC Efficiency Upgrades project, and that the MECP's Toronto District staff have reviewed the draft Screening Report and do not have further comments.	n/a
Chunmei Liu, Regional Environmental Planner Environmental Assessments Branch	Ministry of Environment, Conservation and Parks	2024-01-05	Attached we have also asked the full record of indigenous consultation information including emails, call logs, meeting notes, etc. for the review of the draft ESR. If the requested information is not available at the draft ESR review stage, the ministry will request the full record of indigenous consultation information for our review when a Notice of Completion and the final ESR for the project is released during the 30-day public review period.	Section 4.6: Indigenous Engagement	In response to the MECP's request for the full record of Indigenous engagement information, we would like to note that the draft Environmental Screening Report (Section 4) summarizes our engagement with Indigenous communities during the Environmental Screening Process to date. We have not included the detailed correspondence records in the draft Screening Report as we are sharing these records with each Indigenous community first. And, as noted in your email, we will provide the correspondence with Indigenous communities to the MECP with the Notice of Completion and final Screening Report.	n/a
Jackie Ho, Planner I	Toronto and Region	2023-12-06	Be advised that this project is located within the Toronto Waterfront Screening Area and while TRCA will continue	n/a	Atura Power acknowledges that this project is located within the Toronto Waterfront Screening Area and	n/a

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Infrastructure Planning and Permits	Conservation Authority		to comment on this project throughout the EA process, future permits under the Conservation Authorities Act regulations are not required. Depending on the works that are proposed during detailed design, an application made pursuant to the TRCA Voluntary Project Review process may be recommended by staff. Voluntary Project Review applications are subject to the discretion of the applicant due to the location of the project within the Toronto Waterfront Screening Area.		that while future permits under the <i>Conservation Authorities Act</i> regulations are not required, TRCA will continue to be involved in the PEC Efficiency Upgrades project throughout the EA process. Note, following the successful completion of the EA process, Atura Power plans to move to construction of the planned upgrades in Fall 2024. Atura Power will continue to notify the TRCA of EA milestones including the release of the draft Screening Report (which Atura Power shared notification and a copy of the report with TRCA via email on Dec. 5, 2023) as well as the Notice of Completion and publication of the final Screening Report.	
Jackie Ho, Planner I Infrastructure Planning and Permits	Toronto and Region Conservation Authority	2023-12-06	TRCA advises of the Highly Vulnerable Aquifer in this location. Should works require excavation, consultation with TRCA should be initiated.	n/a	Atura Power recognizes the Highly Vulnerable Aquifer in this location. As noted above, the upgrades will take place within the existing facility footprint and will not require excavation. Atura Power acknowledges that further engagement with TRCA should be initiated should the project require excavation.	n/a
Jackie Ho, Planner I Infrastructure Planning and Permits	Toronto and Region Conservation Authority	2023-12-06	TRCA recommends use of erosion and sediment control measures for stockpiling or staging of equipment outside of the building.	n/a	All critical equipment is to be stored inside the facility. Any equipment stored outside will be temporarily stored on tractor trailer/flatbeds located on existing paved or gravel parking areas and driveways. Atura Power does not expect to affect or change the facility's existing stormwater management plan/program. No effects to erosion or sediment are anticipated.	n/a
Jackie Ho, Planner I Infrastructure Planning and Permits	Toronto and Region Conservation Authority	2023-12-06	TRCA seeks clarification if any work within "existing facilities" extends beyond the building footprint and associated paved areas. If any work is proposed beyond the built and paved areas, consultation with TRCA should be initiated to prevent indirect and/or direct impacts to the nearby wetlands.	Section 3.3: Environmental Effects Assessments	No; the upgrades will take place within the existing facility and associated paved areas. The existing facility footprint will not change. Atura Power acknowledges that further engagement with TRCA should be initiated should the project extend beyond the building footprint and associated paved areas.	n/a
Jackie Ho, Planner I	Toronto and Region	2023-12-06	TRCA staff note that there were no detailed responses to our comments included in the draft screening report.	n/a	We are sharing this letter and a populated copy of Appendix B: TRCA Comments and Responses in	n/a

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
Infrastructure Planning and Permits	Conservation Authority		Please provide us with detailed responses for TRCA staff review in the attached appendix.		response to your Oct. 31, 2023, and Dec. 6, 2023, correspondence.	
Jackie Ho, Planner I Infrastructure Planning and Permits	Toronto and Region Conservation Authority	2023-12-21	TRCA staff are unable to meet the January 7 deadline proposed and request an extension of two weeks. Typically, our service delivery standards are up to 45 business days for reviewing draft EA reports, but staff expect to be able to provide comments by mid-January. Please confirm if Atura Power can accommodate.	n/a	Thank you for your update regarding TRCA's review of the draft PEC Efficiency Upgrades Screening Report and noting staff's need for a two-week extension beyond the January 7, 2024 deadline. We look forward to receiving TRCA's comments by January 19, 2024.	n/a

Name/Title	Organisation, if applicable	Date of Comment	Comment	Draft Screening Report Section Reference	How Atura Power Addressed the Comment/Question	Section of the Final Screening Report that was Updated, if applicable
<p>Jackie Ho, Planner I</p> <p>Infrastructure Planning and Permits</p>	<p>Toronto and Region Conservation Authority</p>	<p>2024-01-17*</p>	<p>1. TRCA previously reviewed the Notice of Commencement received on September 6, 2023 and presentation materials from the Public meeting held on October 5, 2023. A response letter was provided on October 31, 2023. Atura Power has provided responses to these comments as part of this current submission.</p> <p>2. TRCA staff have completed the review of this submission and have objections in principle to the proposed work. Our comments on the Draft Screening Report are addressed. A record of TRCA comments is enclosed as Appendix B: TRCA Comments and Proposed Responses. Specifically staff note the following:</p> <p>a) The project is located within the Toronto Waterfront Screening Area. As such, a permit is not required.</p> <p>b) Continue to notify TRCA of EA milestones including the Notice of Completion and publication of the final Screening Report.</p>	<p>n/a</p>	<p>Thank you for your email and attached letter concerning the TRCA’s review of our draft screening report for our proposed Portlands Energy Centre efficiency upgrades. Atura Power’s response to your letter is in the attached PDF.</p> <p>Thank you for confirming TRCA staff have completed their review of the draft Screening Report for our Portlands Energy Centre (PEC) Efficiency Upgrades project and sharing the letter detailing TRCA’s response. And thank you for confirming that TRCA has no objections to the proposed work and noting that your previous comments on the draft Screening Report shared in October 2023 have been addressed. In response to your letter shared on Jan. 17, 2024, we wish to provide two minor clarifications:</p> <ol style="list-style-type: none"> 1. In your letter, PEC is described as “previously known as the Richard L. Hearn Generating Station on Villiers Island”. Please note that PEC is located in the Port Lands industrial area at 470 Unwin Ave. The former Richard L. Hearn Generating Station is located next to PEC on the southwestern side. 2. In your letter, TRCA notes that we plan to submit a Statement of Completion in February 2024. Please be advised that we plan to issue a Notice of Completion with the final Screening Report in February 2024 and will file a Statement of Completion once the screening process is complete. Thank you again for your review of our draft Screening Report and project materials. As requested, we will continue to notify the TRCA of project milestones including sharing the Notice of Completion and final Screening Report. 	<p>n/a</p>

*Notes correspondence received during an extension of the draft Screening Report review period. The draft Screening Report review period was extended to January 19, 2024 for TRCA staff and MCM staff.

Appendix D

Air Quality Assessment Information

- **Appendix D1: Air Quality Assessment Information**
- **Appendix D2: MECP Office of the Minister's Letter to Atura Power**

Appendix D1: Air Quality Assessment Information

Appendix D: Air Quality Assessment Information

The following air quality assessment information was prepared in response to a letter the MECP Office of Minister shared with Atura Power on September 27, 2024, identifying deficiencies in the PEC Upgrades Screening Report released in March 2024.

1. Scope of the Assessment

The existing PEC facility went through an Environmental Assessment (EA) and was approved in 2003. PEC began commercial operation in 2009, after meeting the Environmental Screening Process for Electricity Projects requirements under Ontario Regulation (O.Reg.) 116/01 and obtaining all required construction permits.

Many members of the public incorrectly believe that the Upgrades project involves expanding the PEC facility. Atura Power wishes to clarify that Atura Power is not proposing an expansion of the existing PEC facility. Rather, Atura Power is planning efficiency upgrades, which are limited to replacing parts of the existing turbines with more efficient parts within the existing facility, during a scheduled maintenance period. All planned project activities will occur within the footprint of the existing facility and the parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls. The increased generation capacity that will be achieved through the upgrades is a result of the new parts which are made of more advanced materials which allow the upgraded turbines to produce a higher power output per gigajoule (GJ) of fuel consumed. There is no planned expansion to the existing PEC facility. Further, Atura Power received a letter from General Electric (GE) Gas Power Services, the manufacturer of the parts being installed for the upgrades, stating that the upgrades to the turbine generator “will maintain [air] emissions levels at or below site permit levels”.

2. Air Quality

Local Air Quality

The PEC facility operates in the Toronto Port Lands. The existing air quality in the Port Lands is influenced by local and long-range (cross-border) contaminants generated in upwind urban and industrial areas. Local air quality is primarily affected by vehicle emissions from nearby transportation links (the Gardiner Expressway and Don Valley Parkway, and Lakeshore Boulevard), which consist primarily of nitrogen oxides (NO_x), sulphur dioxide (SO₂), carbon monoxide (CO), and particulate matter, including TSP (total suspended particulates), PM₁₀ (particulate matter smaller than 10 microns), and PM_{2.5} (particulate matter smaller than 2.5 microns). There are also a number of aggregate handling and other industrial facilities in the Port Lands, which are sources of fugitive dust. Natural gas combustion at the PEC facility is also a local source of emissions, with NO_x being the significant contaminant. As noted above, the manufacturer has confirmed that the upgrades will maintain air emissions at or below site permit levels; therefore, the project will not affect local air quality.

Since the completion of the original Air Quality Assessment in 2003 and commencement of the PEC facility’s commercial operation in 2009, trends in common air pollutants in Ontario show that air quality has improved over time. Ambient concentrations of NO₂ in Ontario are reported to have decreased by 43% from 2003 to 2012 (Ministry of the Environment and Climate Change 2012 Report, published 2014) and an additional 28% from 2012 to 2021 (Ministry of the Environment, Conservation and Parks, 2023).

The trend of ambient concentrations of NO₂ is not as significant at the closest air monitoring station (Toronto Downtown) to the PEC facility as it is for all of Ontario however the trend is still favourable with a decrease of 42% from 2003 to 2012 and an additional decrease of 5% from 2012 to 2021 (Ontario Ministry of the Environment, 2004) (Ministry of the Environment and Climate Change 2012 Report, published 2014) (Ministry of the Environment, Conservation and Parks, 2023).

Land Use and Nearby Sensitive Receptors

Land use within a three-kilometer (km) radius of the PEC facility consists of water, greenspace, and employment areas, with residential areas located nearby. The Port Lands are currently zoned for Employment Use, Industrial use, or Open Space and the nearest residential lands are located approximately 950 meter (m) north-west and 1,225 m north of the PEC facility, between Lake Shore Boulevard East and Eastern Avenue. As described in Section 3.1 of the Final PEC Upgrades Screening Report, the Port Lands are the subject of city planning efforts aimed at revitalization (e.g., the proposed Villiers Island precinct development). New waterfront transit, a Natural Heritage corridor, open space, and urban development are planned for the Port Lands; however, existing business operations will continue. Future development of the Toronto Port Lands was in discussion at the time of the original planning of the PEC facility and therefore taken into consideration in the original Air Quality Assessment for the proposed PEC facility. Given that the PEC Upgrades project “will maintain [air] emissions levels at or below site permit levels”, the proposed upgrades have no bearing on future developments proposed in the Port Lands. Furthermore, land use compatibility studies are required for all proposed developments to determine whether new development or land uses are appropriate to protect people and the environment. If a land use compatibility study determines that a proposed new development with sensitive land use is not compatible with existing facilities, the new development shall not be permitted. Atura Power regularly works with neighbours – both current and future – related to compatibility with other nearby land uses and will continue to do so, however, the onus is on the proposed developer and not on Atura Power to ensure new developments are compatible with the PEC facility.

Construction, Operation, and Decommissioning Phases of the Project

The upgrades project is limited to replacing internal parts of the natural gas fired combustion turbines with more efficient parts within the existing facility. The parts that are being replaced are the same parts that would normally be replaced at regular maintenance overhauls. The part replacement phase of the project will be completed as part of a scheduled maintenance period as early as spring 2025 and will take approximately four to five weeks per unit to disassemble, replace parts and reassemble the gas turbines. The project will not increase site traffic, will take place entirely within the PEC facility and no additional external laydown areas will be required. The planned project will not require works outdoors and no dust or noise control measures are required during installation.

As for the operations and decommissioning phases, the replacement parts installed will be fully integrated into the existing facility. The operations phase of the project will include no changes to current operations other than improved thermal efficiency. The decommissioning phase will be completed either through a subsequent regular maintenance overhaul or through the final decommissioning of the PEC facility. No specific construction, operations or decommissioning considerations are required for this project.

3. References

- Ministry of the Environment and Climate Change. (2014). *Air Quality in Ontario: 2012 Report*. Retrieved from <https://www.airqualityontario.com/downloads/AirQualityInOntarioReportAndAppendix2012.pdf>
- Ministry of the Environment, Conservation and Parks. (2023). *Air Quality in Ontario 2021 Report*. Retrieved from Ontario Ministry of the Environment, Conservation and Parks: <https://www.ontario.ca/document/air-quality-ontario-2021-report#>
- Ontario Ministry of the Environment. (2004). *Air Quality in Ontario 2003 Report*. Retrieved from <https://www.airqualityontario.com/downloads/AirQualityInOntarioReportAndAppendix2003.pdf>

Appendix D2: MECP Office of the Minister's Letter to Atura Power

**Ministry of the Environment,
Conservation and Parks**

Office of the Minister

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Tel.: 416-314-6790

**Ministère de l'Environnement,
de la Protection de la nature et des
Parcs**

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September 27, 2024

Stephen Smith
Environmental Specialist
Atura Power
Email: Portlandsupgrade@aturapower.com

Appendix D was developed in response to this letter the MECP Office of the Minister shared with Atura Power on Sept 27, 2024.

357-2024-1979

Dear Stephen Smith:

I am writing to you today regarding Atura Power's (the Proponent) Portlands Energy Center Efficiency Upgrades (the Project). During the public review period, the Ministry of the Environment, Conservation and Parks (the ministry) received 196 elevation requests asking that that the Project be elevated to an Environmental Review within the Environmental Screening Process for Electricity Projects (ESP) or to a comprehensive environmental assessment.

The ministry reviewed the Project Environmental Screening Report (ESR) including relevant appendices and determined there were deficiencies in the ESR with respect to:

- An assessment of local air quality, including existing activities and sources that significantly impact air quality, and an analysis of how the project may affect existing conditions.
- An examination of nearby sensitive receptors and the project's potential air quality impacts on both present and future sensitive receptors.
- A discussion of local air quality impacts that could arise from the Project during both construction and operation.
- A discussion on the operation and decommissioning phases of the Project.

Next Steps

As a result, Atura is required to address the deficiencies identified above with updates to the applicable sections of the ESR and appendices. Atura should address MECP's comments on the appendix to the Screening Report Atura recently provided to the ministry, a new revised ESR and appendices for review.

Subsequently, Atura is required to publish a new Notice of Completion of a Screening for the Project in accordance with section B.2.4 of the ESP. The Notice of Completion of a Screening Report must provide for a minimum 30-day public review period. The revised ESR and appendices must be made available for public review during the

comment period set out in the new Notice of Completion. A decision regarding the elevation requests already received and any new requests submitted during the new review period will be made after the review period has ended.

I encourage Atura to make this letter publicly available to the requesters and other interested stakeholders.

The Project is designated as a Part II.3 project under the *Environmental Assessment Act*. It is only exempt from the requirements of Part II.3 if the requirements of the ESP for Electricity Projects are met. As such, it cannot proceed until the requirements of the ESP have been met.

Should you have any questions about the information provided in this letter, please contact Kathleen O'Neill, Director, Environmental Assessment Branch at kathleen.oneill@ontario.ca.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd McCarthy", with a long horizontal flourish extending to the left.

Todd McCarthy
Alternate Minister of the Environment, Conservation and Parks