



October 24, 2023

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 an individual Environment Assessment of Capital Power's proposal to increase the generation capacity of its Goreway Power by 40 megawatts

Introduction

I am writing on behalf of the Ontario Clean Air Alliance (OCAA) to request an individual Environmental Assessment of Capital Power's proposal to increase the generation capacity of its Goreway Power Station in Brampton, Ontario by 40 megawatts (MW).

On October 20, 2023, we wrote to Mr. Jay Shukin, Manager, Indigenous and Stakeholder Engagement, Capital Power to provide him with our concerns about Capital Power's proposal and to request Capital Power to voluntarily elevate its project to an individual Environmental Assessment. We have not received a response from Mr. Shukin to our request.

According to Capital Power's September 28, 2023, *Environmental Review Report: Goreway Power Station Upgrades Project* (ERR), its proposed project will reduce Goreway's greenhouse gas (GHG) emissions *rate* per kWh of electricity generation by less than 1/1000th of 1% (page 45).

However, according to the ERR, if the project proceeds, Goreway's total GHG emissions will rise from 677,570 tonnes per year in 2023 to 1,224,620 tonnes per year in 2032 (page 44). This is an 80% increase. In 2032 Goreway's forecast GHG emissions will be equivalent to those of 266,000 cars.¹

¹ The average Canadian vehicle releases about 4,600 kg of carbon dioxide into the atmosphere. https://natural-resources.canada.ca/sites/www.nrcan.gc.ca/files/oeef/pdf/transportation/fuel-efficient-technologies/autosmart_factsheet_6_e.pdf



According to the ERR, the proposed upgrade will *increase* Goreway’s carbon monoxide, fine particulate matter, sulphur dioxide and ammonia emissions *rate* per kWh of electricity generation (page 32). Therefore, the *total* emissions of these air pollutants will rise by more than 80%.

Concerns

We have the following concerns about Capital Power’s ERR and/or its proposal to increase Goreway’s gas-fired generating capacity.

1. Capital Power has **not** obtained a municipal support resolution from the City of Brampton 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.”²

² <https://www.ieso.ca/en/Corporate-IESO/Ministerial-Directives>



2. Capital Power's proposed project will jeopardize Canada's ability to meet its Paris Agreement climate targets.
3. Capital Power has not quantified the *increase* in Goreway's carbon monoxide, particulate matter, sulphur dioxide and ammonia emission *rates* per kWh which will occur if the project proceeds.
4. Capital Power has not provided Goreway's *total* emissions of nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), sulphur dioxide and ammonia in 2022.
5. Capital Power has not provided a forecast of Goreway's *total* emissions of nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), sulphur dioxide and ammonia in each year from 2024 to 2032 inclusive if the proposed project proceeds.
6. Capital Power has not quantified Goreway's *total* adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature deaths) if the proposed project is approved.
7. Capital Power's ERR 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.³

Also, 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.⁴ By increasing our imports of Quebec waterpower, Ontario can avoid the need for new gas-fired generation to power our air conditioners.

³ <https://thoughtleadership.rbc.com/power-shift-how-ontario-can-cut-its-450b-electricity-bill/>

⁴ <https://news.ontario.ca/en/release/1003444/the-governments-of-ontario-and-quebec-support-new-electricity-trade-agreement>



In addition, the ERR provides no analysis of the potential for wind and solar energy combined with energy storage to avoid the need to increase the generation capacity of its Goreway gas plant.⁵

8. The ERR does not propose any mitigation measures to ensure that the project will **not** have a negative net impact on public health and the environment (page 44).

Conclusion

We are requesting that Capital Power's proposed project to increase Goreway's generation capacity by 40 MW should be subject to an individual Environmental Assessment to:

- a) quantify the rise in Goreway's carbon monoxide, particulate matter (PM 2.5), sulphur dioxide and ammonia emission *rates* per kWh of electricity generation which will occur if the project is approved;
- b) quantify Goreway's *total* nitrogen oxides, carbon monoxide, particulate matter (PM 2.5), sulphur dioxide and ammonia emissions in each year from 2024 to 2032 inclusive if the project is approved;
- c) quantify Goreway's *total* adverse health impacts (e.g., asthma attacks, emergency room visits, hospital admissions, premature deaths) in each year from 2024 to 2032 inclusive if the project is approved;
- d) 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
- e) evaluate the benefits and costs of measures to mitigate the adverse health and climate impacts of the proposed project.

Yours sincerely,

A handwritten signature in black ink that reads "Jack Gibbons". The signature is written in a cursive, flowing style.

Jack Gibbons, Chair

cc. Director of the Environmental Assessment and Approvals Branch, MECP
Jay Shukin, Capital Power

⁵ https://www.cleanairalliance.org/wp-content/uploads/2023/04/Great-Lakes-Wind-Report-apr-17-v_01.pdf