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September 9, 2025

Rob Thomas  
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Rob Thomas:

**Subject: Summary of Issues for the Greenlight Electricity Centre Project**

The Impact Assessment Agency of Canada (IAAC) conducted a comment period from August 11 to September 2, 2025, to invite participants to provide their perspective on any issues that they consider relevant in relation to the Greenlight Electricity Centre Project (the project). All submissions received are available on the Canadian Impact Assessment Registry (the Registry), Reference [#89790](#) at: <https://iaac-aeic.gc.ca/050/evaluations/proj/89790>

A Summary of Issues (SOI) document, attached to the transmittal email, provides the key issues within federal jurisdiction that IAAC considers necessary, at this time, to support decision-making on whether an impact assessment is required under section 16 of the *Impact Assessment Act* (the IAA). A summary of other comments, advice, and recommendations from participants for consideration is appended to this letter.

If an impact assessment is required, the SOI and the proponent's response will inform the scope of the impact assessment, and the development of the Tailored Impact Statement Guidelines and plans, as appropriate.

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- 2 -

As the SOI provides high-level summaries of comments received, IAAC encourages Greenlight Electricity Centre Limited Partnership to review the original submissions posted on the Registry to facilitate the preparation of the response.

Pursuant to subsection 15(1) of the IAA, Greenlight Electricity Centre Limited Partnership must provide IAAC with a response that sets out how it intends to address the key issues provided in the SOI. A high-level description is sufficient. Where relevant, Greenlight Electricity Centre Limited Partnership is encouraged to identify if the key issues will be addressed through existing legislative and regulatory frameworks, by proponent commitments to best practices, policies or standards, or both.

IAAC is not requiring Greenlight Electricity Centre Limited Partnership to submit a Detailed Project Description at this time, given the information provided in the Initial Project Description for the project. If the scope or design aspects of the project have or will be changed from what was presented in the Initial Project Description, Greenlight Electricity Centre Limited Partnership should contact IAAC to discuss whether those changes affect the need for a Detailed Project Description.

IAAC is requesting your response to the SOI by **September 29, 2025**. Greenlight Electricity Centre Limited Partnership is encouraged to contact IAAC in the next few days to discuss how much time will be required to produce the response to the SOI. If more than 20 days is required, please notify IAAC in writing and request that IAAC suspend the time limit until the required information is provided.

Greenlight Electricity Centre Limited Partnership is reminded that all records produced, collected or received in relation to the impact assessment of the project – unless prohibited under the *Access to Information Act* – will be considered public and posted on the Registry site for the project.

.../3

- 3 -

If you have any questions, please do not hesitate to contact me at 613-222-1391 or [Chinenye.Ewelike@iaac-aeic.gc.ca](mailto:Chinenye.Ewelike@iaac-aeic.gc.ca).

Sincerely,

*Sent electronically*

Chinenye Ewelike  
Project Manager  
Prairie and Northern Region

Enclosures:

- 1) Attachment I – Appendix I – Comments Advice and Recommendations
- 2) Attachment II – Summary of Issues – Greenlight Electricity Centre Project

c.c.: Erin Flory - [erin.flory@stantec.com](mailto:erin.flory@stantec.com)

## **Appendix I - Comments, Advice, and Recommendations**

The Impact Assessment Agency of Canada (IAAC) is providing the following comments, advice, and recommendations for information purposes only. The proponent is encouraged to consult the Canadian Impact Assessment Registry Internet site for the Project (Reference Number 89790) to review the original comments.

### **Accidents and malfunctions**

- Concern regarding the accidental release of hazardous substances and corresponding effects on the environment. Need for emergency preparedness and related plans.

### **Atmospheric environment**

- Concern about air quality impacts from nitrogen oxides and particulate matter.

### **Climate change and greenhouse gas emissions**

- Concerns about greenhouse gas emissions from the project and the lack of carbon capture and storage. Clarify how the project will align with Canada's commitment to reach net-zero by 2050.
- Concern regarding the upstream emissions associated with natural gas production and transmission.
- Concern regarding potential climate change impacts on the project and the surrounding environment.

### **Fish and fish habitat**

- Concern related to potential effects to fish and fish habitat resulting from changes in water quality and increased sediment concentrations due to potential waterbody crossings and stormwater discharge.

### **Indigenous Peoples' current use of lands and resources for traditional purposes**

- Concern about loss of land and resources used for traditional purposes in the project development area.
- Concern about project effects on biodiversity and related potential adverse impacts to Indigenous traditional practices.

### **Indigenous Peoples' health and well-being**

- Concerns about potential exposure of Indigenous peoples to contaminants of potential concern.
- Concerns regarding cumulative effects and potential risk to Indigenous Peoples since the project is located in an industrial area.

- Concern related to Indigenous Peoples access to emergency and healthcare services should an accident or malfunction occur.
- Concern that project impacts to air quality could be adverse for local Indigenous Peoples.

#### **Indigenous Peoples' rights**

- Concern that the proponent did not identify all groups with treaty rights in the project area.

#### **Indigenous Peoples' social and economic conditions**

- Concern that Indigenous jobs may be lost when land use changes from agricultural to industrial.
- Comment on positive economic effects of the project and request for more detailed economic information, including Indigenous employment, procurement, and economic opportunities.

#### **Structures, sites, or things of historical, archaeological, paleontological, or architectural significance to Indigenous Peoples**

- Concern that sites of significance may be missed and request to involve Indigenous groups in the assessment.

#### **Migratory birds and their habitat**

- Concern regarding migratory bird injury, mortality, sensory disturbances, habitat loss or disturbance, and the destruction of nests and eggs.

#### **Species at risk, terrestrial wildlife and their habitat**

- Concern about wildlife and control methods. Request to use non-lethal controls and to avoid animal testing.
- Concern regarding habitat loss or disturbance resulting in potential increased mortality risk and sensory disturbances for species at risk.
- Request to preserve trees at the project location.
- Concern about the assessment and protection of wildlife and their habitat.

#### **Water – Groundwater and Surface Water**

- Concern about water supply and infrastructure due to increased demand by the project.

#### **Wetlands**

- Concern about the assessment and protection of wetlands.

### Project Design

- Concern about the project scope excluding some infrastructure, thereby limiting the assessment of the project.
- Concern that a detailed decommissioning plan is not included in the Initial Project Description.

### Permits and guidance

- Advice to comply with *Canadian Navigable Waters Act* if required.
- Advice to consult with Fisheries and Oceans Canada regarding the *Fisheries Act* and sections 32, 33 and subsection 58(1) of the *Species at Risk Act* if project activities change to include in-water works or works that may impact fish and fish habitat.
- A Historic Resources application with final development plans must be submitted for the project for review by Alberta Arts, Culture and Status of Women.
- An Alberta *Environmental Protection and Enhancement Act* approval and potentially a *Water Act* approval will be required for the project.