



September 24, 2025

Chinenye Ewelike  
Project Manager, Prairie and Northern Region  
Impact Assessment Agency of Canada

Dear Chinenye Ewelike,

**Reference: Response to IAAC Summary of Issues for the Greenlight Electricity Centre**

Please find attached the Greenlight Energy Centre General Partnership (GECGP)'s responses to the Summary of Issues provided by the Impact Assessment Agency of Canada (IAAC) on September 9, 2025. We appreciate the opportunity to address the comments and concerns raised during the comment period held from August 11 to September 2, 2025. The GECGP remain committed to working collaboratively with IAAC and all interested parties throughout the Greenlight Electricity Centre Project.

Since the submission of our Initial Project Description on July 30, 2025, we are pleased to provide the following updates regarding Project advancement and ongoing engagement activities:

- GECGP has submitted an application to the Alberta Utilities Commission under Rule 007: Application for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments and Gas Utility Pipelines, seeking approval for the thermal power plant and associated equipment.
- GECGP has submitted an application to Alberta Environment and Protected Areas for an Industrial Approval under the Environmental Protection and Enhancement Act.
- We have supported and facilitated visits to the Project Development Area by representatives of Enoch Cree Nation and Ermineskin Cree Nation.
- In addition to site visits, meetings have been held with Enoch Cree Nation, Ermineskin Cree Nation, Foothills First Nation, Lac Ste. Anne Metis Community Association, Saddle Lake Cree Nation, Samson Cree Nation, and Whitefish (Goodfish) Lake First Nation.
- GECGP developed and distributed a Project update Newsletter to identified Indigenous groups, communities and stakeholders during Summer 2025.
- Moving forward, the Papaschase First Nation Band 136 Association will be added to the Project's list of interested parties, and included in future engagement activities and communications.



We trust that these updates demonstrate our ongoing commitment to transparent communication, meaningful engagement, and compliance with all regulatory requirements. Should you have any questions or require further clarification regarding the attached response or Project developments, please do not hesitate to contact us.

Thank you for your attention to this submission.

Sincerely,

<original signed by>

Rob Thomas  
Director, Regulatory Services  
Greenlight Electricity Centre Limited Partnership  
<personal information removed>

cc. Erin Flory, Stantec Consulting Ltd

Attachment: Summary of Issues Response

# **Greenlight Electricity Centre Project Impact Assessment Agency of Canada Summary of Issues Response**



Stantec Consulting Ltd.

Prepared for:  
Greenlight Electricity Centre General Partnership

September 2025

Prepared by:  
Stantec Consulting Ltd.

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## Acronyms / Abbreviations

%	percent
ECCC	Environmental and Climate Change Canada
GECGP	Greenlight Electricity Centre General Partnership
ha	hectare
IAAC	Impact Assessment Agency of Canada
IH-DIZ	Industrial Heartland – Designated Industrial Zone
IPD	Initial Project Description
MW	megawatt
PDA	Project Development Area
PIP	Participant Involvement Plan
the Project	Greenlight Electricity Centre Project
W4M	west of the fourth meridian

# 1 Introduction

Greenlight Electricity Centre General Partnership (GECGP) is proposing the Greenlight Electricity Centre Project (the Project). The Project is a combined cycle 1864 megawatt (MW) power generation facility that will be fueled by natural gas supplied from a pipeline. Electricity produced by the Project will be fed into the Alberta Provincial Grid to meet the electric power requirements of the province and to supply data centres.

The Project is in the Alberta Industrial Heartland – Designated Industrial Zone (IH-DIZ), north of the City of Edmonton, and within Sturgeon County. It is located on approximately 98 hectares (ha) of private land that makes up the Project Development Area (PDA).

On July 30, 2025, GECGP submitted an Initial Project Description (IPD) to the Impact Assessment Agency of Canada (IAAC). The IAAC conducted a comment period for the IPD from August 11 through September 2, 2025. From this comment period, IAAC developed a Summary of Issues. This is GECGP's response to those issues identified by IAAC from the comment period.



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

**Issue:** *Concern that wetlands and other areas for traditional land use in the project area may not have been properly identified, which could impact use by Indigenous Peoples.*

**Response:** GECGP recognizes that the PDA lies within an area where Indigenous groups<sup>1</sup> as identified by the Alberta Landscape Analysis Indigenous Relations Tool (LAIRT) and Impact Assessment Agency of Canada (IAAC) may exercise their rights. The PDA lies within an area where Indigenous groups may exercise their rights, and GECGP recognizes that Indigenous groups may harvest or practice other traditional land use activities around the PDA. However, adverse effects to current use of lands and resources for Indigenous purposes are not anticipated for the PDA, as the PDA is located entirely on privately owned land and is within the IH-DIZ, which is zoned for heavy industrial development. Access to the PDA is limited, as it is currently predominantly cultivated, which provides limited natural vegetation and habitat for wildlife and also for Indigenous land uses.

The vegetation and wetlands survey programs completed in 2023 and updated in 2025 included field studies of the PDA (approximately 98 ha) and portions of a larger Local Assessment Area (LAA) (approximately 141 ha), which included the PDA plus a buffer of 100 metres. The PDA is primarily anthropogenically disturbed vegetation, including cultivation, windrow, or other anthropogenic disturbance (90.16 ha, 92.62% of PDA). Non-anthropogenic upland vegetation is more common in the LAA (4.63%) than in the PDA (1.43%). Wetlands and ephemeral waterbodies represent 5.95% of the PDA and are predominately seasonal graminoid marsh. The 2025 field surveys identified no species at risk (SAR), species of conservation concern (SOCC) nor ecological communities of conservation concern (ECOC) within the PDA or LAA.

GECGP has been engaging with Indigenous groups and has received limited feedback related to concerns and potential impacts to the environment and cumulative effects. Both Ermineskin Cree Nation and Enoch Cree Nation completed site visits in August 2025 and indicated they had no concerns regarding the site at that time. The Proponent is committed to ongoing engagement, including through the provincial permitting application process and welcomes feedback about the Project at any time. GECGP will continue to maintain the relationships it has built with Indigenous groups as the Project progresses.

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<sup>1</sup> Including Alexander First Nation, Beaver Lake Cree Nation, Buffalo Lake Métis Settlement, Enoch Cree Nation, Ermineskin Cree Nation, Foothills Ojibway First Nation, Kehewin Cree Nation, Kelly Lake First Nation, Kikino Métis Settlement, Lac Ste. Anne Métis Community Association, Louis Bull Tribe, Métis Nation of Alberta - Otipemisiwak Métis Government, Métis Nation of Alberta, Region 4, Montana Cree Nation, Paul First Nation, Saddle Lake Cree Nation, Samson Cree Nation, and Whitefish (Goodfish) Lake First Nation; as identified by the LAIRT and by IAAC.

### 3 Indigenous Peoples' rights

**Issue:** *Concern about lack of provincial and federal oversight and related meaningful engagement with Indigenous groups to better understand potential positive and negative impacts of the project.*

**Response:** GECGP recognizes that the PDA lies within an area where Indigenous groups<sup>2</sup> as identified by LAIRT and IAAC may exercise their rights. In addition to submission to the IAAC, the Project is subject to Alberta provincial permitting and regulatory oversight; applications have been submitted for the following: *Environmental Protection and Enhancement Act (EPEA)* application (submitted in September 2025), *Water Act* WAIR application (anticipated submission September 2025), and a Alberta Utilities Commission application (AUC) for the interconnect and substation (submitted August 2025).

GECGP has been engaging with Indigenous communities since May 2025, and has provided Project notification and updates, hosted open houses, and shared Project newsletters. In addition to notifications, newsletter, and open houses, Table 1 outlines additional engagement activities to date between GECGP and Indigenous groups.

Table 1 Additional Engagement Activities Summary

Indigenous group	Additional engagement activity summary
Enoch Cree Nation	August 2025: GECGP met with Enoch Cree Nation to discuss the Project and its potential impacts, and also completed a site visit on August 28, 2025.
Ermieskin Cree Nation	August 2025: GECGP met with Ermieskin Cree Nation to discuss the Project and its potential impacts to lands, water, air, vegetation, and wildlife in June 2025. A follow up meeting and a site visit were held on August 28, 2025.
Foothills First Nation	August 2025: GECGP met with Foothills First Nation to discuss the Project, including engagement, regulatory timelines, water and natural gas supply, environmental concerns, contractor selection process, and economic participation opportunities.
Kikino Métis Settlement	GECGP has requested a virtual meeting with Kikino Métis Settlement to discuss the Project and will continue to be available for a meeting as the Project advances if Kikino Métis Settlement would like to participate.
Lac Ste. Anne Métis Community Association	May 2025: GECGP met with Lac Ste. Anne Métis Community Association to discuss the regulatory process, pre-existing agreements, carbon capture, Project ownership, partnerships, and investment, Project timelines, Project need, Project engagement, economic participation, and environmental assessments.
Saddle Lake Cree Nation	June 2025: GECGP discussed the open house in Gibbons with Saddle Lake Cree Nation. Saddle Lake Cree Nation was unable to attend the June 2025 open house but requested Project information. GECGP provided the information via email.

<sup>2</sup> Including Alexander First Nation, Beaver Lake Cree Nation, Buffalo Lake Métis Settlement, Enoch Cree Nation, Ermieskin Cree Nation, Foothills Ojibway First Nation, Kehewin Cree Nation, Kelly Lake First Nation, Kikino Métis Settlement, Lac Ste. Anne Métis Community Association, Louis Bull Tribe, Métis Nation of Alberta - Otipemisiwak Métis Government, Métis Nation of Alberta, Region 4, Montana Cree Nation, Paul First Nation, Saddle Lake Cree Nation, Samson Cree Nation, and Whitefish (Goodfish) Lake First Nation; as identified by the LAIRT and by IAAC.



<b>Indigenous group</b>	<b>Additional engagement activity summary</b>
Samson Cree Nation	July 2025: GECGP met with Samson Cree Nation to discuss Project engagement, regulatory process, Project location, potential environmental impacts and assessments, a site visit, mapping, and economic participation.
Whitefish (Goodfish) Lake First Nation	May 2025: GECGP met with Whitefish (Goodfish) Lake First Nation to discuss Project via call. GECGP sent additional Project information following the initial call.

GECGP continues to engage with Indigenous groups and discuss their concerns, including Project activities, the Project's environmental impacts and assessments, Project engagement, and requests to complete site visits. Additionally, Enoch Cree Nation, Ermineskin Cree Nation, Foothills First Nation, Lac Ste. Anne Métis Community Association, and Samson Cree Nation have expressed an interest in economic opportunities within their traditional territories.

GECGP is committed to ongoing engagement with Indigenous groups and will continue to maintain the relationships it has built as the Project progresses. In addition to the Indigenous groups GECGP has been engaging to date, GECGP will include Papaschase First Nation Band 136 Association to GECGP's list of interested parties and will share Project updates and engagement opportunities as the Project advances. If the Project is approved, the Proponent will continue to respond to Indigenous groups and stakeholders seeking additional information or engagement throughout the development, construction, operation and decommissioning phases of the Project.

**Issue:** *Concern about potential direct adverse impacts on the ability to practice Aboriginal and Treaty rights.*

**Response:** Regarding concern about potential direct, adverse effects on the ability to practice Aboriginal<sup>3</sup> and treaty rights, GECGP is committed to meeting with Indigenous groups to understand how the Project may affect their Indigenous and treaty rights. GECGP understands that the Project lies within an area where Indigenous groups may practice rights, include hunting, fishing, trapping, traditional plant uses and cultural transmission (e.g., spiritual growth). As noted in Section 22.1 of the IPD, while there may be overlap between the PDA and ancillary infrastructure and areas where rights may be practiced, the effects are anticipated to be limited to construction and are expected to be temporary. GECGP will communicate with all land users including those who may engage in Indigenous practices to identify areas of concern and overlap. However, adverse effects to current use of lands and resources for Indigenous purposes are not anticipated for the PDA, as the PDA is located entirely on privately owned land and is within the IH-DIZ, which is zoned for heavy industrial development. Access to the PDA is limited, as it is currently predominantly cultivated, which provides limited natural vegetation and habitat for wildlife and also for Indigenous land uses.

<sup>3</sup> Herein referred to as Indigenous rights

