

### Project Purpose

The Project is required to serve increasing load requirements, enable the retirement of coal generation, and enable the addition of intermittent renewable generation projects (i.e., wind and solar).

Comments:

The proponent needs to provide adequate justifications for the purpose of serving increasing load requirements and why a gas-powered electrical generating plant is the only alternative for such a scenario. It has been previously determined that there are significant losses occur during transmission of electricity through the current grid system. If there can be significant savings of current generation through alternative options such as reducing the transmission lose, then these alternatives need to be discounted in favour of the production model.

The need to provide adequate justifications for the classifications of renewable generation projects are intermittent. Renewable generation combined with battery storage can provide baseload supply. All renewable generation options have to be seen as not feasible for current baseload supply and increase load requirements. Similarly, other sources of electricity such as interprovincial transfers and energy conservation must be explored for the same requirements outlined above.

### Potential Benefits of the Project

Natural gas generation is a key component to achieving both an increase in renewable capacity and GHG emissions reduction.

Comments:

The other options of reducing GHG emissions need to be adequately assessed as the elimination of an electrical need is equally or even greater able to reduce emissions. Their long-term benefits need to be added into the modeling as to why the gas-powered generation which still produces GHG emissions should be eliminated entirely rather than be the best option. Housing and building design has substantially been improved such that these options are better and more sustainable.

### Consequences of Project Delay

SaskPower is faced with challenges including aging infrastructure and additional power demand.

Comments:

Efforts to both reduce electrical demand and to replace or eliminate infrastructure currently utilized can be done today and is in fact quicker in response to the needs of Saskatchewan residents and businesses. Therefore, there needs to be justifications presented as to why Sask Power has delayed these actions and through their delays created the challenges it now seems to imply are imminent.

It has also been shown that many energy conservation and renewable energy supply options do not require the substantive investment of time and money in environmental assessments that this path dictates. There needs to be additional justifications presented as why they have opted to go through this expensive process when other options would be seen as more responsive and less costly to the citizens of Saskatchewan.

#### Physical Works Associated with Decommissioning

The Project is expected to operate until 2049.

Comments:

The timeline for operation and then later decommissioning seems to be relatively short and therefore seems to be simply a short-term project. As outlined previously, efforts of energy conservation and renewable source generation is much more sustainable and will provide both long-term solutions as well as reducing GHG emissions. Rationale for such a short-term option will need to be provided so as to justify the excessive costs of the project while continuing the production of GHG.

The stranded assets and their waste designation along with their embedded energy costs associated with this project must be justified prior to decommissioning and must be integrated into the overall costs of the project.

#### Production Process Description

The Project will combust natural gas in a gas turbine that is connected to an electric generator to produce power.

Comments:

Every transfer of energy from one source to another has inherent losses. These must be acknowledged adequately in the assessment. These energy losses likely through the heating and cooling of the water must be described adequately so as to assess their impacts on the local weather and associated water bodies. These impacts must be fully explored and explained as to their consequences.

Given the nature of climate change and its subsequent modifications to the availability of water, these must be fully explored given the varied fluctuations presented by the IPCC and other bodies. As Saskatchewan is principally a semi-arid landscape, the availability of the water for other uses needs to be considered, fully explained and assessed.

#### Project Schedule

Comments:

The negative impacts of not doing anything other than the construction of this project must be factored into the costs of this project. Five years of energy

conservation construction and not building more baseline renewable energy needs to be included in the costs for this project.

In addition, the potential impacts of the current lawsuit against SaskPower and the government of Saskatchewan must be factored into the assessment of going down this path. If the lawsuit is sufficient to either delay or stop the project, the inherent losses of time and money needs to be assessed so as to fully understand the final costs of this path.

#### Water Supply Infrastructure

SaskPower is currently analyzing the water quality of the wells as a potential alternative; however, the pipeline is considered the preferred option for the Project's water supply infrastructure.

Comments:

The full analysis and assessment of the wells supplying the necessary water need to be fully described and compared to the other options and all of the associated costs incurred with getting water from other sources.

#### Alternatives to the Project

SaskPower has a limited number of generation supply options available to meet the growing demand for power, and transition from coal, over the next 10 years.

Comments:

The alternatives for putting in renewable energy sources that combine production and battery storage combined with energy conservation need to be fully assessed so as to adequately cover off baseload supply provided by the project. These must include taking the private homeowner and business options into considerations give that these would not cost Sask Power any money but would and could reduce both demand side needs and thus reduce supply needs projected by this project.

#### Wildlife and Wildlife Habitat

Comments:

Beyond the direct impacts in the vicinity of the project, the special displacement and impacts to the migrating species needs to be assessed as this project is within the Central Flyway of a substantive portion of the migrating bird population going north and south each year. How this project will change and impact that migration pattern needs to be fully assessed. There are significant numbers of threatened and endangered species going through the area that may be impacted by this project.

#### Archaeological Site and Significance

The archaeological study area was an approximate 20 km by 20 km square area around the PDA.

Comments:

As a full and comprehensive assessment was not undertaken, the limitations of the assessment not adequately capturing the significance of the site location must be fully described and so as to assess the likelihood of not adequately capturing the full nature of the site as it relates to its inherent archaeological significance. Further there needs to be full and adequate engagement of Indigenous and Metis people who would have traditional knowledge of the area.

GHG Emissions Assessment

Comments:

There needs to be broader assessment provided to the impacts of this project besides the appearance of only including construction and operations. The embedded energy of the products used in the construction and operations need to be included. A full breakdown of the various parts of the assessment needs to be done so as to realistically understand what is included or excluded.

Waste Generation

Comments:

The option of going to a waste free or no waste must be fully explored and the project must assessed any and all options of going to the extent of not going this direction.