



Natural Resources
Canada

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Canada

August 14, 2024

CIAR: [88747](#)

Valerie Coenen
Project Manager, Prairie and Northern Region
Impact Assessment Agency

Submitted by email: BlackBear@iaac-aeic.gc.ca

Subject: Natural Resources Canada Comments on the Initial Project Description and Federal Authority Advice Record for Black Bear Power Plan Project

Dear Colleague,

On July 25, 2024, the Impact Assessment Agency of Canada (the Agency) requested that Natural Resources Canada (NRCan) comment on the Initial Project Description (IPD) and complete the Federal Authority Advice Record (FAAR).

NRCan is submitting this response pursuant to section 23 of the *Impact Assessment Act*. Details of NRCan's response can be found in Appendix A: Black Bear Power Project, Federal Authority Advice Record.

If you have any questions, comments, or concerns, please contact me by email at Natalie.Robinson@nrcan-rncan.gc.ca.

Sincerely,

Natalie Robinson
Impact Assessment Division
Office of the Chief Scientist

CC: Christina Clarke; Peter Unger

Appendix A: Federal Authority Advice Records

Appendix A: August 14, 2024**Federal Authority Advice Record (FAAR)****FAAR Response must be submitted by August 14, 2024**

Black Bear Power Plant Project – Kiwetinohk Energy Corp.

Registry File: 88747

Department/Agency	Natural Resources Canada
Lead Contact	Natalie Robinson
Full Address	580 Booth Street, Ottawa ON K1A 0Y7
Email	Natalie.Robinson@nrcan-rncan.gc.ca
Telephone	403-483-4587
Alternate Contact	Rani Al Anid: Rani.Alanid@nrcan-rncan.gc.ca

1. a) Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the project to enable it to proceed?

If yes, specify the Act of Parliament and that power, duty or function.

Based on the information provided to date, NRCan is not likely to be required to exercise a power or perform a duty or function pursuant to the Department's regulatory role under the *Explosives Act*.

- b) Please describe any Indigenous or public consultation that will be undertaken in relation to the exercise of that power, duty or function, including when it would take place.

No Indigenous or public consultation is anticipated in relation to the exercise of that function at this time.

2. Is your department or agency in possession of specialist or expert information or knowledge in its area of expertise that may be relevant to the conduct of an impact assessment of the project?

Specify the specialist or expert information or knowledge.

NRCan possesses the following expertise that may be relevant to the conduct of an impact assessment for this project:

- Forest vegetation and links to biodiversity including species at risk habitat (e.g., Woodland Caribou among others), as required by ECCC.
- Electricity systems
- Energy and economics analysis
- Natural gas markets and policy
- Natural gas sector emissions

NRCan may further revise its areas of expertise related to the impact assessment as more information becomes available during the subsequent phases of the review process.

3. Has your department or agency considered the project; exercised a power or performed a duty or function under any Act of Parliament in relation to the project; or taken any course of action that would allow the project to proceed in whole or in part?

Specify.

NRCan has not taken any course of action, or exercised a power or performed a duty or function that would allow the project to proceed.

4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the project? (for example: an enquiry about methodology, guidance, or data; introduction to the project)

Provide an overview of the information or advice exchanged.

NRCan has not had previous contact or involvement with the proponent regarding this project.

5. Does your department or agency have additional information or knowledge on the project not specified above, including information on the geographic, environmental, economic or social context of the project? (e.g. location of protected or sensitive areas, previous history between local communities and proponent or similar projects, local or regional social or economic concerns)?

Specify as appropriate.

Based on the information available, NRCan does not possess any additional information or knowledge that has not been specified in this document.

6. Based on the mandate and area(s) of expertise of your department or agency, what are the key issues related to the project?

For each key issue:

- Describe the potential effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Provide advice on how to address the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be considered by the Impact Assessment Agency of Canada (IAAC) and may be used to inform its decision on whether an impact assessment is required and, where appropriate, for next steps in the impact assessment process including to develop project-specific draft Tailored Impact Statement Guidelines.

Please use Table 1 to respond to this question.

See Table 1 for NRCan response.

7. Where possible, identify any additional information the proponent could include in the response to the Summary of Issues and, if IAAC requires it, in their Detailed Project Description, that would:

- Give confidence that minor issues or effects could be addressed and managed by clear measures, existing guidelines, other regulatory processes or other existing tools;

- Inform the decision as to whether an impact assessment is required; or
- Aid in tailoring the Tailored Impact Statement Guidelines, if IAAC decides an impact assessment is required.

These clarifications and additional information will be included as specific questions in the Summary of Issues provided to the proponent.

Please use Table 2 to respond to this question.

[See Table 2 for NRCan responses.](#)

Natalie Robinson

Name of Departmental / Agency
Responder

Senior Impact Assessment Officer

Title of Responder

August 14, 2024

Date

Table 1: Key Issues to inform the impact assessment process

The IAAC asks that federal authorities align expert advice with IAAC’s approach to tailoring by project, which focuses on key project issues, clearly focused on the prevention of adverse effects within federal jurisdiction. In identifying key issues, federal authorities should be mindful of the project’s context (size, scope, location), Indigenous Knowledge and perspectives, and public concerns. Key issues that may be relevant to the decision include:

- adverse effects within federal jurisdiction and direct or incidental adverse effects that may be to some extent significant, based on federal experts’ knowledge and experience with past projects;
- potential impacts on Indigenous Peoples and their rights, based on Indigenous Knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g. at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- adverse effects within federal jurisdiction or direct or incidental adverse effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous Peoples; and
- key concerns raised by Indigenous groups or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from federal authorities on key issues and solutions—and on the scope and detail of any required information and studies—will enable IAAC to focus assessments on issues that are important to participants and to decision-makers.

Comment ID	Relevant section of the Initial Project Description	Valued Component or Factor to Consider	Description of Key Issue (Context and Rationale)	Advice	Plain language summary for inclusion in Summary of Issues
<p><i>Please identify comments by organization and comment number.</i></p> <p><i>e.g.: IAAC-01</i></p>	<p><i>If the comment is related to a specific section of the Initial Project Description, please include that reference.</i></p>	<p><i>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the potential effect or issue applies.</i></p>	<p><i>Provide a brief description of the issue and rationale for being a key issue.</i></p> <p><i>Include, where relevant,:</i></p> <ul style="list-style-type: none"> • <i>the pathway of effects;</i> • <i>relevant context on why it is a key issue;</i> • <i>key uncertainties that should be addressed in the impact assessment;</i> • <i>Indigenous or public concerns or perspective;</i> • <i>potential for differential effects among diverse subgroups;</i> • <i>scientific evidence or Indigenous Knowledge, including from past project experience, which supports inclusion as a key issue.</i> 	<p><i>Where applicable, briefly provide solutions on how to address the potential issue or effects including:</i></p> <ul style="list-style-type: none"> • <i>Information or studies required to describe and characterize the potential effect; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;</i> • <i>Any means, including any powers, duties or functions, that your department or agency has that may mitigate, manage, or set conditions related to the issue or effect;</i> • <i>Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or</i> • <i>Commitments the proponent could make to respond to the issue.</i> <p><i>Where available, please refer to existing text in the Tailored Impact Statement Guidelines template.</i></p>	<p><i>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the proponent.</i></p>
NRCan-01	7	Energy security	Development of additional electricity generation will reduce strain on Alberta’s electricity grid and improve grid stability.	N/A	N/A
NRCan-02	9.1.5	GHG emissions reductions	The potential for connecting the project to a Carbon capture system and hub development aligns with federal emission reductions targets and the proposed clean electricity regulations.	N/A	N/A

Please insert additional rows as necessary.

Table 2. Clarifications or additional information the Proponent could include in the response to Summary of Issues

Comment ID	Relevant section of the Initial Project Description	Description of Issue, Concern or Uncertainty	Clarification or additional information	Plain language summary for inclusion in Summary of Issues
<p>Please identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</p> <p>You may also choose to copy the relevant text here.</p>	<p>Provide a description of the issue, concern or uncertainty the proponent could address in their response to Summary of Issues and, if IAAC requires it, in their Detailed Project Description that would give confidence that the issue will be addressed and managed, by clear measures, existing guidelines, regulatory processes or other existing tools, and thus be the subject of simplified information requests in the guidelines, or simply be removed.</p>	<p>Provide recommended clarification or additional information to be included in their response to the Summary of Issues and, if IAAC requires it, in their Detailed Project Description to address the issue, concern or uncertainty, for example:</p> <ul style="list-style-type: none"> • Clarifications to elements of the project description (e.g. components, activities, locations or alternatives); • Proposed project design changes that could avoid effects; • Evidence that could be presented to demonstrate there is no effect, pathway of effect or that effects would be negligible; • Evidence that standard mitigations will address potential effects • Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents. 	<p>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the issue and of the question or direction for the proponent.</p>
NRCan-01	9.1.2 Natural Gas Supply "natural gas will be supplied from a new dedicated pipeline"	Alberta has significant and low-cost natural gas resources. The Initial Project Description does not refer to actual demand requirements.	NRCan recommends providing additional information or evidence of actual demand requirements in Detailed Project Description.	Need for additional information or evidence on actual demand requirements.
NRCan-02	9.1.5 Carbon Capture System Hub	Clarification on when the Carbon Capture Utilization Storage (CCUS) will come online if it is advanced. Further in the report, a timeline of 2035 is mentioned; however, it is not clear how this is aligned with the project so clarification would be useful as 2035 is not an accurate representation of a hypothetical timeline.	NRCan recommends clarification on when CCUS will come online if it is advanced.	Clarify in what manner will the timing of CCUS be aligned with the project?
NRCan-03	9.1.9 Existing Infrastructure	Clarification of the status of drilled oil well pads will aid in the assessment of the role of a proposed CCUS hub in combination with the projects intended use of the CCUS hub.	NRCan recommends providing additional information on the status of the drilled oil well pads to support the role of a proposed CCUS hub in combination with the projects intended use of the CCUS hub.	Clarify what is the operational status of the drilled oil well pads?
NRCan-04	10	Proposed plant capacity is similar and marginally higher compared to other combined cycle power plants in AB (as itemized by AB's Alberta Electric System Operator (AESO) in the current supply demand report).	NRCan recommends providing additional information to support plant capacity and purpose and need for project.	Need for additional information to support plant capacity and purpose and need for project.
NRCan-05	12.3.A	Lack of supporting information for validation of emission intensity projections.	NRCan recommends identifying similar active projects either in Alberta, Canada, or North America that utilises the same or similar project technologies.	Additional information needed to demonstrate there are other active projects that utilises the same/similar project technologies?
NRCan-06	15.2 "The construction phase will generate \$400 million in value added for the local economy"	Clarification on how the proponent determines value added for construction phase.	NRCan recommends additional information to clarify how the proponent determines value added from construction that directly attributed to the project.	Clarify what is the value added from construction that is directly attributed to the project?
NRCan-07	15.2 "The Project could increase participation in the labour force and provide opportunities for in-migration and population growth of Swan	Clarification on how the proponent anticipates a distribution of employment opportunities. Example estimated number of jobs that may be local, provincial, national or international.	NRCan recommends additional information to clarify how the proponent anticipates a distribution of employment opportunities that may demonstrate estimated number of local, provincial, national or international jobs.	Of the 350-700 jobs attributed to construction, how many are estimated to be local/provincial/national/international?

	Hills and Whitecourt, but it may be that existing persons would more likely benefit from the Project.”			
NRCan-08	15.2 “The construction phase will generate \$400 million in value added for the local economy, supporting on average 350 jobs during the 30- month construction phase (over 700 employees during peak months)	It is unclear how the proponent measures attributed jobs during construction.	NRCan recommends additional information to clarify how the proponent measures attributed jobs during construction.	Clarify what is the average expected salary of the 350 to 700 jobs during construction?
NRCan-09	15.2 “there may be increase in population, creating pressure on local housing markets, both ownership and rental, to accommodate new workers or immigration to the area.”	It is unclear the impact to housing of neighbouring during construction and what considerations are in place to limit negative housing impacts on local communities.	NRCan recommends additional information to clarify where or how the 350 to 700 employees during construction and what considerations exist to mitigate negative housing impacts on local communities.	Clarify where/How will the 350 to 700 employees during construction be housed? What considerations are in place to limit negative housing impacts on local communities?
NRCan-10	15.2 “The construction phase will generate \$400 million in value added for the local economy, supporting on average 350 jobs during the 30- month construction phase (over 700 employees during peak months)	It is unclear, how the proponent will staff its construction phase.	NRCan recommends clarifying of the 350 to 700 jobs during construction, how many employees will be hired directly by the project proponent.	Of the 350 to 700 jobs during construction, how many employees will be hired directly by the project proponent?
NRCan-11	15.2 “Operating activities would generate \$30 million in value added annually, “	It is unclear how the proponent determines value added from operation, that directly attributes to the project.	NRCan recommends additional information to demonstrate how value added from the operation was determined.	What is the value added from operation that is directly attributed to the project?
NRCan-12	15.2 “Operating activities would generate \$30 million in value added annually,”	Clarification on how the proponent determines value added of the \$30 million in operating activities	NRCan recommends additional information to show a breakdown of the \$30 million value added across municipal benefits, provincial benefits, and federal benefits.	Provide a breakdown of how the \$30 million value added will be distributed for additional clarification.
NRCan-13	15.2 “Operating activities would generate \$30 million in value added annually, supporting approximately 30 jobs (actual numbers TBD) annually and provide provincial and municipal government revenues.”	It is unclear how the proponent anticipates the distribution of employment opportunities locally, provincially, nationally and internationally.	NRCan recommends including anticipated distribution of the 30 operation jobs estimated to be local/ provincial/ national/ and international.	Clarify of the 30 jobs attributed to operation, how many are estimated to be local/ provincial/ national/ international?
NRCan-14	15.2	It is unclear the benefit of jobs for the 30 jobs during operation.	NRCan recommends additional information regarding average expected salary of the 30 jobs during operation.	Additional information regarding what is the average expected salary of the 30 jobs during operation?
NRCan-15	15.2	It is unclear how many of the 30 jobs during operation will be hired directly by the project proponent, and therefore the benefit of jobs during operations.	NRCan recommends clarifying of the 30 jobs during operation, how many employees will be hired directly by the project proponent.	Clarify how many of the 30 operation jobs, will be hired directly by the project proponent?
NRCan-16	22.2 “Access to KEC’s Indigenous micro-loan program for Indigenous entrepreneurs building businesses in the areas where KEC operates.”	Clarification on Indigenous program already in place to assess benefit.	NRCan recommends additional supporting information regarding the benefits of the proponent’s Indigenous micro-loan program.	Provide more information regarding the benefits of the proponent’s Indigenous micro-loan program?
NRCan-17	23 “Dispersion modelling of the BBPP was conducted under continuous operations”	The timeline of emissions by the project is unclear.	NRCan recommends additional information to clarify the timeline of the 383t CO2/GWh emissions.	Will the project emit 383t CO2/GWh until 2035?

NRCan-18	23	The report states that “allowable emissions amount to 982,360t/y” and also states that the project’s emissions would increase Alberta’s total emissions by 1.1mt/y” It is unclear if the project exceeds Alberta’s allowable CO2 emissions.	NRCan recommends clarifying if the project will exceed Alberta’s allowable CO2 emissions.	Clarify if the project exceeds Alberta’s allowable CO2 emissions?
NRCan-19	23	The role of the proponent in the broader Technology Innovation and Emissions Reduction (TIER) marketplace is unclear.	NRCan recommends additional information to clarify if the project anticipate the creation or utilisation of TIER credits prior to the incorporation of CCUS.	Provide information to clarify if the project anticipates the creation or utilisation of TIER credits prior to the incorporation of CCUS?

Please insert additional rows as necessary.