February 4, 2026

Impact Assessment Agency of Canada
Attention: Joseph Ronzio
Sent by email: <contact information removed>

Re : Energy Alberta's Final Comments on Draft Tailored Impact Statement Guidelines (TISGs)

Energy Alberta provided comments on the Draft TISGs to the Impact Assessment Agency of Canada (IAAC) on July 23, 2025. The comments provided in this memo are in addition to comments previously provided, as well as Energy Alberta's responses to the federal authorities comments on the draft TISGs, sent to IAAC on October 1, 2025. Many of Energy Alberta's concerns with the current scope of the draft TISGs are captured in both of our previous submissions. This memo concludes our input to the draft TISGs. The final comments are provided through the lens of looking at how the requested information and assessments will materially assist in decision-making with respect to the Project under consideration.

Baseline data collection

There are a few areas of the draft TISGs that are requesting two to three years of baseline monitoring data, for example, Section 8.7.1 and 8.11.1. These data requirements do not respect the federal government's timeline commitment for the completion of the Impact Statement Phase (3 years). Prescribing the minimum number of years of data required without the context of the potential for pathways of effects is not aligned with a risk-informed approach to scoping and conducting an assessment.

- Energy Alberta proposes to collect one year of baseline data that will provide seasonal data. Following the assessment of the potential interactions, we will take a risk-based approach to define further monitoring and baseline requirements beyond one year. Based on the findings of the assessment we can validate the predictions in the assessment over a longer period of time, for those potential impacts of concern identified by the panel.

Existing Baseline information – Section 7.2.1

Energy Alberta would like to respond to one of ECCC's responses, in their letter November 14, 2025, where they recommend that Energy Alberta be required to:

> "provide a summary of the existing baseline information, including: how development of successive upstream projects along the Peace River has resulted in changes in the baseline conditions in the past."

ECCC states in their response that "ECCC continues to recommend inclusion of the statement in red text to ensure the baseline assessment adequately characterizes how past development of successive upstream projects along the Peace River have resulted in changes to the baseline conditions, **across all relevant subsections and value components.** As previously described by ECCC, baseline data for flow conditions should characterize both the natural flow conditions prior to 1968 and the regulated flow conditions since 1972." ECCC further explains that it is up to the Proponent to describe how upstream projects have altered baseline conditions over time.

Energy Alberta agrees with the requirement to understand the current conditions of the Peace River, and will include historical baseline flows of the Peace River in the description of how the river flows have changed over time based on historical records. However, Energy Alberta does not agree with ECCC's assertion that Energy Alberta should explain how the changes in flows have altered baseline conditions for all relevant subsections and valued components. Energy Alberta questions how such an assessment will assist in the decision-making of the Project under review. It has been over 55 years since the W.A.C. Bennett Dam was completed, and "natural flow conditions" have not existed since before construction began. Historical influences on the Peace River ecosystem have resulted in the current state of the water basin, which by many accounts are described as sustainable and healthy. For example, The Mighty Peace Watershed Alliance, in 2024, noted in their assessment of future water use in the Peace River Watershed: "General results indicate that even under high projections of human population growth and industrial expansion, the impact on water quantity in the region on a watershed and sub-basin level will be minimal."[1] Further to this, the State of the Watershed report concluded that: "Overall, the Peace and Slave rivers, as well as their larger tributaries (Smoky, Wabasca) are relatively healthy. They have reasonably good water quality and strong fish populations. Less than 1% of the natural flow of the Peace is allocated for use. Most riparian areas show good health, as they are largely untouched in the Wabasca, Lower Peace, and Slave River sub-watersheds, and to a lesser extent in the Central Peace."[2]

- Energy Alberta disagrees with the request to provide an assessment of how development of successive upstream projects along the Peace River have resulted in changes in the baseline conditions in the past, across all relevant subsections and value components.

[1] Pattison-Williams, J.K., Beattie, L.H. and D. Moody. Current and Projected Water Use in the Peace and Slave River Watershed. 2024. A Report for the Mighty Peace Watershed Alliance (MPWA). Pattison Resource Consulting Ltd. (PRC), Canada.
[2] Mighty Peace Watershed Alliance. State of the Watershed. 2025. MPWA-SoW_Brochure.pdf

Assessment Methodologies and Approaches

In some instances, in the baseline sections of the draft TISGs, specific requirements are being made with regard to various assessment methods.

- Energy Alberta proposes that discipline-specific methodologies be left to the discretion of the proponent's relevant subject matter experts (SMEs). A clear rationale for the selection of various approaches, including study areas and VCs, will be provided (presented and discussed where necessary) to the relevant federal government SMEs, as well as provided in the Impact Statement.

Hydrology and water quantities – Section 8.7.2

Section 8.7.2 states that effects to groundwater and surface water require that "the Impact Statement must: describe the effects of the project on surface and groundwater, including effects related to: potential downstream effects to water quality and quantity including in Wood Buffalo National Park, and the Peace-Athabasca Delta (PAD)."

At this stage of the project proposal, Energy Alberta predicts the following water demands, which are presented alongside current water data on Peace River flows, in the table below. These estimated water requirements are conservative, to be confirmed through further project design over the course of the impact assessment and during the time leading up to the Licence to Construct.

Table 1. Peace River Streamflow vs. Water Demand (at Peace River – 07HA001)

Streamflow Scenario	Streamflow (m3/s)	Peak Water Demand (m3/s)	Water Use as a Percentage of Streamflow
High Flow (1991-2020)	8641	5.4	0.06%
Average Flow (1991-2020)	1848	5.4	0.29%
2023 low (dry conditions)	537	5.4	1.01%
2024 low (during site C filling)	540	5.4	1.00%
Lowest theoretical (Site C minimum release)	390	5.4	1.38%

Table Assumptions:

- Data source: Water Survey of Canada Streamflow 1991-2020 at Peace River (07HA001)
- 5.4 m^3/s is the peak instantaneous demand of the facility. During normal operation conditions water use will be lower (~4.1 m^3/s)

❖ Given the projected water use as a percentage of the Peace River streamflow, with 0.29% during average flows and 1.01% during low streamflow, Energy Alberta requests that Parks Canada review their requirement to describe the potential effects of water withdrawals on the Wood Buffalo National Park and the PAD.

Section 10.3 – Health, social and economic conditions of Indigenous Peoples

Section 10.3.1 requires that a "health baseline study," where applicable based on potential project effects, should be tailored to each of the impacted Indigenous Nations and communities, whereas section 9.1.1 already requires a community profile that describes the overall biophysical, social, and economic health of each Indigenous Nation and community, including baseline information. Given that health baseline information is required in the community profile, a separate health baseline study can be seen as duplicative, or a different way of describing the same aspect. As such, Energy Alberta requests that requirement for "health baseline study" for each impacted Indigenous Nation and community be removed from Section 10.3.1 as the information will already be covered in the community profile under Section 9.1.1.

Indigenous Engagement and Partnership Plan (IEPP)

As Energy Alberta defines the scope of work for the baseline studies and effects assessments for the Project, we are starting to develop a better understanding of the potential pathways of effects. As we further engage with Indigenous Nations and Communities on the scope of the work and the potential pathways, we will continue to share our lessons learned so that IAAC can determine which Indigenous Nations and Communities to include in the Indigenous Engagement and Partnership Plan (IEPP). IAAC has stated several times that the list of Indigenous Nations and Communities that are included in the IEPP is an 'evergreen' list and that the IAAC has the ability to add more Nations and Communities at any time throughout the impact assessment process. This creates an incredible amount of uncertainty and risk to the Project. Energy Alberta is of the view that with consistent communications between Energy Alberta, Indigenous Nations and Communities, and IAAC, it should become clear within 2026 which Indigenous Nations and Communities should be included in the IEPP.

❖ Energy Alberta proposes that IAAC clarify for all parties an expectation that the IEPP list will be finalized by the time the baseline work is completed for the Impact Statement, anticipated for late 2026 – early 2027.

If you have any questions regarding this letter, please contact me or Jill Baker
<contact information removed>

Regards,

<Original signed by>

Amy Langhorne, MSc PMP ICD.D
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