Climate Action Team
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Feedback on Brandon Dispatchable Capacity Project

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On behalf of Climate Action Team Manitoba, a coalition of five Winnipeg-based non-profit organizations,[1] I am writing to urge the Impact Assessment Agency of Canada (IAAC) to conduct a federal impact assessment of the proposed Brandon Dispatchable Capacity Project (BDCP).

An IAAC assessment is necessary for two reasons: 1) The project proponent is Manitoba Hydro, the largest Crown corporation in Manitoba, and the provincial government has indicated a strong preference for the project, which undermines the real or perceived autonomy of provincial assessment; and 2) The project proponent's reporting on potential greenhouse gas emissions appears questionable and in need of independent scrutiny given the requirements of the federal *Canadian Net-Zero Emissions Accountability Act*.

1. Diminished Independence of Provincial Assessment Due to Manitoba Hydro and the Manitoba Government's Strong Support of the Project

Manitoba Hydro is the proponent of the BDCP and has made the project the centrepiece of its 2025 Integrated Resource Plan (IRP) that is currently before the province's Public Utilities Board.[2] Manitoba Hydro has stated that this power plant is the only way for the province to meet impending winter peak demand shortfalls, and that other options such as battery energy storage, firm imports, and replacing inefficient space heating with ground-source heat pumps are infeasible or too costly. Several expert reviewers of the IRP have argued that Manitoba Hydro has unreasonably dismissed alternatives to the power plant and structured the IRP process such that fossil gas is seen as the only realistic option.[3]

[1] Coalition members include Climate Change Connection, Wilderness Committee – Manitoba Office, Green Action Centre, Manitoba Energy Justice Coalition and Canadian Centre for Policy Alternatives – Manitoba Office.
[2] Manitoba Hydro, *2025 Integrated Resource Plan* (Manitoba Hydro, 2026), 16.
[3] Evolved Energy Research, *Review of Manitoba Hydro's 2025 Integrated Resource Plan* (Evolved Energy Research, 2026); Daymark Energy Advisors, *Independent Expert Consultant Report: Manitoba Hydro's 2025 Integrated Resource Plan* (Daymark Energy Advisors, 2026).

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Manitoba Hydro is the largest provincial Crown corporation in Manitoba. In 2024-25, it earned $3.4 billion in revenue and held $32.2 billion in assets and $25.3 billion in debt.[4] Its financial status and needs have a significant bearing on the provincial government. For example, in April 2026, Moody's credit rating agency noted that "the province's forecast of a rapid fiscal improvement relies in part on its expectation of a significant year-over-year improvement in Manitoba Hydro's performance."[5] While Manitoba Hydro has operational autonomy from the province, the two entities' finances are closely linked through government debt advances and guarantees.

The provincial government has strongly advocated for this power plant, announcing its expanded size (from 500 MW to 750 MW) and cost (from $1.4 billion to $3 billion) in its 2025 Throne Speech.[6] Premier Wab Kinew has argued for the project based on "Trump-proofing our economy by having power sovereignty," and has positioned it as one of three major projects that could fundamentally transform the province's economy.[7] Given the close financial relationship and clear preference for the project, there are legitimate questions about the real or perceived autonomy of the Manitoba government's Environmental Approvals Branch in provincial impact assessment. Unlike many other project proposals reviewed by the branch, this power plant is financially and rhetorically backed by the provincial government, and its environmental review is unlikely to be sufficiently independent. As a result, the IAAC should conduct its own impact assessment of the project.

2. Questionable Greenhouse Gas Assumptions Provided by Manitoba Hydro

Throughout the IRP, PUB review process, and submission to the IAAC, Manitoba Hydro has reported questionable projections of greenhouse gas emissions from the power plant. Manitoba Hydro has stated that the power plant will likely only be used between 0.5 and 5 percent of the year, but would be used more frequently during droughts and

[4] Manitoba Hydro, *Manitoba Hydro-Electric Board 74th Annual Report for the Year Ended March 31, 2025* (Manitoba Hydro, 2025), 20, 30.
[5] Steve Lambert, "Credit Rating Agency Says Manitoba's Budget Plan Doesn't Seem to Line up With Its Own Growth Projections," *CBC*, April 3, 2026, https://www.cbc.ca/news/canada/manitoba/budget-moodys-credit-rating-agency-report-morningstar-dbrs-9.7152832.
[6] Gabrielle Piché, "Premier Wab Kinew Promises 'Trump-proofing' of Manitoba Economy in $3-B Project," *Winnipeg Free Press*, November 19, 2025, https://www.winnipegfreepress.com/breakingnews/2025/11/18/power-sovereignty-combustion-turbine-facility-proposed-for-brandon-by-2030.
[7] Piché, ""Premier Wab Kinew Promises"; Bartley Kives, "Kinew Now Banks oncaused Port of Churchill Alone to Change Manitoba's Financial Tides," *CBC*, April 26, 2026, ,https://www.cbc.ca/news/canada/manitoba/manitoba-kinew-megaprojects-analysis-9.7177015.

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low-flow years.[8] In its IAAC submission, Manitoba Hydro claims that average emissions from the new power plant will range from only 2,000 to 10,400 tonnes of carbon dioxide-equivalent (CO_2e) per year between 2030 and 2034, after which it drops to zero due to the purchasing of "offsets or other environmental commodities."[9] These numbers are extremely misleading and do not accurately convey the project's climate impacts.

Manitoba Hydro has reported that a simple cycle gas turbine has an emissions intensity of 532 kg CO_2e/MWh.[10] A 0.5 percent utilization factor of the proposed 750 MW power plant would emit more than 17,000 tonnes of CO_2e per year, while a 5 percent utilization factor would result in more than 170,000 tonnes of CO_2e per year. Higher levels of use would result in significantly more emissions. These numbers sharply diverge from Manitoba Hydro's emissions reporting in its IAAC submission and require additional analysis to ensure the accuracy of that reporting.

An IAAC assessment is warranted due to the increasingly harmful impacts of climate change, primarily driven by fossil fuel combustion, and by federal obligations under the *Canadian Net-Zero Emissions Accountability Act* to achieve net-zero emissions by 2050. Manitoba Hydro and the provincial government have not provided adequate reporting on potential emissions impacts of this proposed project, necessitating a federal assessment to ensure compliance with emissions reduction legislation and trajectories. This assessment is also required to ensure sufficient independence of the impact assessment, which cannot be guaranteed given the Manitoba government's relationship with Manitoba Hydro and the proposed project itself.

Thank you for your consideration.

James Wilt
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[8] Manitoba Hydro, *Brandon Dispatchable Capacity Project Initial Project Description* (Manitoba Hydro, 2026), 5-23.
[9] Manitoba Hydro, *Brandon Dispatchable Capacity Project*, 5-22–5-24.
[10] Manitoba Hydro, *2025 Integrated Resource Plan, Appendix 6: Resource Options* (Manitoba Hydro, 2026), 20.