

July 19, 2026

To: Impact Assessment Agency of Canada

Re: Brandon dispatchable capacity project

From: Stephanie Grout

Thank you for the opportunity to comment on the proposed project. I have a number of concerns, outstanding issues and long-term economic impacts which require further analysis by a federal authority to provide Manitoba with “guidance on how Canada’s commitments in respect of climate change should be considered.”¹

Methane is a significant greenhouse gas (GHG). Canada is a signatory of the 2015 Paris Agreement and has developed legislation and regulatory frameworks to meet those commitments. Additionally, the Federal Government is providing technical and financial support to provinces and municipalities to achieve emission reduction targets, provide energy security, and promote the potential for cleantech industry and low-carbon economy. The Federal Government is also in contact with the broader international community and is aware of current research and developments, emerging technologies and the deployment and upscaling of proven systems.

As there has been limited time given for commentary and input this submission will only cover significant concerns in a very broad approach with references to support further investigation and a more fulsome discussion.

¹ Impact Assessment Act (S.C. 2019, s. 95(2))

Introduction

The Brandon dispatchable capacity project main components consist of three new combustion gas turbines, new transmission lines, and 30 km natural gas pipeline to service the turbines. Key buildings and ancillaries of concern include water treatment systems for clarifiers, demineralization and pumps, exhaust stacks, and backup diesel fuel tanks.

Concerns

Methane is over 84 times more potent greenhouse gas than carbon dioxide. Global methane emissions are responsible for a 30% rise in temperature to date and is the main ingredient in ozone on the ground.² As a result, the rapid reduction of methane emissions is probably the single most important climate action we can take in the short-term.³

The Center for International Law (CIEL) “Early Warnings: Government Knowledge of Climate Change and Legal Responsibility for Climate Harm” finds that scientists regularly communicated to government officials and politicians the risks of burning fossil fuels. The country profile for Canada traces government and industry knowledge and research through publicly accessible documents from as early as the 1950s and 1970s.⁴

Canada is a signatory of the 2015 Paris Accord and has since made several commitments with the most recent to reduce greenhouse gas emissions by 40-50% below 2005 levels. Importantly, there is a legislative requirement through

² Government of Canada. Department of Natural Resources and Climate Change. Our Plan: Reducing Methane Emissions

³ World Bank Group. Global Flaring and Methane Reduction Partnership (GFMR). <https://www.worldbank.org/en/programs/gasflaringreduction/methane-explained>

⁴ The Center for International Law (CIEL) (July 2026) Early Warnings: Government Knowledge of Climate Change and Legal Responsibility for Climate Harm. <https://www.ciel.org/reports/what-states-knew-climate/>

the Canadian Net-Zero Emissions Accountability Act which requires provincial governments to plan, report and course correct to stay on target. As Canada's first Biennial Transparency Report (BTR1) notes in 2024, decarbonization of electricity generation is the cheapest and least disruptive mitigation action. Additionally, the Government of Canada has identified the potential for cleantech industry and low-carbon economy.⁵

The Clean Electricity Regulations (CER) are a key component of Canada's climate strategy and net-zero electricity grid. "Since investments in electricity projects are made years in advance, the Government of Canada is putting in place regulations now to provide ample time for electricity providers to make the necessary investments and plan to meet the growing demand with affordable, reliable and clean electricity"⁶ The proposed gas fired power plants which will face increased stringency and compliance costs at the same time electricity demand is increasing. Making Manitoba Hydro assertion of a less than five percent run time questionable and costly miscalculation for residents and businesses of the province.

Natural Resources Canada provided peer review and comments for the International Renewable Energy Agency (IRENA) report 24/7 renewables: The economics of firm solar and wind. The report confirms (again) that solar and wind with battery energy storage systems (BESS) are cost-effective, with further price reductions over the next five to ten years. It also introduces the firm levelized cost of electricity (F-LCOE) and achieving specific electricity reliability targets. This moves away from the traditional LOCE assessment of base power and peak demand towards delivery certainty of individual assets and firming options

⁵ United Nations Climate Change. (2024) Canada Biennial Transparency Report (BTR). BTR1.

<https://unfccc.int/documents/645162>

⁶ Government of Canada. Department of Natural Resources and Climate Change. Our Plan: Clean Electricity. <https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/clean-electricity.html>

(compliment, overbuild, storage) to meet “hourly matching rates”. It also discusses policy levers that translate cost competitiveness into project deployment at scale.⁷

Both IRENA and TD Bank’s sectoral analysis “Bridging Alberta’s AI Data Center Power Gap: A Case for Renewables” confirms BESS can meet AI’s anticipated energy demand. Interestingly, TD notes a supply constraint with multinational manufacturers having a five to seven year waitlist for gas fired turbines.⁸ This may be a concern as Manitoba Hydro has stated peak electricity demand will exceed available capacity by 2029/30.

Another way to provide energy security is to reduce electricity demand with complementary technologies. Buildings are a significant contributor to Canada’s emissions and in Manitoba heating and cooling is a real concern. District heating systems are increasingly popular as they provide local control for expansion, employment, economic growth, and greater resiliency from fuel price shocks. Since the 1990s, Markham, Ontario has been using district heating and a network of pipes to carry hot and cool water across 14 million square feet of development. Yellowknife, NWT is estimated to save \$160,000 annually with its energy system.⁹

The Federation of Canadian Municipalities Green Energy Fund,¹⁰ with financial and technical support from the Federal Government¹¹ is de-risking community power generation. Municipalities of all sizes can benefit from feasibility studies,

⁷ International Renewable Energy Agency (IRENA) (May 2026) 24/7 Renewables: The economics of firm solar and wind. <https://www.irena.org/Publications/2026/May/24-7-renewables-The-economics-of-firm-solar-and-wind>

⁸ TD Bank (June 16, 2026) Bridging Alberta’s AI Data Center Power Gap: A Case for Renewables. <https://economics.td.com/esg-data-centers-and-renewables-alberta>

⁹ Corporate Knights (June 30, 2026) Canada’s district energy revolution. <https://corporateknights.com/story-studio/canadas-district-energy-revolution>

¹⁰ Federation of Canadian Municipalities. Community Energy Systems. <https://greenmunicipalfund.ca/community-energy-systems>

¹¹ Natural Resources Canada (February 2025) Summary of the Interdepartmental Evaluation of the Green Municipal Fund <https://natural-resources.canada.ca/corporate/planning-reporting/summary-interdepartmental-evaluation-green-municipal-fund>

system design and capital investment for custom designed plans suited to their unique cultural, economic and environmental considerations. What will not be funded is fuel switching to natural gas or efficiency measures affecting natural gas systems.

An early supporter of the Markham Center, the Green Municipal Fund has provided \$17 million in loans and grants for the district energy over the past 25 years. Now Canada's fastest-growing energy utility Markham has been able to attract more than \$270 million in additional capital across multiple stages of expansion from the Canadian Infrastructure Bank and Canadian Imperial Bank of Commerce (CIBC). Once a building is connected to a district energy system it tends to stay connected, providing long-term infrastructure and utility-scale returns for private investors.¹²

Conclusion

As outlined above, increasing costs of methane gas from regulation and price volatility, cost competitive alternatives, deployable projects at scale with short turnaround timelines are key issues which a federal review should consider. Additionally, Manitoba could benefit from advice, research and potential funding opportunities to grow cleantech competencies and low-carbon economies.

Thank you very much for your time and consideration of my submission. Please do not hesitate to contact me with any questions or concerns.

¹² Corporate Knights