



Invenergy

Proposed St. Clair Energy Centre Upgrade and Expansion Project Engagement Plan

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1.0 Project Background

According to the Independent Electricity System Operator (IESO), which is responsible for overseeing Ontario's power system, the province is entering a period of increasing demand for electricity, driven by more consumer usage, and the retirement of existing power plants. To accommodate growing demand for electricity, the IESO is undertaking a procurement process to acquire additional electrical generation capacity from both new power plants and the expansion of eligible existing ones. In response to Ontario's growing demand for electricity, St. Clair Energy Centre (SCEC), owned and operated by St. Clair Power, L.P., an affiliate of Invenergy, is proposing to expand the nameplate capacity of the existing facility located in St. Clair Township, Ontario.

Invenergy is the world's largest privately held developer, owner and operator of sustainable energy solutions. Invenergy's home office is located in Chicago, and it has regional offices in Toronto and Montreal. Globally, Invenergy invests C\$348 million annually in the home communities where its projects are located via the creation of high-quality jobs, lease payments and local taxes. The company has successfully developed more than 190 projects worldwide, totaling over 30,000 megawatts, including wind, solar, transmission infrastructure, natural gas power generation and advanced energy storage projects.

At this time, the proposed upgrade and expansion to the SCEC facility (Project) will include the following:

1. *Project #1 (Upgrade) - Increase plant capacity through process improvements and equipment upgrades. Requiring no physical expansion of the plant, this scenario results in approximately an additional 60 megawatts (MW) of generating capacity.*
2. *Project #2 (Expansion) - Addition of a new gas turbine(s), or reciprocating engines, to achieve a total of approximately 100-120 MW of additional capacity. This would require the expansion of the plant footprint and other upgrades to infrastructure.*

The Guide to Environmental Assessment Requirements for Electricity Projects (the "Guide") issued by the Ontario Government pursuant to the *Environmental Assessment Act* ensures that an Environmental Review Report (ERR) will be prepared and will identify the potential authorizations required. The ERR will also provide an assessment of potential effects and propose mitigation measures for the construction and operation of the facility. In addition, the project and resulting ERR will include a comprehensive engagement and consultation plan.

2.0 Engagement Plan Goals and Objectives

Engagement is an integral component of the Environmental Assessment (EA) process, which provides opportunities for two-way communication with interested stakeholders, community members, elected

officials, and Indigenous Communities. Invenergy recognizes engagement and consultation as an important tool that assists in identifying potential environmental issues and provides a process for them to be given appropriate consideration from the early stages as well as throughout the decision-making process.

The EA process requires that proponents of a project undertake stakeholder, Indigenous and agency engagement early in the planning process and continue to engage throughout the development of the project. Early-onset engagement assists in the success and acceptance of a project by involving the community, keeping members of the public informed of the project, and working collaboratively to address concerns.

Invenergy is committed to a comprehensive Engagement plan as part of its development activities and fulfilling the requirements of the environmental screening process as outlined in the *Guide*. Invenergy's commitment to stakeholder engagement will continue throughout the project including the construction phase. The overall objectives of the Proposed St. Clair Expansion Stakeholder Engagement Plan are to:

- *Identify potentially interested stakeholders and the nature of their interests;*
- *Inform stakeholders of preliminary plans for the project and how the project might affect the physical, natural, social and economic environment in the community; and,*
- *Incorporate stakeholder interests into the planning, design, construction, and operation of the SCEC, where feasible.*

This Engagement Plan will be *Living* in nature; the plan will be revisited often and revised to properly reflect actual activities and to determine adherence to the stated goals and objectives.

3.0 Methods to Engage Indigenous Groups, Stakeholders and the Public

A number of methods may be used during these phases to inform and engage Indigenous communities, stakeholders and the public, including:

- *Identification of potentially interested Indigenous community members during the study area definition process. These groups will be engaged early in the pre-notice engagement phase of the project;*
- *Identification of potentially interested community members and special interest groups during the study area definition process;*
- *Meetings and/or correspondence with local and regional government and provincial agencies to collect data and identify issues associated with the project;*

- *Meetings and/or correspondence with adjacent landowners prior to public announcements in order to inform them and identify any issues;*
- *Advertising in local newspapers such as the Sarnia Observer and the Sarnia/Lambton This Week introducing the project and providing notices;*
- *Receipt of Indigenous, stakeholder, and agency verbal and written comments through meetings, letters, e-mail and/or phone calls;*
- *Production and analysis of a project questionnaire for the virtual information sessions;*
- *Development of a project website (<http://www.stclaireenergycentre.com>) to provide information on the project and to provide online access to the Environmental Review Report and supporting documents; and,*
- *Communication with government agencies and local and regional government stakeholders.*

The Engagement Plan may also use various engagement techniques to build stakeholder awareness about the project and solicit comments and feedback. Specific communication methods may include as necessary: one-on-one and small group meetings, project presentations, telephone discussions, direct mail notices and letters, publications in community newspapers, emails, virtual information sessions, site visits, and a regularly updated website <http://www.stclaireenergycentre.com>

Beginning in October of 2022, the Engagement Plan will be organized into three phases, with each phase building on the previous one (see **Table 1** below). **Figure 1** provides a graphical overview of the anticipated EA and Consultation Process. The following sections provide a description of each phase and the techniques and methods that may be employed to meet the public engagement objectives.

Figure 1: Environmental Assessment and Engagement Process

EA Process and Consultation Flow Chart



Table 2: Engagement Phases of the Project and Planned Activities

TIMING	PURPOSE	ACTIVITIES
Phase 1: Pre-Notice of Commencement	<ul style="list-style-type: none"> • Introduce the project to the community and Indigenous Groups • Identify potentially impacted stakeholders, and determine level of community interest • Raise awareness of the project • Advise stakeholders of the proposed project in the community • Consult with agencies 	<ul style="list-style-type: none"> • One-on-one meetings with neighbors, agencies, environmental interest groups, the Township and Region (if and as required) • Small group meetings with stakeholder interest groups (if and as required) • Online research • Telephone discussions • Mail-out and distribution of letters • Launch of project web site (http://www.stclairenergycentre.com)
Phase 2: Pre-Environmental Assessment Submission	<ul style="list-style-type: none"> • Identify potential concerns of community and discuss proposed plans • Consult with agencies • Incorporate stakeholder input into project development • Discuss draft copy of the ERR 	<ul style="list-style-type: none"> • Discussions with the local Township, Planning Department, and residents • Discussions with the Regional Municipality • Mail-out and distribution of letters • One-on-one, agency and community meetings as required, including pre-submission engagement • Telephone discussions • Preparation and distribution of Notice of Commencement and Virtual Information Session(s) • Virtual Information Session(s) • Response to media inquiries
Phase 3: Construction and Operations	<ul style="list-style-type: none"> • Raise awareness and understanding of construction and operation. • Respond to interests raised 	<ul style="list-style-type: none"> • Development and management of a Community Liaison Committee (if required) • Website updates • One-on-one meetings (if required)

4.0 Phase 1 – Engagement Pre-Notice of Commencement

Phase 1 of the engagement process may involve meeting/electronic correspondence/telephone calls with Indigenous Groups and stakeholders in the immediate project area, conducting research about the community and engaging in preliminary discussions and meetings with residents, the Township, the Region, Ministry of Environment, Conservation and Parks (MECP), Conservation Authority, and interest groups. Phase 1 engagement activities may also focus on meeting with community stakeholders, building stakeholder awareness of the SCEC and Engagement Plan, facilitating stakeholder two-way communications and involvement in the project planning process. Engagement in Phase 1 will aim to establish a working relationship between the project proponents and to accommodate as much feedback as possible into the proposed project plan. These efforts will be undertaken in advance of, and following, publishing the Notice of Commencement and Virtual Information Session. Throughout Phase 1, ongoing engagement will enable Invenenergy to identify new issues, track outstanding issues, and undertake actions necessary to address them.

5.0 Phase 2 – Engagement Pre-Environmental Assessment Submission

A Notice of Study Commencement (Notice) and Virtual Information Session (information session) will be published in the *Sarnia Observer* and *Sarnia/Lambton This Week* over the weeks of November 21st and 28th, 2022 with an Invitation to participate in the Virtual Information Session to be held between December 8th and 22nd, 2022. This notice will provide a summary of the project, the process, details of the information session, and project contact information. Further, a copy of the Notice will be posted on the project website at (<http://www.stclaireenergycentre.com>). Notices will also be sent out directly to landowners within 1 kilometer of the Project, the Township, Regional Municipality, members of the government, Indigenous Groups and special interest groups via a letter to be delivered on November 21st and 22nd, 2022. A copy of the Notice and example covering letters will be provided on the project website.

Further activities may be planned in advance of the Draft ERR including additional correspondence, meetings with stakeholders, Indigenous Groups, and agencies as well an additional Virtual Information Session (should it be necessary).

Invenenergy is committed to ongoing engagement and will continue to actively engage identified stakeholders and agencies concerning the Project. An engagement and consultation record with these groups will be documented in the ERR.

6.0 Phase 3 – Engagement Regarding Construction and Operations

Stakeholder engagement is anticipated to continue throughout the construction and the beginning operation stages of the Project. Depending upon the level of stakeholder and Indigenous Group interest, Invenergy is committed to the establishment of a Community Liaison Committee, where deemed appropriate. The purpose of the committee will be to provide direct access to project personnel in order to communicate comments or concerns from the community.

7.0 Indigenous Engagement and Consultation

Invenergy considers engagement and consultation with Indigenous Groups to be an important component of the EA process. Accordingly, these communities will be directly contacted at the outset of the Project, in order to better understand their interest, if any, in the project area.

A letter will also be submitted by Invenergy to the Ministry of Energy (MOE) providing notification of Invenergy's intent to complete an EA of the Project and requesting the MOE's assessment of Duty-to-Consult requirements. Prior to receiving this response, Invenergy will undertake proactive engagement with the following groups based on knowledge of the area and operational history of the existing facility:

- Aamjiwnaang First Nation;
- Bkejwanong (Walpole Island) First Nation;
- Caldwell First Nation;
- Deshkan Zibiing (Chippewas of the Thames) First Nation;
- Chippewas of Kettle and Stony Point First Nation; and,
- Onyta'a:ka - Oneida Nation of the Thames.

Notification letters will be sent to the Indigenous communities in late October/early November to introduce the Project and provide an opportunity to comment. The Notice of Study Commencement and Virtual Information Session will also be sent to the Indigenous communities. The notification letters will invite the communities to provide input and comments regarding the proposed Project, specifically regarding potential impacts that the Project may have on constitutionally protected Aboriginal or Treaty Rights and any measures for mitigating those impacts. Invenergy will also request the opportunity to meet with each community to discuss the Project as well as to participate in studies, if required, and if the communities would like to provide any specific engagement objectives and goals.

Invenergy is committed to ongoing engagement and will continue to actively engage identified Indigenous groups in meaningful dialogue concerning the Project and endeavour to meet with each Indigenous community for the purposes of exchanging information regarding the Project, responding to

inquiries, discussing issues and concerns regarding the Project; and will respond to communities in a timely manner. An engagement and consultation record with Indigenous communities will be documented in the ERR.