

Atura Power

Summary of Issues Response

Riverside Generating Station Project

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1. Introduction

On October 15, 2025, the Impact Assessment Agency of Canada (IAAC) published their Summary of Issues in response to the comments received during the Initial Project Description (IPD) comment period. Atura Power has prepared this document to respond to the Summary of Issues, as well as provide an update to IAAC on Project progress in relation to the identified issues.

Since submission of the IPD on September 2, 2025, Atura Power has continued to engage with Indigenous communities and complete some additional technical work. The following provides an updated related to those efforts.

Ongoing Indigenous Engagement

Atura Power has invited all communities who have expressed interest in engaging on the Project to participate in a joint monthly meeting series. To date, the five Wawaayataanong Treaty Council communities attend. These include:

- Aamjiwnaang First Nation
- Caldwell First Nation
- Chippewas of the Thames First Nation
- Three Fires Group on behalf of Chippewas of Kettle and Stony Point First Nation
- Walpole Island First Nation

Meetings with the abovementioned communities have been held in September and October, with additional meetings planned on November 13 and December 11. Monthly meetings are anticipated to continue as needed in 2026 and beyond as the project progresses.

The purpose of these meetings is to create a forum where community representatives and the Project team can share information and maintain regular communication, allowing communities to raise concerns and provide feedback on the Project. These meetings supplement ongoing direct engagement with representatives from each Indigenous community.

Atura Power has also participated in community Open Houses when invited by Chief and Council to present information about the Project and its preliminary effects (as outlined in the IPD). These Open Houses provided an opportunity for community members to share their feedback on the Project.

Open houses have been held with Walpole Island First Nation (September 22) and Chippewas of Kettle and Stony Point First Nation (October 16) with additional events planned in with Aamjiwnaang First Nation (November 6) and Chippewas of the Thames First Nation (November 22). Additionally, Atura Power met with Aamjiwnaang First Nation's Environment Committee on October 7 and presented on the project.

Archaeological Assessment Update

Since submission of the IPD, Atura Power has completed the Stage 1 and 2 Archaeological Assessments in accordance with Ontario’s *Standards and Guidelines for Consultant Archaeologists*. All of the Indigenous communities were invited to participate and four of the five communities listed above sent site monitors to participate in the fieldwork. COTTFN and CKSPFN reviewed and provided comments on the Archaeological Assessment report. Additional information on the Archaeology Assessment is described in Table 1.

2. Response to Summary of Issues

Table 1 below provides Atura Power’s responses to the matters raised in IAAC’s Summary of Issues document (October 15, 2025).

Table 1: Response to Summary of Issues

Issue	Response
<p>Indigenous and Stakeholder Engagement and Consultation - Clarify the process for meaningful engagement and consultation with Indigenous Peoples potentially affected by the project.</p>	<p>Indigenous Engagement</p> <p>Early and meaningful engagement are the cornerstone of Atura Power’s approach to Indigenous engagement and consultation. Since the Spring 2023, Atura Power has been actively engaging with Indigenous communities in southwestern Ontario to establish and strengthen relationships including: Aamjiwnaang First Nation (AMFN), Caldwell First Nation (CFN), Chippewas of Kettle and Stony Point First Nation (CKSPFN), Chippewas of the Thames First Nation (COTTFN), Delaware Nation Council (DNC), Métis Nation of Ontario (MNO), Munsee-Delaware Nation (MDN), Oneida Nation of the Thames First Nation (Onyota'a:ka) (ONTT), and Walpole Island First Nation (WIFN).</p> <p>Atura Power initially contacted the above communities regarding projects proposed under the Independent Electricity System Operator (IESO) Expedited Long-Term 1 and Same Technology Upgrades procurement processes. Since 2023, Atura Power has continued to engage with these communities to build trust, share information on an ongoing basis, and strengthen long-term relationships. These established relationships now form the foundation for Atura Power’s engagement efforts related to the Riverside Generating Station Project.</p> <p>Early engagement specific to the Riverside Generating Station began in January 2025 and included details regarding the proposed Project. Atura Power has provided opportunities for Capacity Funding to support communities’ participation in the Project. The frequency and format of engagement activities following early 2025 communications have varied according to each community’s response(s). The engagement has been directly with respective Consultation department staff members, elected Chiefs and Council members or via designated representatives, but generally included a series of:</p>

	<ul style="list-style-type: none"> • Email notifications: Communications sharing advanced copies of public-facing Project materials (e.g., Project Notice & Invitation to Public Meeting); • Virtual and in-person meetings (with Chief/Council and/or staff): Meetings to understand community interests, create Capacity Funding Agreements, establish engagement expectations and protocols, and discuss opportunities for participation in the project (including equity partnerships); • Community meetings: Engagement events during which community members are invited to learn more about the Project (e.g., through display boards and/or presentations), share questions or comments with the Atura Power Project team, and submit feedback via comment forms; • Access to the Project-specific webpage with Project descriptions and related resources: Ongoing access to Project-specific information and materials via the Project webpage; • Direct contact with the Atura Power team: Open invitation for communities to call and or email Atura Power’s Indigenous Relations lead at any time; • Invitations to participate fieldwork: Summaries of upcoming fieldwork anticipated on the proposed Project site and invitations to send Indigenous monitors to participate; • Opportunities to review Project-related documents: Offers to review draft technical documents and reports prior to submission to external parties (e.g., Stage 2 Archaeological Assessment Report); and • Other ad hoc meetings, as requested by communities. <p>Indigenous engagement specific to the Riverside Generating Station Project has continued to gain momentum and grow in magnitude in the latter half of 2025. With communities’ consent, Atura Power established a meeting series whereby the First Nations who have expressed interest in engaging on the Project (AMFN, CFN, CKSPFN, COTTFN, and WIFN) participate in a joint monthly meeting with Atura Power.</p> <p>The meeting series is instrumental in providing Project information and updates to communities in a regular, consistent manner. The idea for the series was established in July 2025 whereby participating communities expressed positive feedback and appreciation for continuing the series. Numerous community representatives in attendance voiced appreciation for the opportunity the series provides to build Nation-to-Nation relationships, citing that many of the communities are aligned on priorities related to the Project. They expressed that the series offers a welcome format for open, transparent and respectful exchange of information.</p> <p>The monthly series also serves as a platform for Atura Power to invite communities to participate in other aspects the Project, such as opportunities to send Indigenous monitors to support fieldwork and</p>
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	<p>technical document review opportunities. Atura Power will continue the monthly meeting series throughout the upcoming provincial Environmental Assessment process and future Project phases.</p> <p>As of Fall 2025, Atura Power has been invited to plan and host a series of in-person community meetings. Primarily open house style, these meetings have enabled Atura Power to share Project information, engage in meaningful dialogue, answer questions and understand priorities and concerns with interested community members.</p> <p>At the invitation of the communities, Atura Power plans to return to host follow-up meetings and continue sharing information and insights through ongoing discussions with community members as the Project progresses.</p> <p>As noted, Atura Power is committed to working closely with all interested communities and will continue to do so throughout the Project lifecycle. The activities completed to date demonstrate Atura Power’s commitment to prioritizing communities’ interests through tailored engagement activities and events that meet their unique needs.</p> <p>Atura Power aims to demonstrate its commitment to building trust by proactively engaging with communities early—by choice rather than through mandated requirements—and by sharing plans for the proposed Riverside Generating Station Project prior to the IESO’s contract award. Through this approach, Atura Power seeks to show that it can be a trusted partner that collaborates, shares information transparently, and considers communities’ interests throughout Project planning.</p> <p>Atura Power will continue to work with communities to implement Capacity Funding Agreements to provide communities opportunities participate in the Project. Atura Power will also continue to provide funding for community events and cultural gatherings and looks forward to continuing to participate in these events as invited by communities (e.g., Powwows, career fairs, etc.).</p> <p>As a primary energy supplier in Ontario, Atura Power is committed to advancing reconciliation through its inaugural Reconciliation Action Plan (RAP). The RAP outlines Atura Power’s intention to foster regular, voluntary collaboration and to build respectful, mutually beneficial relationships with Indigenous communities based on trust, understanding, and shared priorities.</p> <p>Public and Stakeholder Engagement</p> <p>Atura Power is committed to early and meaningful stakeholder engagement and is taking a proactive approach to engagement with the host municipality of St. Clair Township, local residents, elected officials and stakeholder groups in the Sarnia-Lambton region. Atura Power values ongoing dialogue with St. Clair Township and remains engaged through regular communication with municipal representatives.</p> <p>Atura Power remains committed to early engagement and transparent information sharing ahead of the provincial Environmental Assessment and related consultation requirements. These efforts are intended to</p>
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	<p>ensure stakeholders feel respected and well-informed. Atura Power will continue proactive engagement with stakeholders throughout the duration of the proposed Project in a variety of ways, including:</p> <ul style="list-style-type: none"> • Project notifications: Invitations to public meetings, emails sharing anticipated Project activities or key milestones; • Public meetings: Public engagement events during which members of the public will be invited to learn more about the Project (e.g., through display boards and/or presentations), share questions or comments with the Atura Power Project team, and submit feedback via comment forms; • Presentations to council: Presentations to the Mayor of St. Clair Township and elected officials, as needed, to share Project information, answer questions and respond to feedback; • Responses to enquires: Timely responses to Project-related enquiries received via the Project email address, comment forms, or other means; • Updates to the Project webpage: Details regarding anticipated environmental and permitting processes, Project timelines, and copies of Project documentation available for public review; and • Other related engagement activities: Liaising with agencies/regulators, attending municipal engagement events, maintaining and sharing Project engagement records, etc.
<p>Structures, Sites, or Things of Historical, Archaeological, Paleontological or Architectural Significance to Indigenous Peoples - Clarify potential project effects, mitigation measures, avoidance measures and any additional investigations on Indigenous Peoples' sites of significance including notification of chance finds.</p>	<p>Atura Power has designed the project layout to avoid all known archaeological resources.</p> <p>A Stage1/Stage 2 Archaeological Assessment report has been prepared by an archaeologist licensed by the Ontario Ministry of Citizenship and Multiculturalism (MCM). The assessment identified several archaeological resources (e.g. lithic flakes and pottery) of Indigenous origin beyond the project footprint.</p> <p>The report identifies the following mitigation and avoidance measures:</p> <ul style="list-style-type: none"> • Given the findings are beyond 10m from the project footprint, no further Archaeological Assessments are required for the Project to proceed. • If impacts are to occur within 10m of the sites of the findings, Stage 3 Archaeological Assessments will be required which would results in recommendation on mitigating impacts to these sites/findings. <p>Four communities (AMFN, CKSPFN, COTTFN, and MDN) had archaeological monitors participate in the fieldwork component of the assessments. Additionally, the nine communities in proximity to the project were provided with an opportunity to review and comment on the findings of the report. Some comments were received requesting more information on the historical context of the site to be added to the report.</p>

	<p>The comments have been addressed to the satisfaction of the community. The report has been submitted to MCM for review and entry into the Ontario Public Register of Archaeological Reports.</p> <p>During Atura Power’s engagement processes, Indigenous communities have provided feedback that due to the historical nature of the development of the site in the 1960s, chance finds are a concern and that management of those finds is important to the communities. To address this concern, Atura Power will develop an Archaeological Risk Management Plan prior to construction. The plan will outline the procedures for chance finds, which will include ceasing work and contacting appropriate authorities, archaeologist, and Indigenous communities. Atura Power is committed to working with Indigenous communities to develop the plan.</p>
<p>Indigenous Peoples' Health and Well-being - Clarify the potential effects to the health of Indigenous Peoples (e.g. changes to drinking water, water sources, air quality and Indigenous use of lands) and provide information on monitoring parameters.</p>	<p>Atura Power remains committed to ongoing engagement with Indigenous communities throughout the life of the project, including understanding potential effects to the health of Indigenous People. The information below relates to potential effects pathways identified by the Agency; however, Atura Power will continue to engage with communities, and other potential pathways that may be identified by communities will be considered as the project progresses.</p> <p><u>Water</u></p> <p>The project has been designed to avoid in-water works, including water takings and new discharges, associated with the St. Clair River. Based on the studies conducted to date and the current design of the proposed facility, water will be supplied via the existing municipal water infrastructure servicing the site. Use of municipal water is the only proposed interactions with drinking water or other water sources as a result of the project.</p> <p>The project will make use of an existing stormwater management system that currently incorporates runoff from the proposed project site. Modifications will be required to the existing infrastructure but will be designed to maintain the function of the existing system, which operates under a provincial Environmental Compliance Approval (ECA). Stormwater discharged from the Project site will be required to meet the quality and quantity requirements of that approval, with the design modifications to the system subject to Township and MECP approval processes. All process water will be collected and transported and disposed at a licensed off-site facility. Monitoring parameters are expected to include total suspended solids as well as regular system checks to maintain capacity and function of the system.</p> <p><u>Air Quality</u></p> <p>The results of the screening level analysis included in the IPD show that the most relevant emissions for a natural gas generating station (nitrous oxides, carbon monoxide, and fine particulate matter) are all predicted to be below provincial and federal air quality standards when considered together with background levels. These standards are designed to be protective of human health, and therefore no air quality-related effects on human health associated with the facility are anticipated. Operational air emissions are subject to review and approval by the Province of Ontario MECP as part of the Environmental Compliance Approval (ECA) process.</p>

	<p>Facility emissions monitoring will include a Continuous Emissions Monitoring System (CEMS) located next to the exhaust stack, equipped with a probe installed in the stack to measure the following emissions parameters: oxygen, nitrous oxides, and carbon monoxide.</p> <p>Indigenous use of lands The project is located on private land that is owned by Ontario Power Generation (OPG) and zoned for industrial use. The site was previously utilized for electricity generation by the former Lambton Generation Station (GS) which operated from 1969 until its decommissioning in 2013. Access to the property is controlled and restricted as the site is fully fenced and gated.</p> <p>While parts of the OPG property contain some areas that provide potential wildlife habitat, the project site boundary was selected to exclude these areas.</p> <p>Surrounding the Project site, most of the land is privately owned and used for residential or agricultural purposes. In terms of the potential pathway effects of users of adjacent lands, air emissions will meet provincial air quality standards that are designed to be protective of human and animal health.</p>
<p>Indigenous Peoples' Rights - Clarify the process regarding the assessment of the project's impact on rights of Indigenous Peoples.</p>	<p>Atura Power is committed to ongoing and meaningful engagement with Indigenous communities throughout the project lifecycle to understand their priorities, concerns and impact on rights. Atura Power will work with communities both collectively and individually to seek feedback and input on how these findings are reflected in project design and assessments in a meaningful manner throughout the project lifecycle.</p> <p>Atura Power is actively engaged in discussions with interested First Nations regarding potential equity partnerships in the Riverside Generating Station. While recognizing each community's unique views and process for considering equity participation, these discussions reflect our commitment to economic reconciliation and to creating meaningful opportunities for Indigenous participation in the project. We view equity partnerships as a pathway to shared prosperity and a foundation for enduring relationships built on trust, respect, and mutual benefit.</p>

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