

August 25th, 2025

Submitted Electronically through the Environmental Registry of Ontario Portal

To Whom It May Concern:

RE: Streamlining Environmental Permissions for the Electricity Sector (ERO 025-0600)

Capital Power is pleased to have the opportunity to submit comments to the Ministry of the Environment, Conservation and Parks ("MECP") on streamlining environmental permissions for the electricity sector.

Capital Power is a growth-oriented North American power producer, publicly traded (TSX: CPX), and headquartered in Edmonton, Alberta. Driven by our commitment to Powering Change by Changing Power, we develop, acquire, and operate industry leading, utility scale generation facilities using a variety of energy sources. We own and operate approximately 12 gigawatts of power generation capacity across 32 facilities in Canada and the United States. Our Ontario portfolio includes five power plants including three natural gas and two wind facilities that contribute roughly 1,300 megawatts ("MW") of reliable generating capacity to Ontario's energy system. Our operated facilities are the Goreway Power Station, York Energy Centre, East Windsor Cogeneration Centre, Port Dover and Nanticoke Wind, and Kingsbridge 1 Wind.

Capital Power has previously responded to Ontario's call for more power and was awarded five additional supply contracts as part of the Independent Electricity System Operator's ("IESO's") Expedited Long-Term 1 and Same Technology competitive procurements. These projects began development in 2023, have received all their environmental permits, and have either entered commercial operation or are nearing their in-service date. These projects include the:

- 100 MW East Windsor Cogeneration Centre Expansion;
- 40 MW Goreway Power Station Same Technology Upgrade;
- 38 MW York Energy Centre Same Technology Upgrade;
- 120 MW York Energy Centre Battery Energy Storage System ("BESS"); and
- 50 MW Goreway Power Station BESS.

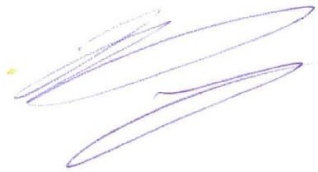
Capital Power commends the action taken by Ontario Government across multiple Ministries aimed at addressing regulatory inefficiencies. As the Ministry knows, Ontario is on the cusp of an energy expansion and has an urgent need for affordable and reliable electricity development in order to meet its burgeoning demand. Shifting to a registration first approach for stormwater management and spill control will help create a more efficient approval process that will allow construction of electricity projects to commence faster at a time expedited energy development is needed within the province. These changes can effectively be implemented without impacting environmental oversight or engagement with Indigenous or local communities. Risks associated with registration ahead of full environmental approvals can be managed through the

development of clear and consistent guidelines, with full environmental compliance approvals remaining available for nonstandard or higher risk projects.

Capital Power is appreciative of all the action taken to date by MECP to expedite environmental assessments for electricity projects and encourages the Ministry to continue to work with project developers and agencies like the IESO to effectively prioritize projects that supports the reliability of Ontario's energy system. Capital Power also encourages the Ministry to continue its review of permitting and approval processes to find further opportunities for regulatory efficiency. More specifically, Capital Power recommends the Ministry seek opportunities to shorten timelines related to the review of public requests to elevate projects to a more comprehensive environmental assessment ("RTEs"). Based on our experience with our most recent projects, these reviews significantly increase the permitting timelines of projects, are unpredictable, and results in financial and non-financial costs to projects. Clarifying timelines and limiting reviews to be within the project's scope and the concern raised within the RTE are opportunities to streamline the process while maintaining the integrity of public consultation. Further, the Ministry may also review the definitions of a significant modification and a minor modification for existing electricity projects to increase the standard for when an Environmental Screening Process is required. Adjusting the standard will reduce the need for environmental screening for projects that have little-to-no impact on the environment.

We appreciate the opportunity to provide comments on this important initiative. We welcome the opportunity to answer any questions you may have regarding this submission. Please feel free to contact me directly at 780-221-1194 or ld EEG@capitalpower.com.

Sincerely,



Lukas Deeg
Senior Lead, Regulatory and Policy
Capital Power