



ELLIOTT FALLS GS WATER MANAGEMENT PLAN IMPLEMENTATION REPORT

BRACEBRIDGE GENERATION LTD.

DECEMBER 31, 2024



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Overview

The Elliott Falls Generating Station Water Management Plan was amended June 29th, 2018 by the Ministry of Natural Resources and Forestry (MNR), under the authority of Section 23.1 (6) of the *Lakes and Rivers Improvement Act*. The amendment was undertaken in order to align the SRSWMP with the 2016 Maintaining Water Management Plans Technical Bulletin.

The implementation reports must be submitted by the proponent every 5 years. The date of submission for this report is December 31, 2024.

The implementation report should include the four components:

- Summary of all amendment requests
- Status of the Standing Advisory Committee (if applicable)
- Results of effectiveness monitoring (if applicable)
- Status and results of any data or information collected outlined in the WMP's data collection program (if applicable)

In May of 2016, Elliott Falls Power Incorporated (EFPC) was purchased by Bracebridge Generation Ltd. On January 1, 2017 the assets of EFPC were transitioned to Bracebridge Generation Ltd. and EFPC was closed.

This report was produced by:

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John Stasiuk



Summary of Amendment Requests

March 2015 Amendment

On March 31st, 2015, the Ministry of Natural Resources and Forestry (MNR) approved an administrative amendment to the Elliott Falls Generating Station Water Management Plan to extend the term of the plan for an additional three years to expire on March 31, 2018.

March 2018 Amendment

On March 23rd, 2018, the Ministry of Natural Resources and Forestry (MNR) approved an administrative amendment to the Elliott Falls Generating Station Water Management Plan to extend the term of the plan for an additional six months.

June 2018 Amendment

On June 29th, 2018, the Ministry of Natural Resources and Forestry (MNR) approved an amendment to the Elliott Falls Generating Station Water Management Plan to align the plan with the approved 2016 Maintaining Water Management Plans Technical Bulletin.

The administrative amendment resulted in changes to the following sections of the plan.

Expiry Date:	The expiry date has been removed
Amendments:	Section 8 has been replaced
Implementation Reporting:	Section 9 has been added



March 2015 Amendment

**Ministry of Natural
Resources and Forestry**

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March 31, 2015

Mr. Kearon Bennett
Blue Metric Environmental
3108 Carp Road, PO Box 430
Ottawa ON K0A 1L0

Dear Mr. Bennett,

Subject: Approval of Amendment to Extend the Term of the
Water Management Plan for the Elliot Falls Generating Station

This letter is to advise that the Water Management Plan for the Elliot Falls Generating Station has been amended under Section 23.1(6) of the *Lakes and Rivers Improvement Act*. An administrative amendment was undertaken and approved March 31, 2015 to extend the term of the water management plan for an additional three years. As indicated in our earlier correspondence, this will ensure that the water management plan remains in effect while providing time for the results of the provincial review to be known (e.g. proposed changes to the requirements for the preparation, amendment and review of water management plans). The plan will now expire March 31, 2018.

Please note, specific text changes are not being proposed to the plan as a result of this amendment. Instead, this letter should be affixed to the Elliot Falls Generating Station Water Management Plan to indicate the term of the plan has been extended to March 31, 2018.

If you have any questions, please contact Amanda McCloskey, Regional Planner, at amanda.mccloskey@ontario.ca or at 705-755-1367.

Regards,

Jane Ireland
Regional Director
Southern Region

c. Vincent Ewing, Bancroft District Manager, Ministry of Natural Resources and Forestry



March 2018 Amendment

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March 23rd, 2018

Kearon Bennett
Elliott Falls Power Corporation
2747 Priscilla Street
Ottawa, ON K2B7E1
kjb@ottawaengineering.com

Attention: Kearon Bennett

Re: Elliot Falls Generating Station Water Management Plan – Plan Extension and Amendment

This letter is to advise that the Ministry of Natural Resources and Forestry (MNR), under the authority of section 23.1(6) of the Lakes and Rivers Improvement Act (LRIA), is undertaking an administrative amendment to the Elliot Falls Generating Station Water Management Plan (EFWMP; the Plan) to extend the term of the Plan for an additional six months. No other changes to the plan will be completed as a part of this amendment. This letter should be affixed to the EFWMP to indicate that the term of the Plan has been extended to September 30th, 2018.

This letter is also to inform you that MNR intends to complete a further administrative amendment in order to align the EFWMP with the Maintaining Water Management Plans Technical Bulletin (MNR, 2016). MNR has completed a review of the EFWMP and identified sections that require revision to ensure that they are consistent with the Technical Bulletin.

A summary of these changes, as well as additional context on where these changes apply and what they mean for proponents, is attached for your review. The amendment replacement text, as described in the attached document, may include:

- Removal of WMP expiry dates, plan term and mandatory review;
- New amendment classification, processes and proponent roles and responsibilities;
- New compliance monitoring and data reporting processes (where WMPs include operating regimes); and



March 2018 Amendment

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- Details of the new Implementation Report, which will summarize monitoring efforts, assess new or continued direction of Effectiveness Monitoring Plans (EMPs) (where applicable) and support adaptive management.

As noted above, MNRF intends to further amend the EFWMP under the authority of the LRIA 23.1(6). Section 23.1 of the LRIA, as supplemented by Section 3.4 of the Technical Bulletin, provides the opportunity for proponents to request that MNRF issue an Order to amend a WMP. Should a proponent request an Order to amend, MNRF will order that the proponent amend the WMP, as outlined above, to align the plan with the mandatory and approved direction provided in the Maintaining Water Management Plans Technical Bulletin (MNRF, 2016).

Please note that if ownership of the EFWMP has changed, provisions of the EFWMP will continue to apply to the facility under new ownership. The facility should continue to operate in accordance with the EFWMP and any relevant amendments. In the case of new ownership, please alert MNRF as soon as possible.

If you have any questions about these amendments, or wish to request an Order to amend the EFWMP, please contact Mike Poskin, Regional Renewable Energy Coordinator at mike.poskin@ontario.ca by April 30th, 2018.

We look forward to working with you on this amendment.

Sincerely,

Sharon Rew
Regional Director
Southern Region
Ministry of Natural Resources and Forestry

cc:

Tammy Verhaeghe, District Manager, Bancroft District, MNRF
Renee Bowler, Manager, Regional Resources Section, MNRF
Erin Cotnam, Land Use Planning Supervisor, MNRF
Mike Poskin, A/Renewable Energy Coordinator, MNRF



June 2018 Amendment

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June 29th, 2018

Bryan Ingram and John Stasiuk
Bracebridge Generation Ltd.
196 Taylor Road
Bracebridge, ON P1L 1J9
bingram@bracebridgegeneration.com
jstasiuk@bracebridgegeneration.com

Attention: Bryan Ingram and John Stasiuk

Re: Notice of Elliot Falls Generating Station Water Management Plan Amendment Approval

This letter is to inform you that Ministry of Natural Resources and Forestry (MNRF), under the authority of Section 23.1 (6) of the *Lakes and Rivers Improvement Act*, has amended the Elliot Falls Generating Station Water Management Plan (EFWMP). An administrative amendment was undertaken by MNRF, and was approved on June 29th, 2018.

The amendment was undertaken in order to align the EFWMP with the 2016 Maintaining Water Management Plans Technical Bulletin. These changes were identified in MNRF's letter notifying of intent to amend, dated March 23rd, 2018. As this letter indicated, these changes may include:

- Removal of WMP expiry dates, plan term and mandatory review;
- New amendment classification, processes and proponent roles and responsibilities;
- New compliance monitoring and data reporting processes (where applicable); and
- Details of the new Implementation Report, which will summarize monitoring efforts, assess new or continued direction of Effectiveness Monitoring Plans (EMPs) (where applicable) and support adaptive management.

Additionally, as indicated, "Bracebridge Generation Ltd." has replaced "Elliot Falls Power Inc." as the current proponent of the Elliot Falls Generating Station Water Management Plan. The provisions of the EFWMP continue to apply to facilities under new ownership.



June 2018 Amendment

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Changes as a result of this amendment are reflected in the updated (June 2018) version of the Elliot Falls Generating Station Water Management Plan, which is attached for your records.

If you have any further questions about this amendment, please contact Mike Poskin, Regional Renewable Energy Coordinator at mike.poskin@ontario.ca or (705) 755-1362.

Sincerely,

Sharon Rew
Regional Director
Southern Region
Ministry of Natural Resources and Forestry

cc:

Paul Heeney, District Manager, Bancroft District, MNRF
Renee Bowler, Manager, Regional Resources Section, MNRF
Erin Cotnam, Land Use Planning Supervisor, MNRF
Mike Poskin, A/Renewable Energy Coordinator, MNRF



Status of the Standing Advisory Committee

The Elliott Falls Generating Station Water Management Plan does not currently utilize a Standing Advisory Committee.

Effectiveness Monitoring Program

The Elliott Falls Generating Station Water Management Plan does not include an Effectiveness Monitoring Program (EMP).

Data Collection Program

The Trent-Severn Waterway continues to monitor and record water levels on Moore Lake and flows in the Gull River for the purpose of managing the waterway and providing direction to Elliott Falls Generating Station operations. Bracebridge Generation does not regulate upstream water levels or downstream flows thus there is no requirement for a rule curve or additional recording of water flows or levels.