



From: TERRE <terrecoalition@gmail.com>
Sent: Wednesday, February 25, 2026 11:24 AM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: margaret.koontz@aturapower.com
Subject: EB-2025-0330 - Atura Power Licence Renewal

Attention Ritchie Murray

Dear Mr. Murray,

Below is TERRE's letter of comment on Atura Power's Licence renewal.

We would also like the following two questions answered:

1. What is the expected new expiry date of the Atura Power renewed licence?
2. Is the rated capacity of the Portlands Energy Centre (soon to be 600 MW) a true limit to their contribution to the electricity supply?

Yours sincerely,

David Smith for TERRE

February 25, 2026

Letter of Comment to the Ontario Energy Board in the matter of the renewal of the license for Atura Power and the Portlands Gas Plant

Toronto East Residents for Renewable Energy (TERRE), a coalition of local residents and environmental groups, was formed in response to media reports that Atura's Portlands Energy Centre (PEC) was no longer running as a peaker plant it had intended to be but rather had been operating for more and more hours each year. PEC is Toronto's single biggest source of Nox and CO2. TERRE is also concerned about the capacity expansion of the plant that was proposed in 2023 and that was the subject of an environmental screening process in 2023 and 2024. The environmental assessment for the capacity expansion was approved by the Ministry of Environment, Conservation, and Parks on May 23, 2025 with the acceptance of Atura's Revised Screening Report.

One of the OEB criteria used to assess applicants for an electricity generation license is "The

applicant and its key individuals' past business history and conduct such that they afford reasonable grounds for belief that the applicant will carry on business in accordance with the law, integrity and honesty.”

In TERRE’s communications with Atura during the environmental screening for the expansion of the Portlands Gas Plant, Atura has stated that they are in compliance with the required laws, regulations and processes. TERRE’s view is they have approached this with a “compliance light”.

The environmental assessment process for electricity generators provides significant latitude for proponents. While suggesting that the proponent hold a public meeting there is no direction on the content or format of the meeting. In comparison to historical and current public meetings either held by Atura or peer companies, Atura elected to have a virtual meeting, on October 23, 2023, which did not cover the risks associated with the gas plant, limited questions and did not show who was in the audience. Over 100 people attended this meeting (with more than 200 questions) which is in marked comparison to the 9 people who attended Halton Hills expansion in-person public meeting or 20 people that attended the in-person public meeting for the new Napanee Gas Plant. The Atura meeting for PEC was restrictive enough that it warranted comment in the media (Toronto Star, Oct 6, 2023 - “Emissions could increase with proposed upgrade at Toronto’s Portlands gas plant”).

In the various versions of the screening report Atura indicated a desire to build a positive relationship with the public through its Engagement Program. TERRE’s view is that Atura simply went through the motions of a public engagement process without taking the actions to actually build a positive relationship – actions like providing complete responses to questions posed by members of the public.

The draft environmental screening report was published on Dec 5, 2023. 480 comments and questions were sent to Atura on this report. In contrast zero comments were received for the Goreway Power Station Environmental Assessment (EA), the St. Clair Energy Centre EA identified less than 10 public comments and the Halton Hills Upgrade EA received questions/comments from three individuals. In the screening process, Atura received no comments supporting the expansion of PEC. The only change made to the draft screening report as a result of the feedback was to change the name of an island they had specified. TERRE views these actions, or rather inactions by Atura, as demonstrative of their lack of responsiveness to community concerns.

Atura did not provide any community benefits to enhance the appeal of its proposal to community members. For the new Napanee Gas Plant, Atura provided the community with up to \$4.8 million dollars. A similar grant for Toronto might have been directed to expanding the Toronto District School Board’s rooftop solar program or to provide evidence that their operations are not only within regulated limits but warrant a social licence to continue operation.

Atura published an Environmental Screening report (March 27, 2024) and did not answer all questions posed during the 30 day comment period. In some of the responses to questions posed it deflected answers to the IESO who themselves were slow on responding and did so only after escalation within their management structure. One question was related to the expected total

emissions from the Portlands plant, which was not included in the PEC screening report. In contrast, the Goreway Power Station project report actually contained the forecasted total emissions. MECP received 196 elevation requests in response to the first Environmental Screening, and Atura received almost 500 comments.

While many of the comments sent to Atura focus on public health and climate change, Atura categorized the comments in a different way (e.g. Air Quality) and then provided indirect answers to an entire category. Neither of the following comments were responded to, indicating Atura's lack of consideration of community health concerns: "I have asthma, and so do some of my children and grandchildren. Toronto smog makes it worse. Thus, I do NOT support the expansion of the Portlands gas plant." and "I moved into Leslieville 25 years ago. In recent years I've had trouble breathing and have been diagnosed with asthma. I am otherwise a healthy, physically active non-smoking 68 year old. All I can think of that has changed is the Portland plant operating "at the instruction of the IESO"."

Of particular note in the Environmental Screening was Atura's response to one of the screening criteria related to public concerns with health and safety. Atura assessed that there were no public concerns with health and safety. Atura, a company headquartered in Oakville, using a consulting company based in Guelph, made this decision for a gas plant in Toronto with a long current and historical resistance to the gas plant without providing any evidence on how they arrived at this conclusion. The Atura personnel who completed this criteria had no medical qualifications. TERRE asked what evidence was used to assess this criteria and received no reply.

Atura's second version Environmental Screening was missing some required sections such as Air Quality and Decommissioning. The Ministry of Environment, Conservation and Parks required that the Air Quality section be added and provided Atura with references to include. Again, the environmental assessment process provides much latitude to proponents and only requires a heading with a sentence under the heading. Atura's response (November, 2024) to the missing section was to claim that Nox emissions in the province were decreasing while ignoring the appendices in the material provided by MECP which shows the Nox emissions in Toronto are the highest. The section on Air Quality is a single paragraph and one sentence refers to PEC directly – "Natural gas combustion at the PEC facility is also a local source of emissions, with NOx being the significant contaminant.". In contrast, the Atura report for the Halton Hills Generating Station has a section on Air Quality that was five pages long. Capitol Power's Goreway Power Station air quality assessment covered 14 pages.

When asked to provide the details of the most recent emissions modelling, Atura provided an Executive Summary which is all that is required by law. This lack of openness and transparency from a public company is concerning. Without the details we do not know what data was used for them to declare that everything is fine. With the media reporting that PEC is Toronto's largest single source of Nox and CO2 this lack of transparency raises public concerns rather than lowering them.

Atura uses the term 'sensitive receptor' in emissions modelling but was unable to define exactly what this means. TERRE expects it would be living things and more particularly humans but we do not know what ages (young, middle age, old) or their health conditions (healthy, asthma, lung

conditions) that were considered.

Atura has made the claim that gas fired electricity generation helps reduce GHG in Ontario by displacing the need for more polluting fuels. They make this claim while only taking into account the gas that is burned and not the emissions from the extraction or transportation of methane. TERRE views this as a form of greenwashing.

In response to the final EA, MECP received 205 'distinct elevation requests'.

Atura was asked to consider installing Nox abatement technology in support of the residential construction in the Portlands. Their response equivocated to "we were here first" without acknowledging that local residents were there before PEC. This response reflects a complete dismissal of Atura of community concerns and local health and air quality impacts.

While Atura may have the financial means to justify a renewed license TERRE proposes that they do not have the social license.

