

To: Canadian Environmental Assessment Agency
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SaskPower appreciates the opportunity to provide comments on the Expert Panel Draft Terms of Reference for the *Canadian Environmental Assessment Act, 2012* (CEAA) Review.

Established in 1929, SaskPower is Saskatchewan's leading energy supplier. We are defined by our commitment to support economic growth and enhance quality of life in our province. Our corporate mission: ensuring reliable, sustainable and cost-effective power for our customers.

SaskPower has a keen interest in ensuring regulatory processes such as the *Canadian Environmental Assessment Act, 2012* and other intersecting regulations and policies, are structured in a manner that supports timely, efficient and predictable outcomes. SaskPower has embarked on a challenging and ambitious plan to meet growing electricity demand, replace aging, critical infrastructure and reduce our environmental footprint, while minimizing rate impacts for our customers. Our ability to implement our plan depends on effective federal and provincial environmental assessment processes.

With this context in mind, SaskPower has reviewed the Expert Panel Draft Terms of Reference and would offer the following comments:

- **The Panel should be asked to consider “how the environmental assessment process can be structured to support project advocates in the achievement of acceptable environmental outcomes” rather than “how to require project advocates to choose the best technologies available to reduce environmental impacts”.** The role of environmental assessment is to “identify opportunities to avoid, eliminate, or reduce a project’s potential adverse impact on the environment”. There are many potential ways of achieving this outcome. By focussing on results rather than specific technologies, project proponents are empowered to develop innovative solutions in a manner that is the most economically efficient and socially acceptable for the circumstances.
- **The Panel should be asked to review areas of duplication with provincial agencies and determine opportunities for further delegation and/or substitution**

toward an outcome of one project, one review. Defining specific standards and thresholds, or the development of guidelines regarding the conduct of an environmental assessment could allow for greater delegation of processes to provincial agencies.

- **The Panel should be asked to look at opportunities to improve consistency between decisions made under CEAA and other federal legislation such as the *Fisheries Act*.** In doing so, unnecessary delays in the development of projects can be prevented and environmental outcomes aligned with CEAA decisions can be assured.
- **The Panel should be asked that the scope of the review be undertaken with a view to ensuring an efficient and timely environmental assessment process.** Completion of the environmental assessment process within a predictable timeframe is of critical importance if SaskPower is to deliver on its mandate and contribute to national interests such as greenhouse gas emission reductions.

Thank-you for the opportunity to provide comment on the Expert Panel Terms of Reference. SaskPower looks forward to further input into the review of CEAA 2012.