CF Napanee Battery Energy Storage System

Municipal Report

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Executive Summary – MSR Request & Completion of Project Engagement Activities

Submitted to: Greater Napanee Staff
Subject: Municipal Support Resolution (MSR) – CF Napanee Capacity Project
Proponent: CF Napanee Storage Ltd. – wholly owned by CarbonFree
Date: December 2, 2025

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1. Purpose of This Submission

The purpose of this Executive Summary is to confirm that CarbonFree has completed Greater Napanee's Municipal Support Resolution (MSR) process for proposed energy projects and to provide an update on key project refinements made in response to community feedback.

This submission accompanies our formal request for an MSR for the CF Napanee Capacity Project, a proposed Battery Energy Storage System (BESS) in Greater Napanee. Included with this summary are supporting materials arising from our pre-development activities, including environmental studies, grid-connection analysis, site design work, and confirmation of compliance with IESO LT2c procurement requirements.

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2. Project Changes to the Original Design

Extensive community engagement during the preliminary design phase has resulted in several significant improvements to the project, made directly in response to concerns raised by nearby residents. Key changes include:

- **Relocated Project Driveway and Access Road**

The original design proposed the use of an existing laneway on the west side of the property, which is currently used to access neighbouring parcels and is located near a residence and an active horse stable/riding facility.
The access plan has been **revised** to establish a new entrance directly from River Road, with an access road along the **east** side of the property—away from residences and the horse stable. This relocation increases the setback between project-related vehicle movement and the stable to **over 200 metres**.

- **Enhanced Visual and Noise Buffering**

The updated design includes a vegetated earthen berm along the northern and western boundaries to provide visual screening and additional sound attenuation.
Approximately **20 acres of existing woodland** sit between the project area and the northern boundary. Except for a small section accommodating the relocated access road, this woodland will remain undisturbed.

- **Designation of Public-Use Lands**

The northern half of the property—approximately **25 acres**—will not be used for the BESS facility. CarbonFree will designate these lands for public recreational use through agreement with the Municipality and local community.
Should the project receive an IESO contract in 2026, this land commitment will be included as part of the Community Benefits Agreement (CBA). Possible uses, subject to community input, include walking/biking/riding trails, nature paths, running loops, or an off-leash dog park.

- **Neighbour Compensation Program**

Consistent with common practice for energy infrastructure developments, CarbonFree will offer **annual compensation** to directly adjacent landowners for the life of the project. This program will form part of the proposed Community Benefits Agreement.

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3. Summary of the Proposed Project

CarbonFree has been evaluating lands in the Napanee area since spring 2025 through environmental, planning, transmission, and site-design studies. Although the lands were assessed for potential solar development, we are now presenting the project exclusively as a Battery Energy Storage System for the purpose of this MSR request.

Key project details include:

- **250 MW** Battery Energy Storage System (BESS)
- Access from River Road at the southeastern end of the property
- Direct adjacency to the Hydro One transmission corridor
- CarbonFree holds an option to purchase the lands and intends to be a long-term owner and ratepayer within Greater Napanee

The project is being advanced in alignment with:

- IESO Long-Term 2 (LT2) capacity procurement requirements
- Municipal expectations regarding safety, land-use compatibility, and community benefit
- The Township's MSR Evaluation Framework and associated guidelines

The project is also being developed in partnership with **Mohawks of the Bay of Quinte** and **Capstone Infrastructure**, a Canadian independent power producer with extensive operating experience in wind, solar, hydro, biomass, and battery storage projects. A long-term Community Benefit Agreement (CBA) is proposed to provide stable annual funding to the Township over the 20-year IESO contract term.

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4. Compliance With Greater Napanee's MSR Process

Greater Napanee requires proponents to complete a structured, multi-stage engagement process prior to requesting municipal support. CarbonFree has completed all required steps, summarized below:

3.1 Pre-Consultation With Municipal Staff

- Submitted the IESO-standard Pre-Engagement Notice in October 2025 and initiated consultations during the week of October 19.
- Submitted a Concept Plan to the Planning Department and retained Fotenn Planning Consultants for preliminary planning analysis.
- Staff feedback was received regarding siting, technical review requirements, and engagement expectations.
- In response to community feedback, the access road location was revised; updated plans were shared with residents for whom contact information was available.
- All questions and materials requested by staff have been addressed in this submission.

3.2 Outreach to Council and Senior Staff

- An introductory in-person briefing was provided to Council at their meeting on **November 10, 2025**.
- A comprehensive project overview package was supplied to staff and Council.

3.3 Public Notification and Engagement

- **Public Notice:** Hand-delivered to properties within 1 km during the week of November 10.
- **Project Signage:** Installed at the River Road entrance on November 17.
- **Public Open House:** Held November 26, 2025 at the Best & Bash Arena, consistent with staff recommendations.
  Display boards, summary documents, and technical specialists were onsite to address questions.
- **Door-Knock Campaign:** Conducted within 1 km of the site. Engagement details are documented in the attached report.
- **Project Website** (https://cfNapaneestorage.com/) and project email established for ongoing communication, with responses provided promptly.
- All public feedback to date has been documented and incorporated into the project design where feasible.

3.4 Indigenous Consultation & Partnership – Mohawks of the Bay of Quinte (MBQ)

- Initial engagement began in April 2025.
- Ongoing collaboration includes commitments to training, capacity support, environmental review, archaeological participation, and long-term equity involvement.
- MBQ formally joined the project as a **50.1% majority equity partner** during the week of November 24, 2025.

3.5 Technical Review Preparedness

The following studies have been initiated or completed consistent with staff expectations and IESO requirements:

1. Preliminary Environmental Study by Hatch (field and desktop analyses)
2. Preliminary Planning Assessment by Fotenn
3. Grid-connection analysis based on IESO technical guidance

5. Community Benefits and Long-Term Municipal Advantages

CarbonFree is prepared to enter into a Community Benefit Agreement (CBA) aligned with precedents established through LT1 and LT2 procurements. The CBA is intended to deliver:

- **Annual financial contributions** to the Township for the life of the project
- Approximately **25 acres** of designated public recreational lands
- Local contracting and employment opportunities
- Collaboration with the Township on emergency-response planning and training

The proposed CBA value is **$2,000 per MW per year**, subject to the final contracted project size with the IESO. The CBA will be finalized following any contract award.

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6. Conclusion and Request

CarbonFree confirms that **all required engagement steps** under the Greater Napanee MSR process have been completed.

We have invested significantly in feasibility analysis, community engagement, environmental review, and early-stage design to ensure the project aligns with municipal, community, and system needs.

We respectfully request that municipal staff bring forward our request for a Municipal Support Resolution to Council for consideration in accordance with Township procedures and timelines. CarbonFree remains available to participate in any further discussions with staff, Council, and the community.

Who is CarbonFree?

Ontario Renewables Pioneer

Founded in Ontario in 2006, CarbonFree is Canadian, privately owned, with 20 years of success developing and financing renewable energy infrastructure across the province.

Unique Project Sourcing Strategy

CarbonFree has a team dedicated to identifying and securing suitable land and partners driven by a deep understanding of the energy market and the regulatory environment

History of Developing Projects with FN Partners

CarbonFree has developed and financed 400MW+ of renewable energy projects with Indigenous partners in Ontario

Operational Success

CarbonFree has a long history of operating renewable energy infrastructure safely and sustainably by partnering with local suppliers, contractors, and communities.




Ontario's Significant Power Needs

Ontario's Independent Electricity System Operator (IESO), has identified the need for new energy and capacity supply in Ontario.

What is causing this Growth?

- Increased Economic Activity
- Population Growth
- Electrification of Transport
- Retirement of Energy Generation Facilities

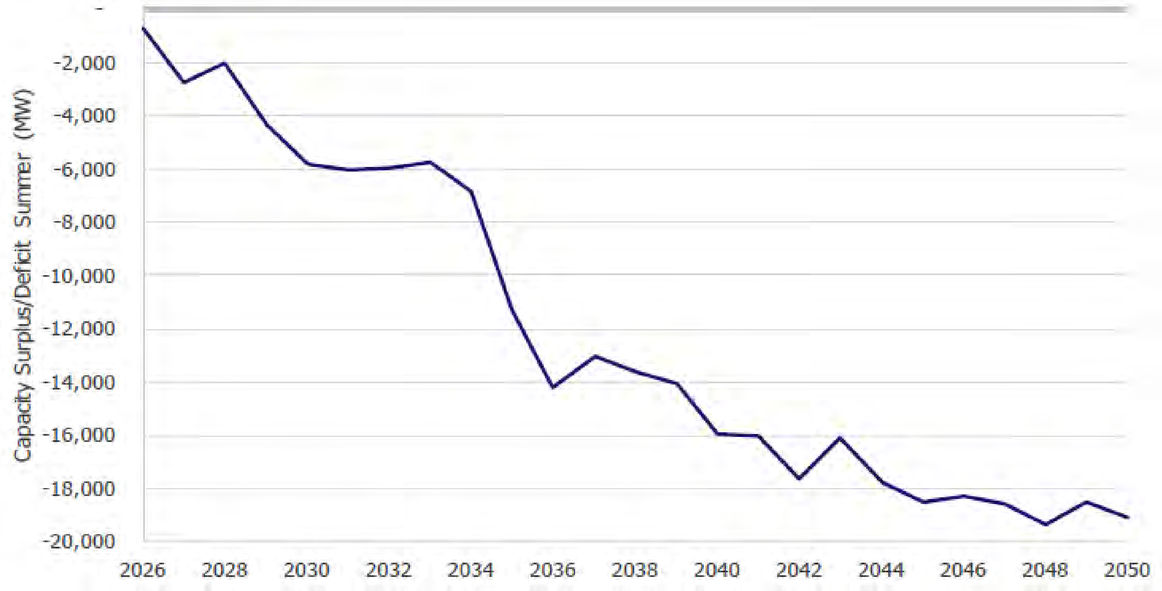
Long-Term 2 Capacity (LT2c)

To close this supply gap, IESO is running competitive procurements. The contracts have a 20-year term. This is a competitive RFP process with the singular goal of reducing ratepayer costs

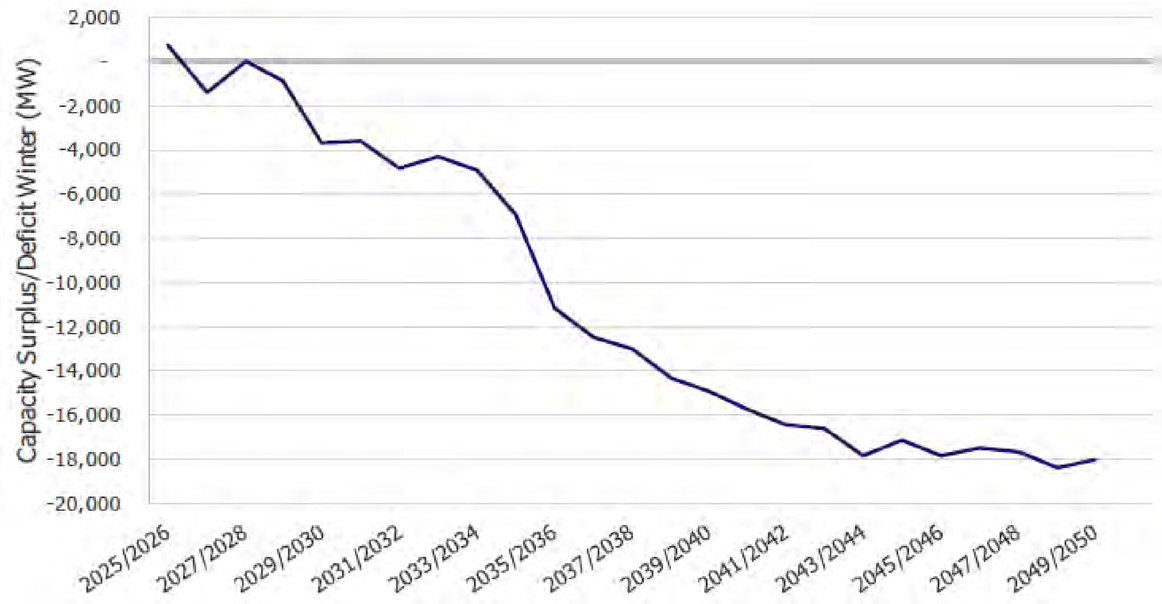
The proposed project will take part in this IESO LT2c RPF process. The proposed project is intended to improve the electrical transmission system in Ontario, addressing weak points in electrical capacity, efficiency and reliability.

By charging during the times of reduced demand and discharging during times of peak demand Batteries offer increased grid efficiency and reduced costs.

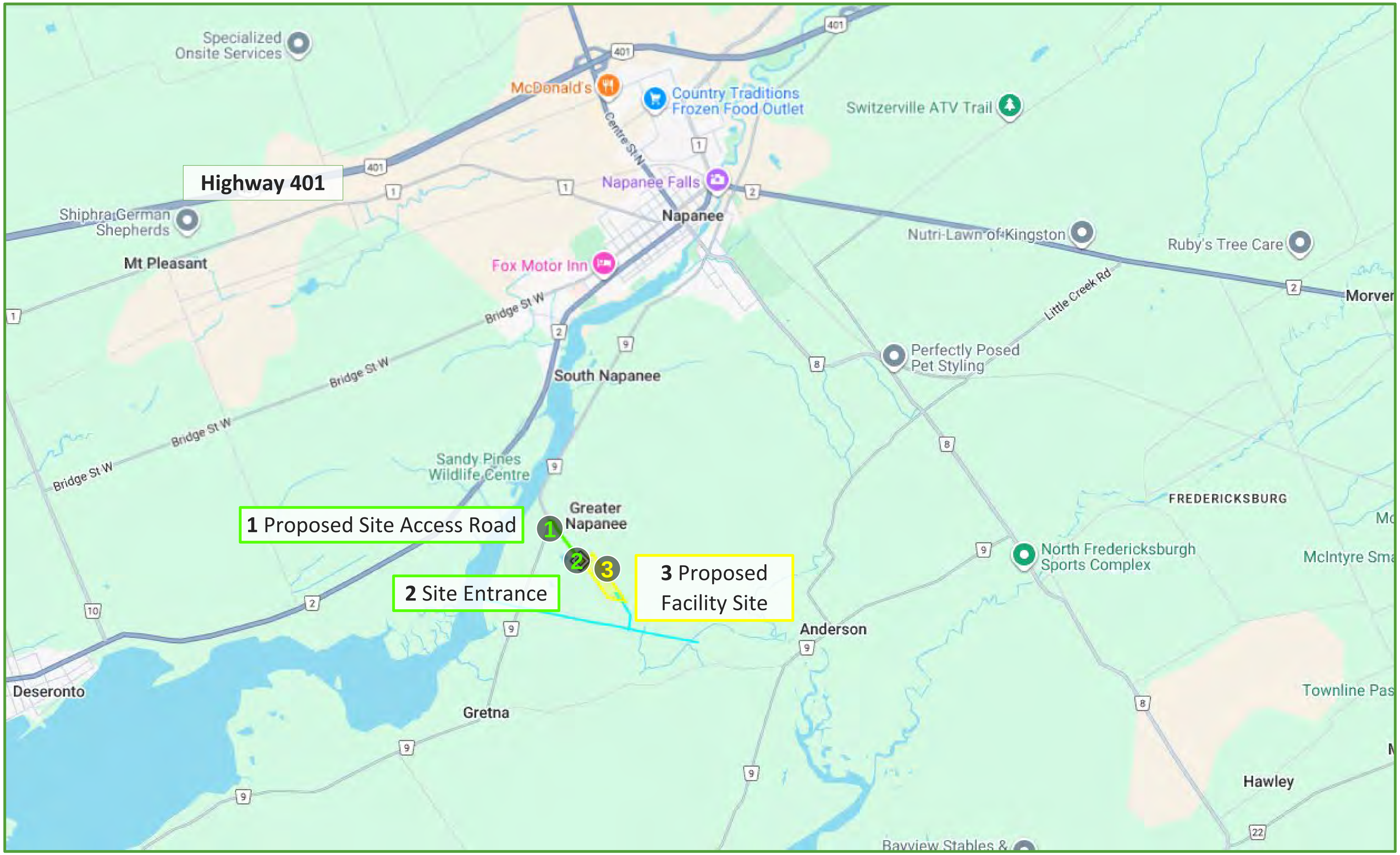
Summer Capacity Surplus/Deficit



Winter Capacity Surplus/Deficit



Napanee BESS Project Location



Napanee BESS Project Description

The proposed project would be in Ward 2 of Greater Napanee on the former Engine Renewals lands in the traditional territory of the Mohawks of Bay of Quinte (MBQ). The project would advance to permitting if a contract is awarded by the IESO in 2026.

Project Site:

- The project site is on the southern end of the property, set back 500m from **County Road (River Rd) 9.**

- These **rural zoned** lands were previously used for light commercial/industrial purposes**.** The facility would occupy approximately **15-25 acres** depending on the IESO contract capacity.

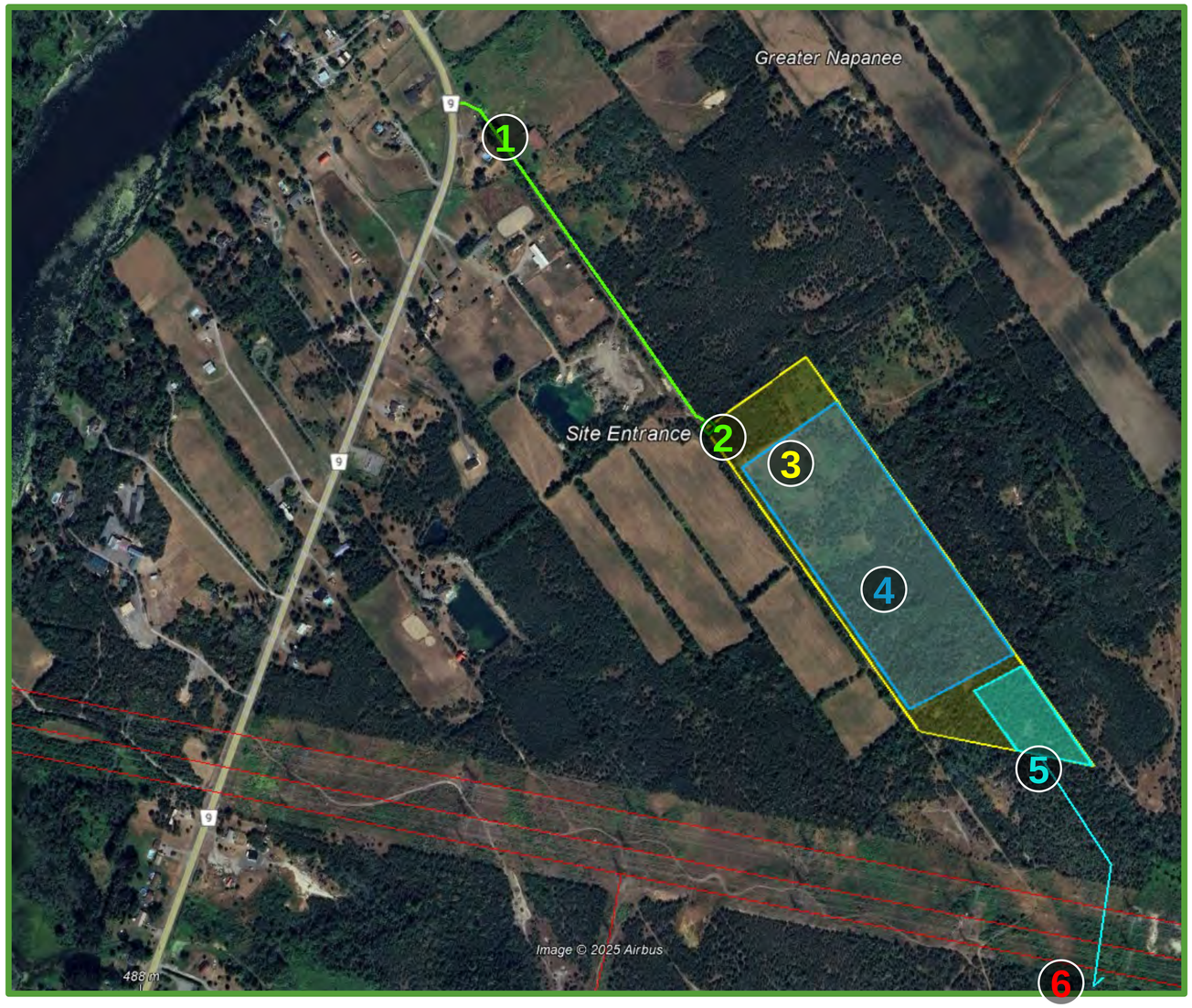
- The site was selected due to its proximity to the transmission line corridor and the Napanee Transmission Station.

The Battery Energy Storage System (BESS) Facility:

- CarbonFree Napanee BESS will store and inject up to **250 MW** of power for up to eight hours.

- The storage system would use **Lithium Iron Phosphate (LFP)** batteries which have lower density and have proved to be safer than NMC batteries common in the last decade.

- A substation at the southern end of the facility will step up the medium voltage from the facility to the 230 kV voltage of the neighbouring transmission lines.



Map of proposed preliminary location for the proposed CarbonFree Napanee BESS Facility. Map Key: **1** Proposed Site Access Road, **2** Site Entrance, **3** Proposed Facility Site, **4** Battery Field, **5** Substation, **6** Existing Transmission Corridor

Benefits to the Local Community

The project would be a **critical infrastructure asset** that will help meet Ontario's growing power demands, provide additional **revenue** to local community, provide property tax revenue to Greater Napanee, and will serve a vital role in the process of **Reconciliation** with local First Nations.

First Nation Partnership

The **Mohawks of Bay of Quinte (MBQ) are a 50% ownership partner** in the project ensuring that significant project revenues remain local to the region and adding a significant step towards the federal commitment to Reconciliation

Municipal Revenue

A **Community Benefit Agreement,** in addition to property taxation, will provide up to **$10 million** over the life of the project ($2,000/MW/Yr)

Economic Growth

The Project will drive **local economic growth** through **job creation and increased investment,** driving revenues for surrounding businesses and trades

Meeting Ontario's Energy Needs

The project will **strengthen and diversity Ontario's energy grid** by managing peak loads and maximizing efficiency of other generation sources to avoid risks such as power outages and rolling blackouts.

Regional Energy Centre

The township of Greater Napanee is emerging as a major energy centre and the addition of battery storage projects solidifies this growing position.

Project Stages & Timeline

Public & Municipal Consultation	2025 Q3-Q4	2025
IESO LT2c Proposal Submission*	December 18, 2025	
IESO LT2 Project Award*	June 16, 2026	
Public Consultation	Follow up public meeting(s) to keep stakeholders informed	2026-2027
Pre-Construction (Target: 2026-2027)	Site Investigations Environmental and Construction Approvals	
Construction (Target: 2028-2029)	Project procurement and construction Testing & Commissioning	2028-2029
Operations (Target: 2029-2049)	24/7 monitoring Regular site maintenance Repowering / upgrading equipment as required Community Benefit Agreement	2029-2050
Decommissioning & Closure (Target: 2049-2050)	Dismantling equipment Recycling and disposing of replaced materials off-site Site rehabilitation	

* These dates are set by the IESO LT2 process

Community Consultation & Input

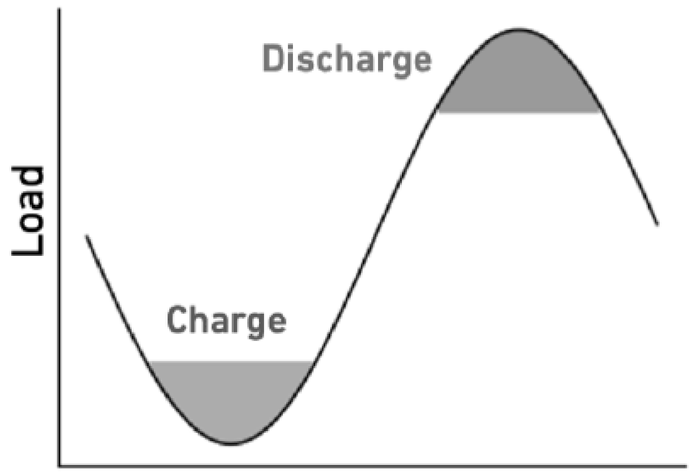
Public input is an essential part of the process. We are committed to engaging landowners, public stakeholders, members of the local community and First Nations whose traditional lands incorporate the proposed lands.

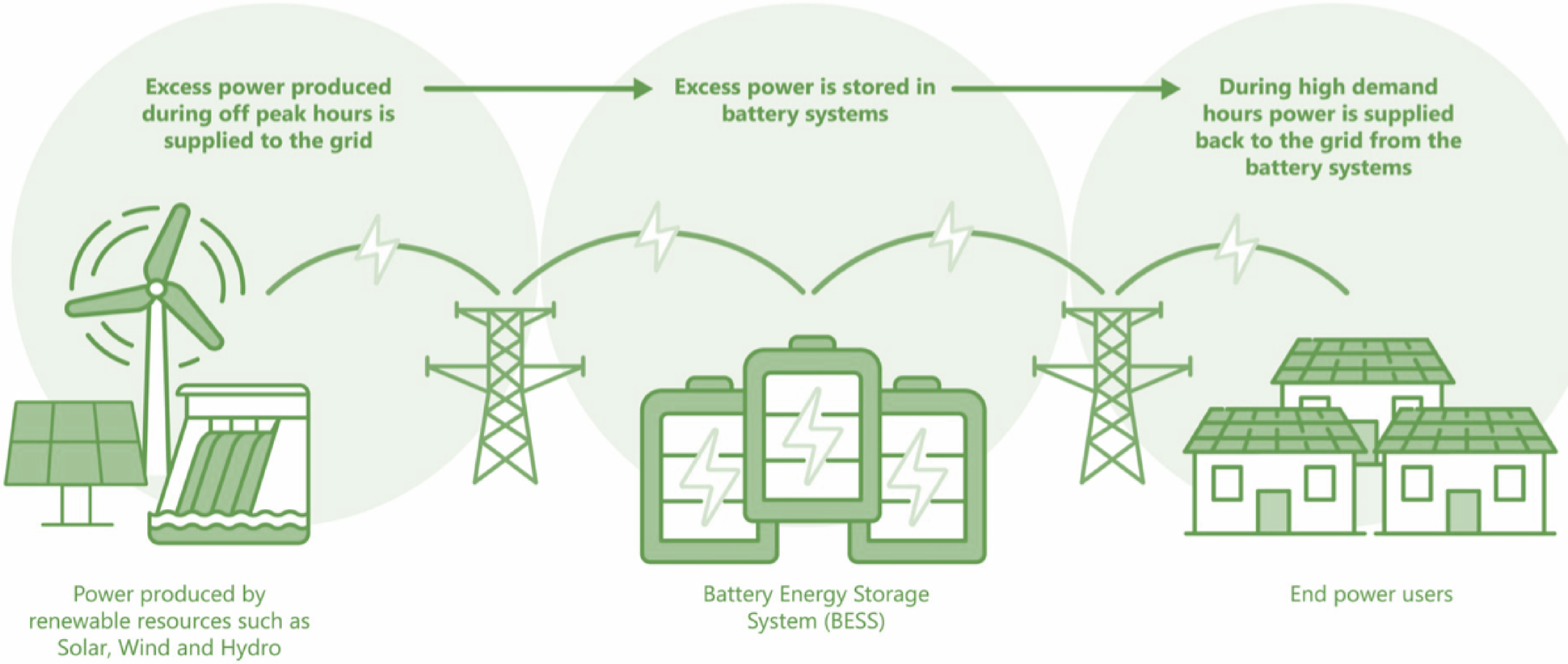
Our Commitment	
Project information Notices	Delivered to homes within 1km radius from the proposed Project Site
Door to Door	Neighbourhood canvassing conducted prior to public meetings, A report with community feedback will be submitted to the municipal staff and Council.
Public Meetings	Tonight's meeting is the first of several to be conducted during the pre-development phase of the project. Subsequent meetings will be scheduled if the project is awarded a contract.
Municipal Engagement	• Council delegation Nov. 10, 2025 with introduction of proposed project • Public feedback report to follow first public meeting • Follow-up with Staff & Council - Dec. 9, 2025
Project Website **Email**	Project Website with ongoing updates: **www.cfnapaneestorage.com** Direct messaging is available on the project website Project Email: cfnapaneestorage@carbonfree.com
Stay Informed	We will remain attentive to any questions or concerns that may arise from the local community at any stage of the project's development. All inquiries will be responded to in a timely manner, and we will ensure that clear and helpful information is always available.

Battery Energy Storage System (BESS)

Battery energy storage projects are critical infrastructure assets that provide flexibility and stability to the electrical grid during peak demand periods, avoiding events such as rolling blackouts. Battery energy storage system (BESS) have been procured by the Independent Electricity System Operator (IESO) since 2014.

- The BESS is charged overnight during low demand period.
- Electricity is injected back onto the grid during peak energy demand hours offsetting the need for emissions-intensive generation (natural gas)





BESS Technology

What is a BESS?

- A Battery Energy Storage System (BESS) is an electrochemical system that utilizes batteries to charge (collect energy) from the power grid, store, and discharge that energy when called upon do so by the grid operator.

- BESS consists of rows of modular, outdoor-rated enclosures roughly the size of shipping containers. These enclosures house lithium-ion batteries, similar to those found in everyday items such as laptops, tablets, cellphones, electronic toothbrushes, and other household power tools.

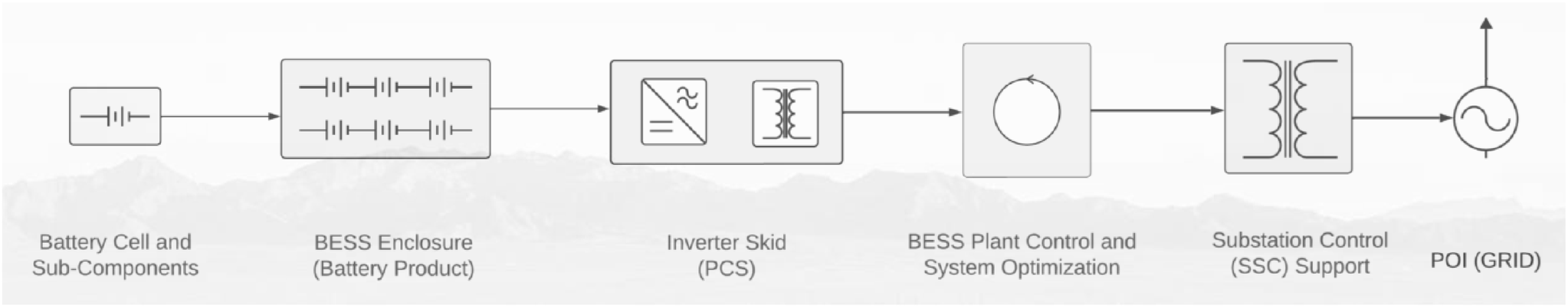
- For the proposed project, the batteries will use lithium iron phosphate (LFP) technology, which has a lower energy density and is therefore less likely to overheat.

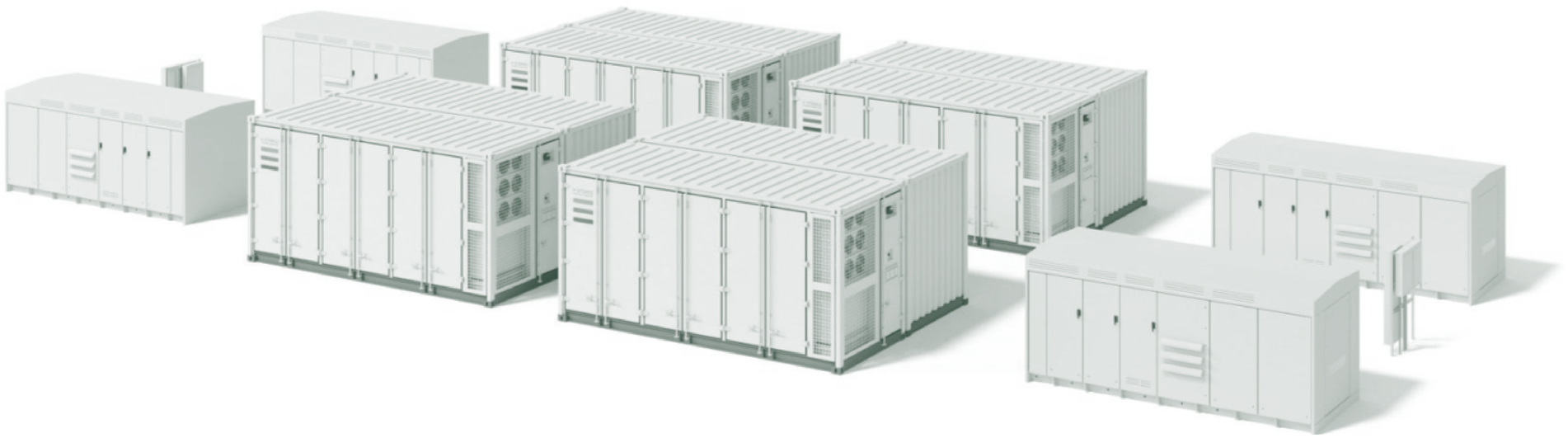
An example of a BESS unit that may be used in the facility.

BESS Technology

What other components are used in a BESS facility?

In addition to the Battery Energy Storage System (BESS) enclosures that contain the battery cells that store energy, the facility will also include inverters, medium voltage transformers, monitoring/control enclosures, and a high-voltage substation. The facility may also include space for storage, a small operations room, back-up power, and networking equipment.





An example layout of BESS units, inverters, and transformers that may be used in the facility.

Commitment to Safety

Stationary Battery Energy Storage Systems are subject to several local and modern safety standards that work to identify and mitigate the risks of thermal events and other environmental risks.

The proposed project will be a state-of-the art development equipped with safeguards to protect against operational risks, and designed to meet or exceed internationally accredited codes and standards. Compliance will be certified and assessed by independent and qualified third parties.

Multiple regulatory bodies oversee the development of BESS projects. The project design and operations will be subject to regulatory review and oversight, and we will be actively engaging with regulators to ensure we are satisfying regulatory requirements.

Codes and Standards

- National Building Code
- National Fire Code Canada
- NECB 2017 National Energy Code of Canada for Buildings
- ULC -Underwriters Laboratories of Canada
- UL 1741 Standard for Inverters, Converters, Controllers, and Interconnections
- UL 1973 Standard for Batteries for Use in Stationary, Vehicle Auxiliary Power and Light Electric Rail (LER)
- UL 9540 Standard for Energy Storage Systems and Equipment
- UL 9540A Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems
- NFPA855 Standard for the Installation of Stationary Energy Storage Systems

Authorities Having Jurisdiction

- Local Municipality
- Ontario Ministry of Energy
- Independent Electricity System Operator
- Ontario Ministry of Environment, Conservation and Parks
- Electrical Safety Authority

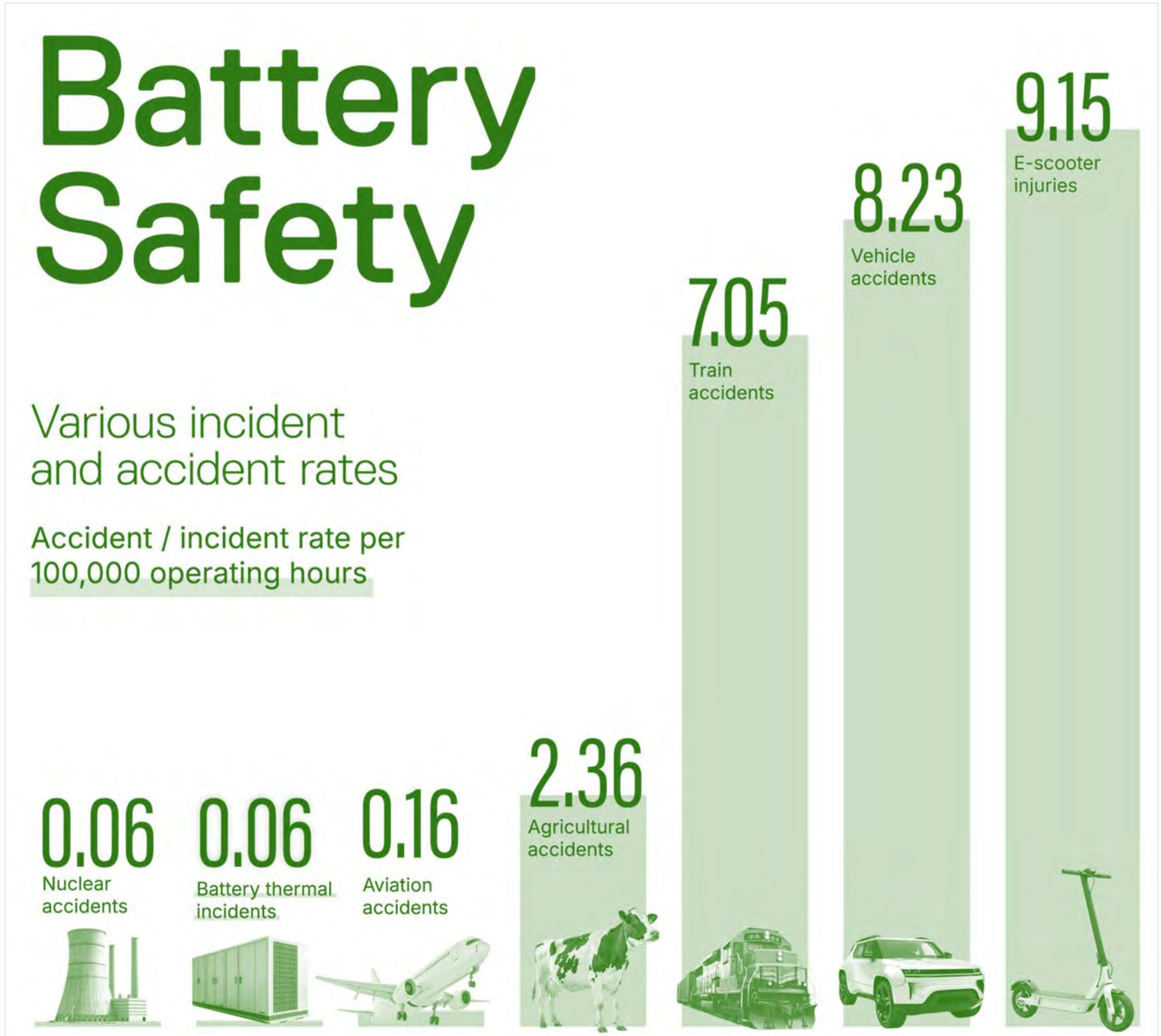
Battery Safety

Safer Technology

- Battery chemistries are shifting to types that are much less prone to thermal runaway. Older generation systems have typically been nickel-magnesium-cobalt (NMC) chemistries, but more modern systems like ours are increasingly using much safer lithium-iron-phosphate (LFP) batteries.

- Management systems are improving every year and can better detect overheating, overcharging and short circuits, and even predict when a failure may happen.

- Modular designs of batteries, often inside shipping containers, prevent fires from spreading by isolating the event to a single container, or even a single unit within a container.



Source: Federal Railroad Administration, National Transportation Safety Board, National Association of City Transportation Officials, BESS Failure Incident Database

FIRE PREVENTION AND MITIGATION

PREVENTION

EQUIPMENT SELECTION

- **Field Tested Equipment with a long safety track** record. Working with two of the best BESS suppliers in the world with tens of operating facilities and thousands of BESS units deployed.
- **Safer Lithium Iron Phosphate (LFP) type battery cells** which have a substantially lower risk of thermal runaway events compared to older generation Nickel Manganese Cobalt (NMC) type cells.
- Integrated **extensive safety and fire prevention systems** with redundancy and back-up.

SITE DESIGN

- Site design will be informed by **Hydro One's BESS Fire Protection Risk & Response Assessment Standard** requirements. Prepared by the Fire & Risk Alliance.
- **Codes and Standards**
  National Fire Code of Canada,
  Ontario Fire Code,
  NFPA 855 Standard for the Installation of Energy Storage Systems,
  UL 9540: Standard for Energy Storage Systems and Equipment,
  UL 1973: Standard for Batteries,
  UL 9540A: Standard for Test Method for Evaluating Thermal Runaway Fire Propagation

CONTINUOUS MONITORING

- The Facility including every individual BESS unit will be continuously **monitored by experts 24/7** to ensure that any potential issues are identified and addressed from an early stage before a failure occurs.
- Systems can be controlled, isolated, and shutdown remotely.
- Redundant internet connectivity and back-up power to maintain remote control in case of a failure.

MITIGATION

FIRE SUPPRESION

- Equipment designed to **prevent unit-to-unit fire propagation.**
- **Fire Alarm System.** Provides both prevention and mitigation functions by shutting down the batteries in the event of an alarm.
- **Venting System.** Maintains combustible gasses within 25% of lower flammable limit in case of a thermal run-away event.
- **Deflagration Panels.** Redundant safety system designed to vent out the gases generated during deflagration event.

INCIDENT RESPONSE PLANNING

- **Fire Department/First Responder Training and Site Familiarization Drills:** Industry best practices based on Emergency Response Plan and Full-Scale Fire Test experience**.**
- Subject Matter Expert availability to provide support to Incident Commander in case of an event.
- **Emergency Response Planning.** The facility does not go into operation without having a site-specific emergency response and evacuation plan.

CONTINUOUS MONITORING

The Facility including every individual BESS unit will be continuously monitored by experts 24/7 to ensure that any potential technical issues or security issues are identified and addressed from an early stage before a failure occurs.

- An Energy Management System (EMS) will monitor status of all BESS equipment and report any fault detected to the operator immediately. It will proactively analyze operating data to optimize system health and identify potential issues from early stage
- A Battery Management System (BMS) will monitor and track critical parameters of each individual battery, and report operating limits, alarms, rapid fault isolation on rack and enclosure level

An example of fire safety systems in a typical BESS unit that may be used in the facility.

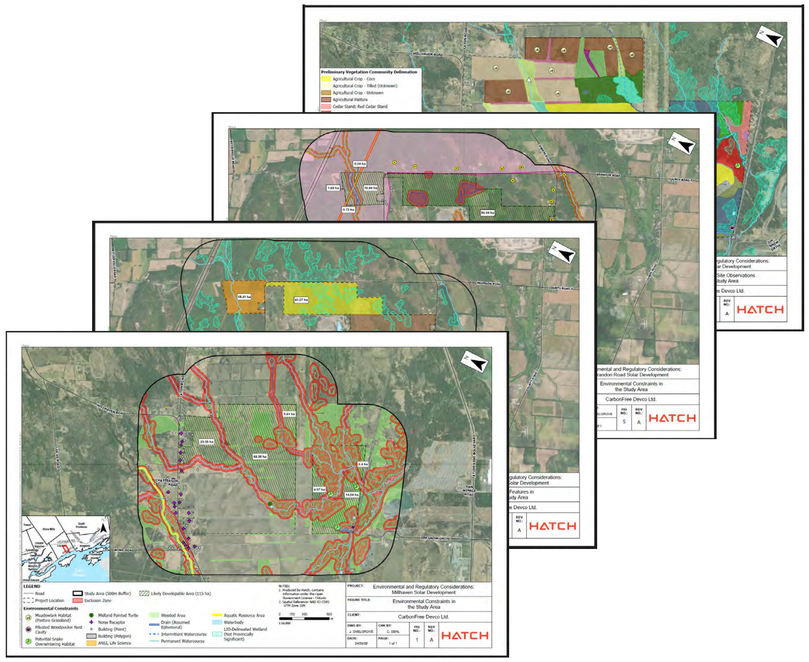
Environmental Approval

CarbonFree is working **with Hatch** to conduct environmental assessments for the project site. Hatch is an Ontario based, employee-owned, engineering services firm.

Battery projects are classified as **electrical transmission infrastructure.** and are subject to the Ministry of the Environment, Conservation and Parks Class Environmental Assessment for Minor Transmission Facilities ("**Class EA**").

The Class EA is an environmental assessment process under the Ontario Environmental Assessment Act for projects that have predictable and manageable environmental effects.

The Class EA assesses a range of environmental factors and should there be an unexpected result, further studies are undertaken and mitigation measures are implemented.



Key Features of a Class Environmental Assessment

- Pre-approved process under the Ontario Environmental Assessment Act
- Requires proponents to follow a **phased planning process**, including:
  - Assessing potential environmental impacts
  - Identifying and evaluating alternatives
  - Consulting with the public, Indigenous communities, and agencies
  - Documenting findings in an Environmental Study Report (ESR) or similar document
  - Includes mechanisms for resolving concerns.

Noise - Construction and Operation

- A detailed **noise impact assessment** will be completed as part of the **necessary environmental permitting prior to construction**. As a part of the study, ambient noise levels will be measured, noise receptors (including homes) will be mapped, and any other factors that may impact the propagation of noise will be accounted for.
- Installation of berms, noise barriers, vegetation or other **mitigation measures** may be incorporated based on the noise study results and **permitting requirements.**
- The proposed location of the facility is significantly **set back from the road and neighboring residences**. This substantially reduces the resulting noise levels at the road.
- If the project proceeds, construction activities would take place only during **permissible hours.**
- The main source of noise during operation is the **air conditioning /HVAC** systems on the battery containers. An individual BESS unit can produce up to 75 decibels at 1 meter distance when running at full load - similar to the noise level of a vacuum cleaner. At 500 meters, the sound level would be expected to **drop below the typical nighttime background noise** in a rural setting, before accounting for baffling from the surrounding environment or mitigation measure required by the noise study.

Artistic rendition of a typical rural battery project

Limited Local Disruption and Impacts

- **Visual Impact.** We recognize the importance of the local landscape. The project is designed with a low-profile layout where the most equipment is only 3 meters tall. The strategic use of existing vegetation, and new perimeter screening with native trees and shrubs will blend the facility into the surroundings as much as possible.

- **Limited Lighting.** Site lighting will be strictly for safety and security, designed to minimize "light pollution" and intrusion on neighboring properties. We will use fully shielded, downward-facing fixtures that focus light only where needed (e.g. entrance gates) and employ motion-sensing technology to keep lighting at low levels.

- **Limited Traffic**. Once the facility is operating, traffic will be very limited since it is operated remotely and does not require regular deliveries or shipments. Significant traffic will be limited to the main construction phase, and scheduled maintenance a few times a year over the project's year lifespan. A Traffic Management Plan will be implemented to manage construction vehicle routes and schedules, minimizing impacts on local roads.

- **Physical Security.** The safety and security of the community and the facility are a top priority. The site will be surrounded by a robust, non-climbable perimeter fence with controlled access. Security will include features like intrusion detection systems, cameras, and regular 24/7 remote monitoring to ensure the site remains secure at all times.

- **Air Quality.** Emissions during construction are primarily dust and vehicle exhaust, which will be localized, temporary, and will have minimal impact. A dust management plan will be in effect during construction to limit dust emissions.

- **Zero Emissions During Operation.** Unlike fossil fuel power plants, manufacturing plants, or warehouses, our facility has zero emissions during operation. It does not burn any fuel.

Artistic rendition of a typical rural battery project

Water Resources

- **No Groundwater Extraction.**
  Battery facilities do not use groundwater during construction or operation, or at any other time. If water is required during construction, it will **NOT** be pumped from wells, aquifers, or water bodies.

- **No Water Use During Operation.**
  Unlike data centers or manufacturing plants, battery facilities **do not consume water** during operation. During construction water use would be limited to site preparation (e.g. dust control) and concrete. Any water required would be brought in on tanker trucks.

- **Drainage and Stormwater Management Plans.**
  A Stormwater Management Plan will be designed to control the quantity, rate, and quality of any runoff from the site. This will include features such as sedimentation and erosion controls during construction and permanent features as required like vegetated swales or retention basins to manage post-construction flow.

- **Containment For Working Fluids.**
  Liquids are limited to the air conditioning units and the transformers and would be designed with containment trays that can capture more than the total volume of the liquid in case of a leak. The liquids are cooling fluid (e.g. a water-glycol mixture, like antifreeze) and transformer insulating oil common to electrical installations. Where possible, we try to use biodegradable natural oil in our transformers.

- **Compliance with Ontario Regulations and Permitting.**
  Necessary permits would be obtained from several levels of government, including the municipality, the Ministry of the Environment, Conservation and Parks (MECP), and the local conservation authority. The project's water and stormwater management plans will be designed to comply with the applicable provincial regulations, including the Environmental Protection Act and the Ontario Water Resources Act.

- **Minimal Impact on Permeability.**
  The project design will aim to maintain natural ground permeability. Strategies include the use of existing access roads, using gravel in low-traffic areas, and maximizing the use of vegetated, permeable surfaces to maintain similar rates of natural groundwater drainage and recharge.

Capstone At A Glance

PROFILE

A publicly-traded developer and long-term owner-operator of renewable and thermal power projects, including wind, solar, run-of-river hydro, biomass, & natural gas cogeneration.

Based in Ontario

- Capstone has been a major player in the Ontario renewable energy market since 2005 when our 99 MW Erie Shores Wind Farm began commercial operation
- Our business is built on the strong foundation created through the success of our 20 power facilities operating in the province
- Our people work and live in the communities where we operate, and we actively support community-level initiatives

Capstone in Ontario by the numbers

450+MW

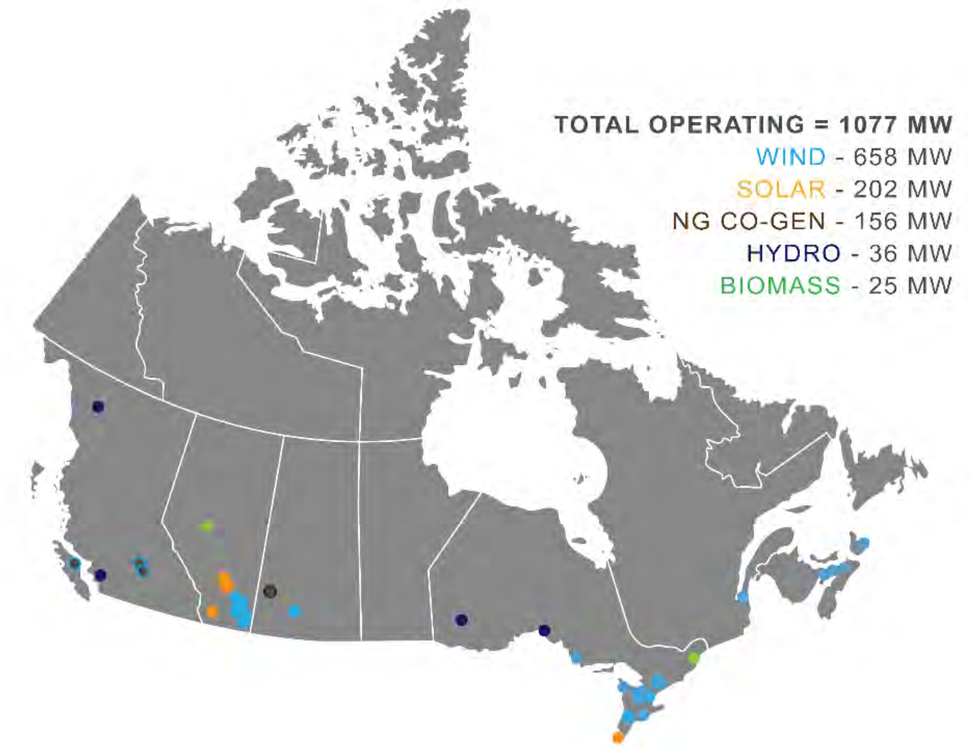
Gross installed capacity, more than 50% of our Canada-wide footprint

950 GWh+

Clean electricity generated in Ontario every year. This is enough to power 90k+ households annually

120 FT Staff

With our Head Office in Toronto and 20 of 36 facilities, Ontario is home 2/3 of our employees



KEY STATS

1,077 MW

Gross installed capacity across Canada

~5 GW

Current development project pipeline in Canada & US

36 Facilities

Proven track record of Operational and HSE Excellence

October 30, 2025

Notification of Registration for LT2(c-1) RFP

Proponent Legal Name: CF Millhaven Capacity Ltd.

Unique Project ID: LT2c1-3161

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Powering Tomorrow.

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www.ieso.ca

This notice was delivered electronically to the email addresses noted above.

Hello,

All capitalized terms used in this notice, unless otherwise stated, have the meanings ascribed to them in the LT2(c-1) RFP. This notice is delivered per Section 3.4(d) of the LT2(c-1) RFP.

Congratulations, you have successfully registered the identified Long-Term Capacity Services Project for the purposes of this LT2(c-1) RFP listed below. Successful registration does not confirm that the Long-Term Capacity Services Project satisfies the eligibility requirements specified in Section 2.1 of the LT2(c-1) RFP, and the Proponent is responsible for ensuring that the Proponent and its Proposal, if any, comply with the requirements of the LT2(c-1) RFP. Please find your Unique Project ID below for your prospective Proposal submission under the LT2(c-1) RFP. Prospective Proponents are reminded that the Proposal Submission Deadline for the LT2(c-1) RFP is December 18, 2025 at 3:00 PM EPT and that the communications rules under Section 3.5 of the LT2(c-1) RFP are currently applicable.

LT2(c-1) RFP Registration

Proponent Name	CF Millhaven Capacity Ltd.
Project Name	CF Millhaven Storage
Unique Project ID	LT2c1-3161

Thank you,
Long-Term RFP Procurement Team
Independent Electricity System Operator (IESO)
Web Page: Long-Term 2 RFP

EXHIBIT A
FORM OF MUNICIPAL RESOLUTION IN SUPPORT OF PROPOSAL SUBMISSION

Resolution NO: _____Date: _____

[Note: The Municipal Resolution in Support of Proposal Submission must not be dated earlier than seven (7) months prior to the RFP Effective Date.]

WHEREAS:

1. The Proponent is proposing to construct and operate a Long-Term Capacity Services Project located on Municipal Project Lands, as defined and with the characteristics outlined in the table below, under the Long-Term 2 Capacity Services (Window 1) Request for Proposals ("LT2(c-1) RFP") issued by the Independent Electricity System Operator ("IESO").

2. Capitalized terms not defined herein have the meanings ascribed to them in the LT2(c-1) RFP.

3. The Proponent has delivered, no later than sixty (60) days prior to the Proposal Submission Deadline, a Pre-Engagement Confirmation Notice to an applicable Local Body Administrator in respect of the Municipal Project Lands that includes the details outlined in the table below, except for the Unique Project ID which should only be required as part of the Pre-Engagement Confirmation Notice if available.

Unique Project ID of the Long-Term Capacity Services Project (if available): *<input Unique Project ID>*	LT2c1-3162
Legal name of the Proponent: *<input legal name of the Proponent>*	CF Napanee Capacity Ltd.
Name of the Long-Term Capacity Services Project: *<input name of the Long-Term Capacity Services Project>*	CF Napanee Storage
Technology of the Long-Term Capacity Services Project: *<input technology of the Long-Term Capacity Services Project>*	Battery Energy Storage System (BESS)

Maximum potential Contract Capacity of the Long-Term Capacity Services Project (in MW): *<input the maximum potential Contract Capacity of the Long-Term Capacity Services Project (in MW)>*	250 MW
Property Identification Number (PIN), or if PIN is not available, municipal address or legal description of the Municipal Project Lands: *<input the applicable description>* (the "Municipal Project Lands")	45113-0468 (LT)

4. Pursuant to the LT2(c-1) RFP, if the Long-Term Capacity Services Project is proposed to be located in whole or in part on Municipal Project Lands, the Proposal must include Municipal Support Confirmation which may be in the form of a Municipal Resolution in Support of Proposal Submission;

NOW THEREFORE BE IT RESOLVED THAT:

5. The council of *<insert name of Municipality>* _____ supports the submission of a Proposal for the Long-Term Capacity Services Project located on the Municipal Project Lands.

6. This resolution's sole purpose is to satisfy the mandatory requirements of Section 4.2(c)(iii) of the LT2(c-1) RFP and may not be used for the purpose of any other form of approval in relation to the Proposal or Long-Term Capacity Services Project or for any other purpose.

7. The Proponent has undertaken, or has committed to undertake, Indigenous and community engagement activities in respect of the Long-Term Capacity Services Project to the satisfaction of the Municipality.

8. The Municipal Project Lands *<does/does not>* _____include lands designated as Prime Agricultural Areas in the *<insert name of Municipality>* _____'s Official Plan.

9. Where the Municipal Project Lands does include lands designated as Prime Agricultural Areas in the *<insert name of Municipality>* _____'s Official Plan as of the date of this resolution:
    a. The Municipal Project Lands are not designated as Specialty Crop Areas;

b. The Long-Term Capacity Services Project is not a Non-Rooftop Solar Project;
c. The Proponent has satisfied the AIA Component One Requirement to the satisfaction of the Local Municipality; and

If the Proponent is selected as a Selected Proponent under the LT2(c-1) RFP, the council of *<insert name of Municipality>* _____ will engage in good faith with the Selected Proponent to enable the Selected Proponent to complete the AIA Components Two and Three Requirement

DULY RESOLVED BY THE LOCAL MUNICIPALITY

on the ____day of _____, 20____

<Signature lines for elected representatives. At least one signature is required.>

DULY RESOLVED BY THE [ ]
on the ____ day of _____, 20____

Per: _____
Mayor

Per: _____
Clerk
(We have authority to bind the Municipality)
[Municipal Seal, if applicable]

2025

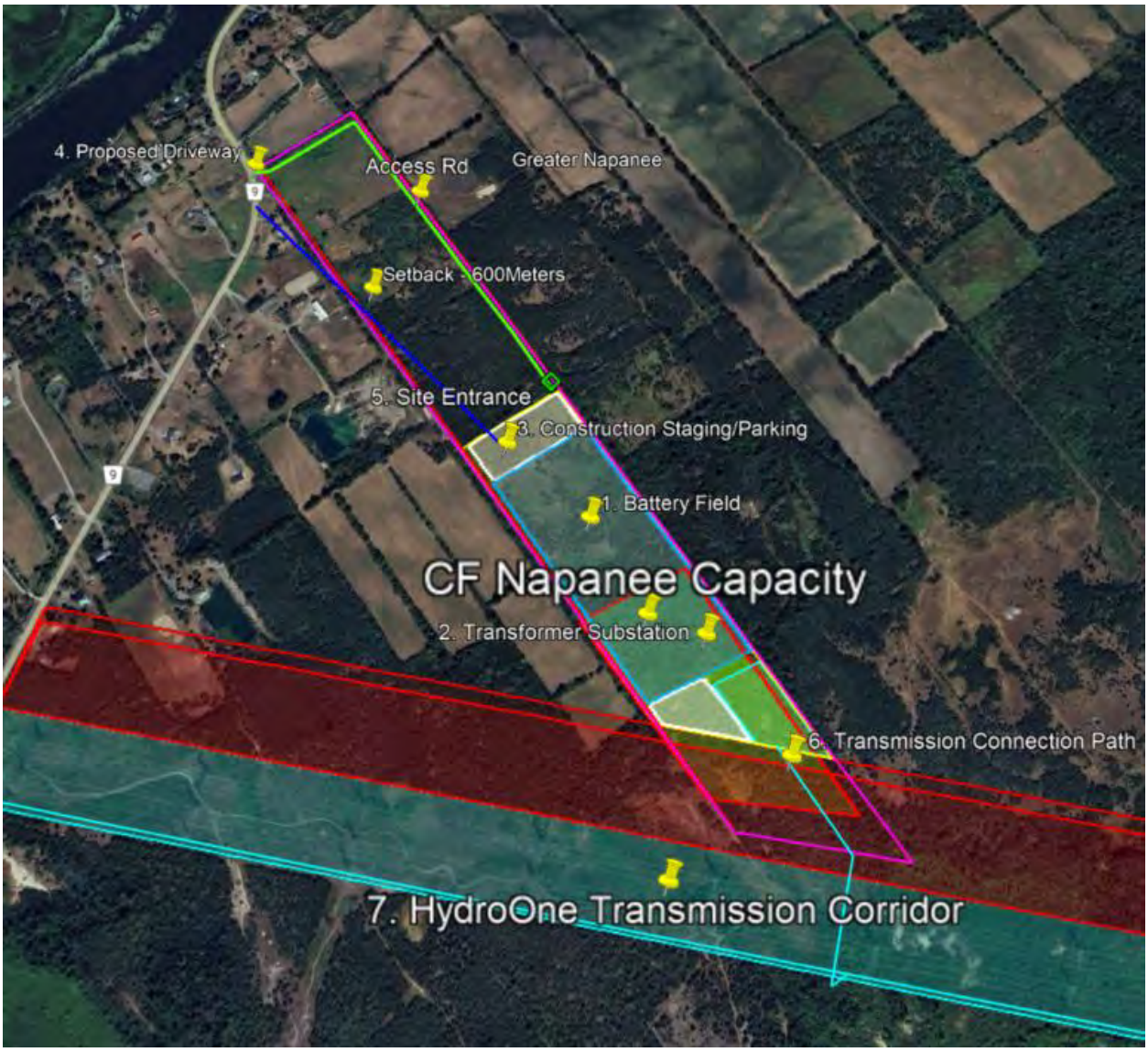
CarbonFree Napanee Battery Energy Storage System

TOWN OF GREATER NAPANEE – PROJECT CONCEPT PLAN

DOUG DEEKS

Project Location

Project Detail



Property PIN: 451130468

FIGURE 1: CARBONFREE NAPANEE 250MW BESS LOCATION
ADDRESS: 766 RIVER RD NAPANEE ON K7R3H5

Project Concept Plan and Overview

- Project purpose: To provide long-duration grid capacity, reliability services, and energy shifting to support the IESO LT2c procurement.
- Typical operation: Charge during low-demand hours (overnight-weekend / low-price) and discharge during peak demand or when instructed by IESO/market operator.
- Expected construction duration: ~12–18 months (site prep, civil, installation, commissioning 2027-2028).

Site plan Figure 2

Map key:

1. Battery Field (rows of containers housing battery units)
2. BESS Substation & step-up transformer(s)
3. Staging / laydown/parking/Operations building
4. Municipal rd entrance
5. Site entrance / interior access road
6. Route to POI / tap line to transmission corridor
7. HydroOne Transmission Line Corridor

Key Project Components

1. Battery Field — Modular containerized battery units. Arranged in rows with internal access roads and separation distances for safety and maintenance. Containers house battery racks, inverters/PCS and HVAC/controls.

2. Transformer Station (TS) — Step-up transformer(s) convert site MV to transmission voltage required at the Point of Interconnection (POI). The TS is in a fenced, secured yard with oil containment and spill prevention.

3. Switchyard & Interconnection — High-voltage equipment, relays and protection, and the tap line connection to the nearby transmission corridor or substation. This is coordinated with the utility and built to HydroOne safety and specification standards.

4. Control / Operations Building — Office, control room (SCADA/EMS), maintenance workshop, and parking. This is a small building with no full time staff

5. Fire Protection —separation corridors and access lanes sized for emergency vehicles. Project includes emergency response planning and coordination with local fire services.

6. Stormwater Management — Basins, swales and erosion control to manage runoff and protect local waterways. Designed to meet municipal stormwater and environmental requirements.

7. Access & Security — Controlled entry gate, perimeter fencing, security cameras and limited security lighting designed to minimize offsite light spill.

8. Tap Line / Route to POI — The route of the short connection line to the transmission corridor is shown.

Area allocation (approx.)

- Battery field (containers + access lanes): ~12 acres
- Transformer station & switchyard: ~1acres
- Control building & parking: ~0. 5acre
- Stormwater / environmental buffers: ~2 acres
- Landscaping, setbacks & security: ~2 acres
- Total fenced Area: ~20 acres

Safety & community protections

- The site uses engineered fire separation, monitoring systems, and onsite suppression water supply. Battery systems include thermal monitoring and automatic shutdown protocols.
- The project will develop an Emergency Response Plan with the local fire department and first responders. Training and site familiarization will be provided for emergency personnel.
- The battery field is setback >500m from nearest residential neighbours and from the nearest municipal road. Noise from inverters and transformers will be controlled via equipment selection, acoustic enclosures and landscaping buffers including vegetated berms; expected operational noise will be below regulatory limits at nearest houses and will be confirmed per permitting requirements by on-site acoustic study pre-construction and permitting.
- Visual impact minimized with landscaping, low-height equipment placement and dark-sky-compliant lighting. Vacant land within the property and between houses and the installation is wooded and provides additional visual and sound barrier.

Project Memo

H376595

November 21, 2025

To: CarbonFree Devco Ltd. From: Christopher Sehl

CarbonFree Devco Ltd.
CarbonFree BESS Developments

Battery Energy Storage System: Regulatory Review Memorandum Millhave and Napanee

1. Introduction

Hatch Ltd. (Hatch) has been retained by CarbonFree Technology Devco Ltd. (CarbonFree) to assist with an initial stage of environmental due diligence of several properties proposed to be utilized for Battery Energy Storage Systems (BESS) (hereinafter referred to as the "Project"). The Project is proposed to be located across multiple parcels of land located within The Town of Greater Napanee and Loyalist Township (hereinafter referred to as the "Napanee Project properties" and "Millhaven Project properties). Each of the Project properties consists primarily of rural zoned lands as depicted in within the Figures of Appendix A.

This memorandum provides an overview of the applicability of federal, provincial, and municipal environmental legislation for each Project, assesses the risk to both Project feasibility, identifies potential red flags to development, and recommends next steps.

2. Methodology

2.1 Desktop Review

Hatch conducted a review of publicly available information to identify site-specific environmental and regulatory constraints for both Project properties, including:

- Municipal Zoning By-law and Official Plan;
- Species at Risk records;
- Land Information Ontario (LIO) Database (Environmental Features);
- Ministry of Natural Resources and Forestry (MNR) mapping, forestry and wetland information;
- Site drainage features; and
- Indigenous lands.

2.2 Identification of 'Developable Areas'

Hatch has utilized publicly available data sources from Section 2.1 to identify "Developable Areas". Specifically, "Likely Developable Areas", which are defined as areas with no known technical fatal flaws based on the results of the desktop review and reconnaissance. In addition, Hatch has identified additional areas "Potentially Developable Areas" which are associated with areas that would likely require additional measures to comply with typical setbacks outlined in municipal Official Plan documents or the Environmental Screening Criteria associated with the Hydro One Municipal Class Environmental Assessment (2024) (Class EA). Figures 1 and 3 in Appendix A outline the Developable Areas and potential constraints associated with the Project properties.

Additional field efforts to verify potential constraints and potential impacts are recommended to further refine constraints associated with the Developable Areas.

2.3 Preliminary Environmental and Regulatory Review Findings

Following the desktop review, Hatch has prepared this memorandum, which contains the following:

- A summary of environmental and regulatory considerations, including matrix of permitting and approval requirements;
- A map of the Project properties and surrounding 300-m buffer (Study Area) and reflective of potential development constraints (Appendix A);
- A review of the Project properties as it pertains to consideration of Indigenous Lands; and
- Recommendations for next steps where environmental surveys are warranted to navigate the municipal permitting processes or the Class EA screening requirements.

3. Preliminary Environmental and Regulatory Review Findings

3.1 Permitting and Approval Requirements

The following subsection summarizes the various federal, provincial, and municipal planning policies and regulations that have the potential to apply to the Project.

3.1.1 Environmental Assessment Requirements

3.1.1.1 Impact Assessment Act

The *Impact Assessment Act* (IAA), which repealed and replaced the *Canadian Environmental Assessment Act* (2012) on August 28, 2019, dictates the process necessary for assessing impacts of major projects and projects that are carried out on federal lands. The impact Assessment Agency of Canada (IAAC, or the "Agency") is the regulatory body that is responsible for the management and coordination of Impact Assessments (IA) under the IAA. The Agency has the power to delegate any part of an IA to a provincial government or an Indigenous governing body.

Both Projects do not meet the definition of a Designated Project under the IAA (S.C. 2019) and are not located on federally owned land, accordingly, an approval under the IAA is not required.

3.1.1.2 Environmental Assessment Act

3.1.1.2.1 Transmission Facilities

The *Environmental Assessment Act* (EAA) intends to protect, conserve and provide wise management of the environment in Ontario. Whereas large complex projects are typically subject to an individual EA process, Class EAs permit group projects with known environmental effects to proceed in a streamlined manner.

Hydro One's Class Environmental Assessment for Transmission Facilities (2024) (the Class EA) applies to the following undertakings:

- Establishing a new temporary transmission line that has a nominal voltage of greater than or equal to 115 kilovolts (kV) and is greater than 2 kilometers (km) in length;
- Refurbishing an existing transmission line that has a nominal operating voltage of greater than or equal to 115 kV and is greater than 2 km in length;
- Establishing a new transmission station that has a nominal operating voltage of greater than or equal to 115 kV; and
- Expanding an existing transmission station, where the expansion involves the acquisition of land, and the transmission station has a nominal operating voltage of greater than or equal to 115 kV.

It is anticipated that the development of either Project will require a connection to the existing transmission line having a nominal operating voltage of less than 500 kV, and the establishment of a transmission station with a nominal operating voltage of greater than or equal to 115 kV and less than 500 kV, which typically are available to be screened through the Class EA Screening Process.

The Class EA Screening Process involves the following:

- Issuance of a notice of commencements.
  - Issued to relevant regions of the MECP EA branch, adjacent landowners, relevant First Nations, municipalities, relevant commissions (i.e., Niagara Escarpment Commission), Conservation Authorities, Impact Assessment Agency of Canada (where relevant), relevant Indigenous communities.
- Creation of a screening report which evaluates the proposed Project against 16 screening questions as laid out in the Class EA.
  - This screening report will include a discussion of potential alternatives and the base need for the Project.
- Notice of successful screening completion.

If either Project cannot satisfy the Class EA screening questions, it must be carried forward to the full Class EA process. In addition, if an interested or affected party during the Class EA Screening Process identifies potential direct or indirect effects that cannot be mitigated, including potential adverse effects on Aboriginal or treaty rights, the proponent will subject the project to a Full Class EA Process as described in this document. Should the concern raised by an interested or affected party be later resolved, the proponent may revert back to the Class EA Screening Process.

3.1.2 Permits and Approvals

3.1.2.1 Species at Risk Review

Species at Risk Act

The federal *Species at Risk Act* (SARA) provides a framework to ensure the survival of wildlife species and the protection of natural heritage in Canada. Under SARA, the Federal government has responsibility for wildlife as follows:

- Wildlife on federal lands;
- Aquatic species; and
- Migratory birds protected by the *Migratory Bird Convention Act* (MBCA).

Species listed under SARA are defined as species at risk (SAR) of disappearing from Canada. Specifically, SARA contains prohibitions against the killing, harming, harassing, capturing, taking, possessing, collecting, buying, selling, or trading of individuals of Endangered, Threatened and Extirpated Species listed in Schedule 1 of the Act. The Act also contains a prohibition against the damage or destruction of their residence (e.g., nest or den).

The prohibitions in SARA apply throughout Canada to all aquatic species and migratory birds (as listed in the MBCA) regardless of whether the species are resident on federal, provincial, public or private land. This means that if a species is listed on Schedule 1 of SARA and is either an aquatic species or a migratory bird, there is a prohibition against harming it or its residence. For all other listed species, the Act's prohibitions only apply on federal lands.

It is noted that the SARA also contains a provision to protect species designated as Endangered or Threatened by a provincial or territorial government when found on federal lands. Furthermore, in certain circumstances, the responsible minister may apply SARA prohibitions to protect any other species listed in Schedule 1 of SARA when found on private lands, provincial lands, or lands within a territory, if provincial/territorial laws do not effectively protect the species or its residence.

Established under the SARA, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) assesses species published under Schedule 1, 2 and 3 under the SARA. A summary of potential SAR for the Study Areas is presented in Table 3-1. It is noted that the SARA also contains a provision to protect species designated as Endangered or Threatened by a provincial or territorial government when found on federal lands.

Neither Project's properties are on federal lands, and the Project's are not anticipated to be subject to requirements under the SARA. In certain circumstances, the responsible minister

may apply SARA prohibitions to protect any other species listed in Schedule 1 of SARA when found on private lands, provincial lands, or lands within a territory, if provincial/territorial laws do not effectively protect the species or its residence, however the likelihood of this being applicable to the Project is anticipated to be low. Hatch has reviewed critical habitat areas related to bird species regulated under SARA to confirm if potential mechanisms exist for federal regulation following the finalization of the provincial changes to the *Species Conservation Act.*

Ontario Endangered Species Act

The *Ontario Endangered Species Act* (ESA) was passed into law in 2007 and came into effect on June 30, 2008. Under the ESA, there are more than 200 species in Ontario that are identified as extirpated, endangered, threatened, or of special concern. Species that are listed as threatened or endangered receive full protection under the Act, while those listed as special concern do not. Section 9 of the ESA generally prohibits the killing or harming of a threatened or endangered species, as well as the destruction of its habitat. Section 10 of the ESA prohibits the damage or destruction of the habitat of species listed as endangered and threatened. Habitat is broadly characterized within the ESA as the area prescribed by O. Reg. 242/08 as the habitat of the species or an area on which the species depends directly or indirectly, to carry on its life processes, including reproduction, rearing of young, hibernation, migration or feeding. Activities with the potential to impact the habitat of species protected under the Act may require a permit prior to conducting those activities.

Recent updates to the Ontario ESA have been made to shift many permit requirements to a registration-first model, allowing projects to proceed upon registration rather than awaiting ministerial approval. Where registration alone cannot adequately avoid or mitigate negative environmental effects, permitting may still be required. The ESA is expected to eventually be repealed and replaced by the *Species Conservation Act* (SCA) (tentatively in January 2026). The SCA is intended to replace certain permitting and conditional exemption processes with a standardized approach to species recovery and protection measures.

A summary of potential SAR for the Study Area is presented in Table 3-1.

3.1.2.1.1 Desktop Records Review

A desktop records review was completed to screen for natural heritage features within 1 km of the Project properties such as potential SAR presence (threatened or endangered), SAR habitat (threatened or endangered), and sensitive or significant environmental features such as wetlands, waterbodies and Areas of Natural or Scientific Interest (ANSIs). Sources reviewed for natural heritage information included, but were not limited to the following:

- MNR Natural Heritage Information Centre (NHIC);
- Ontario breeding Bird Atlas (OBBA);
- eBird – Custom Selection;
- Ontario Reptile and Amphibian Atlas;
- INaturalist – Review of observations within 1 km of the Project properties;

- Department of Fisheries and Oceans (DFO) Species at Risk Mapping tool – Custom Selection;
- COSEWIC technical summaries;
- Ministry of Environment, Conservation and Parks (MECP) Species at Risk in Ontario list;
- Canadian Important Bird Areas (IBA) Map; and
- Lower and upper tier Official Plans.

3.1.2.1.2 Results

Based on the results of the desktop records review, Table 3-1 provides a summary of SAR with the potential to be present within the Study Area for both Project properties, as well as mitigation/avoidance strategies and next steps.

Table 3-1: Species at Risk with the Potential to be Present within the Study Area and Proposed Next Steps

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
Birds										
Eastern Meadowlark	*Sturnella magna*	NHIC, INaturalist, Ebird, OBBA	THR	THR	THR	Eastern Meadowlarks breed primarily in moderately tall grasslands, such as pastures and hayfields, but are also found in alfalfa fields, weedy borders of croplands, roadsides, orchards, airports, shrubby overgrown fields, or other open areas. Small trees, shrubs or fence posts are used as elevated song perches.	Low	**Millhaven**: based on past site visits the farm fields selected for the Project do not contain crops suitable for nesting **Napanee**: The site lacks extensive grasslands suitable for species.	Avoid clearing during April-July.	N/A
Bobolink	*Dolichonyx oryzivorus*	NHIC, Ebird, OBBA	THR	THR	THR	Historically, Bobolinks lived in North American tallgrass prairie and other open meadows. With the clearing of native prairies, Bobolinks moved to living in hayfields. Bobolinks often build their small nests on the ground in dense grasses. Both parents usually tend to their young, sometimes with a third Bobolink helping.	Low	**Millhaven**: based on past site visits the farm fields selected for the Project do not contain crops suitable for nesting **Napanee**: The site lacks extensive grasslands suitable for species.		
Least Bittern	*Ixobrychus exilis*	NHIC	THR	THR	THR	Found in a variety of wetland habitats, but strongly prefers cattail marshes with a mix of open pools and channels. This bird builds its nest above the marsh water in stands of dense vegetation, hidden among the cattails.	Low	**Millhaven**: limited cattail marshes are present in proximity to proposed site. **Napanee**: Limited Wetland habitat is present on site. Habitat may exist south of likely interconnection points to the existing transmission line.	Avoid encroachment of wetlands.	Assess unevaluated wetlands if required for Project footprint.

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
Pileated Woodpecker	*Dryocopus pileatus*	OBBA	-	-	-	Pileated Woodpeckers live in mature deciduous or mixed deciduous-coniferous woodlands of nearly every type. This species can also be found in younger forests with scattered, large, dead, or dying trees, as well as decayed downed trees. Throughout their range, Pileated Woodpeckers can also be found in suburban areas with large trees and patches of woodland.	Likely	**Millhaven**: Pileated Woodpecker activity has been observed in adjacent forest habitats but is unlikely to be impacted by the proposed footprint **Napanee**: Deciduous forests and thickets occur throughout the site that likely support Pileated Woodpecker	Screen site prior to clearing for potential nesting activities. Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	Complete a field visit to screen the area for potential nesting cavities.
Eastern Whip-poor-will	*Antrostomus vociferus*	OBBA	SC	THR	THR	The Eastern Whip-poor-will is usually found in areas with a mix of open and forested areas, such as savannahs, open woodlands, or openings in more mature, deciduous, coniferous and mixed forests. It forages in these open areas and uses forested areas for roosting (resting and sleeping) and nesting. It lays its eggs directly on the forest floor, where its colouring means it will easily remain undetected by visual predators.	Moderate	**Millhaven**: Species is unlikely to be present in proximity to the Millhaven site. **Napanee**: Open forest habitats are present that could support the species.	Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	N/A

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
Grasshopper Sparrow	*Ammodramus savannarum*	NHIC, OBBA	SC	SC	-	Lives in open grassland areas with well-drained, sandy soil. It will also nest in hayfields and pasture, as well as alvars, prairies and occasionally grain crops such as barley. It prefers areas that are sparsely vegetated. Its nests are well-hidden in the field and woven from grasses in a small cup-like shape. The Grasshopper Sparrow is a short-distance migrant and leaves Ontario in the fall to migrate to the southeastern United States and Central America for the winter.	Moderate	**Millhaven**: Large portions of the site are not suitable for grassland bird species **Napanee**: The area contains some open pasture and grassland areas that could be suitable to support the species	Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1st to August 31st) to avoid contravention of the MBCA.	N/A
Wood Thrush	*Hylocichla mustelina*	NHIC, OBBA	SC	THR	THR	The Wood Thrush lives in mature deciduous and mixed (conifer-deciduous) forests. They seek moist stands of trees with well-developed undergrowth and tall trees for singing perches. These birds prefer large forests but will also use smaller stands of trees. They build their nests in living saplings, trees or shrubs, usually in sugar maple or American beech.	Likely	**Millhaven**: Likely to occur in adjacent forest habitats given presence of moist wooded areas with preferred tree species as common associates. **Napanee**: Mixed forests including moist areas exist throughout the site.	Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	N/A
Eastern Wood-pewee	*Contopus virens*	NHIC, OBBA	SC	SC	SC	The eastern wood-pewee lives in the mid-canopy layer of forest clearings and edges of deciduous and mixed forests. It is most abundant in intermediate-age mature forest stands with little understory vegetation.	likely	Likely to occur at both sites given frequent occurrence of intermediate-age and mature forest edges.	Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	N/A
Golden-winged Warbler	*Vermivora chrysoptera*	OBBA	SC	THR	THR	Golden-winged Warblers prefer to nest in areas with young shrubs surrounded by mature forest – locations that have recently been disturbed, such as field edges, hydro or utility right-of-ways, or logged areas.	High	Habitat suitable for all life processes are present on both sites or in directly adjacent lands.	Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	N/A

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
Canada Warbler	*Cardellina canadensis*	OBBA	SC	SC	THR	The Canada Warbler breeds in a range of deciduous and coniferous, usually wet forest types, all with a well-developed, dense shrub layer. Dense shrub and understory vegetation help conceal Canada Warbler nests that are usually located on or near the ground on mossy logs or roots, along stream banks or on hummocks. It winters in South America.	Moderate	**Millhaven**: A well-developed shrub layer is lacking in all wet forest types found on-site which greatly limits potential for nesting. The proposed site largely avoids potential habitat. **Napanee: N/A**	Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	N/A
Bald Eagle	*Haliaeetus leucocephalus*	OBBA, eBird	SC	NAR	-	Bald Eagles typically nest in forested areas adjacent to large bodies of water such as rivers, lakes, ponds. They typically avoid nesting around heavily developed and populated areas when possible. Bald Eagles are tolerant of human activity when feeding, and may congregate around fish processing plants, dumps, and below dams where fish concentrate. Bald Eagles prefer tall, mature coniferous or deciduous trees that afford a wide view of the surroundings for perching. In winter, they can also be seen in dry, open uplands if there is access to open water for fishing.	Site 1: Moderate	**Millhaven**: Lack of large water bodies and nesting features present on site. Hydro poles in adjacent lands provide some limited nesting opportunity. **Napanee**: Some nesting opportunities may exist within the forested area of the site given proximal wetlands and significant watercourses.	Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	Napanee: Complete a site investigation to review the area for potential nesting activity.
Barn Swallow	*Hirundo rustica*	NHIC, OBBA	SC	THR	THR	Prefers open habitats (farmlands, wetlands, road ROW, forest clearings). Nests are built on human-made structures and ledges (inside/outside buildings, barns, under bridges, in culverts). Requires wet sites with nearby mud to build nests.	Moderate	Anthropogenic structures that may be suitable for nesting occur in proximity to both sites. It is unlikely nesting will be impacted by the proposed Projects.	Avoid the destruction of any anthropogenic features with observed nesting.	

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
Louisiana Waterthrush	*Parkesia motacilla*	NHIC, OBBA	THR	THR	THR	The Louisiana waterthrush is usually found in steep, forested ravines with fast-flowing streams. Although it prefers running water, especially clear, coldwater streams, it also less frequently inhabits heavily wooded, deciduous swamps having large pools of open water. It nests among the roots of fallen trees, in niches of stream banks, and in or under mossy logs.	Low	**Millhaven**: The proposed footprint is outside of areas likely to support the species. **Napanee: N/A**	Avoid encroachment of wetlands. Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	N/A
Rusty Blackbird	*Euphagus carolinus*	OBBA	NAR	SC	SC	The Rusty Blackbird breeds in habitats that are dominated by coniferous forest with wetlands nearby. During the winter, it is found in wet woodlands, swamps, and pond edges, often foraging in agricultural lands. In Ontario, the breeding range is found in the Hudson Bay Lowlands and northern Boreal Shield ecozones.	Confirmed	**Millhaven:** A Rusty Blackbird was heard calling during the past site reconnaissance at Millhaven. While habitat is suitable for foraging and stop-over, breeding on site is unlikely given the area is outside of the Hudson Bay Lowlands and northern Boreal Shield ecozones. **Napanee:** N/A	Avoid vegetation clearing within restricted timing windows for Nesting Zone C2 (April 1 to August 31) to avoid contravention of the MBCA.	N/A
Loggerhead Shrike	*Lanius ludovicianus*	NHIC, OBBA	END	END	-	In Ontario, the Loggerhead shrike prefers pasture or other grasslands with scattered low trees and shrubs. It lives in fields or alvars (areas of exposed bedrock) with short grass, which makes it easier to spot prey. It builds its nest in small trees or shrubs and hunts by waiting patiently in tree branches until it swoops down and attacks its unsuspecting prey – usually large insects, such as grasshoppers.	Low	**Millhaven**: Despite some suitable features for foraging occurring on site, the distinct lack of exposed bedrock and shrubs throughout most of the property limit potential. **Napanee:** N/A	N/A	N/A

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
						Loggerhead shrikes also require spiny, multi-branched shrubs (usually Hawthorn species) where they can impale their prey prior to consumption. Barbed wired fencing can also be used for this.				
Snapping Turtle	*Chelydra serpentina*	NHIC, ORAA, iNaturalist	SC	SC	SC	Prefer shallow waters so they can hide under the soft mud and leaf litter, with only their noses exposed to the surface to breathe. Omnivores feeding on vegetation, small vertebrates, and invertebrates. Require loose substrates on land for egg deposition. Hibernation takes place at the bottom of waterbodies.	Moderate	**Millhaven and Napanee** Presence of adjacent streams, watercourses and wetlands are likely suitable for specie.	Avoid encroachment on wetlands and watercourses. Follow MNRF guidance for the installation of reptile and amphibian exclusion fencing during construction.	Turtle nesting surveys may be requested by the municipality within an EIS pending final footprint of Napanee site.
Blanding's Turtle	*Emydoidea blandingii*	NHIC, ORAA	THR	END	-	Blanding's turtles prefer shallow water with high densities of aquatic vegetation. They are known to have high fidelity, travelling long distances to nesting sites. They overwinter at the bottom of permanent waterbodies.	Moderate	**Millhaven**: Unlikley to be impacted the selected Project footprint. **Napanee**: The Napanee River north of the site likely contains potential habitat for the species. Some potential exists within watercourses and wetlands south of the existing transmission line.		
Midland Painted Turtle	*Chrysemys picta marginata*	NHIC, ORAA	SC	SC		Painted turtles inhabit waterbodies, such as ponds, marshes, lakes and slow-moving creeks, that have a soft bottom and provide abundant basking sites and aquatic vegetation. These turtles often bask on shorelines or on logs and rocks that protrude from the water. The midland painted turtle hibernates on the bottom of waterbodies.	Moderate	**Millhaven**: Unlikley to be impacted the selected Project footprint. **Napanee**: The Napanee River north of the site likely contains potential habitat for the species. Some potential existis within watercourses and wetlands south of the existing transmission line.	Avoid encroachment on wetlands and watercourses. Follow MNRF guidance for the installation of reptile and amphibian exclusion fencing during construction.	Turtle nesting surveys may be requested by the municipality within an EIS pending final footprint of Napanee site.

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
Eastern Musk Turtle	*Sternotherus odoratus*	NHIC	SC	SC	SC	Eastern Musk Turtles are found in ponds, lakes, marshes and rivers that are generally slow-moving have abundant emergent vegetation and muddy bottoms that they burrow into for winter hibernation. Nesting habitat is variable, but it must be close to the water and exposed to direct sunlight. Nesting females dig shallow excavations in soil, decaying vegetation and rotting wood or lay eggs in muskrat lodges, on the open ground or in rock crevices.	Moderate	**Millhaven**: Unlikley to be impacted the selected Project footprint. **Napanee:** The Napanee River north of the site likely contains potential habitat for the species. Some potential exists within watercourses and wetlands south of the existing transmission line	Avoid encroachment on wetlands and watercourses. Follow MNRF guidance for the installation of reptile and amphibian exclusion fencing during construction.	Turtle nesting surveys may be requested by the municipality within an EIS pending final footprint of Napanee site.
Northern Map Turtle	*Graptemys geographica*	ORAA	SC	SC	SC	The Northern Map Turtle inhabits rivers and lakeshores where it basks on emergent rocks and fallen trees throughout the spring and summer. In winter, the turtles hibernate on the bottom of deep, slow-moving sections of river. They require high-quality water that supports the female's mollusc prey. Their habitat must contain suitable basking sites, such as rocks and deadheads, with an unobstructed view from which a turtle can drop immediately into the water if startled.	Moderate	**Millhaven:** Waterbodies and streams present on site are too small and shallow to support the species. Adjacent wetland may provide some habitat. **Napanee**: The Napanee River north of the site likely contains potential habitat for the species. Some potential exists within watercourses and wetlands south of the existing transmission line.	Avoid encroachment on wetlands and watercourses. Follow MNRF guidance for the installation of reptile and amphibian exclusion fencing during construction.	Turtle nesting surveys may be requested by the municipality within an EIS pending final footprint of Napanee site.
Eastern Ribbonsnake	*Thamnophis saurita*	ORAA	SC	SC	-	The Eastern Ribbonsnake is usually found close to water, especially in marshes, where it hunts for frogs and small fish. A good swimmer, it will dive in shallow water, especially if it is fleeing from a potential predator. At the onset of cold weather, these snakes congregate in underground burrows or rock crevices to hibernate together.	Millhaven Low	**Millhaven**: Presence of mosaic of habitats suitable for all life processes adjacent to the site. However, known occurrences in the area are nearing historic (one record in 2010) so potential is limited. **Napanee:** N/A	N/A	N/A

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
Amphibians										
Western Chorus Frog Great Lakes St. Lawrence Canadian Shield population	*Pseudacris maculata* pop. 1	On site observations	NAR	THR	THR	Vernal breeding species that prefer temporary or ephemeral streams and water bodies in forested or open areas. They can be found in marshes, floodplains, slough forest, agricultural fields, roadside ditching and more.	High	**Millhaven**: Habitat suitable for all life processes is present on site. Chorus frogs were heard calling near in the southernmost marshes on site. **Napanee**: Wetland areas to the southern end of the site are likely suitable.	Avoid alteration of hydrology a encroachment of wetlands. **F**ollow MNRF guidance for the installation of reptile and amphibian exclusion fencing during construction.	Municipal EIS requirements may result in Anuran Call surveys.
Insects										
Monarch	*Danaus plexippus*	NHIC, observations	SC	END	SC	In Canada, Monarchs are most abundant in southern Ontario and Quebec where milkweed plants and breeding habitat are widespread.	High	**Millhaven**: Suitable habitat for the growth of several milkweed species is present on site. **Napanee:** N/A	Avoid damage to areas conducive to Milkweed growth (forest edges, meadow, swamps and marsh).	
Mammals										
Little Brown Myotis	*Myotis lucifugus*	Project experience	END	END	END	Bats are nocturnal. Roosting occurs in treed environments (usually large diameter trees), rock crevices, select attics, abandoned buildings, barns, and bat houses in colony format to raise their young. Foraging occurs typically over water, along waterways, and forest edges. Little Brown Bats hibernate most often in caves or abandoned mines that are humid and remain above freezing.	High	**Millhaven:** N/A not proposed in wooded areas. **Napanee**: deciduous and mixed forest present likely presenting some level of bat maternity roost habitat.	Time tree removal to avoid the bat active season (April 1 to September 30 in Southern Ontario) if the removal is considered to avoid impairing or eliminating the function of habitat for supporting bat life processes (e.g. remove, stub, etc. a proportionally small number of potential maternity or day roost trees in treed habitats which would not result in fragmentation/barriers).	Complete detailed leaf-off habitat surveys, to determine potential impacts. If the active bat season can be avoided, and potential maternity roost habitat is low acoustic studies may not be required Areas found to have potential habitat and require clearing to have acoustic monitoring surveys completed during the month of June.
Northern Myotis	*Myotis septentrionalis*	Project experience	END	END	END	Northern Myotis are associated with boreal forests, choosing to roost under loose bark and in the cavities of trees. Rarely using manmade structures for roosting. Foraging usually occurs over rivers, forest gaps, edges, and along trails. These bats hibernate most often in caves or abandoned mines.	High	**Millhaven:** N/A not proposed in wooded areas **Napanee**: deciduous and mixed forest present likely presenting some level of bat maternity roost habitat.		
Hoary Bat	*Lasiurus cinereus*	Project experience	END	END	Under consideration	Migratory species whose foraging and maternity roost habitat overlaps with	High	**Millhaven:** N/A not proposed in wooded areas		

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
						Myotis sp., choosing to roost under loose bark and in the cavities of trees. Treed habitat in coniferous and deciduous forests with dense clusters of foliage in the crown of the candidate tree, typically larger in diameter and tall. Occasionally roosts in shrubs. Habitat generalist. Foraging occurs in open areas such as wetlands, grasslands, and open fields with patchily distributed trees. Does not overwinter in Ontario.		**Napanee**: deciduous and mixed forest present likely presenting some level of bat maternity roost habitat.		
Eastern Red Bat	*Lasiurus borealis*	Project experience	END	END	Under Consideration	Migratory species whose foraging and maternity roost habitat overlaps with Myotis sp, choosing to roost under loose bark and in the cavities of trees.	High	**Millhaven:** N/A not proposed in wooded areas. **Napanee**: deciduous and mixed forest present likely presenting some level of bat maternity roost habitat.		
Silver-haired Bat	*Lasionycteris noctivagans*	Project experience	END	END	Under Consideration	Migratory species whose foraging and maternity roost habitat overlaps with Myotis sp, choosing to roost under loose bark and in the cavities of trees.	High	**Millhaven:** N/A not proposed in wooded areas **Napanee**: deciduous and mixed forest present likely presenting some level of bat maternity roost habitat.		
Tri-colored Bat	*Perimyotis subflavus*	Project experience	END	END	END	During the summer, the Tri-colored Bat is found in a variety of forested habitats. It forms day roosts and maternity colonies in older forest and occasionally in barns or other structures. They forage over water and along streams in the forest. At the end of the summer, they travel to a location where they swarm; it is generally near the cave or other underground location where they will overwinter.	High	**Millhaven:** N/A not proposed in wooded areas. **Napanee**: deciduous and mixed forest present likely presenting some level of bat maternity roost habitat.		
Eastern Small-footed Myotis	*Myotis leibii*	Project Experience	END	N/A	NAR	In the spring and summer, eastern small-footed bats will roost in a variety of habitats, including in or under rocks,	High	**Millhaven:** N/A not proposed in wooded areas.		

Common Name	Scientific Name	Source	SARO	COSEWIC	SARA	Habitat	Potential	Site/ Rationale	Preliminary Avoidance/Mitigation Considerations	Proposed Next Steps
						in rock outcrops, in buildings, under bridges, or in caves, mines, or hollow trees. In the winter, these bats hibernate, most often in caves and abandoned mines. They seem to choose colder and drier sites than similar bats and will return to the same spot each year.		**Napanee**: deciduous and mixed forest present likely presenting some level of bat maternity roost habitat.		

3.1.2.2 *Fisheries Act*

The federal *Fisheries Act* provides protection to fish and fish habitat such that:

- "No person shall carry on any work, undertaking or activity other than fishing that results in the death of fish" [Section 34.4 (1)]
- "No person shall carry on any work, undertaking or activity that results in harmful alteration, disruption or destruction of fish habitat." [Section 35(1)]
- Fish habitat is defined by the Act as "water frequented by fish and any other areas on which fish depend directly or indirectly to carry out their life processes, including spawning grounds and nursery, rearing, food supply and migration areas".

The *Fisheries Act* requires that any development project avoid causing the death of fish, or a Harmful Alteration, Disruption or Destruction (HADD) of fish habitat unless authorized by the Minister of Fisheries and Oceans. This applies to any works being undertaken in or near waterbodies that supports fish habitat as defined in the Act. If mitigation measures cannot be applied, and residual effects will cause death to fish, or result in a HADD, then a Request for Review must be submitted to the DFO. If the DFO identifies that the Project is likely to result in the death of fish or a HADD of fish habitat, an authorization (i.e., approval) for the Project will be required and as a result, offsetting measures may also be required.

Any water body or watercourse that contains fish, or indirectly supports fish, as described in the *Fisheries Act*, is provided protection under the Act.

Based on a review of the proposed Project sites, a 30-m setback is likely possible to remove potential concerns regarding impacts to fish habitat.

3.1.2.3 *Migratory Birds Convention Act*

The *Migratory Birds Convention Act* (MBCA) protects migratory bird populations by regulating potentially harmful anthropogenic activities. The MBCA and the Migratory Birds Regulations (MBR) are federal legislative requirements that are binding on the public and all levels of government, including federal and provincial governments.

The bird species that are protected are listed under Article I of the MBCA, are native or naturally occurring in Canada, and are known to occur regularly in Canada. The legislation protects certain species, controls the harvest of others, and prohibits commercial sale of all species. As described in Section 6 of the associated MBR:

Subject to Subsection 5(9), no person shall:

- Disturb, destroy or take a nest, egg, nest shelter, Eider Duck shelter or duck box of a migratory bird; or
- Have in his possession, a live migratory bird, or a carcass, skin, nest, or egg of a migratory bird except under authority of a permit therefor.

The "incidental take" of migratory birds and the disturbance, destruction or taking of the nest of a migratory bird is prohibited. "Incidental take" is the killing or harming of migratory birds

due to actions, such as economic development, which are not primarily focused on taking migratory birds. No permit can be issued for the incidental take of migratory birds, their nest or their eggs as a result of economic activities. These prohibitions apply throughout the duration of the year.

Environment and Climate Change Canada (ECCC) and the Canadian Wildlife Service (CWS) have compiled nesting calendars that show the variation in nesting intensity by habitat type and nesting zone, within broad geographical areas distributed across Canada. While this does not mean nesting birds will not nest outside of these periods, the calendars can be used to greatly reduce the risk of encountering a nest. It is noted that ECCC advises that avoidance is the best approach.

The MBCA is applicable to the Site and accordingly, any vegetation removal is recommended to occur outside of the breeding and nesting period (generally early April to late September in any given year). However, should vegetation removal be necessary during the recognized breeding window, a nest sweep must be conducted by a qualified biologist to ensure proposed cleared areas do not contain active nests and young. Note that while the core breeding and nesting calendar developed by ECCC is a guideline for peak breeding activity, the MBCA protects birds year-round.

3.1.2.4 Fish and Wildlife Convention Act

The *Fish and Wildlife Conservation Act* (FWCA) provides a framework for the governance of fish and wildlife management in Ontario. It is administered by the MNR, and provides guidance on licensing, reporting, and limits for hunting and/or trapping game wildlife. Additionally, the FWCA provides the MNR with the authority to issue licenses and other authorizations under this legislation and the Ontario Fishery Regulations (2007).

As there is no need to conduct dewatering and associated fish capture and relocation (e.g., as part drain works) a License to Collect Fish under O. Reg. 664/98 of the FWCA is not anticipated to be required.

3.1.2.5 Conservation Authorities Act

3.1.2.5.1 Millhaven

The Millhaven Project falls within the jurisdiction of the Cataraqui Region Conservation Authorities (CRCA). The Proposed project footprint largely falls outside of the expected regulated area of the CRCA aside from proposed access roads. It is expected that with mitigation and proper design permit activities may be avoidable with the CRCA. Where necessary, they will be minor permit applications expected to require information typically required for municipal building permits.

3.1.2.5.2 Napanee

The Napanee Project falls withing the jurisdiction of Quinte Conservation. Large portions of the north and southern extents of the Napanee Project property, including the existing transmission line fall within the regulated boundary of Quinte Conservation. Consultation with Quinte Conservation is expected to be required prior to commencing permitting activities to understand input requirements to permitting applications. The regulated area, buffered from

the Napanee River is related to the 1:100-year flood plain. Floodplain mapping may be warranted to further refine this boundary, pending Project siting.

The Napanee Project properties and Millhaven Project properties fall within the Quinte Conservation and the CRCA jurisdiction, respectively.

The Quinte Conservation regulated area covers a substation portion of the Napanee Project property, therefore it has been assumed that a “Major Application” permit will be required through Quinte Conservation.

3.1.2.6 Environmental Protection Act and Ontario Water Resources Act

Emissions or releases to the natural environment are permitted through the *Environmental Protection Act* or *Ontario Water Resources Act* as managed by the MECP. For BESS Projects, this is typically associated with stormwater discharge, substation containment and treatment systems and noise/odour emissions to air. The type of permit varies depending on the type of emission and magnitude.

3.1.2.6.1 Environmental Compliance Approval

In accordance with the Ontario Water Resources Act, it is anticipated that an industrial sewage works Environmental Compliance Approval (ECA) will be required for both Projects. An industrial sewage works ECA will be required for the construction, establishment, and operation of new sewage works. This includes the replacement and alteration of existing sewage works and the collection, transmission, treatment, and disposal of sewage. In addition, the permit will be required for any planned discharge of sewage (i.e., drainage or storm water) to the natural environment.

It should be noted that ECA’s often have extensive review periods associated with them. On average, the MECP will take approximately 3 months to review an initial application. However, several rounds of review should be accounted for to resolve the Ministry’s comments.

3.1.2.6.2 Environmental Activity Sector Registration

A Noise Impact Assessment will be undertaken to assess the potential effects of both Projects on existing and potential future sensitive receptors (based on the zoning classification of the surrounding land). Noise emissions will be compared to the exclusion limits for the appropriately classified residential receptors in accordance with the MECP NPC-300 protocol.

If the noise impact assessment determines that the anticipated noise impact from facility exceeds MECP acceptable levels at the respective receptors, recommendations will be made to mitigate the noise impact on these receptors. These may include, but not be limited to:

- Noise barriers;
- Noise enclosures for the inverters and transformers; and
- Noise silencers or noise reduction kits for the different equipment.

The proposed Projects will also require registration on the Environmental Activity and Sector Registry (EASR) for noise emissions as per Ontario Regulation 1/17. This registration will

permit air and noise permissions from low-risk activities resulting from Project activities provided the noise impact assessment indicates compliance with NPC 300 levels.

A 500-m setback is from existing buildings within Appendix A, Figure 1. It should be noted that this is a general estimation, and modelling of proposed equipment and locations is required to understand what appropriate setbacks are necessary or whether additional mitigation measures such as noise walls are required. Without performing this activity, it is difficult to assess appropriate setbacks from noise generating sources. The 500 m has been set to publicly available layers outlining buildings; however, these may not qualify as receptors in all cases. Similarly vacant lots or other sensitive land uses (campgrounds) where buildings are not shown have not been incorporated as part of this screening. More detailed analysis may be necessary to quantify the likelihood of being able to site the facility on the Napanee site without noise attenuation mitigation (i.e., noise wall or berm).

To avoid the need for detailed noise impact assessments, a 1,000-m setback is required from noise generating equipment to potential receptors, which is unlikely to be feasible at the Napanee site.

3.1.2.7 Official Plan and Municipal Zoning By-Law

3.1.2.7.1 The Town of Greater Napanee

The Town of Greater Napanee Official Plan (2014) indicates the Project parcels are generally zoned as rural. Based on the text within the Official Plan a rezoning application will likely be necessary to permit the site for the Project. A building permit is generally required and consultation with the municipality/fire department is recommended to ensure alignment on emergency response requirements and fire code requirements.

Additionally, multiple constraint layers have been indicated on the Official Plan schedules that should be noted:

- Zoned Environmental Protection Area: Described as areas that are located within 30 m of a watercourse where further development should not be permitted. This area overlaps with previous constraints outlined within this memo and is shown on Figure 1. Development within this area appears to be avoidable based on a preliminary review. Development within this area will require justification as to why it cannot be located elsewhere as well as an Environmental Impact Study (EIS). The successful completion of the EIS does not guarantee acceptance from the municipality.
- Environmentally Sensitive Area: Described as include significant woodlands, significant valley lands, significant wildlife habitat, unevaluated wetlands, adjacent lands within 120 m of the following features: a provincially significant wetland, provincially significant life science ANSI, significant valley lands, significant woodlands, significant wildlife habitat, fish habitat, and adjacent lands within 50 m of a provincially significant earth science ANSI. Development or alteration of Environmentally Sensitive Areas may be permitted in accordance with the underlying land use designation, only if it is demonstrated by an appropriate study or studies that there will be no negative impacts on features and functions as further defined in this Plan. An EIS would be required to outline how the area can be developed responsibly without impacts to the relevant sensitive

feature. These areas have been outlined on Figure 1 and have been correlated with potentially developable areas. Further consultation with the municipality may be necessary to understand the extent and location of the specific environmental feature to comment on the likelihood of a successful development application.

- Closed Waste Disposal Site: A Closed Waste Disposal Site has been depicted within the Official Plan. The Official Plan indicates council must consult with the Ministry of Environment Conservation and Parks regarding the compatibility of proposed developments with closed waste disposal sites. A development application for lands within a waste management influence area shall not be approved unless it is demonstrated that measures may be implemented to mitigate potential environmental and nuisance effects associated with the use of adjacent lands for waste management purposes. It should be noted that excess soils where required to be removed from the site may also carry additional disposal expenses pending the quality of the material required to be removed. The Closed Waste Disposal Site and associated 500-m radius area has been reflected on Figure 2. Further discussion with the municipality area warranted to understand the limitations and risks associated with utilizing this area. The area shown on Figure 2 is for information purposed only and has not been factored into the developable area calculations.
- Aggregate Reserve Area: Areas of high aggregate potential where establishing aggregate uses may be appropriate, may be permitted in accordance with the underlying land use (rural) provided that no proposed use which would preclude the economical future use of these lands for mineral extraction is permitted. Given the BESS Project is expected to be temporary in nature, it is unlikely that its development will preclude future resource extraction. Further consultation with the municipality is warranted to understand the potential limitations of developing this area. The area shown on Figure 2 is for information purposed only and has not been factored into the developable area calculations.

A revised official plan has been made public for review in May of 2024. The official plan website noted that the plan was expected to be approved in 2024 but has still yet to be finalized as of November 2025. Although not finalized the following potential constraints were noted:

- Significant Woodlands: The proposed site contains mapped significant woodlands. An assessment by a qualified biologist is required to confirm the presence of significant woodlands and where present an EIS is required to outline how impacts to woodlands can be avoided. Per the Official Plans setbacks from Significant Woodlands are 120 m.
- Unstable Bedrock (known Karst Topography): The municipality may require additional geotechnical or karst surveys as well are set some limitations on material storage restrictions in the area.
- Abandoned Mine site (located within 1 km): The official plan will require consultation with the Ministry of Northern Development, Mines and Natural Resources to understand potential impacts associated with the abandoned mine. This is unlikely to be a significant consideration.

- Wetlands associated with the southern portion of the property have been mapped as a waterbody within the revisions to the Official Plan.
- Waterbodies and Fish Habitat where present are stated to require a 120-m setback. An EIS is required to work within this setback.
- Generally, proposals are required to complete an assessment of whether significant wildlife habitat may be present on site and respect a 120-m setback. Where present, an EIS is required to work within the 120-m setback.

3.1.2.7.2 Loyalist Township

Loyalist Township Official Plan Schedule A and Zoning By-Law indicate, the property is designated as Rural, with the permanent and intermittent watercourses identified as part of an Environmental Protection Zone.

Based on past consultation with Loyalist Township, lands designated as Rural within the Site may be permitted for the Project, if the zoning is amended to industrial land use designation. A building permit is generally required and consultation with the municipality/fire department is recommended to ensure alignment on emergency response requirements and fire code requirements.

The Loyalist Township Zoning By-Law designates the watercourse running through the Site as Environmental Protection zone. According to the Loyalist Township Official plan, the permitted uses of Environmental Protection designations are those which enable the preservation and conservation of the natural environment. The plan states “Structural development related to the supply of water for human or wildlife communities or flood control structures may also be permitted. Infrastructure shall, wherever possible, be located outside lands designated Environmental Protection”, meaning development and site alteration are not permitted on the lands within the Environmental Protection designation. A satisfactory Environmental Impact Assessment (EIA) would be required to work within these areas. Based on the preliminary footprint this does not appear to be necessary. Hatch has assumed a setback of 30 m, in alignment with the REA and CRCA regulation setbacks for wetlands and watercourses (see Figure 1).

Based on a preliminary review of Loyalist Township Official Plan (2022) Schedules K, the majority of the Loyalist Township (including the Site) is considered a highly vulnerable aquifer area, and a significant groundwater recharge area. New development within significant groundwater recharge areas and highly vulnerable aquifers that involve potential contaminants where they would constitute a drinking water threat may be subject to site plan control and risk management measures to protect the groundwater. An aquifer vulnerability and karst assessment report (as per Policy 5.2.5 p) may be required. The Township will provide notice of decision for any approvals that involve potential contaminants to the CRCA to facilitate monitoring of the implementation of this policy. Municipal consultation should be undertaken to confirm requirements.

3.1.3 Summary Developable Area

3.1.3.1 Napanee Project

The Developable areas associated Napanee Project properties have been divide into two categories. The Likely Developable Areas are defined as area that falls outside of the Environmental Protection Area, Environmentally Sensitive Areas defined by the relevant Official Plan as well as a 30-m setback from all present watercourses and wetlands available through public resources. The total Likely Developable Area is 4.32 ha.

The Potentially Developable Areas are defined as area that falls within constraint areas that contains some risk to development, however, may be permitted through the completion of additional studies or permits. This area is largely associated within the Environmentally Sensitive Areas but outside the Environmental Protection Areas within the relevant Official Plan. The total Potentially Developable Area is 17.90 ha.

Appendix A contains figures depicting the areas of Likely or Potentially Developable Areas and the Potentially Developable Areas and the associated constraints.

Overall, the following volumes of developable area are expected to be available as defined in Section 2.3 and shown in Appendix A.

3.1.3.2 Millhaven Project

The Likely Developable Areas for the Millhaven Project properties are defined as areas outside of the 30-m setbacks associated with wetlands, waterbodies and Environmental Protection Areas as defined by the relevant Official Plan (completely overlaps with 30 m setbacks). The total Likely Developable Area is 41.29 ha.

The Likely Developable Areas for the Millhaven Project properties are defined as areas outside of the 30 m setbacks associated with wetlands, waterbodies and Environmental Protection Areas as defined by the relevant Official Plan (completely overlaps with 30-m setbacks). The total Potentially Developable Area is 30 ha.

3.2 Permit Matrix

Table 3-2 provide an overview of the permits deemed to be applicable to the Project, along with relevant considerations, respectively per Site.

Table 3-2: Preliminary Project Permit Matrix

Legislation	Agency	Permit, Approval or Authorization	Likelihood	Rationale and Considerations Schedule Considerations
Federal				
Fisheries Act	DFO	Request for Review.	Potentially required.	Potentially required if encroaching on permanent and/or intermittent watercourses. This is primarily associated with access roads within the Millhaven Project Layout. This can be avoided through the use of clear span bridge designs.
Migratory Birds Convention Act	ECC	Compliance with the migratory breeding bird timing windows.	Required.	Required for Site preparation activities that could result in destruction of nests or individuals. May influence construction schedule. Detailed search for any pileated woodpecker nests within any planned cleared area ahead of construction.
Provincial				
Environmental Assessment Act	MECP	Hydro One Class Environmental Assessment Screening.	Required.	Required for establishing a substation between 115 kV to 500 kV.
Endangered Species Act/ Species Conservation Act		ESA Permit(s) or *Species Conservation Act* Registration.	Potentially required.	Based on the results of Hatch's review, the development of the Project may require approval under the ESA, dependent on sitting considerations, because potential to have adverse effects on SAR habitat within the study area. See Table 3-1 for preliminary avoidance/mitigation considerations and recommended next steps.
Environmental Protection Act	MECP	Environmental Compliance Approval: Noise and Air Emissions, Industrial Sewage.	Required.	An Environmental Compliance Approval for noise and emissions is likely required for the substation associated with the proposed Project. This is related to emissions generated by future transformers. In addition, the facility will be required to comply with NPC-300 which will require noise studies to be completed to demonstrate the ability of the facility to meet required noise thresholds at sensitive receptors including adjacent vacant lots. An Environmental Compliance Approval for Industrial Sewage is required for any treatment system and discharge to the natural environment. This is typically associated with stormwater management infrastructure and secondary containment designs associated with substation transformers.
Conservation Authorities Act	Quinte Conservation or CRCA	Conservation Authority Permit.	Unlikely to be required.	Required if work is planned within 30 m of a wetland or waterbody or other hazard lands
Ontario Heritage Act	Ministry of Citizenship and Multiculturalism	Archaeological Assessment Registration Letter.	Likely to be required.	Required in areas associated with the Project footprint.

Legislation	Agency	Permit, Approval or Authorization	Likelihood	Rationale and Considerations Schedule Considerations
Municipal				
Planning Act	Napanee and Loyalist Official Plan	Environmental Impact Assessment	Potentially required.	Where the Project falls within the Environmental Protection Area of the Loyalist Official Plan, or where the Project properties falls within the Environmentally Sensitive Area Overlay.
		Zoning amendments	Required.	Zoning by-laws currently designate all Project properties as rural and will be subject to zoning by-law amendments.
Local Bylaw	Napanee and Loyalist Official Plan	*Building Permit*	Required.	

3.3 Indigenous Lands Review

The following section summarizes Hatch's review of the Sites as it pertains to consideration of Indigenous Lands defined within the IESO RFPs . The use of the IESO's LT2 RFP definition of Indigenous Lands has been selected as an approximation to indicate the potential for the Project to affect lands or resources used for traditional purposes by Indigenous people in Ontario.

Table 3-3: Summary of the Site as it pertains to "Indigenous Lands" defined within the IESO's LT2 RFP

Criteria	Located on Project Site (Yes/No)	Rationale
(a) "reserve land" as set out in the Indian Act, RSC 1985, c I-5;	No	As per the *Indian Act*, RSC 1985, c I-5, reserve land means "(a) a tract of land, the legal title to which is vested in Her Majesty, that has been set apart by Her Majesty for the use and benefit of a band, and (b) except in Subsection 18(2), Section 20 to 25, 28, 37, 38, 42, 44 to 51 and 58 to 60 and the regulations made under and of those provisions, includes designated lands." The Project properties are located within the Crawford's Purchases (1783) area. Based on the First Nations and Treaties Map (Government of Ontario, 2022) and the Canadian Geographic Indigenous peoples Atlas of Canada (The Royal Canadian Geographical Society, 2018) for this Treaty area, the Project Site is not whole or in part located on "reserve lands" as set out in the Indian Act.
(b) "designated lands" as set out in the Indian Act, RSC 1985, c I-5;	No	As per the *Indian Act*, RSC 1985, c I-5, designated lands means "a tract of land or any interest therein the legal title to which remains vested in Her Majesty and in which the band for whose use and benefit it was set apart as a reserve has, otherwise than absolutely, released or surrendered its rights or interests, whether before or after the coming into force of this definition. The Project properties are located within the Crawford's Purchases (1783) area. Based on the First Nations and Treaties Map (Government of Ontario, 2022) and the Canadian Geographic Indigenous peoples Atlas of Canada (The Royal Canadian Geographical Society, 2018) for this Treaty area, the Project Site is not whole or in part located on "designated lands" as set out in the *Indian Act*.
(c) "special reserves" as set out in s. 36.1 of the Indian Act, RSC 1985, c I-5;	No	As per the *Indian Act*, RSC 1985, c I-5, "special reserves" means "Where lands the legal title to which is not vested in Her Majesty had been set apart for the use and benefit of a band before the coming into force of this section, the effect of Section 36 of this Act, as it read immediately before the coming into force of this section, continues in respect of those lands and that Act applies as though the lands were a reserve within the meaning of this Act." The Project properties are located within the Crawford's Purchases (1783) area. Based on the First Nations and Treaties Map (Government of Ontario, 2022) and the Canadian Geographic Indigenous peoples Atlas of Canada (The Royal Canadian Geographical Society, 2018) for this Treaty area, the Project Site is not whole or in part located on "Special Reserve" as set out in the *Indian Act*.

Criteria	Located on Project Site (Yes/No)	Rationale
(d) fee simple lands that are held in trust for the benefit of a First Nation in Ontario that is a "band" as defined in the *Indian Act*, RSC 1985, c I-5, provided that those lands are the subject of an application or proposal by such First Nation to have Canada set the lands apart as reserve lands pursuant to Canada's "Additions to Reserve Policy" (2016) or the Addition of Lands to Reserves and Reserve Creation Act, SC 2018, c27;	No	As per the *Indian Act*, RSC 1985, c I-5, band means "a body of Indians (a) for whose use and benefit in common, lands, the legal title to which is vested in Her Majesty, have been set apart before, on or after September 4, 1952, (b) for whose use and benefit in common, moneys are held by Her Majesty, or (c) declared by the Governor in Council to be a band for the purposes of this Act." Further, an Addition to Reserve is "a parcel of land added to the existing reserve land of a First Nation or that creates a new reserve" (Government of Canada, 2019). The full list of Additions to Reserve found on the Government of Canada website (https://sac-isc.gc.ca/eng/1466532960405/1611939046478) was consulted in order to determine if any Addition to Reserve lands were located within the footprint of the Site. No addition to Reserve lands were identified within the Project properties.
(e) Crown lands or other lands that Canada has agreed to recommend be set apart as reserve for a First Nation in Ontario that is a "band" as defined in the Indian Act, RSC 1985, c I-5 in settlement of such First Nation's land claim; or	No	According to the Crown Land Use Policy Atlas provided by the Ministry of Northern Development, Mines, Natural Resources and Forestry, there is no Crown lands located in southern Ontario that includes the Project properties. Through a desktop review, it is assumed that there are no Crown lands that Canada has agreed to recommend be set apart as reserve for a First Nation in Ontario.
(f) "settlement lands" transferred to the Algonquins of Ontario or its Institutions pursuant to the Algonquins of Ontario Treaty with Canada and Ontario ("Treaty"), or otherwise held by the Algonquins of Ontario or its institutions pursuant to the Treaty, for the benefit of one or more of the Algonquins of Ontario communities or Treaty beneficiaries.	No	The Algonquins of Ontario Settlement Area is comprised of nine million acres within the watershed of the Kichi-Sìbì and the Mattawa River in Ontario, encompassing Ontario's largest land claim negotiation. Through a desktop review, it is assumed that the Project properties are not whole or in part located within the Algonquins of Ontario Treaty Land Claim Settlement Area Boundary.

4. Schedule

The following tentative schedule has been built based on past Hatch experience. It is based on a best-case scenario associated with past agency review times. It is assumed that no major comments, or objections are raised through the Class Environmental Assessment process, municipal permitting processes or by relevant agencies. It also assumes that the facility can be designed within recommended setbacks from natural features and can be designed to be NPC-300 compliant. The schedule has been built with an assumed start date of January 2026.

Environmental Approvals and Engineering Activities		2026												2027		
		Q1			Q2			Q3			Q4			Q1		
		J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
Preliminary Site Investigations	Preliminary Site Investigation to Verify Potential Constraints															
HONI Class Environmental Assessment Screening	Creation of Stakeholder Engagement List															
	Notice of Class Environmental Assessment Screening															
	Screening Report (Contingent on SAR, Municipal EIS or															
	Notice of Class Environmental Assessment Finalization															
Permitting Activities	Environmental Review of Proposed Layout															
	Municipal consultation (Finalize Municipal Permit EIS Requirements)															
	Municipal Zoning Approvals															
	Municipal Site Plan/Building Permit Approval															
	Conservation Authority Approval (where needed)															
	Municipal Approval of EIS (where needed)															
	Acoustic Assessment															
	Environmental Compliance Approval															
Archaeological and Cultural Heritage Assessment	Stage 1 Archaeological Assessment															
	Stage 1-2 Archaeological Assessment															
	Acceptance of Archaeological Assessment															
Engineering to Support Permitting Activities	Desktop Review Activities															
	Conceptual Layout Review, Site Plan															
	Acoustic Assessment															
	Site Grading and Drainage Design															
	Stormwater Management Design															
	Substation Main Power Transformer Containment															
Additional Permitting Efforts	Targeted SAR or Natural Heritage Site Visits (where needed)															
	SAR or EIS permitting (where needed)															

5. Recommendations

The following provides a summary of recommendations:

- With respect to requirements under the *Fisheries Act*, a general 30-m setback from wetlands and waterbodies (including ditches) is recommended to avoid the potential for adverse effects to shoreline vegetation and water quality which may constitute fish habitat or supporting fish habitat.
- Any vegetation removal is recommended outside of the bird and bat breeding and nesting periods (generally early April to late September). However, should minor vegetation removal be necessary during the recognized breeding window, a nest sweep must be conducted by a qualified biologist to ensure proposed cleared areas do not contain active nests and young.
- Hatch has assumed that no development within 30 m of a wetland will occur requiring permitting through the relevant conservation authority.
- A Noise Impact Study for transformers should be completed in accordance with standards put in place by NPC-300.
- The Napanee Project properties site should be investigated to better classify the likelihood of Significant Wildlife Habitat or Species at Risk Habitat, specifically bat species.
- If Project designs encroach on any wetlands mapped on the LIO unevaluated wetland layer, that boundaries be re-assessed through detailed Ecological Land Classification or the Ontario Wetland Evaluation System to determine actual wetland boundaries and associated setbacks required.
- Archaeological Assessments involving test-pitting may be required within the proposed Project footprint. Costs associated with test-pitting can be significant and it is therefore recommended that cost estimates be obtained by licensed consulting Archaeologist to gain certainty on the level of effort.
- Stormwater and substation containment Environmental Compliance Approvals are long lead time review permits with the MECP. They have a guaranteed review window of 1 year and provided a complete application. This work should be advanced to the extent possible.
- Municipal engagement should be completed as soon as feasible to better understand potential needs for EIS studies, specifically at the Napanee site given the Official Plan revisions in process.

Appendix A
Figures

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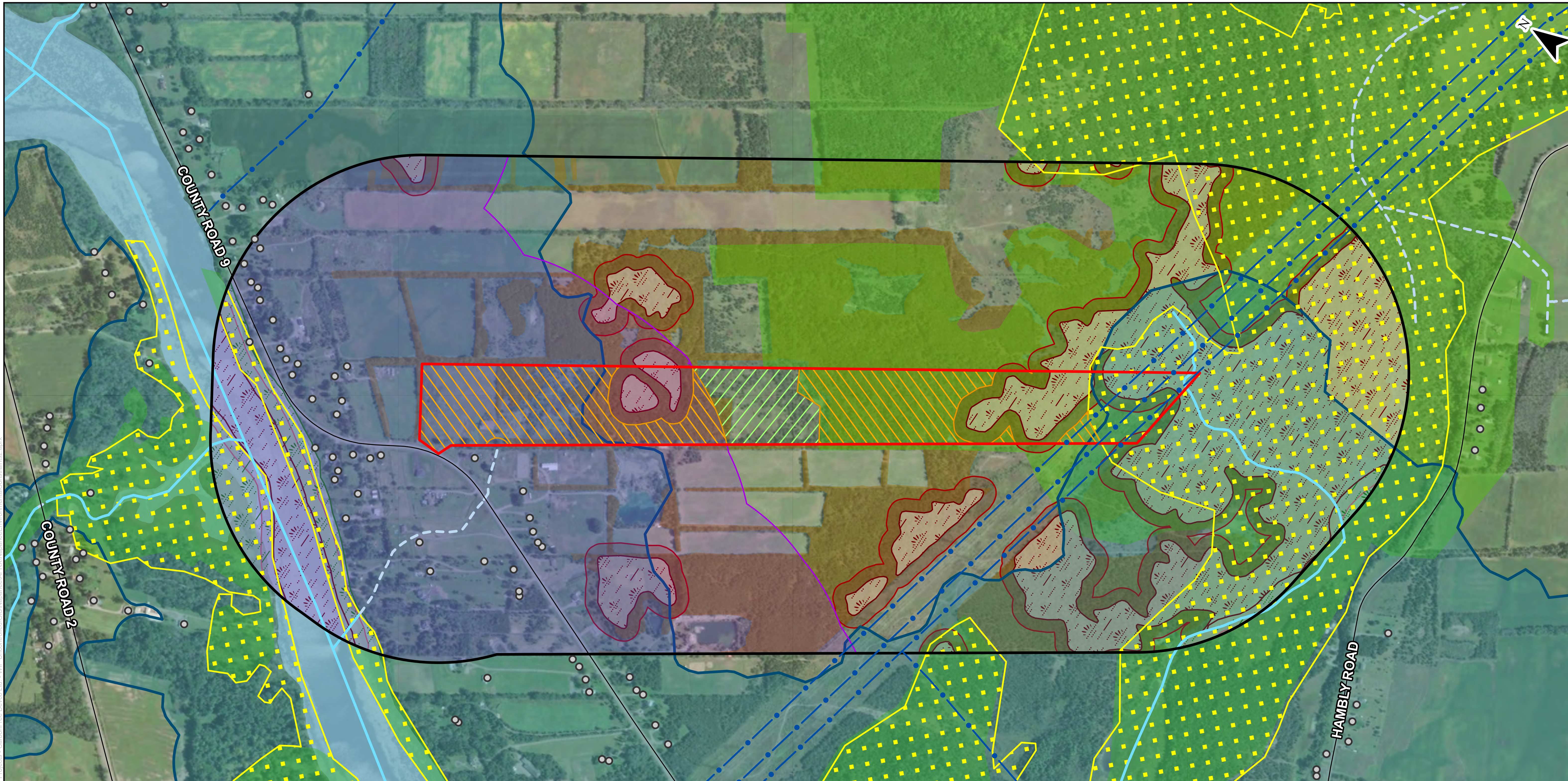

LEGEND

- Building
- Utility Line
- Road
- Watercourse (Intermittent)
- Watercourse (Permanent)
- Study Area (500m Buffer)
- Project Location
- Potentially Developable Area
- Likely Developable Area
- Environmentally Protected Area
- Environmentally Sensitive Area
- Minimum Expected Acoustic Setback
- Quinte Conservation Regulated Area
- Provincially Significant Wetland
- Unevaluated Wetland
- Unevaluated Wetland (30m Buffer)
- Waterbody
- Wooded Area

NOTES:
1. Produced by Hatch, contains information licensed under the Open Government Licence – Ontario
2. Spatial referencing: NAD 1983 CSRS UTM Zone 18N
3. Environmentally protected areas identified from Town of Greater Napanee Official Plan, Schedule A - Land Use Plan
4. Environmentally sensitive areas identified from Town of Greater Napanee Official Plan, Schedule B - Environmental and Resource Constraint Areas
5. Quinte Conservation Regulated Area identified from Quinte Conservation Screening Limit GIS Viewer O. Reg 41/24

0 125 250 500 m

1:9,000

PROJECT:	Napanee BESS Screening
FIGURE TITLE:	Environmental Constraints in the Study Area
CLIENT:	CarbonFree Devco Ltd.

DWG BY:	CHK BY:	FIG NO.:	REV NO.:
V. BAXTER	C. SEHL	1	1
DATE: 20/11/25	PAGE: 1		

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COUNTY ROAD 9

COUNTY ROAD 2

HAMBLY ROAD

N

LEGEND

- Building
- Waste Disposal Site
- Utility Line
- Road
- Watercourse (Intermittent)
- Watercourse (Permanent)
- Study Area (500m Buffer)
- Project Location
- Aggregate Reserve
- Waste Disposal Site (500m Buffer)
- Provincially Significant Wetland
- Unevaluated Wetland
- Waterbody

NOTES:
1. Produced by Hatch, contains information licensed under the Open Government Licence – Ontario
2. Spatial referencing: NAD 1983 CSRS UTM Zone 18N
3. Environmentally protected areas identified from Town of Greater Napanee Official Plan, Schedule A - Land Use Plan
4. Environmentally sensitive areas identified from Town of Greater Napanee Official Plan, Schedule B - Environmental and Resource Constraint Areas

0 125 250 500 m

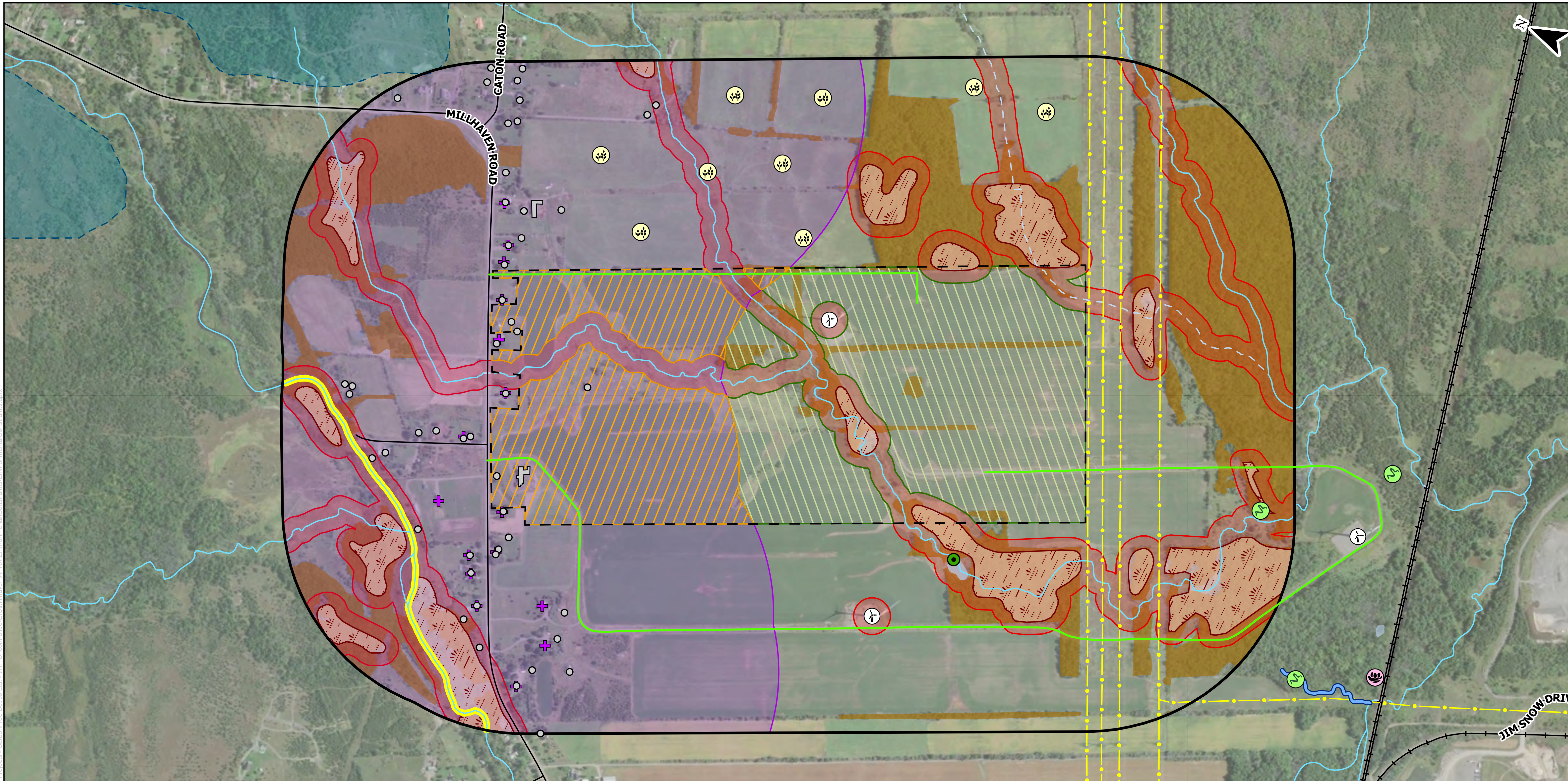
1:10,000

PROJECT:	Napanee BESS Screening
FIGURE TITLE:	Additional Municipal Constraints in the Study Area
CLIENT:	CarbonFree Devco Ltd.

DWG BY:	CHK BY:	FIG NO.:	REV NO.:
V. BAXTER	C. SEHL	2	1
DATE: 20/11/25	**PAGE:** 1		

HATCH

Vantor



LEGEND

- Building (Point)
- Noise Receptor
- Meadowlark Habitat (Pasture Grassland)
- Pileated Woodpecker Nest Cavity
- Potential Snake Overwintering Habitat
- Existing Turbine
- Midland Painted Turtle
- Access Road
- Aquatic Resource Area
- Drain (Assumed Ephemeral)
- Utility Line
- Rail
- Road
- Intermittent Watercourse
- Permanent Watercourse
- Project Location
- Study Area (500m Buffer)
- Likely Developable Area
- Potentially Developable Area
- ANSI, Life Science
- Building (Polygon)
- Exclusion Zone
- Unevaluated Wetland
- Waterbody
- Wooded Area
- Minimum Expected Acoustic Setback

NOTES:

1. Produced by Hatch, contains information licensed under the Open Government Licence – Ontario
2. Spatial referencing: NAD 1983 CSRS UTM Zone 18N

0 125 250 500 m

1:9,000

PROJECT:	Millhaven BESS Screening
FIGURE TITLE:	Environmental Constraints in the Study Area
CLIENT:	CarbonFree Devco Ltd.

DWG BY:	CHK BY:	FIG NO.:	REV NO.:
V. BAXTER	C. SEHL	3	1
DATE: 20/11/25	PAGE: 1		

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Community Engagement Summary —Proposed Napanee BESS

Executive summary

CarbonFree Technology Inc. and Capstone Infrastructure Corporation participated in a public open house on November 26, 2025 at the Best & Bash Arena to share detailed information about a proposed Battery Energy Storage System (BESS) in Greater Napanee and to collect formal public feedback. In addition to the open house, the project team carried out targeted local engagement activities around the parcel on County Road 9. A flyer drop to notify of the meeting was completed within a 1 km radius in each direction of the parcel on County Road 9. Door-to-door canvassing was also undertaken within the same 1 km radius: the team visited 48 homes and received 28 responses. To each response at the door, CarbonFree provided information and collected feedback. Project website interactions produced two contacts to date; both received responses from the project team. Social media was also monitored for public sentiment and posts related to the Project; while there were no direct interactions initiated through social channels, the team is aware of and tracking online discussions regarding the Project's potential impacts.

The open house itself used an open format with 20 poster boards arranged around the room perimeter and staffed stations for one-on-one discussion. Attendees could review posters at their own pace and speak directly with project team members. The event attracted 68 official sign-ins from members of the public (including some Greater Napanee Council members). Poster boards and staff presented project information and answered questions. Feedback forms and voluntary sign-in sheets were made available; 68 people elected to sign-in, and 18 feedback sheets were completed. All who provided an email on the sign-in sheet will be sent a follow-up. Posters at the meeting have been uploaded to the Project website: **CFnapaneestorage.com**

Hosts and on-site project team

- **Participants:** CarbonFree Technology Inc. & Capstone Infrastructure Corporation.
- **On-site team members:**
    - Doug Deeks — VP, Project Development (CarbonFree)
    - Emma Coyle — VP, Legal (CarbonFree)
    - Maged Sami — VP, Engineering (CarbonFree)
    - Megan Hunter — Senior Manager, Communications (Capstone Infrastructure Corporation)
    - Syd Healey — Asset Management (Capstone Infrastructure Corporation)
    - Lewis Angel — Stakeholder Relations Coordinator (CarbonFree)

Report date: December 2, 2025

Napanee BESS FAQ

Theme	Question/Comment	Responses Provided/Action Taken
Site selection	Why was this location selected? The project should have been sited in an industrialized area.	The site was selected based on the following factors: • Electricity system need • Proximity to Hydro One transmission corridor • Transmission availability (ability of the transmission system to accept electricity injected at the point of connection) • The land is currently zoned as "rural" in Napanee Township's Official Plan and is not a Prime Agricultural Area • Suitability of land for construction and operation of a BESS that allows for project construction, safe operation, and compliance with setback requirements • Availability of land for lease or purchase CarbonFree understands that community members would like the project to be placed in another community, and CarbonFree is appreciative of the many suggestions for alternate locations that were provided. The project site was selected based on numerous features that are required for successful BESS development. CarbonFree's expectation that it can be successfully permitted in a manner that ensures compliance with all requirements (including noise and light), operated safely, and positioned behind visual screens so as to preserve existing vistas.
	Concern for quality of life for horses during operation of BESS facility; the site will interrupt resident's use of land for riding recreational vehicles and hunting, and rural living.	CarbonFree is proposing to make a northern portion of the property that is not included in the project site (~25 acres) available for recreation and horse riding, subject to direct input from the local residents with respect to preferred usages. Concerns with respect to noise are addressed below under **Theme: Noise**.
Provincial energy needs	Why is BESS needed?	BESS technology provides needed generation capacity to the IESO-administered market. Generation capacity is a necessary element of a reliable grid, and sufficient generation capacity is needed to meet North American reliability requirements. BESS, gas-fired generation, and some long duration storage technologies are the technologies commercially ready to meet electricity

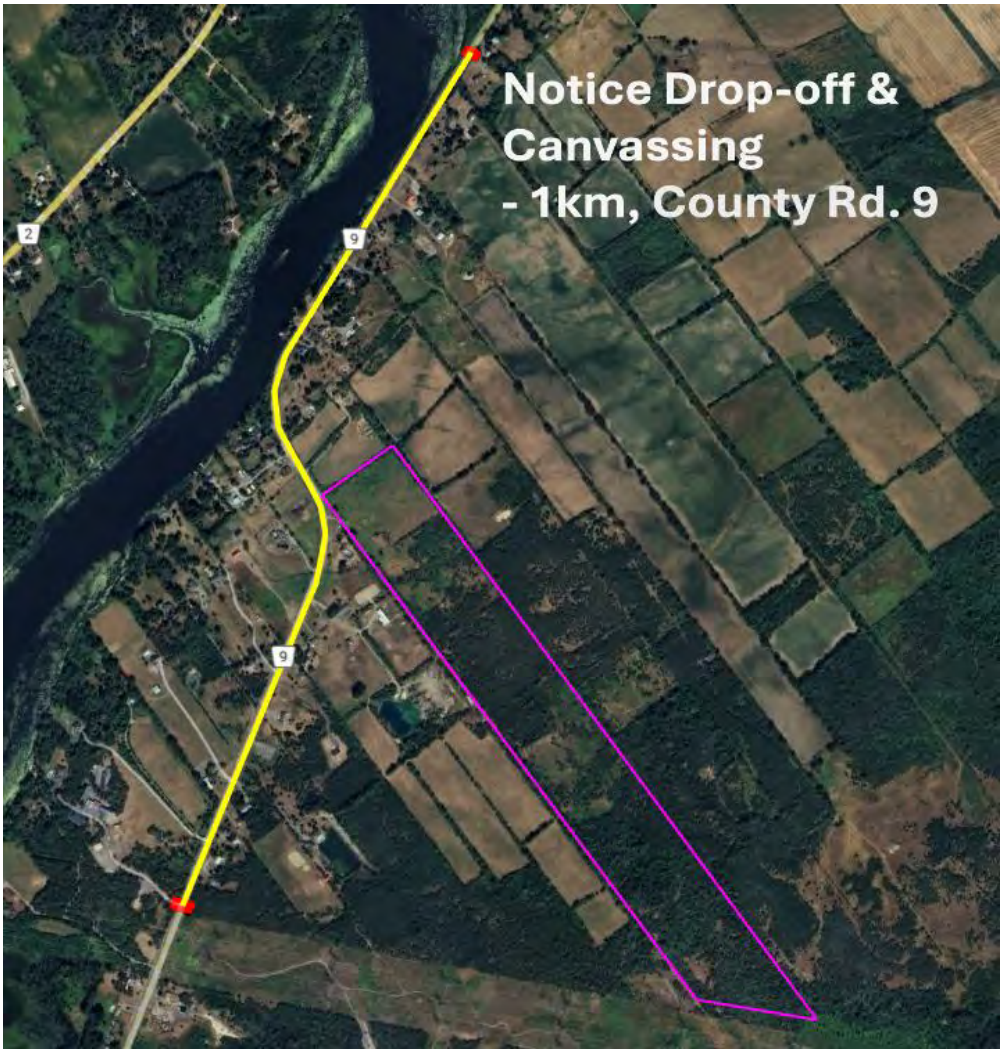
		system capacity needs. Storage (both BESS and long duration storage) has the added benefit of leveraging existing grid resources to provided needed flexibility to Ontario's electricity system to ensure cost-efficient reliability.
Geotechnical conditions	Concern with respect to the limestone bedrock.	CarbonFree believes the site and its geotechnical features can support the development and operation of a BESS facility, but it is in early-stage development and additional geotechnical studies are expected to be undertaken. Any concerns raised by subsequent studies will be addressed prudently and in accordance with leading practices.
Noise	Concern with respect to noise during construction.	Construction plans will be developed with community input to ensure minimal disruption to residents. A detailed noise assessment will be completed as part of the necessary environmental permitting activities required to be undertaken prior to construction. As part of the study, ambient noise levels will be measured, noise receptors mapped, and any other factors that may impact the propagation of noise will be accounted for. If the project proceeds, construction activities would take place only during permissible hours and a construction plan would be developed in consultation with Napanee Township prior to the commencement of construction.
	Concern with respect to noise from project operation impacting quality of life, horses.	The project will be subject to all regulatory noise limits. The proposed location of the facility is significantly set back from the road and neighboring residences. This substantially reduces the resulting noise levels at the road. The main source of noise during operation is the air conditioning /HVAC systems on the battery containers. An individual BESS unit can produce up to 75 decibels at 1 meter distance when running at full load -similar to the noise level of a vacuum cleaner. At 500 meters, the sound level would be expected to drop below the typical nighttime background noise in a rural setting, before accounting for baffling from the surrounding environment or any mitigation measures required by the noise study. Any noise impact can be further reduced by optional noise screens. The transformer setback from the nearest residence is >1 km and is

		similarly subject to all regulatory noise requirements.
Water	How much water will be the project use?	There will be no groundwater extraction required for the construction or operation of the project and BESS facilities do not consume or require water for operations. Any water needed during construction will be trucked onto the site and not be pumped from wells, aquifers or water bodies. There may be a small amount of water used for watering trees and foliage, but local water will otherwise not be required. A Stormwater Management Plan will be designed to control the quantity, rate, and quality of any runoff from the site. This will include features such as sediment and erosion controls during construction and permanent features as required like vegetated swales or retention basins to manage post-construction flow. The facility will be designed to achieve minimal impact on natural ground permeability using existing access roads, gravel use in low-traffic areas, maximizing the use of vegetated, permeable surfaces to maintain similar rates of natural groundwater drainage and recharge. Necessary permits would be obtained from several levels of government, including the municipality, the Ministry of the Environment, Conservation and Parks (MECP), and the local conservation authority. The project's water and stormwater management plans will be designed to comply with the applicable provincial regulations, including the Environmental Protection Act and the Ontario Water Resources Act.
	What about water contamination? Is there a risk that the facility will contaminate local water wells?	Liquids used in the operation of BESS facilities are limited to those needed for air conditioning units and the transformers. The facility would be designed with containment trays that can capture more than the total volume of the liquid in case of a leak. The liquids are cooling fluid (e.g. a water-glycol mixture, like antifreeze) and transformer insulating oil common to electrical installations. Where possible, we try to use biodegradable natural oil in our transformers.

Fire and safety	What about fire risk? How would a fire be prevented or put out?	BESS technology has benefitted from material advancements with respect to safety and fire prevention. The project would be built with equipment and systems from world-class suppliers with a demonstrated track record for safe operations and integrated extensive safety and fire prevention systems, providing for redundancy, early monitoring, and back-up safety systems. The project's site design will comply with Hydro One's BESS Fire Protection Risk 7 Response Assessment Standard, and the National Fire Code of Canada; Ontario Fire Code; NFPA 855 Standard for the Installation of Energy Storage Systems; UL 9540 Standard for Energy Storage Systems and Equipment; UL 1973 Standard for Batteries; UL 9540A Standard for Test Method for Evaluating Thermal Runaway Fire Propagation. The batteries will also all be made from Lithium Iron Phosphate (LFP) technology, which is far less amenable to thermal runaway and fire risk than the older Nickel Manganese Cobalt (NMC) technology. These advanced systems allow for 24/7 preventative monitoring at the level of the individual BESS unit, isolation of systems, and remote shutdown of individual units. To ensure functioning in the event of an emergency, redundant systems to ensure internet connectivity and back-up power are also included in facility design.
	What would happen in the event of a fire?	While the risk of fire is considered remote, fire department/first responder training and site familiarization drills will be funded by the project. This training will include industry best practices based on emergency response plans and full-scale fire test experience testing that require systems can burn safely without additional risk to adjacent areas. The facility will not go into operation without having a site-specific emergency response and evacuation plan. Best practices require trained fire departments and first responders to allow the enclosure to burn in a controlled manner so that all fuel is consumed and the possibility of reignition is minimized.

Quantitative Summary

Canvassing (Door Knocking)	1km strip of County Rd. 9: 48 homes, 28 responses
Public Meeting	68 community members officially signed-in
Project Website	2 Responses
Notification dropoffs	1km strip of County Rd. 9



Time/Date	Property	Response/No Response	Name	Comment/Questions
12:25pm, Nov 19	518 County Rd. 9	Response	[redacted]	Concerns about it being adjacent to farms and being in residential space General concerns about contaminants and disaster They are against the project, doesn't matter if it's 99.99% risk free
5:07pm, Nov 19	552 County Rd. 9	Response	Did Not Provide	Completely against it
4:00pm, Nov 19	608 County Rd. 9	Response	[redacted]	shallow soil, all rock Water flows from swamp on the South side of the property out to the Napanee river Any contaminants that spill into the swamp will reach the river where people have river wells Project affecting his hunting activities
3:39pm, Nov 19	834 County Rd. 9	Response	Did Not Provide	No questions She let her husband know about the public meeting She doesn't care about the project, has received the notice for the public meeting
4:46pm, Nov 19	594 County Rd. 9	Response	[redacted]	She runs a horse stable adjacent to the project, concerned for business and horse's health Generally, against the project for construction disturbance and noise effects on animals while operational
3:26pm, Nov 19	860 County Rd. 9	Response	Did Not Provide	No questions, didn't want to speak Unsure if I was talking to the homeowner
2:56pm, Nov 19	896 County Rd. 9	Response	[redacted]	What happens if it gets hit by lightning Fire concerns Asking of chemical composition of battery cells Asking about the effects on water table Questions about a possible magnetic fields or electrical field, radiation from the site Comment on local drought & risk of fire spreading easily
2:40pm, Nov 19	922 County Rd. 9	Response	Did Not Provide	Concerns over property value, don't think it'll affect his home but will affect [redacted] Questioning the placement of the project Would be better by Hwy. 33 near Bath Inquisitions on water table and chemicals on site
2:37pm, Nov 19	938 County Rd. 9	Response	[redacted]	Not for or against the development of the project General inquisitions on noise and visual impact of the project once operational Explanation of possible contaminants on site Ensuring no water will be drawn from a well They will be attending the public meeting
2:20pm, Nov 19	940 County Rd. 9	Response	[redacted]	Indifferent on the development of the project He trusts we will do our due diligence

11:48am, Nov 19	672 County Rd. 9	Response	[redacted]	Not oppositional to the development of the project In favor of the project -"can't say no forever" Curious about number of full-time workers once operational
11:48am, Nov 19	674 County Rd. 9	Response	[redacted]	In favor of project development, he said if his neighbor is in agreement then he is an agreement
11:20am, Nov 19	897 County Rd. 9	Response	[redacted]	Understands the need for the project Not for or against the project's development Predicts a lot of resistance at the public meeting
11:06am, Nov 19	857 County Rd. 9	Response	[redacted]	Asking why we picked this parcel for the BESS to be sited on No real opinion on the project Not for or against the project's development
10:29am, Nov 19	841 County Rd. 9	Response	[redacted]	Asking why we are not sited in industrial zone There is going to be a big turn out at the public meeting There is space by the Home Hardware which is an industrial zone to site the project Where River Rd. turns to County Road 9, no more public water lines or fiber optic cables; the community runs on wells He understands the battery chemistry, the fire risk and prevention measures He has worked on battery projects himself Believes people are undereducated on the technology but are rightly upset about the project location
5:44pm, Nov 18	744 County Rd. 9	Response	[redacted]	Concerns around wells and the local drought Runoff comes towards their property Planning to build a house in the front of their property adjacent to access point for the project site People are hunting right next door the next line concerns over noise and vibration and light Main concern is operating noise, very sensitive to noise due to health concerns Asking what we are contributing to the fire department Doesn't see any benefit in grid reliability since they are on a backup generator Asking about setbacks and firebreaks Is there insurance going to double Questions on surrounding property tax values Would fire department be able to access the site without a maintenance crew? Suggestions on fire suppressant fencing Water, fire and property value are three main concerns There is a fire suppressant business in town which they recommend we look into
5:02pm, Nov 18	789 County Rd. 9	Response	[redacted]e	Asking why the Bess is in their backyard instead of being in Toronto Asking what the batteries are for People are walking through the site on a daily basis Who owns CarbonFree Asking about CarbonFree history in BESS Asking about leakage explosions and liquids Asking if it is the same chemistry as Tesla's batteries Asking about setbacks asking about how many homes can be powered on a 250 MW times 8 hour battery Questions on noise, noise permits and design around noise receptors Asking about job creation during construction phase and operations
4:16pm, Nov 18	806 County Rd. 9	Response	[redacted]	Questions about the project's effects on groundwater Asking if it is linked to a generation site Asking when environmental studies will take place Asking what liquids are on site and about seepage risk How many acres is the site How many full-time workers during operations How long does construction last Would anything happen to local livestock Risks of explosion/fire concerns Questions on what gases could build up and be vented in a possible fire situation How often do batteries get replaced
2:08pm, Nov 18	731B County Rd. 9	Response	[redacted]	Indifferent of the project Moving out West before construction

1:50pm, Nov 18	737 County Rd. 9	Response	[redacted]	Concerns with the dry aquifer Concern surrounding environmental impact of construction and operation of project Wants us to go where there isn't as much groundwater being used in a residential area Wants us to educate the local community of disaster plan and environmental permitting process Says we will have to deal with tree huggers which is ironic because farmers use fertilizers etc. which poisons ground water He wants us to educate on job opportunities and benefits that the project brings next time people are going to be wary of a possible disaster since there is a track record in Ontario of industrial disasters	
1:42pm, Nov 18	731A County Rd. 9	Response	[redacted]	Unhappy with proposed project Does not want it in his neighborhood Concerns over possible disaster including fire and effects on the aquifer	
1:20pm, Nov 18	719 County Rd. 9	Response	[redacted]	Asking about projects location and its relation to the hydro plant in Bath Asking why there is an SVP under CarbonFree for this project and its relation to financing Issues about getting right insurance on the BESS If there is a major disaster will the SPV be funded enough to fix the issue The wells don't go very deep, there's been a drought Asking about the design style of the BESS what it looks like Auto Body Shop had contaminated soil in north end of Project's parcel Concerned about possible environmental effects of the project site, asking about local BESS projects	
11:16am, Nov 18	755 County Rd. 9	Response	[redacted]	He will attend public meeting Asking about access Rd. location asking if we've spoken with farmers on other side of the street No negative feedback	
11:03am, Nov 18	776 County Rd. 9	Response	[redacted]	The corner which our project access gate resides on is very dangerous in the winter time Concerned about how the construction access will affect The Walking trail adjacent to the South side of County Road 9 Worried about noise during construction Concerned about resale value and anything that can get into the aquifer	
10:25am, Nov 18	819 County Rd. 9	Response	[redacted]	Asking if the project is a generation or storage project Asking about the disposal method of the batteries Not on board with the project	
10:15am, Nov 18	814 County Rd. 9	No Response	N/A		N/A
11:25am, Nov 18	724 County Rd. 9	Response	Did Not Provide	Did not have time to speak, said they'd reach out to schedule a call	
11:32am, Nov 18	690 County Rd. 9	No Response	N/A		N/A
11:43am, Nov 18	744 County Rd. 9	No Response	N/A		N/A
1:14pm, Nov 18	721 County Rd. 9	No Response	N/A		N/A
4:57pm, Nov 18	804 County Rd. 9	No Response	N/A		N/A
10:21am, Nov 19	826 County Rd. 9	No Response	N/A		N/A
10:58am, Nov 19	843 County Rd. 9	No Response	N/A		N/A
11:16am, Nov 19	873 County Rd. 9	No Response	N/A		N/A
11:27am, Nov 19	899 County Rd. 9	No Response	N/A		N/A
11:41am, Nov 19	927A County Rd. 9	No Response	N/A		N/A
11:42am, Nov 19	927B County Rd. 9	No Response	N/A		N/A
11:42am, Nov 19	927C County Rd. 9	No Response	N/A		N/A
12:17pm, Nov 19	658 County Rd. 9	No Response	N/A		N/A
12:22pm, Nov 19	652 County Rd. 9	No Response	N/A		N/A
1:52pm, Nov 19	843 County Rd. 9	No Response	N/A		N/A
2:51pm, Nov 19	910 County Rd. 9	No Response	N/A		N/A
3:20pm, Nov 19	894 County Rd. 9	No Response	N/A		N/A
3:35pm, Nov19	842 County Rd. 9	No Response	N/A		N/A
4:21pm, Nov 19	642 County Rd. 9	No Response	N/A		N/A
4:25pm, Nov 19	632 County Rd. 9	No Response	N/A		N/A
4:28pm, Nov 19	616 County Rd 9	No Response	N/A		N/A
5:02pm, Nov 19	556 County Rd. 9	No Response	N/A		N/A

12:10am, Nov 17	Website Contact	Response	[redacted]	Can you speak to these points please? They were presented to me as part of a request to sign a Petition. I would like to make an informed decision. **ARGUMENT AGAINST THE CF NAPANEE STORAGE PROJECT (Proposed for 766 County Road 9, Beside My Home and Farm at 804 County Road 9)** 1. Immediate Safety Risk to Homes, Families, and First Responders Large-scale Battery Energy Storage Systems (BESS) pose well-documented risks of fire, explosion, and thermal runaway. These events burn at extreme temperatures, can reignite repeatedly, and release toxic gases. Placing the CF Napanee Storage Project directly beside my home and my child's living environment puts our lives, our neighbours, and our animals at risk. This location is rural, and local fire services are not equipped with the highly specialized training or chemical fire-suppression systems required for lithium battery fires. 2. Threat to Water Sources, Wells, and the Napanee River The proposed site sits beside: • The Napanee River, • Residential wells, • Agricultural water sources, and • Nearby quarry sites, which directly affect groundwater movement. Any toxic leakage or fire runoff could contaminate drinking water for homes along County Road 9, endanger livestock, harm wildlife, and compromise the river ecosystem. A single contamination event could take years to recover from, if at all. 3. Incompatibility With Surrounding Land Use The surrounding properties are agricultural, residential, and rural, not industrial. Two working farms — including mine — operate livestock (horses, sheep, chickens). These animals are extremely sensitive to noise, fumes, and environmental stress. A massive industrial battery installation does not belong in a neighbourhood filled with family homes, children, farms, and riverfront ecosystems. 4. Noise, Vibration & Health Concerns for Families and Livestock BESS facilities run continuously, producing: • Mechanical hums • Cooling fan noise • Transformer noise • Vibration This is harmful to small children, farm animals, and long-term mental health. My livelihood depends on stable, safe conditions for my animals — this project puts that at risk. 5. Loss of Livelihood & Property Devaluation An industrial battery plant steps from my home will: • Significantly reduce property value, • Make future saleability difficult, • Jeopardize my farm operations, • Interfere with raising livestock safely, and • Put my child in unnecessary proximity to heavy industrial hazards. This project takes away financial stability I've worked my whole life to build. 6. Environmental & Agricultural Impact County Road 9 contains important farmland and a river ecosystem. Introducing hazardous industrial materials into this region directly contradicts the long-term goals of protecting Ontario farmland and preserving rural communities. 7. Better, Safer, and More Appropriate Locations Exist Greater Napanee has proper industrial and commercial zones specifically suited for large-scale energy storage. There is no justification for placing the CF Napanee Storage Project in the middle of a rural residential and agricultural corridor beside the Napanee River.
8:45pm, Nov 16	Website Contact	Response	[redacted]	Sorry for not knowing much about this project so this may seem like a silly question. What is the energy source for this battery storage facility?

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
1	[redacted]	204 Water St W Napanee	[redacted]
2		731 county Rd. 9.	
3			
4			
5			
6			

CarbonFree TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
7	[redacted]	642 County Rd 9 Napanee	[redacted]
8		959 County Rd 9 Napanee	
9		959 County Rd 9 Napanee	
10		804 County Rd 9 Napanee	
11		789 county Rd 9 Napanee	
12		658 River Road	

CarbonFree TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
25	[redacted]	737 County Rd 9 Napanee ON	[redacted]
26		9381 River Rd	
27		9138 City Rd #2	
28		724 COUNTY RD 9.	
29		1979 CR 9 Napanee ont	
30		204 Water St W Napanee	

CarbonFree TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
19	[redacted]	719 CTY RD 9	[redacted]
20		2069 County Rd 9	
21		8061 County Road 9	
22		7318 County Rd 9	
23		216 BAYSHORE RD	
24		1023 #9	

CarbonFree TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
1	[redacted]	642 Cty Rd. 9 Napanee	[redacted]
2		632 Cty Rd 9 napanee	
3		823 Cataraqui Woods Dr Kingst	
4		346 Nicholson Pl. Rd.	
5		92 Neilson Rd.	
6		37 Johnson side rd	

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

① whose staff is making the report on 9th St.
② What is the liquid in the cooling system?
③ In the artist's rendering there are 5 cars. How many people will be on site daily?
④ You say Berms or fences for noise abatement. Which is it? Both/Neither?
⑤

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

People from larger cities have chosen County Rd 9 for solitude and peace. You are disrupting Rural living

Animals will be displaced forcing them to relocate closer to Napanee

~~Do~~ Aesthetically people are moving from cities to be away from plants

I don't believe for one minute that there won't be ~~real~~ health concerns as a result ~~of~~ this moving forward

This will in the end ruin our peaceful and healthy life on County Rd #9

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

we dont want it, it is too close to our home and dangerous NO!

2. Please provide your name and ccntact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	

CarbonFree
TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

- Battery storage facilities are important if we want to keep up with the demand for electricity - but why build a plant so close to highly populated area (rural but still highly populated)

- Concerns
  - fire
    - I thought it very difficult to put out a battery fire
    - Air pollution
    - Water "

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

The purpose of zoning by-laws is to regulate what happens in each zone.

Finding land for this BESS with the right zoning is something we would support 100%.

Playing around with zoning details in order to permit a BESS is something we do not support 0%

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

Poor location - Residential and Town, and River
Fire risk - Pollution.
Noise risk - Houses will be relatively close.
Better location - Atwa Pave - Expansion of Phase 1
Poor Communication in this process.

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

- NOISE
- FIRE
- Damage to roads
- Damage to farm land
- Enough of this in our AREA
- Find a location NOT near residents
- limited tax revenue
- limited # of employees

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]		[redacted]

CarbonFree
TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

This is not wanted in our residential neighbourhood! People are living here and do not want the noise, environmental risks light concerns, water contanimantion.
I moved from Guelph a year ago to our peaceful retreat on the river. It was difficult in this community of Napanee to actually find accessible trails to walk and enjoy nature; I just discovered the trail on this property that you want to destroy with industrial gross looking excessive cans! There are children horses, chickens, pets and families living here This is a horrible choice for a battery plant. I suggest going to where your hydro plant is along shores of Lake Ontario.

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

PLEASE SHOW THIS UP T.O. ASS.

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone

CarbonFree
TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

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No.	Name	Mailing Address	Email
1	[redacted]	1137 E COUNTY RD 9 NAPANEE	[redacted]
2		1137 H COUNTY RD 9	
3		1945 County RD 9	
4		340 Hambly	
5		" "	
6		642 County Rd 9.	

CarbonFree TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
13	[redacted]	33 Hambly Rd	[redacted]
14		744 County Rd 9	
15		415 County Rd 9	
16		1489 County RD 9	
17		5162 County Rd 9	
18		5497A County Rd 9	

CarbonFree TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
19	[redacted]	1023 County Rd 9 Napanee ON K7R0E4	[redacted]
20		2371 CR9	
21		2423 CR9	
22		132 CR 9	
23		2069 County Rd 9	
24		737 County Rd 9	

CarbonFree TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
7	[redacted]	40 HAMBLY RD	[redacted]
8		15 Hambly Rd Napanee	
9		826 County Rd 9 Greater Napanee	
10		938 Cty Rd #9 NAPANEE ONT	
11		1849 COUNTY RD 9	
12		841 County Rd 9	

CarbonFree TECHNOLOGY

CarbonFree

Public Feedback Sign-In

November 26, 2025

No.	Name	Mailing Address	Email
25	[redacted]	886 River Rd	[redacted]
26		804 County Rd 9 K7R 0H4	
27		804 County Rd 9	
28		298 Hamby Rd K7R 0E7	
29		899 County Rd 9 K7R 0E4	
30		899 County Rd 9 K7R 0E4	

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

SECURITY CONCERNS WITH FIRE FROM AN ACT OF TERRORIST OR MILITANT EXTREMISTS, I.E. ARSON FROM A DRONE TO THE FACILITY. HOW WILL YOU PROTECT OUR COMMUNITY?

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

No. Don't want it.

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree
TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

Are you aware of the impact this would have on the horses DIRECTLY beside this project both during "short term" construction and long-term operation?!
Horses have stress receptors that are elevated by any noise over 90dB (thunder is at 115dB) and this will be consistent operational noise of 75dB ALL THE TIME. my horse does not deserve a stressful life (at 24 yrs old) that will shorten her life guaranteed!
Not only will this project disrupt the environment, humans, homes, land, water and our ANIMALS. Take this project to an industrial park / land! Not in my horse's home.

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	[redacted]

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

① Nhapanee does not need or want another battery storage facility. We don't want our precious little town to become known as the hub of battery storage.
② Should not be placed closed to residential areas. To me the Altura at the Lenox Generating Plant should be more than efficient and is in a much better location.
③ We have many vacation here and enjoy our waterways. Retirees enjoy our comunity and there is too high a risk having these facilities here. Property Values will deplete, people with health issues is a concern if ever one of these ever blew up. Noise, pollution etc.
WE DO NOT WANT ANY MORE IN OUR TOWN!!

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]		

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

I do not agree with the placement of this next to homes and families. Find a place next to the existing Hydro Plant!

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

We moved from Scarborough because of chemical plants close to us. We do not want a plant or project that can devalue our home and possibly affect our water wells. We also have concerns of a possible fire. We are seniors who are not in the position to evacuate at a moments notice. There are also wildlife around this proposed site that in the case of emergency have nowhere to go.

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]	[redacted]	

CarbonFree
TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

I understand the future need but I am not in favour and am adamantly against these storage facilities being in a residential rural area especially on limestone and surrounded by water (rivers & bays).
There is also the matter of little advance notice to residents as to the proposal. Also the apparent neglect on Carbon Free's assessment of the area being proposed. There has been no contact with Conservation Authority. The area's proposed is ~~not~~ Environmentally Protected area's

2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]		

CarbonFree TECHNOLOGY

CarbonFree
Comment Sheet

November 26, 2025

1. Please provide any comments, questions or concerns you feel should be considered by CarbonFree.

(1) Should NOT be near any residential / farm areas!
There are plenty of industrial areas within the neighbouring areas where this would be much better suited!!

(2) If this is so great, why does it only have a projected life span of 25 years? This does not make sense - especially with the future cost of dismantling & disposal.

(3) If it has already been proven that wind & solar haven't been as beneficial as hoped - why do you possibly think this can be a better solution??

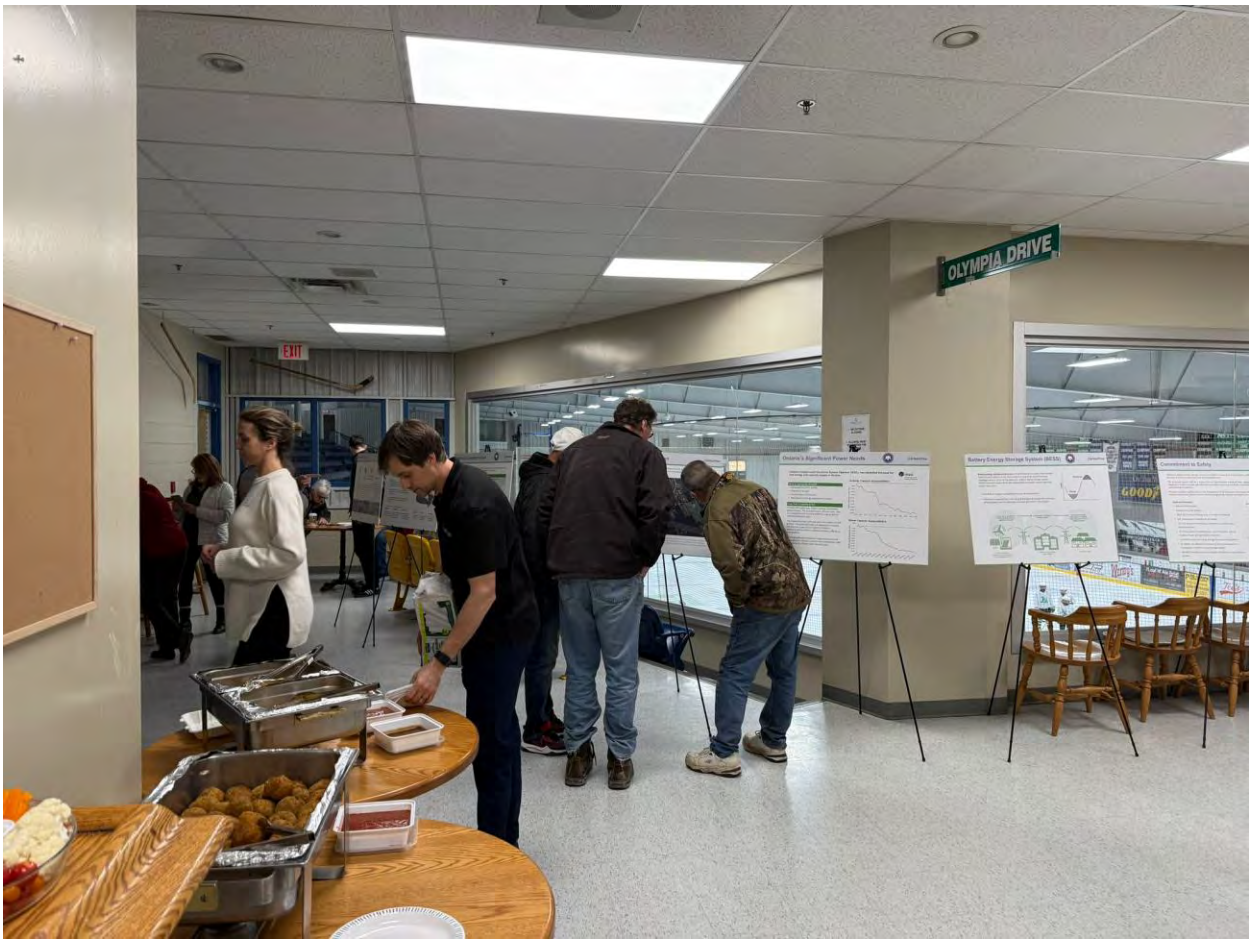
2. Please provide your name and contact information below (OPTIONAL):

Name	Mailing Address	Phone
[redacted]		

CarbonFree TECHNOLOGY

Napanee BESS sign posted on proposed site.

The first few attendees at the Napanee BESS public meeting.



Catering courtesy of The Catering Company, Napanee.

Public meeting was held at the Best & Bash Arena Large Lounge November 26th, 2025