

Introduction to the proposed Hydroelectric Pumped Storage Plant by TC Energy

Save Georgian Bay Opposes this Proposal

Save Georgian Bay is a group of volunteers who oppose this plant being built on the pristine shores of Georgian Bay.

Our group is comprised of local residents, cottagers, environmentalists, engineers, activists, consultants and business owners.



TC Energy – Proposed Pumped Storage Plant Meaford Tank Range

TransCanada Energy (TCE)
Hydroelectric Pumped Storage Plant (PSP)
Department of National Defence (DND)

TCE (*formerly TransCanada Pipeline*) has received permission from the DND to do a feasibility study for a 1000 mw PSP on the shores of Georgian Bay. This proposed facility has serious and potentially harmful implications for local communities, the environment and Georgian Bay's aquatic ecosystem.

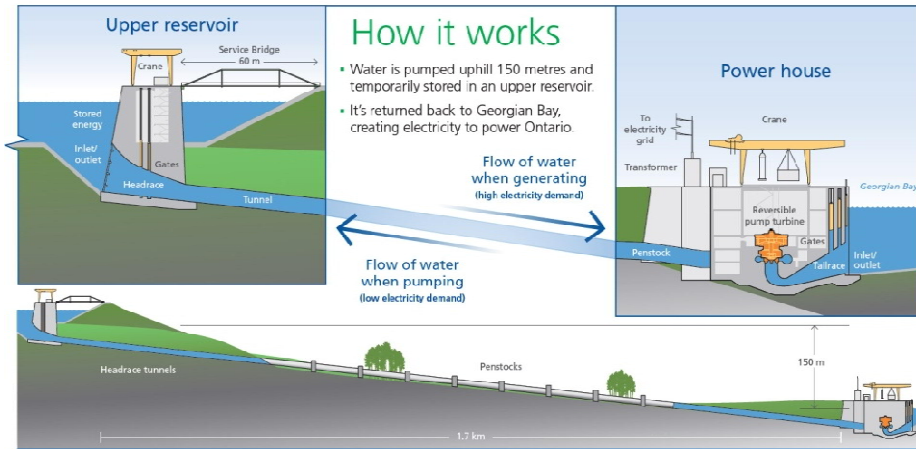
**Proposed Site Plan 4th Canadian Division
Training Centre Meaford ON**



TC Energy Proposed Site Plan

What is Pumped Storage?

Open Loop



Open Loop System Pumped Storage Plant

*(Requires access to a natural flowing water source;
in our case Georgian Bay at Black Point/Seagull Bay)*

TC Energy is Proposing an Open Loop System

Water from Georgian Bay (23 million cubic meters) will be pumped up the escarpment 150m through 3 turbines to a man made reservoir (375 acres) and temporarily stored. It will then be released back into Georgian Bay to generate electricity which will be transferred to the power grid near Barrie.

A **Closed Loop System** does not require a natural water source and is typically built in abandoned mines & quarries (*Marmora Ontario*)

TC Energy identified Ludington MI Pumped Storage Plant as a “Like Project”

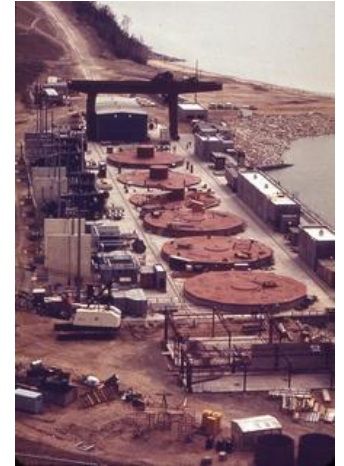
Ludington Michigan PSP 1875mw



Reservoir, shoreline intake break wall



Penstocks & Pumphouse



High Tension Lines Corridor



Light Pollution

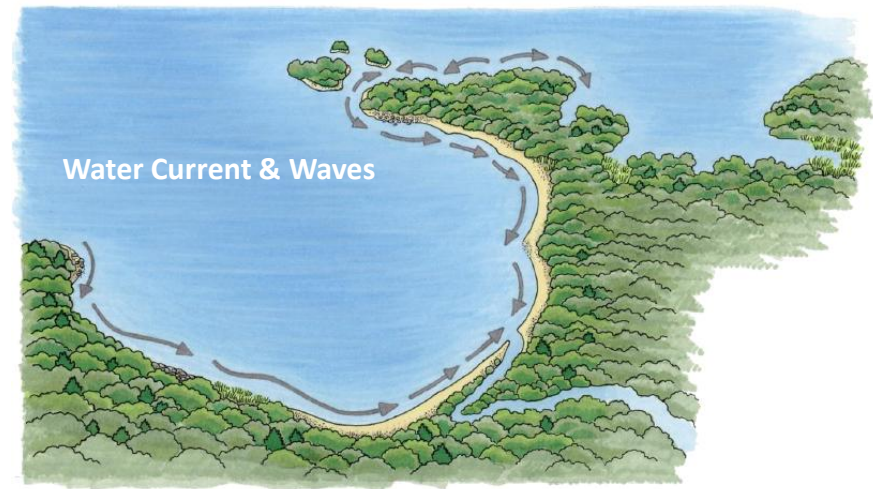


Turbidity



Environmental Impact

- Approx. 500 acres of forest destroyed and its inhabitants displaced
- 375 acre partially excavated and partially dammed concrete reservoir
- 700m shoreline intake area along Seagull Bay/Black Pt & break wall to be built 850m into the bay will entrap & kill fish, destroy spawning areas and aquatic ecosystems
- Water will be pumped in & out of Georgian Bay every day creating constant water turbidity affecting quality of water
- Noise, water, light and air pollution during & after construction (*possible on site cement production*)
- High voltage transmission line corridor required from Meaford to Barrie to connect to the grid



Municipalities should consider lessons learned from other areas where piers, jettys and dredging projects have interrupted natural shore processes with negative economic, social and environmental consequences . (South Georgian Bay Shoreline Stewardship Guide)

Community Issues

- Nearby residents to endure 4+ years of construction producing noise, pollution, impacts on roads, dug wells (*will we have water?*) as well as shoreline wells (*will the water be safe to drink?*)
- Water turbidity & natural currents in the bay will affect the shoreline for miles and miles (*will our town water be safe?*)
- The man made reservoir will be built above existing homes & neighborhoods



Construction of the Penstocks (turbines) at Ludington MI Site

Community Issues

- TCE boasts 800 jobs over 4yrs – most of these will be transient workers. Where will the worker housing be built? (*it will not be on the base*), 12-15 permanent jobs post construction, some can be remote
- Contributing to local economy...short term at what cost?
- Our local labor force will be further depleted, what will happen to family owned businesses that have supported our communities for decades?
- Will people want to visit here, swim in our water or fish in the bay? How will this affect our tourism industry in the long run?



TC Energy Workforce Accommodations

TCE Tactic – Eminent Domain

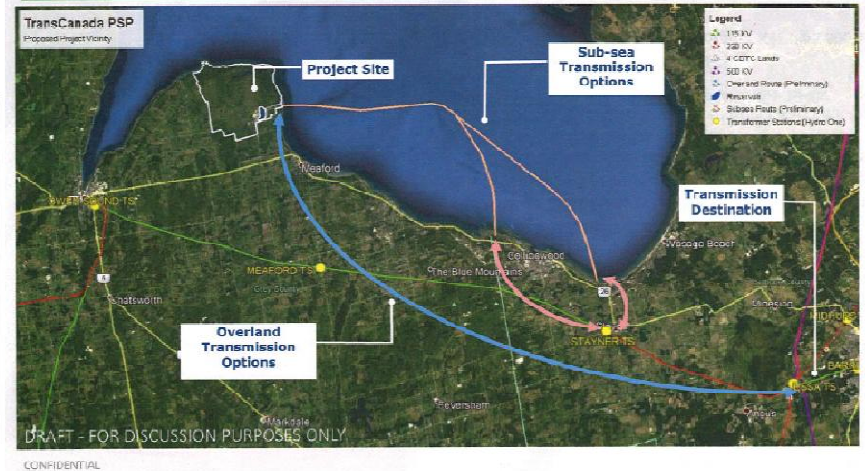
High Tension Lines CORRIDOR

The proposed facility would be connected to Ontario's electricity grid through a “newly constructed transmission line...routing is to avoid sensitive or valued features where possible”

John Mikkelsen, Director, Power Business Development



Proposed Transmission Connection



Can a landowner refuse access? Will TCE use eminent domain?

Our goal would be to contain the facility to as much extent as possible within the confines of the Meaford base and in the case of the transmission lines, within existing corridors. Where private lands are required, TC Energy is committed to working with landowners affected by the project to resolve issues and reach mutually acceptable agreements for the land rights required for the project. It is TC Energy's preference to negotiate voluntary agreements with all landowners and only resort to available legislated expropriation procedures when efforts to obtain negotiated agreements have been exhausted.

Expropriation July 1942

“Opening Old Wounds”



My ancestors were told the land would be used for training purposes only and that they could buy the land back after the war, but this clause turned out to be non-binding. If the Department of National Defense were to make land that was expropriated for training available to TC Energy for their pumped storage facility (instead of using it for anything but training as originally promised) I and other descendants of those landowners would consider it a huge slap in the face of those farmers and fishers who were forced to give up their land at a difficult time and under difficult circumstances (excerpt from open letter of descendent).

HELP Save Georgian Bay!



Please join us to identify the truly best solutions for Ontario and Grey County.



How You Can Help!

Write a Letter:

The Municipality

bclumpus@meaford.ca
council@meaford.ca
cao@meaford.ca

DND

Holly King, Section Head -
Directorate Real Property Services
ThirdPartyAccess@forces.gc.ca

Elected Officials

Harjit Sajjan, Minister of Defence
DND_MND@forces.gc.ca

Alex Ruff, MP
Alex.Ruff@parl.gc.ca

The Honourable Catherine McKenna
infrc.ministerministre.infrc@canada.ca

Terry Dowdall, MP
Terry.Dowdall@parl.gc.ca

Bill Walker, MPP
bill.walker@pc.ola.org

Justin Trudeau, PM
pm@pm.gc.ca

Sign our Petition at:

[Change.org/save georgian bay](https://change.org/save-georgian-bay)

(we do not receive any of the donated funds on Change.org)



Deputation: Save Georgian Bay

RESOLUTION #1:

A RESOLUTION OF THE MEAFORD MUNICIPAL COUNCIL ("COUNCIL"), TRANSMITTING THE VOICE OF OUR CONSTITUENT AND LARGER COMMUNITY WHO LARGELY OPPOSE THE ALLOCATION OF DND LAND AND WATER ACCESS TO TC ENERGY FOR THE PURPOSE OF A PUMP STORAGE PLANT ("PROJECT"), ASKING THAT THE DEPARTMENT OF NATIONAL DEFENCE ("DND") CHOOSE NOT TO SUPPORT THE PROJECT AS PROPOSED.

WHEREAS, Council were elected to represent the constituents of Meaford, and to make decisions considering the common good of the municipality,

WHEREAS, the constituents of Meaford and the larger community largely oppose the Project as evident by the Save Georgian Bay Petition with nearly 20,000 signatures,

WHEREAS, the reasons for opposition vary, but in general constituents see the Project as incompatible with strategic priorities of the community of Meaford that embrace the natural beauty of Georgian Bay and the Niagara Escarpment,

WHEREAS, the Project design is based on the Ludington plant from the 1960's that includes a shore-based intake and offshore breakwalls that destroyed fish habitat and kill millions of fish per year as evident from court documents and compliance monitoring reports,

WHEREAS, the Project has a high likelihood of causing the same significant adverse environmental effects as the Ludington plant – death of fish; harmful alteration, disruption or destruction of fish habitat; release of deleterious substances; damage or destruction of habitat for endangered or threatened species,

WHEREAS, the Project provides limited employment opportunities during operations, and the employment opportunities during construction pose a risk to other employers with the surrounding areas,

WHEREAS, TC Energy has investigated the Project for at least the past two years yet demonstrates a lack of knowledge of or concern for the community of Meaford or environment of Georgian Bay and Niagara Escarpment,

WHEREAS, TC Energy did not consider community or environmental factors in their selection of site, design or technology, yet viable alternative sites, designs and technologies are available,

WHEREAS, TC Energy claim the Project to be 'green' yet TC Energy pipe and burn fossil fuels as their primary business, and other sites, designs and technologies provide the same carbon output as the Project but without harming the environment or community,

WHEREAS, TC Energy has implied benefit to the community of Meaford associated with the temporary housing for migrant workers during construction, yet the same benefit has been offered to First Nations and all municipalities within the surrounding areas,

WHEREAS, TC Energy propose a new overland transmission corridor from Barrie to either Meaford or Collingwood, either of which have a high likelihood of causing significant disruption of residential and agricultural lands,

WHEREAS, TC Energy has a poor environmental performance according to the National Energy Board and Polaris Institute,

WHEREAS, the constituents of Meaford support the valuable service provided by the 4th Canadian Division Training Centre of the DND, and do not support the use of these expropriated lands and waters for purposes other than that originally intended,

The Council of the Corporation of the Municipality of Meaford enacts as follows:

1. Council will rescind all previous resolutions declaring approval or neutrality of the Project,
2. Council hence forth opposes the Project as proposed,
3. Council will inform the DND of their opposition to the Project,
4. Council will ask the DND to consider the same.

Deputation: Save Georgian Bay

DRAFT RESOLUTION #2

A RESOLUTION OF THE MEAFORD MUNICIPAL COUNCIL ("COUNCIL"), TRANSMITTING THE VOICE OF OUR CONSTITUENTS AND THE LARGER COMMUNITY WHO LARGELY OPPOSE THE ALLOCATION OF DND LAND AND WATER ACCESS TO TC ENERGY FOR THE PURPOSE OF A PUMP STORAGE PLANT ("PROJECT"), ASKING THAT THE DEPARTMENT OF NATIONAL DEFENCE ("DND") SPECIFY CONDITIONS ON ANY FURTHER AUTHORIZATION GRANT TO TC ENERGY TO HOLD THEM TO ACCOUNT TO THE HIGHEST POSSIBLE STANDARD OF CARE REQUIRED BY LEGISLATION AND/OR BEST PRACTICE.

WHEREAS, Meaford Council were elected to represent the constituents of Meaford, and to make decisions considering the common good of the municipality,

WHEREAS, the constituents of Meaford and the larger community largely oppose the Project as evident by the Save Georgian Bay Petition with nearly 20,000 signatures,

WHEREAS, the reasons for opposition vary, but in general constituents see the Project as incompatible with strategic priorities for the community of Meaford that embrace the natural beauty of Georgian Bay and the Niagara Escarpment,

WHEREAS, the Project design is based on the Ludington plant from the 1960's that includes a shore-based intake and offshore breakwalls that destroyed fish habitat and kill millions of fish per year as evident from court documents and compliance monitoring reports,

WHEREAS, the Project has a high likelihood of causing the same significant adverse environmental effects as the Ludington plant – death of fish; harmful alteration, disruption or destruction of fish habitat; release of deleterious substances; damage or destruction of habitat for endangered or threatened species,

WHEREAS, TC Energy propose a new overland transmission corridor from Barrie to either Meaford or Collingwood, either of which have a high likelihood of causing significant disruption of residential and agricultural lands,

WHEREAS, TC Energy has a poor environmental performance according to the National Energy Board and Polaris Institute,

WHEREAS, the constituents of Meaford support the valuable service provided by the 4th Canadian Division Training Centre of the DND, and do not support the use of these expropriated lands and waters for purposes other than that originally intended,

The Council of the Corporation of the Municipality of Meaford enacts as follows:

1. Council will rescind all previous resolutions declaring approval or neutrality of the Project,
2. Council will hence forth oppose the Project as proposed unless all conditions outlined in Schedule A are achieved to the satisfaction of Council,
3. Council will inform the DND of their opposition and conditions,
4. Council will ask the DND to consider the same.

SCHEDULE A

THE MEAFORD MUNICIPAL COUNCIL ("COUNCIL"), TRANSMITTING THE VOICE OF OUR CONSTITUENTS AND THE LARGER COMMUNITY WHO LARGELY OPPOSE THE ALLOCATION OF DND LAND AND WATER ACCESS TO TC ENERGY FOR THE PURPOSE OF A PUMP STORAGE PLANT ("PROJECT"), ASK THE DEPARTMENT OF NATIONAL DEFENCE ("DND") TO INCORPORATE THE FOLLOWING CONDITIONS ON ANY FURTHER AUTHORIZATIONS GRANTED TO TC ENERGY WITH RESPECT TO THE PROJECT. THESE CONDITIONS HOLD TC ENERGY TO ACCOUNT TO THE HIGHEST POSSIBLE STANDARD OF CARE REQUIRED BY LEGISLATION AND/OR BEST PRACTICE.

1. Alternative site locations – TC Energy proposed the current site based on the following criteria: the site provides approximately 150 m of vertical elevation difference between the Niagara Escarpment and Georgian Bay, Georgian Bay provides a source of water at no cost to TC Energy, and the site is located within 100 km of the power grid. TC Energy did not take community or environment into consideration in their site selection, as demonstrated during the 11th December 2019 community meeting hosted by TC Energy. The Australian Renewable Energy Mapping Infrastructure ("AREMI") has identified three prospective sites for pump storage plants within Southern Ontario, and other companies have identified abandoned mines and quarries for use as pump storage plants. Council requires TC Energy to retain a third-party expert of Council's approval to undertake a comprehensive assessment of all potential sites, including, but not limited to, the three prospective sites identified by AREMI and abandoned mines and quarries, considering them individually and in the aggregate. This report will rationalize the best sites with least environmental impacts and most acceptance by the community.
2. Alternative designs – TC Energy proposed the current design based on the Ludington plant. The Ludington plant was approved for construction in the 1960's, and is based on an open system that draws and releases water through a shore-based intake/outfall protected by armourstone breakwalls. The Ludington plant has since caused significant adverse environmental effects, including the destruction of fish habitat and the death of millions of fish per year. TC Energy has not considered alternative designs, as demonstrated during the 11th December 2019 community meeting hosted by TC Energy. Council requires TC Energy to retain a third-party expert of Council's approval to undertake a comprehensive assessment of all possible design alternatives, including, but not limited to, closed systems, offshore intakes, velocity caps, energy dissipation structures. This report will rationalize the best design with least environmental impacts and most acceptance by the community.
3. Alternative technologies – TC Energy proposed a pump storage plant as their preferred technology for energy storage. They have not considered any other technology, as demonstrated during the 11th December 2019 community meeting hosted by TC Energy. Yet other companies have used other energy storage technologies elsewhere in Ontario and throughout North America. These other technologies provide the same or improved total life cycle potential for carbon output reduction as what TC Energy claims for the Project yet they can be constructed on brownfields, near urban centers, without need of new transmission corridors, without causing death of fish, destroying fish habitat or habitat for species at risk. Council requires TC Energy to retain a third-party expert of Council's approval to undertake a comprehensive assessment of all possible energy storage technologies and/or load balancing methods, including, but not limited to, lithium-ion batteries. This report will rationalize the best technology with least environmental impacts and most acceptance by the community.

4. Turbidity – The constituents of Meaford express concern regarding turbidity since the waters of Georgian Bay are typically pristine, the nearshore substrate is predominantly cobble overlying clay, and those living along the shoreline or within town draw potable water from shorewells or from the bay. TC Energy claims *“proper design and construction of the outlet and other project structures in Georgian Bay will result in a design that does not contribute to turbidity in Georgian Bay”*. Yet TC Energy has not provided design details to support their claim, nor does TC Energy seem aware of local site conditions, as demonstrated during the 11th December 2019 community meeting hosted by TC Energy. Council requires TC Energy to submit a comprehensive assessment detailing: local site conditions, including borehole logs and appropriate geophysical investigations; loading rates of materials causing turbidity from all possible sources affected by the Project during site preparation, construction, operation and decommissioning; design details, including mitigation strategy, monitoring plan, and response plan. This report is to be made available to Council and the community.
5. Baseline water quality – The currently water quality of Georgian Bay within the vicinity of the Project site is considered pristine, and likely complies with water quality guidelines of the Canadian Council of Ministers of the Environment and the Provincial Water Quality Objectives. But available data are limited. Council requires TC Energy to implement and maintain a comprehensive surface water quality monitoring program starting immediately and spanning a minimum two-year period prior to submitting their impact assessment report. The monitoring program should provide sufficient spatial and temporal resolution to quantify the frequency and duration of clear flow periods from which background levels of turbidity and other water quality parameters will be defined. The monitoring program should also include such other parameters and meet such other requirements as stipulated by appropriate federal and provincial agencies. Data from this monitoring program will be made available to Council and the community on a quarterly basis through the monitoring period.
6. Water quality criteria – The Canadian Council of Ministers of the Environment and the Ontario Ministry of Environment, Conservation and Parks specify surface water quality objectives for the protection of aquatic life. Among other parameters, these objectives specify allowable limits for turbidity. Council requires TC Energy to comply with the applicable federal and provincial water quality objectives for all parameters. For clarity, the background level and natural state for turbidity shall be taken as the clear flow condition of calm winds, no waves and dry weather. In the event the federal or provincial authorities grant a mixing zone, this mixing zone shall be limited to 100 metres from the edge of the Project footprint, and must not result in toxic conditions or irreparable environmental damage including risk to ecosystem integrity and human health nor interfere with water supply, recreational or other water uses of the adjacent property owners.
7. Potable water – TC Energy’s proposed project has the potential to impact the quantity, quality and safety of potable water for those communities along the shoreline or inland that source water from either shore wells or drilled wells. When asked about this potential concern at the 16th January 2020 community meeting hosted by TC Energy, representatives of TC Energy stated that TC Energy would construct a water supply main from Meaford to provide potable water to these communities. Council interprets such statements from TC Energy as commitments to the community, and thereby requires TC Energy to fulfil this commitment at no cost to the community.
8. Light and noise – TC Energy has acknowledged the plant will emit noise and light during construction and operations, yet they claimed during the 16th January 2020 community meeting

hosted by TC Energy that local residents would not notice either. Given the nearest resident is located within 100 m or so of the proposed plant, Council requires TC Energy to provide evidence of how they intend to limit noise and light within such a restrictive area.

9. Aquatic community characterization – Preliminary investigations identify that at least 23 species utilize the nearshore environment of Georgian Bay within the vicinity of the Project. Several of these species are listed as threatened by COSEWIC. But available data are limited. Council requires TC Energy to retain a third-party subject matter expert of Council's approval to undertake a comprehensive aquatic habitat and aquatic community monitoring program to characterize habitat and organisms prone to impingement and entrainment, and to support the optimization of siting of the intake/outfall, diffuser structures and other offshore structures. The monitoring program should focus on fish, ichthyoplankton, macrozooplankton and benthic invertebrates; extend from the shoreline out to 30 metre depth; extend approximately 2 km along the Project site shoreline; and occur throughout the Spring, Summer and Fall seasons. The monitoring program should also include such other requirements as stipulated by appropriate federal and provincial agencies, and be approved by Council. Data and interpretive report from this monitoring program will be made available to Council and the community on a quarterly basis through the monitoring period.
10. Avoidance of sensitive habitat – TC Energy state they will avoidance of spawning and other sensitive aquatic habitat yet TC Energy has proposed a shore-based intake/outfall structure with offshore breakwalls located immediately within an area of known spawning habitat for Lake Whitefish, Lake Trout and Carp. Council requires TC Energy to locate the intake/outfall and diffuser structures beyond the nearshore habitat zone so as to avoid risk of adverse operational effects. Alternatively, Council requires TC Energy to consider an alternate location for the intake/outfall, or to redesign the plant as a closed loop system contained on land.
11. Mitigation of fish mortality – TC Energy states they will employ mitigation measures to further reduce the potential adverse environmental effects associated with the Project. For the case of the Ludington plant, mitigation consisted of a 2 km long net during the open water seasons (April through November). This form of mitigation has limited effectiveness, causes incidental fish mortality, and poses a hazard to boaters. More appropriate mitigation measures include velocity caps or diffuser structures to reduce the risk of impingement and entrainment. Council requires TC Energy to employ mitigation measures through means other than netting.
12. Fish habitat offsets – TC Energy suggest the use of fish habitat offsets to compensate for impacts associated with death of fish and destruction of fish habitat. As the community most impacted by the Project, Council requires TC Energy to apply fish habitat offsets within areas adjacent to the municipal boundaries of Meaford and in a form considered by Council as beneficial to the community of Meaford.
13. Species at risk – Preliminary investigations identify that as many as 11 species listed as being at risk may utilize the lands and waters within the vicinity of the Project. But available data are limited. Council requires TC Energy to retain a third-party subject matter expert of Council's approval to undertake a comprehensive monitoring program to characterize habitat and flora and fauna within the area of influence. The monitoring program should include requirements as stipulated by appropriate federal and provincial agencies, and be approved by Council. Data and interpretive report from this monitoring program will be made available to Council and the community on a quarterly basis through the monitoring period.

14. Avoidance of habitat for species at risk – Council requires TC Energy to avoid all habitats associated with species at risk.
15. Physical limnology – The Project as proposed draws and releases a large volume of water from and to the shores of Georgian Bay. This cycle of flows will alter the natural circulation patterns within Nottawasaga Bay and possibly throughout Georgian Bay. It could affect stratification, heat balances and ice formation over large areas, yet nothing is yet known about such potential significant adverse effects. Council requires TC Energy to retain a third-party subject matter expert of Council's approval to undertake a comprehensive assessment of the physical limnology of Georgian Bay and mathematical model predictions of the potential effects of construction, operations and decommissioning on circulation, stratification and ice formation. Further, Council requires TC Energy to take preventive measures to minimize potential disruption of the physical limnology of Georgian Bay.
16. Shoreline erosion – The Project includes construction of offshore breakwalls that will impede the natural movement of sediments along the shoreline. Council requires TC Energy to retain a third-party subject matter expert of Council's approval to undertake a comprehensive assessment of coastal processes along the western shore of Nottawasaga Bay, including but not limited to, the potential effects on waves, alongshore currents, sediment transport, and potential erosion and accretion of sediments along the shoreline. This report will be made available to Council and the community.
17. Dam break analysis – The Project includes the construction of a 23 million cubic meter reservoir on the upper levels of the Niagara Escarpment. While the exact details of the design are not yet known, it is presumed it will consist of dams, excavations and impervious liner. Considering the reservoir is to be located upgradient from where many families live, Council requires TC Energy to retain a third-party subject matter expert of Council's approval to undertake a comprehensive dam break analysis to assess the potential loss of life should an unforeseen catastrophic failure of the reservoir occur. This report will be made available to Council and the community.
18. Transmission corridor – TC Energy proposed two possible routes to convey electricity to and from the grid – an overland option and an underwater option. The overland option will likely cause significant adverse effects to residential and agricultural lands across a large portion of the township of Meaford. Council opposes this option and requires TC Energy to instead consider only the underwater option.
19. Public notification of transmission corridor – The public is largely unaware of the proposed transmission corridor. Council requires TC Energy to notify all municipalities, residents and business located within 2 kilometers of any prospective corridor so that those communities and stakeholders have an opportunity for input during the initial study phase of the feasibility of the project, with enough notice to fully participate in the DND comment period.
20. Agreements with Saugeen Ojibway Nation and other First Nations – TC Energy declared its intent to enter into a partnership with Saugeen Ojibway Nation (SON) and possibly other First Nations and/or Metis Nations with respect to this Project. In the spirit of full transparency, Council requires TC Energy to publicly disclose the terms, conditions and financial arrangements of such partnerships. In the event such partnerships exist and to avoid any possible perception of conflict of interest, Council further requires TC Energy award contracts for monitoring and assessments associated with this Project only to fully independent third-party entities.

21. Community housing – TC Energy declared its intent to construct housing units for 800 workers who will be temporarily employed during the four-year construction phase of the Project. TC Energy has offered these housing units to the community of Meaford after completion of the construction phase. They have also promised the same units to First Nations and other municipalities in exchange for their support. As the community most affected by the Project, Council requires TC Energy to allocate no fewer than 75% of the housing units to be constructed within the municipal boundaries of Meaford and to be constructed in locations and of such quality agreeable to Council and consistent with building codes and municipal master planning.
22. Site decommissioning – TC Energy declared a 50-year life span for the Project. Council requires TC Energy to submit a comprehensive decommissioning plan for the site, including costing, to restore the site to its current condition. Council does not accept TC Energy's position that decommissioning will be addressed in the future at the end of the project life. TC Energy will establish a bond or other payment mechanism acceptable to Council to fully fund future decommissioning of the site.
23. Risk analysis – TC Energy will prepare a complete risk analysis of the project and its operation, including public health and safety, environmental health and safety, threats of water or fluid leakage, weather or other environmental risks, threats to the eco-system and habitats, water quality and any other risk areas; inclusive of risks and anticipated prevention actions.
24. Economic evaluation – TC Energy declares the benefit to rate payers to be \$250 million per year, but they have not disclosed the full economic evaluation for the Project. TCE will provide a full pro forma projection, sharing the projection of costs and revenues, for review by Council and the community.
25. Carbon emissions – TC Energy declares the Project will result in a reduction in carbon emissions during operations. Council requires TC Energy to provide a carbon balance projection report for the entire project life cycle, including construction and decommissioning.
26. Third party review – TC Energy agrees to provide funding to Council and the town of Meaford for legal representation and expert technical review throughout the process starting immediately and extended through the first two years of operation following commissioning of the plant. The estimate for this funding is \$200,000 for 2020 and 2021 and will be adjusted as needed to meet unforeseen costs associated with the review.