

April 23, 2020

MV2019L1-0001

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Request for Extension of Submission Dates and Continuous Flow Monitoring for Water Licence MV2019L1-0001 Due to COVID-19

Hello Tyree,

Throughout late 2018 and 2019 the Northwest Territories Power Corporation (NTPC) went through the water licence renewal process for the Jackfish Generating Facility in Yellowknife, Northwest Territories. The facility contributes power to the North Slave electrical system and has engine cooling systems that use water from Jackfish Lake. On October 18, 2019 Water Licence MV2019L1-0001 was issued for the Jackfish Facility. Water Licence MV2019L1-0001 includes conditions and requirements for various submissions under the new licence. Some key submissions and submission dates in the licence are:

- Part E, condition 4- Thermal Plume Delineation Study Design- January 29, 2020
- Part E, condition 5- Thermal Plume Delineation Study Report- August 1, 2021
- Part F, condition 2- AEMP Design Plan- November 1, 2021
- AEMP 1st year Report- March 31, 2023

MV2019L1-0001 also requires “All volume and temperature measurements shall be measured and recorded continuously (i.e., using electronic data storage chips or equivalent) during periods of Discharges and reported on a monthly basis (Part B- 1):”

As with many organizations in the NWT the COVID-19 pandemic has reduced available resources and diverted remaining resources to critical tasks during this period. NTPC declared a Level 2 Emergency on March 13, 2020 which was upgraded to a Level 3 Emergency on March 18, 2020. Since this time and in accordance with the Level 3 Emergency operating conditions NTPC has cancelled all non-essential work at all sites across the territory.

Before the pandemic NTPC was moving forward with instrumentation upgrades to meet the new requirements and complete the required submissions for MV2019L1-0001. Under

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current operating conditions installation of the required instrumentation is not possible. A temporary system is in place to obtain the required temperature data but the existing flow monitoring system cannot provide continuous flow data.

Continuous flow data is required to complete the Thermal Effects Study to accurately characterize the potential impacts of the facilities operations on the thermal profiles within Jackfish Lake. Temperature data has been gathered in Jackfish Lake and at the outlets but without continuous flow data the relationships between generation, system flow and water temperature at the outlets and in the lake cannot be accurately investigated.

The results of the Thermal Effects Study will be required to complete the AEMP Design Plan.

In a January 27, 2020 meeting between NTPC and the MVLWB NTPC requested an extension for the Thermal Plume Delineation Study Design submission until April 10, 2020 to allow time for the Jackfish Instrumentation Study to completed. The Instrumentation Study and Thermal Plume Delineation Study Design were both delayed by COVID-19 impacts as outlined in a March 30, 2020 email to the MVLWB.

To account for COVID-19 delays and allow time for current operating conditions to pass and/or detailed policies to be developed to complete work under current conditions NTPC is requesting an extension for the implementation of the continuous flow monitoring requirements and the submissions that require this data.

The requested submission/completion dates are:

- Jackfish Instrumentation Study- April 24, 2020
- Part E, condition 4- Thermal Plume Delineation Study Design- May 29, 2020
- Installation of continuous flow monitoring instrumentation- August 31, 2020
- Part E, condition 5- Thermal Plume Delineation Study Report- December 31, 2021
- Part F, condition 2- AEMP Design Plan- March 31, 2022
- 1st Annual AEMP Report- March 31, 2023 (may not contain full year of data)

Please confirm if these dates are acceptable and if there is any other further information we can provide.

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Thanks for your time,



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