



Indigenous & Community Engagement Plan

Project: Elmbrook Agrivoltaics

*Project Address: PT LT 20 CON 1 SW GREEN POINT SOPHIASBURGH AS IN PE69159,
W OF PE152274, EXCEPT PT 1 47R1831; S/T PE49315, SB9091; PRINCE EDWARD*

Revision History

Date	Notes
May 09, 2025	Original draft
August 11, 2025	Project Capacity increased from 15.5 MW to 22 MW

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1. Introduction

Compass Greenfield Development Inc. has developed this Indigenous and Community Engagement Plan (the “Plan”) for the Elmbrook Agrivoltaics (the “Project”), a proposed sheep farming and solar generation project.

The Project will have about 250 sheep and approximately 22 MW megawatt AC (“MWac”) of solar power that will be located in the Prince Edward County.

Compass Greenfield Development Inc. will submit the Project into the IESO’s Request for Proposals under the Long-Term 2 procurement¹ (“LT2 RFP”) on or before the Submission Deadline.

This Indigenous and Community Engagement Plan’s objectives are to:

- Provide details about the Project
- Describe the IESO’s LT2 RFP process
- Describe our commitment and process towards Indigenous and community engagement
- Provide engagement and feedback opportunities for Indigenous and community stakeholders
- Address and respond to Indigenous and community feedback
- Describe our plans for future Indigenous and community engagement

It is very important that Indigenous, local community, and other stakeholders are contacted and communicated with regarding details of the proposed Project.

If the Project is successful in the LT2 RFP and awarded a contract, it will be in operation for 20+ years. To ensure that the development, implementation, operation, and decommissioning of the Project is successful, we strive to effectively incorporate the interests and concerns of Indigenous and local communities and other stakeholders during the planning, building, operating, and decommissioning phases.

All capitalized terms used in this document are defined in the LT2(e-1) RFP or Contract.

¹ More information about the IESO’s Long Term 2 RFP is available here: <https://www.ieso.ca/Sector-Participants/Resource-Acquisition-and-Contracts/Long-Term-2-RFP>

2. Purpose of the Indigenous and Community Engagement Plan

This Plan identifies our commitment and strategy for establishing and sustaining a transparent and productive engagement with Indigenous and local communities. This Plan is a “living” document and may be updated during the project life cycle to better suit the goals and objectives of the engagement process.

The Plan will:

- Publish reader-friendly and publicly accessible project information to help Indigenous and local community understand the proposed Project, understand where to get more details on the project and describe opportunities for providing feedback;
- Promote active public engagement through effective and targeted outreach;
- Design a communication plan to inform Indigenous and local community stakeholders of on-going community engagement and project development activities;
- Create engagement opportunities for Indigenous and local community stakeholders to be involved throughout the development process, including the planning and development of project design;
- Create opportunities to collect and engage with public feedback on the project website and during public community meetings; and
- Determine and address any issues or concerns that the public or other stakeholders have with regards to the Project.

3. Key Project Information

Compass Greenfield Development Inc. (the “Developer”) will be creating a special purpose entity to own and operate Elmbrook Agrivoltaics. Further detail on the Developer is presented in *Section 4. Developer Background*.

The Developer is proposing to develop, construct, and operate the Project, which will have about 250 sheep and approximately 15.5 MW megawatt AC (“MWac”) of solar power that will be located on private land in the Prince Edward County at PT LT 20 CON 1 SW GREEN POINT SOPHIASBURGH AS IN PE69159, W OF PE152274, EXCEPT PT 1 47R1831; S/T PE49315, SB9091; PRINCE EDWARD.

A preliminary layout of the Project is available on the project website². This infrastructure project will bring local benefits including employment, community benefits payments, lease payments, property tax revenue, and capital spending in the local economy.

Since the Project is in the early development stages, the location of major equipment, such as solar modules, inverters and/or transformers, and access roads have not yet been finalized. However, the preliminary layout provides a proposed Project boundary, outside of which development is not likely to occur.

The final layout will take into account outputs from environmental and other field studies and feedback from Indigenous and local community stakeholders, as applicable. Environmental and technical studies aid in the understanding of any impacts on the local community, natural and cultural heritage, archaeology, and other important local factors.

Development activity is bound to have some sort of impact on its local environment, however it is our goal to ensure that our proposed Project minimizes or avoids the potential for negative impacts through extensive due diligence prior to construction.

What is Agrivoltaics?

Agrivoltaics is dual use of land for agricultural and solar generation activities.

We are excited to share that this project will be one of Compass Greenfield Development Inc.’s (“CGD”) commitment to Agrivoltaics in Ontario. The Project will continue to utilize the land for agriculture purposes while simultaneously contributing to Ontario’s electricity needs by providing emission free electricity through solar power generation. Agrivoltaics is already common in Ontario, where sheep are used on several projects to maintain the vegetation on solar farms.³

The solar panels present many benefits to this type of livestock while contributing to the overall efficiency in the facility’s operation. For more information on agrivoltaics visit Agrivoltaics Canada⁴. The

² Preliminary project layout available on the project website here: elmbrookagrivoltaics.ca

³ See a video of sheep co-existing in a field of solar arrays here:

<https://todaysnorthumberland.ca/2024/09/11/video-thousands-of-sheep-doing-lawn-maintenance-on-solar-farms/>

⁴ Agrivoltaics Canada website available here: <https://agrivoltaicscanada.ca/>

Developer is a member of Agrivoltaics Canada and Compass Greenfield Development is committed to agrivoltaics using livestock and/or planting crops or creating native habitats.

4. Developer Background

Compass Greenfield Development Inc. ⁵

Compass Greenfield Development Inc. (“CGD”) was born out of Compass Renewable Energy Consulting Inc⁶, and leverages our consulting DNA, implementing a proven process to identify and advance greenfield development opportunities for solar and battery energy storage. Our team has been active in the renewable energy market in Ontario since 2007. We have a long-term strategic perspective coupled with on the ground experience in doing the doing that results in projects successfully reaching commercial operation, through which all our stakeholders benefit. This includes landowners, municipalities, Indigenous partners, investors and the public at large.

CGD was successful in securing Battery Energy Storage contracts in both the Expedited Long Term 1 and Long Term 1 procurements in 2023 and 2024 respectively. These include the Walker BESS 4,5,6 projects in Windsor, Ontario (collectively 14.997 MW), the Almonte BESS projects in Mississippi Mills, Ontario (collectively 14.989 MW) and the North Glengarry BESS project in North Glengarry, Ontario (16.30 MW).

In addition to actively developing these battery energy storage projects, CGD manages the operations of eight solar facilities, four in Ontario and four in Saskatchewan, and has a development pipeline exceeding 500 MW.

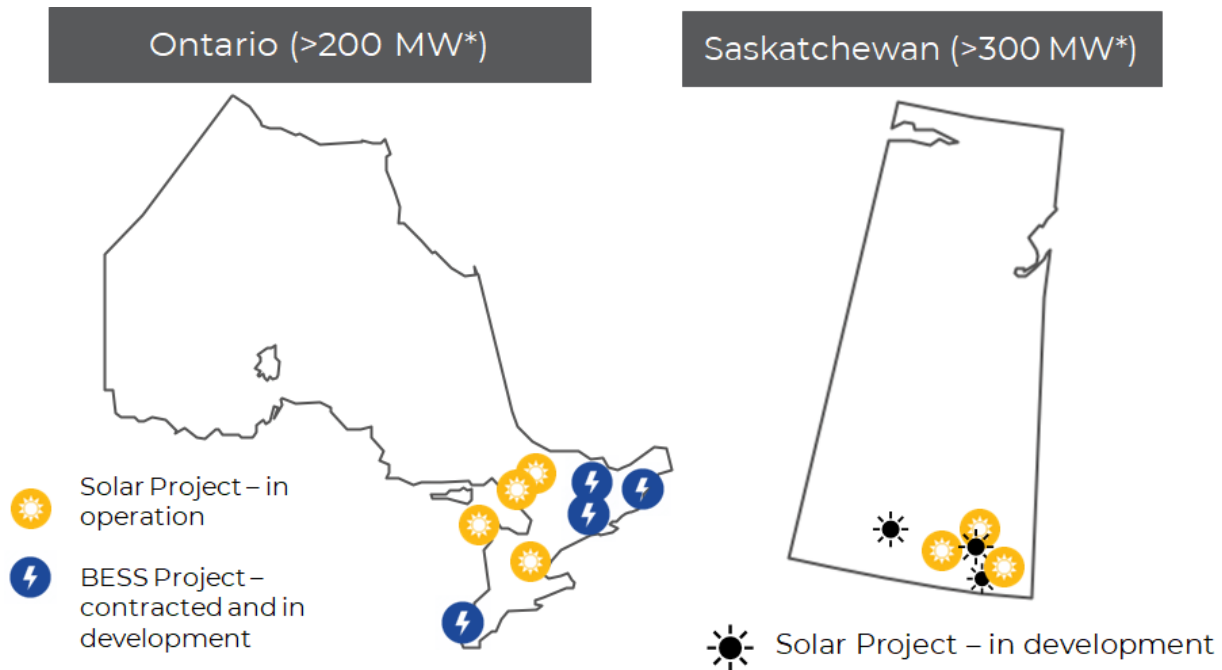


Figure 1 – Compass Greenfield Development Projects Under Management

⁵ Compass Greenfield Development Inc. website: <https://compassgreenfield.ca/>

⁶ Compass Renewable Energy Consulting Inc. website: <https://compassenergyconsulting.ca/>

5. Energy Procurement Information

After more than a decade of strong supply, Ontario is entering a period of emerging electricity system needs, driven by increasing demand, the refurbishment of nuclear generating units, as well as expiring contracts for existing facilities.

Recognizing the necessity to address these needs in a timely, cost-effective and flexible manner, the IESO has engaged with stakeholders in the development of a resource adequacy framework. As Ontario's electricity system evolves to become more diverse and dynamic, procurement processes must evolve along with it. The resource adequacy framework published on the IESO's website targets robust competitive processes that focus on cost-effective reliability, while more effectively balancing ratepayer and supplier risk in this changing environment.

As described in the Annual Planning Outlook published on the IESO's website in March 2024⁷ some of the mechanisms intended to support the IESO's resource adequacy initiatives are:

- i. the Long-Term 2 Energy Supply Request for Proposals (the "LT2(e) RFP"), which is intended to acquire approximately 14,000 GWh of annual energy supply to meet system energy needs from New Build Electricity generating facilities; and
- ii. the Long-Term 2 Capacity Services Request for Proposals (the "LT2(c) RFP"), which is intended to acquire capacity services to meet system reliability needs from New Build resources representing up to a total of 1.6 GW of targeted contracted capacity

As set out in the directive of the Ontario Minister of Energy and Electrification issued to the IESO pursuant to subsection 25.32 of the Electricity Act dated November 28, 2024 (the "Directive"), the LT2(e) RFP is to be comprised of multiple procurement windows, each set out in distinct requests for proposals. This Long-Term 2 Energy Supply (Window 1) Request for Proposals (the "LT2(e-1) RFP") is the first such procurement of the LT2(e) RFP. Similarly, pursuant to the Directive, the LT2(c) RFP is to be comprised of multiple procurement windows and the Long-Term 2 Capacity Services (Window 1) Request for Proposals (the "LT2(c-1) RFP") is the first such procurement by the IESO.

The LT2(e-1) RFP is intended to competitively procure year-round energy generation services from New Build Electricity generating facilities equal to or larger than one (1) MW registered or able to become registered in the IESO-administered markets, with an aggregate Expected Annual Imputed Production of 3,000 GWh (the "Total Target Annual Energy").

⁷ Find the IESO's Annual Planning Outlook document here: <https://www.ieso.ca/en/Sector-Participants/Planning-and-Forecasting/Annual-Planning-Outlook>

6. Stakeholders List

Identifying the list of stakeholders that may be interested in the development of the Project is key to a successful engagement plan. We intend to keep this stakeholder list updated across all stages of Project development, construction, operation, and decommissioning. As a result, the Project will interface and consult with the various types of stakeholders mentioned below.

Landowner Stakeholders

- Residents of Properties located adjacent and in proximity to the boundary of the Project Site

Indigenous Stakeholders

- Indigenous Communities who may have an interest in the Project and / or those that are included as part of a delegation of the Crowns Duty to Consult obligations

Municipal Stakeholders

- Chief Administrative Officer or equivalent for the Local Municipality in which the proposed Project is located
- Mayor and council members

Government and Regional Authorities

- Ontario Ministry of Energy and Electrification
- Independent Electricity System Operator
- Ontario Ministry of Environment, Conservation and Parks
- Ontario Ministry of Tourism, Culture and Sport
- Local Conservation Authorities
- Electrical Safety Authority
- Local Distribution Company
- Local Fire and Rescue Department

7. Indigenous Consultation and Engagement

The Project is not located on Indigenous Lands, as defined by the LT2 RFP, however we acknowledge that the Crown has a duty to consult with Indigenous Communities that would be delegated to us.

Prior to contract award, we encourage and welcome any Indigenous Community, who has questions or concerns about the Project to please contact us directly through the project email: info@elmbrookagrivoltaics.ca.

Post contract award, but prior to the commencement of any construction or site preparation work, we commit to diligently follow the Duty to Consult (“DTC”) process as detailed by the Ministry of Energy and Electrification or equivalent (“Ministry”)⁸ including the following:

- Request for DTC Assessment from the Ministry as soon as practical following the notification of selected proponents under the IESO’s LT2 RFP;
- Receive DTC Assessment Letter indicating if the Duty to Consult has been triggered;
 - If yes, a Delegation Letter, which delegates the procedural aspects of the Crown’s duty to consult to the Proponent, will be included in the response
- Conduct consultation activities with the potentially affected Indigenous Communities
- Preparation of and Indigenous Consultation Record and submission to the Ministry for review
- If the Ministry is satisfied with the Indigenous Consultation Record, a DTC Sufficiency Letter is issued to the Proponent.
 - Otherwise, further direction is provided to the Proponent to address any outstanding rights-based matters or remedy any consultation-related deficiencies

⁸ We recognize the process and the provincial ministry responsible for the delegating the Duty to Consult obligations of the Crown may change and are committed to following the most recent process post contract award.

8. Local Community Engagement

We will engage the local community stakeholders in two distinct ways, described in greater detail below.

Information Sharing

The Plan seeks to inform stakeholders about the Project and its progress through the following informational tools:

- **Project website:** hosting details about the Project and status of development activities;
- **Notice of public community meeting:** posted to the Project Website, and delivered by hand delivery, electronic mail, regular mail, or courier to the Chief Administrative Officer or equivalent for the Local Municipality in which the proposed Project is located and residents of adjacent and nearby properties;
- **Public community meetings:** an introduction meeting planned before the Submission Deadline, and a planned meeting subsequent to successful contract award through the IESO's procurement process;
- **Environmental studies:** completed in support of the Project will be posted to the project website; and
- **Project updates:** to be posted to the project website as applicable.

Consultation

In addition to informing the Local Municipality and community, our engagement process seeks to create opportunities to consult with identified local community stakeholders to gather feedback on the Project through the following feedback tools:

- Electronic correspondence through the project email address;
- Public community meetings;
- Public meetings with the Local Municipality's municipal council; and
- Feedback and FAQ via the project website.

9. Staged Approach to Community Engagement

Project timelines can be divided into five (5) distinct stages that have differing goals and objectives. The Project's community engagement activities will be tailored for each of the following project stages. As of the date of the Plan, the Project is in Stage 1.

- ❖ **Stage 1:** Pre-Contract through Contract Award
- ❖ **Stage 2:** Development
- ❖ **Stage 3:** Construction
- ❖ **Stage 4:** Operation
- ❖ **Stage 5:** Decommissioning

Stage 1: Pre-Contract through Contract Award

During Stage 1, the community engagement process will:

- Inform local community stakeholders and municipal government about the Project;
- Collect and engage with public feedback through the project website and during the public community meeting; and
- Promote active project engagement by effective and inclusive outreach.

The Pre-Contract Stage is currently ongoing and concludes when the Project is awarded a contract by the IESO. The following engagement tasks, at a minimum, will be completed before the Submission Deadline.

- Inform the Local Municipality of the proposed Project by engaging with staff and participating in a delegation at one or more municipal council meetings;
- Create and manage a project website, keeping content current with all relevant Project information such as site layouts, schedule, and upcoming municipal and community meetings;
- Create and manage a unique project email address to collect feedback;
- Create and manage a Project-specific distribution list;
- Share a copy of this Plan on the project website;
- Share a copy of the Notice of public community meeting on the project website;
- Deliver, via electronic mail, regular mail, or courier, a copy of the Notice of public community meeting to the residents of Properties located adjacent to the boundaries of the Project Site, representatives of the Local Municipality;
- Host one (1) public community meeting. The meeting will include:
 - Legal name and contact information for the Developer;
 - Project Name, Nameplate Capacity, and technology of the proposed Project;
 - A project layout showing the boundaries of the of the Project Site, location of the Connection Point and the Connection Line within the relevant municipality; and
 - Updates on the status and progress of development activities.
- Upon request, host meetings with Indigenous Communities; and
- Where appropriate, respond to questions and concerns raised during our engagement process.

The time, date, and details on how to participate of the public community meeting will be posted on the project website and provided in the meeting notice.

If members of the local community are not able to attend the meeting, we encourage all interested persons to visit our project website where the documents and information presented at the public community meeting will be posted, or to contact us directly through the project email address provided on the website.

Stage 2: Development (up to 2 years) & Stage 3: Construction (1 year)

If the Project is awarded a contract by the IESO, we are committed to continuing its engagement with all interested stakeholders throughout the lifecycle of the Project.

During the development and construction phases, engagement will focus on continuing to inform local community stakeholders, notifying and engaging with Indigenous Communities to fulfill any Duty to Consult obligations. We will provide updates on the Project progress through project update newsletters, as well as ensuring the Project meets all permitting obligations as set out by the various Authorities Having Jurisdiction (“AHJs”).

Stage 2 will begin upon execution of an energy contract and will last until the start of construction. Once construction is underway, Stage 3 of the engagement plan will take effect.

During Stages 2 and 3, we will perform the following engagement tasks:

- An in-person public community meeting will be held prior to the start of construction to communicate how the development team has incorporated stakeholder feedback in the project design;
- Inform interested stakeholders on the results of technical studies;
- Meet with municipal officials, as requested, to keep them updated on the project progress;
- Obtain a list of Indigenous Communities with whom we will consult about the project from Ministry of Energy and Electrification or equivalent;
- Provide notice(s) to the Indigenous Communities regarding the Project;
- Meet with Indigenous Communities, as requested, to keep them updated of Project progress;
- Develop an Emergency Response and Public Safety Plan with local public safety authorities;
- Develop and engage stakeholders on the Decommissioning Plan;
- Update the project website regularly with relevant project information and updates;
- Record and engage with stakeholder feedback through the project website; and
- Issue a project update newsletter, as applicable, with project information and updates for interested stakeholders.

Stage 4: Operation (20 to 30 years)

The project operation stage is anticipated to last 20 plus years from the time the project achieves commercial operation (i.e. is fully operational), until the decommissioning. The goals and objectives for this stage will be focused on ensuring the Project operates efficiently and safely.

During Stage 4, we will perform the following engagement tasks:

- Manage the safe operation of the Project;
- Effectively communicate and implement the Emergency Response and Public Safety Plan; and

- Issue a project update newsletter, as applicable, with project information and updates for interested stakeholders.

Stage 5: Decommissioning (up to 1 year)

At this stage of the project's lifecycle, we will implement the Decommissioning Plan compliant with all prescribed municipal and provincial regulations and requirements. Property landowners, neighbors, the Local Municipality, and Indigenous Communities will be consulted for a second time to ensure the local community is aware of the proposed Decommissioning Plan.