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Ni Ti Mountain Wind Project – Shadow Flicker Assessment Memo

The Ni Ti Mountain Wind Project (the Project) is a 200-MW Indigenous-majority-owned wind energy project owned and being developed by Ni Ti Mountain Power General Partnership (Ni Ti Power), which currently includes Stellat'en First Nation (Stellat'en) and Innergex Renewable Energy Inc. (Innergex). Nadleh Whut'en First Nation (Nadleh Whut'en) is also expected to join the Partnership by acquiring an equity interest in the Project. In 2024, the Project was selected as one of nine successful wind projects to receive an Electricity Purchase Agreement (EPA) through BC Hydro's 2024 Call for Power competitive Request for Proposal procurement process. The Project is located in the Bulkley-Nechako region of British Columbia (BC), immediately south of Fraser Lake and will include the installation of up to 35 utility scale wind turbine generators, collector lines, transmission lines, a substation, Operations and Maintenance (O&M) facility, site access roads, and temporary construction and laydown areas. The Proponent has retained Green Cat Renewables Canada Corp. (GCR) to prepare a shadow flicker assessment (SFA) for the Project.

Version 1.2 of the British Columbia Energy Regulator's (BCER) *Draft Proposal: Interim Guidance for Renewable Energy Permit Applications* (the Interim Guidance), released in January 2026, includes circumstances under which an SFA may be required in support of an Energy Resource Activities Act Permit application to construct and operate a renewable energy project. Specifically, the Interim Guidance specifies that an SFA is "required to be submitted if there is a receptor (building regularly occupied by persons) within 1.5km of proposed operating area".[1] The definition of a shadow flicker receptor follows the same definition used for noise receptors. The definition is from version 2.4 of the *BC Noise Control Best Practices Guideline*, which specifies that regularly occupied buildings include "any permanently or seasonally occupied structure used for habitation for the purpose of human rest; […] with the exception of an employee or worker residence, dormitory, or construction camp located within an energy-related industrial plant boundary."[2]

Shadow flicker can only be observed under certain combinations of geographical position and time of day, when the sun may pass behind the rotor of a wind turbine and cast a moving shadow over a neighbouring residence. The shadow flicker effect is only experienced from within a building where the shadow passes over a window, or other opening, facing the project turbines.[3] Receptors were identified using satellite imagery. The nearest receptor, as defined by the Interim Guidance, is located approximately 4km north of the nearest proposed turbine location, with all other turbines sited between 4km-11.5km. As there are no receptors within 1.5km of Project turbines, an SFA is not required under the Interim Guidance. The Project area in relation to nearby receptors is shown below in Figure 1.

Given the substantial distance between the Project turbines and nearest receptor, the Project is not anticipated to cause shadow flicker impacts on nearby receptors. Any potential shadow flicker predicted for receptors farther than 1.5km from a turbine is expected to be far less impactful than for receptors closer to a turbine due to the decreased

[1] British Columbia Energy Regulator, *Draft Proposal: Interim Guidance for Renewable Energy Permit Applications* (Jan. 2026), Version 1.2, Chapter 2
[2] British Columbia Energy Regulator, *British Columbia Noise Control Best Practices Guideline* (Jun. 2024), Version 2.4, Appendix A
[3] P. Brinckerhoff, *Update of UK Shadow Flicker Evidence Base: Final Report* (London: UK Department of Energy and Climate Change, Mar. 2011) pg. 51-52.

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shadow definition at longer distances. Given the direction of the Interim Guidance, and the significant distance between the turbines and the receptors, it is GCR's professional opinion that a shadow flicker assessment is not required for this Project.

If concerns are raised regarding shadow flicker from the Project at the nearby receptors, the Proponent will engage with the impacted parties to investigate the concern and, where appropriate, identify and implement suitable mitigation measures.

Kind regards,



Jacqueline Gallagher

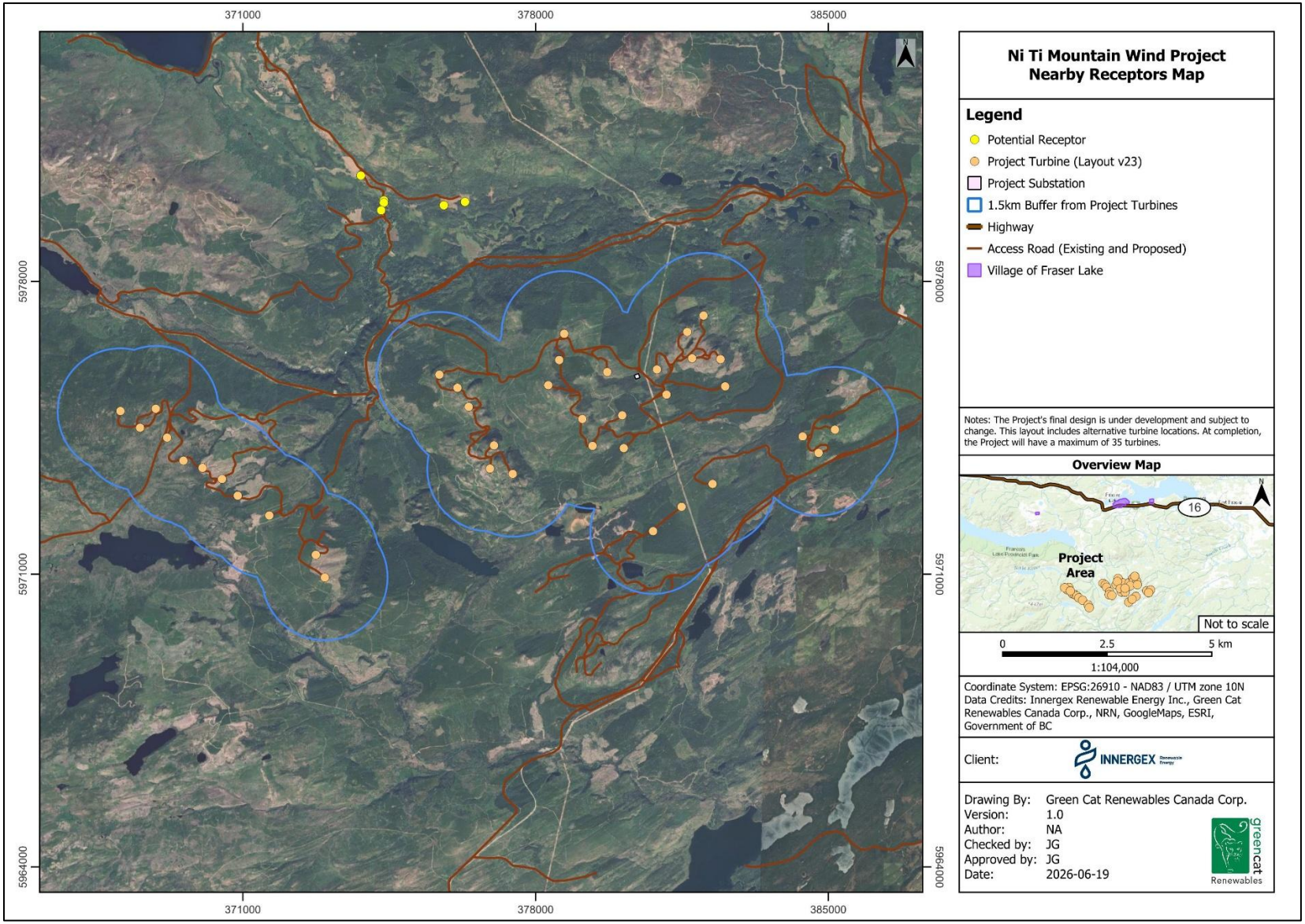

Figure 1: Project overview and relative location of nearby receptors