Town of Charlottetown

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April 11th, 2022

Board of Commissioners of Public Utilities 120 Torbay Road, P.O. Box 21040 St. John's, Newfoundland and Labrador A1A 5B2

To the Board of Commissioners of Public Utilities,

The following is in response to the letter issued on April 7th 2022 regarding the NL Hydro request for the construction of a Southern Labrador Mini-Grid, connecting four coastal communities in Southern Labrador. In the letter the Public Utilities Board (PUB) outlines that the PUB "have reviewed the record and the Board does not believe there has been sufficient analysis of alternatives considering the many issues which should be addressed in relation to such a significant change". The request from the PUB for a comprehensive planning study and multiple engineering reports should be set aside due to two communities in Newfoundland and Labrador operating without a proper power station.

Having lost the hydro plant in November of 2019 the Communities of Charlottetown and Pinsents Arm have been forced to operate on back-up generators based in Charlottetown. The generators were described as being a short-term solution while a permanent fix was in development. The Town Council for Charlottetown has had multiple meetings with the executive for NL Hydro, with the aforementioned stating that the permanent structure would be a better and cleaner power source then what was in place. When it was decided by NL Hydro engineering that a new multi-community regional plant was the best solution, our community council was not pleased. The thought that a new diesel power plant was being proposed by NL Hydro made no sense as the world is moving towards newer, cleaner and environmentally safer power solutions. However, when it was explained that this new plant would only be the primary station at first, then it would be converted to the regional backup station when a clean energy source is found or power from Churchill Falls could be diverted to the region, our council agreed that this was in the best interests of the region.

The Charlottetown Hydro plant was an example of an aging power plant in Southern Labrador. It was outdated, with its power output being stretched to its capacity and it was by-no-means meeting current environmental standards. However, this issue was not unique to the Charlottetown Power Plant as the majority of the power plants in Coastal Labrador, that would be replaced by the proposed Southern Labrador Mini-Grid, are in a similar state. These plants are still operational though and have the time to meet the suggested criteria for the project proposed at this scope and

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scale. Therefore, it is in our council's opinion that those opposed to the project are not fully understanding, or respecting, the severity of the situation facing the communities of Charlottetown and Pinsents Arm.

The response provided by the PUB is unacceptable with the town of Charlottetown. The Public Utility Board, regional organizations and neighboring communities have not only failed the communities of Charlottetown and Pinsents Arm with their opposition to the project, they have also failed the region. The Town of Charlottetown and Pinsent's Arm are in need of a new stable power solution now. Not only for the residents of both communities, but also for the fishing industry operating in the region. The community of Charlottetown currently operates the only Shrimp processing plant in Labrador. The denial of the NL Hydro request could potentially affect residents from L'Anse au Clair to Nain, as well the Northern Peninsula of Newfoundland, due to Charlottetown processing shrimp from fishermen living in all said communities.

Our council does understand why there are many who oppose a project that goes against the current provincial direction of a greener initiative. However, after meeting with NL Hydro our council understands their action plan that has been outlined and therefore support the construction of a regional diesel site. Our council worries that if a new power plant is constructed in Charlottetown, which is the cheapest upfront solution, the South Coastal Labrador communities will lose the opportunity to connect to a renewable power site like Churchill Falls. It is our council's opinion that neighboring councils, organizations and environmental groups opposed to the project must stop viewing the Southern Labrador Mini Grid as a lateral move but rather as a step forward in the right direction. A regional plant providing our communities with the power they require to operate well opening possibilities for communal growth. A regional plant offering cleaner emissions and superior power capabilities while providing future possibilities for our communities to be connected to clean renewable power resources. Lastly, a plant that will allow for two communities that have been operating on mobile back-up units the opportunity to have proper power and offer long term stability to the region.

Yours Sincerely,

Riela Orom

Hon. Ricky Oram Mayor, Town of Charlottetown (Labrador)