



OFFICE OF THE PRESIDENT

November 4, 2021

Cheryl Blundon
Director of Corporate Services and Board Secretary
Public Utilities Board
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2
VIA EMAIL: cblundon@pub.nl.ca

Dear Ms. Blundon,

SUBMISSION ON THE CONSTRUCTION OF PHASE 1 OF HYDRO'S LONG-TERM SUPPLY PLAN FOR SOUTHERN LABRADOR

I am writing to you today to express NunatuKavut Community Council's (NCC) serious concerns around the application for approval of the Construction of Phase 1 of Hydro's Long-term Supply Plan for Southern Labrador pursuant to Section 41(3) of the Public Utilities Act. Our concerns are outlined below.

NCC is the governing body that represents approximately 6,000 Inuit primarily from south and central Labrador. Translated from Inuttitut, NunatuKavut means "our ancient land" and refers to our territory. The long-term supply plan proposed by NL Hydro directly impacts the communities of Port Hope Simpson, Charlottetown, St. Lewis and Mary's Harbour, located in the heart of our territory. These communities are also home to NunatuKavut Inuit. We understand that NL Hydro representatives have been meeting with the Town Councils of these four communities about this proposed plan as early as May of this year, without any consideration for consultation or engagement with NCC until most recently. NCC has been leading community-based research over the last few years to better understand energy security needs across our territory. These efforts are continuing and NCC is best positioned to help guide decision-making on projects that have significant impacts on our communities. To illustrate this lack of engagement, the first meeting with NL Hydro on this matter was scheduled for today, November 4, the deadline for submissions to the Public Utilities Board (PUB). This meeting, unfortunately, had to be rescheduled. NCC should have been engaged at the beginning of this process not at the end.

NCC signed a Community Development Agreement (CDA) with Nalcor Energy in December 2017. This agreement, now under NL Hydro, was designed to foster a future improved relationship based on mutual interest, respect and trust. The lack of consideration for NCC around NL Hydro's plans to proceed with long-term energy options for four NunatuKavut communities is extremely disappointing and runs counter to the spirit and intent of the CDA. Furthermore, the CDA specifically references plans to form a commercial energy entity (Schedule A-5) between Nalcor and Nunacor, our business development arm. Consequently, NCC and Nunacor are currently engaged in a commercial energy planning process with NL Hydro. As it stands, the process being undertaken by NL Hydro in this latest PUB application does not contemplate this commitment in any way. It is also very unfortunate that NL Hydro is not addressing the incredible opportunity to introduce renewable energy options in NunatuKavut communities.

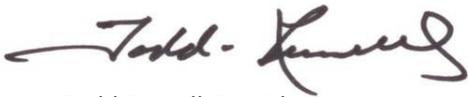
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The Province of Newfoundland and Labrador, through the Department of Industry, Energy and Technology, is seeking input from the public, industry and stakeholders in order to develop a Renewable Energy Plan for the province. Coincidentally, the deadline for written submissions on this process is also today. The decision by NL Hydro to essentially double down on diesel yet again seems to be completely at odds with renewable energy integration as a mandate.

The process being undertaken by NL Hydro is egregious and does nothing to advance reconciliation with NunatuKavut Inuit. We respectfully ask that this application be denied and that NCC be engaged from the outset on any further discussions on energy solutions for NunatuKavut communities.

I would be happy to discuss our concerns in more detail. Please contact my executive assistant, Tiffany Lambourne, if you require further information or would like to set up a meeting. She can be reached by email at executiveasst@nunatukavut.ca or by telephone at 709-899-4384 or 709-896-0592 ext. 225.

Nakummek,

A handwritten signature in black ink, appearing to read "Todd Russell". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Todd Russell, President
NunatuKavut Community Council

Cc Hon. Andrew Parsons, Minister of Industry, Energy and Technology