



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,

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

Thank you for the opportunity to submit our expressions regarding the above application by NL Hydro.

Nunacor Development Corporation is an Indigenous community development corporation that was incorporated in 2003 by The NunatuKavut Community Council Inc. (NCC). Nunacor owns and operates several businesses throughout Labrador and has a keen interest in developing renewable energy in our Indigenous communities. Nunacor's mandate is to generate sustainable revenue to direct profits to NunatuKavut Community Council to deliver programs and services to its members.

In December 2017, the NunatuKavut Community Council entered into a Community Development Agreement with Nalcor. Within this consequential agreement, commitments related to development of a joint Commercial Entity between Nunacor & Nalcor were set out. The purpose of this commercial arrangement is to advance and develop alternate energy activities for the purpose of providing NCC communities economically viable alternatives and smart energy solutions. 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 and Nunacor around NL Hydro's plans to proceed with long-term energy options 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 between Nalcor and Nunacor, our business development arm. Consequently, Nunacor is 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.

This long-term supply plan proposed by NL Hydro has immediate and direct impacts the communities of Port Hope Simpson, Charlottetown, St. Lewis and Mary's Harbour. Town Council members made Nunacor aware of NL Hydro's communications regarding their plans to centralize diesel power systems in the community of Port Hope Simpson. Despite our expectations, presentations of this proposed plan were made to the Town Councils without any engagement with us until recently. NCC has been leading

community-based research over the last few years to better understand energy security needs across our territory and this research has directly influenced Nunacor's commercial energy plan. Nunacor is in the midst of phase 2 of our commercial energy plan, "*Sustainable Energy Plan & Commercial Arrangements for NunatuKavut Communities*" with the support of Dunsky Energy Consultants. If meaningful engagement and consultation was desired, Nunacor and NCC would have been engaged at the beginning of this process, rather than at this stage, the end.

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.

We respectfully ask that this application is stopped as it no way adheres to Indigenous consultation nor does it represent the spirit of, nor the commitments laid out in our Community Development Agreement.

In the best interests of our NunatuKavut Communities, our people, and our future, we need Nunacor and NCC to be engaged from the outset on any further discussions on energy solutions for NunatuKavut communities.

Please contact me should you wish to discuss further.

Yours sincerely,

A handwritten signature in black ink that reads "Andy Turnbull". The signature is written in a cursive, flowing style.

Andy A. Turnbull
Chief Executive Officer
Nunacor