

To: The Committee for the Regional Assessment of Offshore Wind Development in Nova Scotia

From: Norm Dimmell, President, Emera Newfoundland and Labrador

Date: December 20, 2024

Subject: Awareness About and Protection of the Maritime Link Submarine Cables

Dear Committee Members,

I am writing on behalf of Emera Newfoundland and Labrador (ENL), owner and operator of the Maritime Link 500MW electricity transmission system. Please note that ENL also collaborated in the development of a separate but aligned letter to the Committee from Emera Inc., our parent company.

As the Committee prepares to finalize the final report, I would like to reinforce the importance of the Maritime Link and the need to ensure shared safety in the vicinity of the submarine cables and related assets. Drawing on information included in the interim and final draft report, it appears that a portion of the Sydney Bight development area is in close proximity to the Maritime Link submarine cables, which is a significant concern due to related risks including safety and the reliability of the Maritime Link. We believe that development in the Sydney Bight area can proceed, however important steps must be taken to safeguard against risks of contact with and disruption of the Maritime Link submarine cables.

About the Maritime Link

The Maritime Link delivers renewable electricity from Muskrat Falls in Labrador through Newfoundland to Nova Scotia. Completed in 2017 and extending over 500 kilometres, the Maritime Link includes two ~170 kilometre submarine HVdc (high-voltage direct current) transmission cables under the Cabot Strait between Cape Ray (NL) and Point Aconi (NS). The submarine cables operate at 200,000 volts and can deliver 500 MW of energy, typically delivering approximately 20% of Nova Scotia's total electricity needs. The Maritime Link plays an important role in helping meet the Government of Nova Scotia's target to phase out coal generation and reach 80% renewables by 2030. It is also a critical part of Atlantic Canada's electricity infrastructure, supporting regional stability and enabling the transition to cleaner energy. In addition, by connecting the island of Newfoundland to the North American electricity system, the link gives Newfoundland and Labrador the ability to sell and purchase energy via the Maritimes.

Federal clean energy policy objectives include being off-coal by 2030 and a net-zero electricity sector by 2035. The Government of Canada has identified inter-provincial transmission infrastructure like the Maritime Link as a critical enabler for Canada's clean energy future. The federal government has supported the development of the Maritime Link and associated projects through steps including the federal loan guarantee.

In order to construct and operate the Maritime Link between Point Aconi Nova Scotia and Cape Ray Newfoundland, the governments of Canada, Nova Scotia and Newfoundland and Labrador have provided our company with rights and interests in a corridor across the Cabot Strait (including geographically in the vicinity of the Sydney Bight), which should be considered in relation to the development of offshore wind in the area.

Risks

As activity in the oceans surrounding Nova Scotia increases, it is critical to highlight key risks of contact with and disruption of the Maritime Link submarine cables. These risks include:

- Interactions with high-voltage submarine cables can result in death, injuries, equipment failure and loss, or vessel capsizing.
- Vessel operators who damage the submarine cables will face significant liability risks (considering repair costs would be in the tens of millions of dollars).
- Cable damage would be a significant reliability event creating implications for the connected provincial utilities, considering the critical role of the Maritime Link in connecting and stabilizing the region's electricity grid – particularly during the winter months.
- Submarine cable repair and restoration is very costly and could take several months or more, presenting a significant disruption to Atlantic Canada's electricity grid. In such an event, if a cable gets damaged, this could impede government-mandated clean energy objectives and the ability of utilities in the region to meet energy-sharing commitments and legislated renewable energy and emissions targets, resulting in potential fines.

Recommendations

We believe that development in the Sydney Bight area can proceed however, given all of the above, we would encourage the Committee to:

- Include reference to and context about the Maritime Link in the final report and other existing or future critical interprovincial infrastructure.
- Recommend the creation of a development exclusion zone around the Maritime Link submarine cables (details to be determined through further engagement).

- Recommend that any future activities related to offshore wind development include appropriate warnings about the risks of contact with and disruption to submarine cables in general, and the Maritime Link submarine cables in particular, and make provisions to prohibit and mitigate contact with the submarine cables including through the recommended exclusion zone.

We would be happy to meet with you or your staff and to provide more information to assist you. Having implemented the Maritime Link Project and operated the asset since 2018, our team has expertise in the intersection of oceans and electricity transmission that may be of value to your work. Thank you for your attention and for helping to ensure Canada's oceans are safe for everyone.

Yours sincerely,



Norm Dimmell
President