



COMMENTS RE: DRAFT REGIONAL ASSESSMENT OF OFFSHORE WIND DEVELOPMENT IN NOVA SCOTIA

INTRODUCTION

Thank you for the opportunity to provide feedback as part of the Regional Assessment of Offshore Wind Development in Nova Scotia. This submission is being provided by Emera Inc. and includes feedback from our affiliates Nova Scotia Power, and Emera Newfoundland & Labrador.

We would like to commend the independent Committee for its thorough approach, methodology, stakeholder and indigenous engagement, analysis and recommendations. The Regional Assessment (RA) provides a valuable roadmap for industry, policy makers, regulators and the public writ large.

OVERVIEW

By way of background, Emera Inc., a TSX 60 company based in Halifax, Nova Scotia, has grown from a single electric utility into an energy leader serving over 2.5 million customers in Canada, the US and the Caribbean. We are focused on safely delivering cleaner, reliable energy while always working to minimize the cost impacts for our customers.

Nova Scotia Power is a fully integrated electric utility (i.e., responsible for generation, transmission and distribution) and serves more than 525,000 residential, commercial and industrial customers. The utility provides 95 per cent of Nova Scotia's generation, transmission and distribution services.

Emera Newfoundland & Labrador (ENL) was established in 2010 as the business entity responsible for the company's strategic investments in Newfoundland and Labrador including regarding the Nova Scotia Power Maritime Link (Maritime Link, or ML). Commissioned in 2018, the ML is a 170Km high-voltage direct current (HVDC) subsea cable which links Newfoundland & Labrador to Nova Scotia and now delivers up to 20% of Nova Scotia's electricity, replacing coal-fired generation. The project was built on time and on budget and is the longest subsea HVDC cable in the Americas.

BACKGROUND

From a macro perspective, Atlantic Canada is pursuing offshore renewables development with a solid foundation of regulating and developing major projects in the offshore area. While offshore wind generation is new, HVDC subsea infrastructure has been operational in the region since 2018, and petroleum exploration, development, operation and decommissioning activities have been prominent for decades. This experience shows that when planned and regulated effectively, major projects can be built in a sustainable manner and on time and on budget.

In the case of the ML, the regulatory approval process for the project involved 3 government jurisdictions: the Federal Government, the Province of Nova Scotia and the Province of Newfoundland and Labrador. The three jurisdictions had a coordinated approach to review the project based on Emera's Project Environmental Assessment (EA). Federally, the Major Projects Management Office took the lead in coordinating federal approvals. This oversight included monthly

meetings of Deputy Ministers to address issues in a timely manner. This oversight was essential for coordinating across federal departments and keeping the approval process on-time.

Ahead of filing the Project EA with regulators, Emera as the project proponent, undertook approximately 18 months of preparation work, including robust Mi'kmaq and stakeholder engagement and environmental studies. This upfront work was essential in helping to build a durable project and a predictable regulatory review timeline. For example, the upfront work helped to identify the specific issues that needed to be addressed by the EA process such as potential effects to lobster/crab and migration in relation to electromagnetic frequencies emitted from subsea cables.

OBSERVATIONS

1. Given the important role of stakeholder, fisher, and indigenous engagement and the need for sound science during the project development stage, we fully support the Committee's recommendations around participant funding and engagement. This includes support for intervenor funding, funding for Mi'kmaq organizations and for Mi'kmaw Ecological Studies, establishing the Scotian Shelf Collaborative Research Initiative and open discussions among marine users more generally including in Maine and New England broadly.
2. An important consideration for the RA, and particularly around the Sydney Bight, is the need to clearly mark the location of the Maritime Link HVDC cables as an "exclusion zone" on any proposed licence area. Interference with the ML transmission line during construction, development and operations of offshore renewable energy projects must be avoided in order to protect and ensure shared safety and the reliability of this critical infrastructure. ENL has provided a stand-alone submission to the Committee which provides additional information on this critical safety consideration.
3. As the Committee finalizes its recommendations, it is important to reinforce that regulatory processes that may flow from the RA must be timely, predictable and efficient in order for offshore wind development to proceed. Recent studies have shown that unfortunately Canada is now lagging globally when it comes to efficiency in project permitting on energy and natural resources projects. As noted in the Canada Electricity Advisory Council (CEAC: 2024) report, the World Bank for example has ranked Canada as one of the slowest jurisdictions for permitting, performing 36th out of 38 countries.¹ The CEAC (2024) further highlights the need for significant regulatory reform in order for Canada to meet decarbonization policy targets:

"Current regulatory frameworks, designed to safeguard against environmental harm, are paradoxically stalling the clean energy projects that are necessary to decarbonize the economy and mitigate the worst impacts of climate change. Addressing climate change demands pragmatic flexibility. The Council has determined that the urgency of climate change and the associated global economic transition requires a recalibration of Canada's priorities that accounts for the critical role of clean electricity."²

¹ Canada Electricity Advisory Council – [Powering Canada – A Blueprint for Success, Final Report \(2024\), page 96](#):

² Ibid: page 50

One of the Council’s four cornerstones captures the need for urgency in developing renewable projects:

“Speed: To achieve its goals, Canada needs to rapidly expand its clean electricity infrastructure. That simply will not happen without measures designed to attract capital, involve Indigenous Nations and communities, and, critically, recalibrate project review and approval processes across the country and at every level of government to enable more clean electricity.”³

Insofar as the regional assessment will provide a basis for regulators and policy makers to make decisions, we encourage the Committee to consider the CEAC’s observation that regulatory approval processes need to be recalibrated to enable more clean electricity.

SUMMARY

We appreciate the opportunity to provide feedback to the Committee. Thank you for the important work you have undertaken on behalf government and in consultation with the public. We remain broadly supportive of the Committee’s work and have noted three considerations:

1. Our support for funding of stakeholder and indigenous participants; and the value of collaboration and sharing of information among marine users;
2. The need for an exclusion zone around the Maritime Link HVDC cable; and,
3. The opportunity for the SEA recommendations to help enable efficient and timely regulatory permitting decisions in the future.

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³ Ibid, page 11