



September 28, 2022

Honourable Mike Holland,
Minister of Natural Resources and Energy Development
Hugh John Flemming Forestry Centre
P. O. Box 6000
Fredericton, NB
E3B 5H1

Dear Minister Holland:

The Conservation Council of New Brunswick (CCNB) welcomes the Government's five-year climate plan update, [*Our Pathway Towards Decarbonization and Climate Resilience: New Brunswick's Climate Change Plan 2022 – 2027*](#). This letter focuses on the commitment to develop a clean electricity strategy (see Appendix). We believe that a clean electricity strategy is fundamental to New Brunswick's ability to transition to near zero emissions, which requires that we electrify our economy and our lives.

CCNB would like to recommend that the strategy be developed quickly (e.g., in less than a year). We recommend that the province launch a robust process that allows stakeholders and experts from critical sectors like utilities, community groups, industry, small business, environmental and social groups, as well as academia to hear from each other in an open forum. We recommend appointing these stakeholders and experts to a round table that would meet monthly, receive and consider background information provided by government and stakeholders, and be able to request timely analysis to support the round table's work. Terms of reference would establish the objectives of the round table, timeline and status of recommendations made.

There is an opportunity, through a round table, to encourage stakeholders and experts to find consensus where they can, and to identify areas of disagreement, which, in turn, assists government in finalizing a clean electricity strategy. The round table should include ensure social (e.g., affordability/energy poverty, community engagement, social acceptance), environmental (e.g., air, water, soil, climate change implications), technical (readiness, reliability, regional inerties, etc.) and economic (e.g., least-cost) factors are considered and incorporated into the clean electricity strategy. The round table should also have a role in

informing the interim steps committed to in the climate action plan, including setting efficiency targets, and review energy and electricity legislation.

Government should commit to reflecting recommendations in their final strategy or to explaining in the strategy or a response document why recommendations were not accepted. Transparent, inclusive processes can help build the social consensus we need to successfully implement the clean electricity strategy when completed. Round table stakeholders will be critical to that successful implementation.

The 2022 to 2027 climate plan also committed to creating a net zero advisory body and to delivering a net zero strategy. Clearly, the clean electricity strategy is critical to delivering a net zero strategy. The clean electricity strategy process needs to integrate with the net zero advisory board process in some way. It could involve joint meetings, joint appointments and/or a sequential process where the clean electricity strategy feeds into the net zero blueprint process.

There also needs to be a public engagement process, either through round table events where people make presentations, the legislative committee, and/or an online survey. If a survey is used, the process needs to be robust, meaning that the survey design and proposed questions are reviewed by experts to ensure questions are not leading, that all options are considered and that the public feedback delivers results government can act on.

We believe that a robust process that situates a clean electricity strategy for New Brunswick within the regional and national context, reflects current and planned climate change regulations, technical and economic opportunities for least-cost electrification, including efficiency, as well as social and community concerns about project implementation is critical to our ability to compete in a net zero world.

CCNB looks forward to engaging with you and your team on developing a robust clean electricity strategy for New Brunswick in 2023.

Sincerely,

A handwritten signature in blue ink that reads "Louise Comeau".

Louise Comeau
Director, Climate Change and Energy Solutions
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506 238 0355

Cc: Heather Quinn
Jeff Hoyt, Climate Change Secretariat

Appendix:

NEW ACTION

THE PROVINCIAL GOVERNMENT WILL:

7. Develop a Clean Electricity Strategy by 2025 for achieving net-zero electricity emissions by 2035, based on guiding principles that support clean, reliable, efficient, and affordable electricity. The Strategy is expected to:
 - a. Identify the role of renewable energy, including distributed energy, that may support the electricity grid, lower peak demand, and provide capacity support. This may also include the role of storage, renewable and clean fuels such as clean hydrogen, geothermal, renewable natural gas (RNG) and biomass, in New Brunswick's energy systems in all sectors;
 - b. Include the development of two first-of-their-kind small modular reactor technologies;
 - c. Strengthen investments and broaden the scope of energy efficiency and demand-side management initiatives, including improving access to programs for moderate-income families;
 - d. Set a clear path to transition off coal-fired electricity; and
 - e. Explore regional opportunities to share clean electricity resources to meet the increasing demand for electrification.
8. As interim steps in advance of the Clean Electricity Strategy, and ultimately contributing to the strategy itself:
 - a. Set clear electricity efficiency performance targets and reporting requirements for NB Power (New Brunswick's all-fuels energy efficiency delivery agency) and provide dedicated annual funding to continue supporting low income and Indigenous programs as well as program participants who use non-electric fuels by 2023;
 - b. Ensure New Brunswickers have equitable access to energy efficiency programs through long-term financing and/or payment mechanisms by 2024, in collaboration with NB Power. These may include traditional financing programs or new, innovative options; and
 - c. Review provincial energy legislation by 2024 for opportunities to further enable GHG emissions reductions and investments in new clean fuels, technologies, and resources to be considered in the regulatory process.
9. Enable the local production and use of renewable natural gas (RNG) and clean hydrogen to ensure that New Brunswickers have access to decarbonized fuels by 2030 to meet their future energy requirements.
 - a. By 2025, investigate and, if appropriate, set a minimum proportion of RNG and/or clean hydrogen in the provincial natural gas supply for gaseous fuel distributors.
 - b. By 2030, support the strategic implementation of RNG and clean hydrogen re-fueling infrastructure while prioritizing co-location with existing fueling stations.