

September 18, 2026

Honourable Jean-Claude D'Amours
Minister of Post-Secondary Education, Training and Labour
Government of New Brunswick

Via email: Jean-Claude.D'Amours@gnb.ca

RE: Input on Data Centre Development in New Brunswick

Minister D'Amours,

On behalf of the Atlantica Centre for Energy, New Brunswick Business Council and TechImpact, we are pleased to submit the enclosed materials for your consideration regarding the opportunity and policy considerations associated with data centre development in New Brunswick.

Atlantica Centre for Energy's interest is from an energy-system and infrastructure perspective, with a focus on how large new loads such as data centres could affect electricity demand, generation, transmission, reliability and broader regional energy planning. Atlantica's involvement also reflects the importance of considering data centre development within the context of New Brunswick's long-term energy needs and economic growth objectives.

New Brunswick Business Council's perspective considers of the province's broader business and investment community, including the potential implications for economic growth, competitiveness, productivity, capital investment and major-project development. Its contribution helped ensure the discussion contemplated not only the requirements of individual data centre projects, but also the conditions New Brunswick needs to attract investment while delivering wider economic value.

TechImpact's viewpoint emphasized expertise related to New Brunswick's technology sector, digital economy and workforce. Its involvement helped connect the discussion around physical data centre infrastructure with the broader opportunities associated with artificial intelligence, digital transformation, technology-sector growth, talent development and the province's ability to build economic activity around the infrastructure itself.

Together, the three organizations brought complementary perspectives on energy, economic development and technology, reflecting the cross-government nature of the opportunity and the need for a coordinated approach.

Our original intention was to use this work to inform our members and provide broader insight to governments and stakeholders across Atlantic Canada. With the Government of New Brunswick now consulting on a proposed data centre policy framework, we are pleased to submit the work as a direct response to that process.

For ease of review, our submission includes three components:

1. The full **commissioned research paper**, Data.Centres.in.Constrained.Systems, which provides the detailed evidence base and jurisdictional comparison. (Attached)
2. Powering.the.Digital.Economy;A.Practical.Framework.for.Data.Centre.Development.in.Atlantic.Canada, a shorter **public-facing discussion paper** that translates the research into five practical evaluation criteria. (Attached)
3. **Annex A**, which compares those five criteria directly with New Brunswick's proposed framework and identifies areas of alignment and suggested clarification.

Together, these documents are intended to support an informed, coordinated discussion about how New Brunswick can assess and potentially pursue data centre investment in a manner that supports economic growth while addressing energy, infrastructure, workforce, fiscal and broader public-policy considerations.

We appreciate the opportunity to provide this work to the Government of New Brunswick and would be pleased to discuss the findings and considerations outlined in the submission.

Sincerely,



Michelle Robichaud
President
Atlantica Centre for Energy



Monica Gaudet Justason
CEO
New Brunswick Business
Council



Cathy Simpson
CEO
TechImpact

CC: Hon. René Legacy, Minister of Finance and Treasury Board, Minister of Energy

Hon. Luke Randall, Minister responsible for Opportunities New Brunswick, Minister responsible for Economic Development and Small Business

Jeff Hoyt, Deputy Minister, Energy

Traci Simmons, Deputy Minister, Economic Development and Small Business and CEO, Opportunities New Brunswick

Hemant Kumar, Assistant Deputy Minister, NB Growth Office

ANNEX A

Alignment Between New Brunswick's Proposed Data Centre Policy Framework and the Five-Criteria Evaluation Framework

The Government of New Brunswick's proposed policy framework and the five-criteria framework developed by the Atlantica Centre for Energy, New Brunswick Business Council and TechImpact are broadly aligned in their objectives. Both seek to protect existing electricity customers, ensure projects create measurable economic and community value, assess environmental and infrastructure impacts, require credible project commitments, and support meaningful community and First Nations participation.

The comparison below identifies areas of strong alignment and several areas where additional clarity could strengthen implementation of the provincial framework.

Five-Criteria Framework	Alignment with Government of New Brunswick Framework	Suggested Clarification or Enhancement
1. Is it real? Separate serious investment from speculative demand through evidence of financing, customers, project readiness, binding milestones and a credible load schedule.	Strong alignment. The Province requires proponents to demonstrate financial capacity, operating experience, site control, project readiness and evidence of customer demand. It also requires financial assurances and contractual commitments protecting against delay, reduced demand, closure or cancellation.	Make the commitment test more explicit. Consider identifying the evidence required before electricity capacity is reserved. For example, deposits, executed agreements, binding development milestones and expiry dates. The framework should also specify how long capacity can be held before being released for other uses and how phased load requests will be treated.

2. Can the energy system support it and can the project support the energy system? Assess maximum and expected grid draw, new generation/storage, peak-period behaviour, transmission needs and whether project infrastructure creates broader system capacity.	Partial-to-strong alignment. The Province requires project-specific system costs to be borne by the developer, requires demand management during system constraints and addresses on-site generation. It also states that projects will be prioritized for grid access according to anticipated economic and community benefits.	Expand from connection impact to net system impact. The framework could explicitly assess whether a project adds generation, storage, transmission, substations, contracted flexibility or other infrastructure that reduces its net claim on constrained capacity or creates capacity for other economic growth. It should also clarify how load phasing and required in-service dates factor into capacity decisions.
3. Who pays, and who carries the risk? Apply cost-causation principles and contractual protections so existing customers do not inherit project-specific costs or stranded assets.	Very strong alignment. The Province states that projects must pay new electricity-system costs they create and provide financial assurances against delay, reduced demand, closure or cancellation. Protecting ratepayers is one of the core purposes of the framework.	Clarify how this principle will be implemented. Government could identify the expected role of tariffs, minimum-purchase commitments, exit provisions, deposits or other contractual mechanisms. It would also be useful to distinguish project-specific costs from infrastructure that may create broader system benefits and to clarify how such shared benefits would be treated.

4. What value is created in return? Assess investment, construction and permanent employment, taxes, procurement, workforce development, digital-sector benefits, infrastructure contribution and opportunity cost.	Very strong alignment. The Province proposes assessing capital investment, construction and permanent employment, local hiring, wages, workforce development, procurement from NB and Indigenous businesses, tax revenues, R&D, partnerships with post-secondary institutions and startups, First Nations partnerships, innovation benefits and potential use of excess heat. It also proposes prioritizing projects with Canadian data-sovereignty and domestic-use benefits.	Clarify how value will be compared when capacity is scarce. Where multiple credible projects compete for limited electricity or infrastructure, assessment should consider credible competing demand and the resources required as well as gross benefits. Projects that expand usable system capacity or leave infrastructure available for broader economic development should receive appropriate recognition. Avoid comparing a current, credible investment with purely hypothetical future projects.
5. Can it earn and maintain public confidence? Assess site-specific environmental impacts, municipal impacts, community benefits, transparency, First Nations participation and long-term monitoring.	Very strong alignment. The Province includes detailed requirements relating to water, biodiversity, municipal infrastructure, emissions, noise, traffic, waste, decommissioning, local-government and First Nations engagement, measurable community benefits, public reporting and enforcement.	Clarify sequencing and relationship to existing regulatory processes. Engagement should occur early enough to influence material project terms, but the policy framework should complement rather than duplicate legislated environmental, municipal and permitting processes. Government should also maintain a clear distinction between general community engagement and the Crown’s responsibilities regarding First Nations

There are also several issues that cut across all five criteria and would benefit from clarification in the final provincial framework.

1. Decision-making accountability and governance

The provincial framework states that government will establish and maintain a governance framework to oversee the assessment, review and prioritization of proposals, and that departments and agencies will apply a common approach. That is directionally consistent with the discussion paper, but it does not yet explain who makes the final decision, how the respective roles of government, NB Power, regulators, municipalities and other authorities fit together, or how competing considerations are reconciled.

For major loads requiring a significant share of constrained electricity capacity, we recommend that the final framework clearly identify:

- which body assesses technical electricity-system feasibility;
- which body determines rate and cost-allocation issues;
- which existing regulatory and environmental approvals remain applicable;
- who assesses economic and strategic value; and
- who is ultimately accountable for the decision to allocate scarce electricity capacity.

This is important both for public accountability and for investor certainty.

2. Clear timelines and an investment-ready process

The provincial framework is appropriately rigorous, but it is largely silent on decision timelines. The discussion paper recommends that credible projects be able to move quickly once required evidence and commitments are provided.

We recommend establishing clear process stages, information requirements and indicative decision timelines. A strong framework should reduce uncertainty rather than introduce an open-ended additional approval layer.

3. Allocation of scarce capacity

The Province already states that, where multiple qualifying projects compete for limited capacity, preference will be given to projects demonstrating greater overall community benefit and economic value.

We support this principle, with two suggested refinements:

First, the comparison should be between credible and reasonably foreseeable alternatives, rather than holding capacity for unidentified future opportunities.

Second, public value should include energy-system contribution. A project that underwrites additional generation, storage, transmission or other infrastructure and thereby expands the province's capacity for subsequent development may have greater strategic value than its direct economic contribution alone would suggest.

4. Distinguish existing capacity from new capacity

The framework would benefit from distinguishing between projects that:

- rely primarily on existing grid capacity;
- require new utility infrastructure or generation;
- bring or finance incremental generation/storage; or
- largely self-supply while using the grid for transmission, balancing or backup.

These configurations create materially different risks and opportunities and should not necessarily be assessed identically.

5. Proportionality of conditions

The Province's framework requires a positive recommendation only where each core criterion is satisfied. That provides clarity, but implementation should avoid turning every desirable characteristic into an absolute threshold.

Some requirements should be mandatory: reliability, applicable environmental and regulatory requirements, credible financing and protection of existing customers. Other characteristics, such as economic spillovers, excess-heat utilization, compute access or additional infrastructure, are more appropriately treated as comparative value factors that strengthen a proposal rather than universal prerequisites.

This distinction will help maintain a framework that is rigorous without unintentionally becoming a barrier to otherwise strong investment.