

**Submission to the Department of Environment and
Climate Change
on the
*Environmental Assessment of the Fischells Salt
Dome Power Generation Project - Resubmission***

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Introduction

Energy NL was founded in 1977 to represent the supply and service sector of the energy industry. Today Energy NL represents over 500 member organizations worldwide which are involved in, or benefit from, the energy industry of Newfoundland and Labrador. Energy NL members are a diverse representation of businesses involved in a range of activities related to both renewable and non-renewable energy development, construction, and operations. This includes, but is not limited to, areas such as direct offshore and onshore supply; health and safety equipment and training; engineering solutions and fabricators; law firms and human resource agencies.

Energy NL and our members are excited about the prospects in the province for new renewable energy projects, and we are pleased to participate, via this submission, in the Environmental Assessment for the proposed Fischells Salt Dome Power Generation Project (“the Project”).

Project Rationale

Energy storage is a critical, but often overlooked, part of any energy system. As the need for increasing generation continues to grow, especially in the form of renewable energy sources, so too does the need for reliable, long-term storage capacity. Energy generation sources like wind and solar are intermittent in nature, the sun does not always shine, and the wind does not always blow. The Renewable Energy Institute highlights that “[w]ithout a way to store energy when these sources are plentiful and dispatch it when they’re not, power systems can become unreliable and inefficient.”¹ While large-scale renewable energy projects typically include some level of energy storage in their plans, it is most frequently used as short-duration storage to help smooth rapid fluctuations in production. Developing grid-scale, long-duration energy storage capacity is an impactful addition to any energy system and electricity grid.

The Canada Energy Regulator identifies three main types of energy storage currently commercially available in Canada: pumped storage hydropower, compressed air energy storage, and battery energy storage systems.² Simultaneously, salt cavern storage is seen in projects like ATCO’s Salt Cavern Storage Project in Alberta, the Freeport Energy Storage and Sequestration Hub in Texas, as well as Enstor Gas’s Mississippi Hub Storage, used for storing natural gas. Triple Point Resources’ (TPR) proposed Fischells Salt Dome Power Generation Project demonstrates a combination of these two readily available methods that would be an innovative, reliable, and important addition to the continued diversification of the Newfoundland and Labrador energy system.

In 2024 Newfoundland and Labrador Hydro (NLH) issued their Resource Adequacy Plan, which clearly states the need for both more energy and capacity, and that the system must be expanded in order to be prepared for increased customer demand and navigating the retirement of assets such as the Holyrood Thermal Generating Station. In addressing these needs, maintaining reliability of the system is a key pillar in how the utility plans to move forward. This is where a project such as the Fischells Salt Dome can play a key role. Triple Point Resources notes that the Project’s ability to store and deliver firm renewable energy on demand aligns well with NLH’s stated goals of diversifying supply, stabilizing the grid, and

¹ [Why Energy Storage is Just as Important as Generation - The Renewable Energy Institute](#)

² Market Snapshot: Energy storage in Canada may multiply by 2030, Canada Energy Regulator, July 2025

supporting long-term growth. By offering a scalable, zero emission energy generation and storage option that could help meet firm energy and capacity requirements, TPR is positioning this Project as an attractive and competitive proposal.

Triple Point Resources proposes the development of one or more engineered underground salt caverns through a solution mining process, which can be leveraged for the storage of compressed air generated using available electricity. This stored compressed air can later be released to drive turbines and generate electricity when demand is high. By using wind turbines to power operations, their systems will not require fuel for operations, resulting in no greenhouse gas emissions. As per the September 2026 re-submission, the Project will also include a 230 kV bi-directional transmission line between the facility and Bottom Brook Terminal Station, enabling delivery of reliable, dispatchable power that supports grid stability and overall energy security through the integration of intermittent renewable energy sources. This grid integration would then allow for export opportunities such as across the Maritime Link to regional markets and supporting Atlantic Canada more broadly. The Project aims to play a key role in bridging the gap between ambitious climate change commitments, renewable energy supply targets, and the operational realities of a low-carbon energy system.

Beyond storage capacity, a unique asset of the Project is the ability to monetize the recovered salt. When the brine from the solution mining process is brought to the surface, it will be diverted to an on-site crystallization facility to produce marketable salt. This offers a complementary revenue source for the Project, while also generating additional employment and economic opportunities in the region.

Economic Impact

Economic indicators and considerations are a key component of any environmental assessment process. At this stage, TPR estimates that the capital cost for all components will be approximately \$1.5 billion CAD. This includes an estimated \$400 million for the main power facility, \$500 million for the salt production components, and \$600 million for the wind farm. These estimates include all engineering, construction (labour and materials), and other components and activities costs.

Project construction will result in approximately 800 full-time equivalent positions at peak, averaging 300-400 positions at any specific time, and is expected to occur over an approximately three-year period from 2028 to 2031. Once commissioned, the Project will operate 24-hours per day on a full 365-day year basis and will be maintained by TPR employees likely on a 12-hour shift basis. The total personnel roll during operations is estimated to be approximately 70 persons.

These estimates will continue to be refined as the detailed engineering and design work continues, but it offers early insight into the positive economic impact the project would have. This investment would create employment and business opportunities, leading to additional direct and indirect economic benefits through the associated income, taxation, and gross domestic product increases throughout the life of the project.

Local Supply and Service

Large-scale energy development projects, such as the Fischells Salt Dome Power Generation Project, can provide significant opportunities for local Newfoundland and Labrador-based companies and workers. This can come from securing contracts within their existing business lines; opportunities to increase capacity and specialization within their lines of business, through expansion and joint ventures; or by entering into entirely new lines of business. The size of capital investment required for a project of this scale, coupled with an operations phase spanning 50 years, provides the opportunity for additional investment in supply chain support necessary for the project proponents to achieve project objectives.

In their registration document, TPR states they are “committed to the adjacency principle, and to hiring and contracting as many local qualified persons and companies as possible.” They highlight their commitment to ensuring full and fair opportunity for local and provincial participation in the various phases of the project. They also commit to establishing and implementing policies and procedures to ensure diversity, inclusion, and equity in their employment and contracting practices. Additionally, TPR recognizes the interest in maximizing local and regional benefits tied to major resource and energy developments. Energy NL supports an approach that provides full opportunity for its members to participate in all stages of the Project and use their experience and expertise, while also becoming involved in a new energy sector. Benefits requirements established by the provincial government must ensure optimization of participation by the local supply and service sector, including Energy NL members, and the requirements must be measured, monitored, and enforced.

Environmental and Other Considerations

In their registration document, TPR has outlined details regarding their project construction and operations and associated potential areas of impact. Through 2025 and 2026 several “Valued Components” have been identified and evaluated by the company through desktop studies. The registration document provides details regarding potential interactions between the project and these “Valued Components” associated with the atmospheric environment; water resources; fish and fish habitat; vegetation and wildlife (including species at risk); protected and special areas; people and communities; land and resource use; fisheries and other marine activities; and economy, employment, and business. The proponent is committing to appropriate mitigative and preventative measures and actions to address identified impacts.

Triple Point Resources has placed emphasis on community and stakeholder engagement, beginning this work in the very early stages of Project planning. These activities have been on-going since, and have included numerous meetings with local communities, Indigenous and stakeholder organizations, and the public. The company has demonstrated a commitment to hearing concerns, and incorporating input from communities, organizations, and the public in their project design. This is demonstrated through the ongoing evaluation of two alternatives for both seawater supply and saltwater disposal based on feedback received. The decision on these alternatives will be made based on the technical and economic evaluation, as well as public feedback. Triple Point Resources highlights the extensive list of entities they have engaged with at least once through the development work done thus far. This list includes federal and provincial agencies and representatives, Indigenous groups and organizations, communities and

organizations (Energy NL included), as well as multiple community information sessions in November 2024 and March 2026.

Conclusion

Energy NL supports the approval of this project based upon the work undertaken to date, including desktop studies on key environmental and socioeconomic indicators; the commitment from the proponent to meet environmental standards and implement appropriate mitigation; and the economic benefits the project will provide Energy NL members and the province. This large-scale energy storage project would be an integral part of the energy mix in Newfoundland and Labrador, providing employment, local supply and service opportunities, training, technology transfer, and other benefits.

With respect to supply and service opportunities for Newfoundland and Labrador companies, Energy NL believes this project to be an emerging opportunity for its members, and as with other major energy projects in the province, Energy NL encourages the Government of Newfoundland and Labrador to ensure a process is in place for consideration of local benefits, via a local benefits plan and commitments. Benefits for this project and all other energy projects must be monitored, measured, and enforced to ensure local companies are the principal beneficiaries of the development. Energy NL is available to work with the provincial government and any proponent regarding the implementation of such a plan, as well as engagement of the supply and service sector of the energy industry to ensure full and fair opportunity for them to participate in these energy projects.



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