NATIONAL MUSEUM OF BERMUDA

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The position of Executive Director is sponsored by
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The Honourable Alexa Lightbourne
Minister of Home Affairs
Government of Bermuda
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May 20, 2026

Dear Minister Lightbourne,

RE: Consultation Response: National Electricity Sector Policy 2026

The National Museum of Bermuda (NMB) welcomes the opportunity to respond to the NESP 2026 consultation. As a registered Bermuda charity operating a nationally significant heritage site at the Royal Naval Dockyard, we are both a major electricity user and an organisation committed to reducing our environmental impact through investment in renewable energy.

To date, NMB has installed solar photovoltaic infrastructure that offsets approximately 30% of our electricity consumption, reducing our reliance on the grid. However, due to the nature of our operations, including climate-controlled galleries and collections storage, security systems, and year-round public access, we remain substantially dependent on grid electricity.

We support the policy's focus on affordability, reliability, and evidence-based planning through the Integrated Resource Planning process. However, we are concerned that the current draft does not adequately address the position of public-benefit institutions and other end users with high, non-discretionary energy demand, or the specific financial risks the proposed framework may create for these customer groups.

1. **Affordability framework does not reflect non-profit realities**
The policy prioritises affordability and equity, particularly for vulnerable households, but does not recognise charities, museums, or heritage institutions as a distinct category of end user. Institutions such as the NMB, and other organisations with high non-discretionary energy demand tied to preservation, safety or public service delivery, face high, unavoidable electricity consumption with limited ability to reduce demand or pass costs on without compromising access and programming.

For example, gallery and collection storage climate control is not discretionary; reductions in energy use directly affect the preservation of Bermuda's cultural heritage collections. This is a characteristic of a broader category of non-discretionary demand linked to essential public functions, and this structural vulnerability is not currently addressed within the policy's framework.

2. **Continued exposure to fuel price volatility**
The policy acknowledges that Bermuda's electricity costs are driven by global fuel price fluctuations but does not clearly set out how exposure to this volatility will be reduced for end users in the near to medium term, particularly those with limited ability to adjust demand in response to price signals.

For organisations with high, non-discretionary demand, this creates ongoing uncertainty in operating costs, directly impacting long-term planning, financial sustainability, and the delivery of public-facing programmes and essential services.

3. **Least-cost approach may prolong cost pressure**
The policy's least-cost framework may, depending on implementation, slow the transition away from fuel-based generation if lower-cost conventional options are prioritised in the near term.

For organisations already investing in renewable energy to manage long-term costs, this creates uncertainty as to whether those investments will deliver sustained benefit over time.

4. **Distributed generation framed as a system cost risk**
The policy identifies distributed generation as contributing to upward pressure on tariffs through reduced grid sales. While these system concerns are recognised, this framing risks disadvantaging institutions that have taken proactive steps to reduce grid dependence.

For organisations that have reduced its reliance on the grid, including the NMB, future tariff structures or regulatory changes designed to address cost-shifting concerns may diminish the value of further investment or introduce additional cost burdens. This creates uncertainty for organisations seeking to align with national renewable energy objectives.

5. **Community energy models do not address site-based institutional demand**
NMB welcomes the introduction of Community and Cooperative Energy Models as a mechanism to broaden participation in renewable energy. However, these models are primarily designed for shared or off-site generation and do not address the realities of high-demand, site-dependent institutions.

NMB's energy use is intrinsically linked to its physical historic site. While shared generation models may provide indirect financial benefit, they do not reduce underlying grid reliance or operational exposure to rising costs. Without complementary measures, there is a risk that community-based solutions advance equitable access for households while leaving public-benefit institutions and other site-dependent users without a viable pathway to manage operating costs.

Recommendations
We respectfully request that the Government:

- Explicitly recognise public-benefit non-profit organisations and other end-users with non-discretionary, site-dependent energy demand within the policy's affordability and equity framework
- Identify and evaluate mechanisms to reduce end-user exposure to fuel price volatility, particularly for customers with limited ability to reduce or shift demand
- Ensure tariff design and distributed generation frameworks are structured to avoid unintentionally penalise customers who have already invested in renewable energy and reduced grid reliance
- Explore appropriate relief or classification mechanisms for defined categories of end users with high, non-reducible energy demand linked to public service delivery

The National Museum of Bermuda supports the Government's goal of a sustainable and resilient energy system. To be truly equitable, this transition must also ensure that institutions serving the public good are not disproportionately impacted, particularly where they have already taken substantial steps to reduce their reliance on the grid.

We appreciate the opportunity to contribute to this consultation and welcome further engagement on these issues.

Sincerely,

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