

Black River Wind Limited

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May 5, 2011

Nancy McNeil
Regulatory Affairs
NS URB
Box 1692 Halifax NS
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Dear Ms. McNeil:

RE: Renewable Energy Community Feed-in Tariffs-

To the knowledge of Black River Wind Ltd, the Government of Nova Scotia did not participate in this hearing other than by some representatives from the NSDOE and NSE being present at the hearing.

The Government of Nova Scotia did not present any evidence.

The Government of Nova Scotia did not make any representatives available for questioning.

Further, representatives of the Government of Nova Scotia availed themselves of very limited cross-examination of participants, that is experts, during the hearing.

The Government of Nova Scotia has put forward a model for feed in tariffs/community feed in tariffs that is highly problematic but has not provided the rationale or made itself available to be scrutinized on its basis.

The final submission by representatives of Government of Nova Scotia suggest that all is well in their model despite evidence and hard work on the part of many participants to show why the proposed model is inadequate.

The Utility and Review Board, under the Act, has the authority to improve the model. For example increasing the differentiation of rates for wind so as to increase opportunity to develop cost-effective projects.

The Utility and Review Board also has the authority to evaluate how flawed a proposal this model is, the risk to ratepayers and investors, the low likelihood that any significant number of projects will be successful under such a restrictive model with very weak notions of how financing will work.

The outcome of the 2009 proposal for the New Page biomass electricity generation project was that it was judged to be too high a risk for the ratepayers by the URB.

The model for feed in tariffs/comfits put forward by the Government of Nova Scotia does not meet a basic means test. The risks to the ratepayer associated with this model for feed in tariffs/community feed in tariffs are too high. It should be judged so and returned to the Government of Nova Scotia for the necessary modifications.

The regulations under the Act and strings of legal citations by representatives of the Government of Nova Scotia should not be used as a cover to hide behind and prevent a better outcome to really enable Nova Scotia's citizens to participate in renewable energy production and enjoy all the consequent benefits.

Respectfully submitted,

(by email)

Peggy Cameron
Vice-president, Black River Wind Ltd.