

August 19, 2011

Nancy McNeil
Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
1601 Lower Water Street, 3rd Floor
P.O. Box 1692, Unit "M"
Halifax, NS B3J 3S3

Re: Renewable Energy Community Feed-in Tariffs - BRD-E-R-10 / Matter No. Mo3632

Dear Ms. McNeil:

Please accept these comments on behalf of Nova Scotia Power with respect to the Compliance Filing filed by Synapse in the above noted matter.

Renewable Energy Community-Based Feed-In Terms and Conditions– Availability Clause (4)

The language in the Availability clause in the draft Terms and Conditions should be modified to ensure alignment with the Province's requirement that "energy generated remains on the distribution system". Nova Scotia Power understands the Province's intent is that COMFIT projects will result in no intended reverse-flow of energy from the distribution system to the transmission system.

The draft Terms and Conditions' Availability clause (4) states: "will not generate more than the minimum load on the substations serving the feeder to which the generators would connect, minus the capacity of the generators already connected to the feeder."

To align with the Provincial intent, it is suggested that this be re-worded as:

“will not generate more than the minimum load on the substation [transformer]{s} serving the feeder to which the generators would connect, minus the capacity of the generators already connected to the [substation transformer] (~~feeder~~).”

NSDOE’s proposed revision to the Availability clause (4) of the Biomass Combined Heat and Power Projects Terms and Conditions:

Nova Scotia Power has reviewed the proposed revised wording submitted by the NSDOE in its August 19, 2011 submission.

Nova Scotia Power notes that metering systems are generally not in place to provide real-time metered data, as suggested in the proposed revised wording from NSDOE, to verify existing generator capacity and overall substation transformer load. Further, costs to implement such metering and associated communications systems necessary for data retrieval would represent considerable cost to the COMFIT proponent. In addition, real-time data from other generating facilities and the Nova Scotia Power distribution system would be considered confidential, non-public information and would consequently not be available to the proponent to perform the annual verification proposed.

Yours truly,

A handwritten signature in blue ink, appearing to read "Nicole Godbout".

Nicole Godbout
Regulatory Counsel

c: COMFIT intervenors