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BERWICK, NOVA SCOTIA

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Nova Scotia Utility
and Review Board

October 30, 2006 **By e-mail; original follows**

Ms Nancy McNeil, Regulatory Affairs Officer
The Nova Scotia Utility and Review Board
P.O. Box 1692, Unit "M", Halifax, NS
B3J 3S3

Dear Ms McNeil;

Re: NSUARB – P – 886

Parties to this proceeding have been invited to comment upon the list of issues to be considered. I note that we are in the beginning of an IRP process which has now subsumed a previous DSM filing by NSPI, have just completed a Hearing on the ELIIR-2 rate, are at the beginning of process of stakeholdering on implementation of EMGC recommendations 51, 52, 75 and 76 on the basis of Mr Cary's work for DoE, and have before us the present Application. I have just reviewed the memos from Dr Stutz and the letter from Mr Ferguson circulated by fax by Mr Outhouse, respecting the proposed adjustments to the IRP timeline *and the capital projects that NSPI wishes to exempt from IRP process.*

I am led to the conclusion that it is an error to deal with these matters piecemeal. They are all inter related to some degree, some highly so. That said I consider it appropriate to address both the issues question re P-886 and the IRP timeline in one letter.

We support the position of Dr Stutz respecting the IRP timeline. It is too important to rush the process. It is also too important to cede management of the process to NSPI, and we call on the Government and the Department of Energy to show leadership in formulating what is in fact Provincial energy and emissions policy. We will all pay for the outcomes, and we will all live with the outcomes.

To the extent that there is a public health benefit to the items on Mr Ferguson's list, such as the Low NO_x firing and the Trenton bag house, we can support their approval outside the IRP process on that basis. No generation additions should be approved until the IRP is complete.

We also support the position of HRM that the EMGC recommendations respecting renewables and co-generation and should be effected forthwith.

Yours truly,

Don Ry

Donald Regan,
Superintendent
BERWICK ELECTRIC COMMISSION
On behalf of the Municipal Utilities Co-operative of Nova Scotia.