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June 21, 2018

VIA EMAIL

28323

Ms. Doreen Friis
Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
1601 Lower Water Street, 3rd Floor
Halifax, NS B3J 3S3

Dear Ms. Friis:

Re: M08059 – Generation Utilization and Optimization – Comments on Synapse Energy Economics, Inc. (“Synapse”) Final Report

The Consumer Advocate has reviewed the Synapse Report and wishes to highlight two areas that will require ongoing monitoring by the Board and input from interested parties:

1. The Synapse report shows large benefits from more aggressive (Medium) DSM. This appears to be true even excluding any benefits of avoided transmission and distribution investments. This conclusion should encourage EfficiencyOne to maximize its DSM efforts; and
2. The least-cost plan and the resulting cost depends on how much of a capacity contribution is imputed to the wind resources. The evidence to date indicates that NSPI's 17% valuation of wind capacity is too low. The Board should consider moving forward with a proceeding to settle the valuation of wind capacity in a reasonable manner. Settling that issue would improve NSPI's planning.

Yours truly,

A handwritten signature in blue ink, reading "WL Mahody".

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