

Doreen Friis
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

January 6, 2020

RE: 2020 Integrated Resource Plan Terms of Reference

Dear Ms. Friis,

Thank you for your letter, entitled 'M08929 - Integrated Resource Planning' dated December 19, 2019. Having reviewed the Draft Terms of Reference' ("ToR") in respect of the Integrated Resource Plan ("IRP"), and the related stakeholder comments, we are pleased to present our comments to you, as follows:

'Today's Planning Environment' section:

1. In consideration of the Sustainable Development Goals Act (SDGA), we are encouraged to see that NS Power agrees that those goals identified within the SDGA will be critical in developing the scenarios for the IRP.

'Objectives' section:

1. We are encouraged to see that the ToR objectives contemplate flexibility to the Strategy, as we feel the ability to change and adapt is extremely important in this rapidly changing landscape.
2. We are fully supportive of the commitments as presented, in adapting Nova Scotia's electricity system in coordination with climate change initiatives and decarbonization of the Nova Scotia system. However, we would stress that references to 'affordability' be specific to the 'long term'.
3. We are supportive of a least-cost, long-term electricity strategy.

'Developing an Electricity Strategy for the Future' section:

1. We are discouraged to see that NS Power's *primary* decision criterion used for IRP modeling continues to be solely based on minimizing cumulative present value of the annual revenue requirements. We feel that reduction in greenhouse gas emissions should also be acknowledged as part of this criterion. The ToR in its current form, only acknowledges the latter as a secondary consideration.
2. We are encouraged to see that NP Power will examine scenarios for replacement of all coal units by both 2030 and 2040, and earlier.

Process Timeline:

1. As a general point to note, it is imperative that sufficient time be granted for stakeholder review, and the ToR should be explicit in defining these review periods. More so, the amount of time prescribed should be commensurate with the volume of materials presented to stakeholders for review.

Best regards,

"Austen Hughes"

Austen Hughes | Vice President - Operations
Natural Forces