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Nicole Godbout
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Via email: nicole.godbout@nspower.ca

And

Crystal Henwood
Administrative Assistant to
Doreen Friis, Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
3rd Floor, 1601 Lower Water Street
Halifax, Nova Scotia B3J 3S3
Via email: Crystal.Henwood@novascotia.ca
January 9, 2020

Re: M08929 – Integrated Resource Planning

Dear Ms. Godbout and Ms. Fris:

Envigour Policy Consulting Inc. has been retained by QUEST and Marine Renewables Canada as their consultant in this matter. We have reviewed the Draft Terms of Reference Document and are generally satisfied with the wording and approach.

However, we believe it may be useful for this exercise if the Input Assumptions and the resulting Potential Resource Plans include a greater detailed account of the uncertainty with respect to the rate of decline in the price of technologies. This uncertainty applies to a wide range of renewable energy technologies including, solar, offshore wind, tidal, renewable natural gas and hydrogen as well as other elements of Distributed Energy Resources such as EV's, Demand Management and Storage.

We recognize that the Strategy, Roadmap and Action Plan are to include "consideration of "signposts" to monitor, future decision gates, and related triggers of changes to the Strategy". However, we believe it would be useful to go a bit further to run models to determine the price at which these technologies would become economic for ratepayers. This may be implicit in the exercise of creating "signposts", but we believe it would be helpful in making it explicit. Such clarity is particularly important given the lengthy time frame of the Plan – 25 years.

We would also note that by explicitly modeling these resources at an economic price, the IRP would also better understand the value they bring to the system. Such values may include greater capacity from offshore wind, greater predictability from tidal, greater scalability from solar PV, and greater flexibility for peak shaving from storage (including hydrogen), renewable natural gas and demand management.

A handwritten signature in black ink, appearing to read 'Bruce Cameron'.

Bruce Cameron
Principal Consultant,
Envigour Policy Consulting Inc.

c.c. Tonja Leach, Executive Director QUEST
Via Email: tleach@questcanada.org

Elisa Obermann, Executive Director Marine Renewables Canada
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