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Via Email: [Crystal.Henwood@novascotia.ca](mailto:Crystal.Henwood@novascotia.ca)  
September 17, 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 IRP Draft Findings, Action Plan and Roadmap. We have participated in the process for more than a year now. We wish to congratulate all those who have participated in this extensive and likely expensive process. We also believe the IRP has been comprehensive within the terms of the relevant legislation and regulatory practice.

However, as we begin to end this phase of the work, we suggest that we consider some context and acknowledge what the process did not include. First of all, the IRP is taking place within a rapidly changing public policy and technology environment.: one that will likely evolve in unexpected directions and produce technology breakthroughs for prices and solutions not anticipated in the IRP assumptions and modelling.

Secondly, the IRP of necessity had gaps when considering the broader energy and climate change agenda. It did not purport to be an energy IRP and thus did not evaluate the full benefits as customers shifted energy needs to the electricity system from other systems. It also did not assess the supply risks associated with dependence on imports of natural gas or environmental compliance implications of using back-up diesel. It also did not consider the opportunities for the grid from the customer purchase of batteries. And it, of course, did not assess the policy benefits of early action on decarbonization as that is the purview of the governments.

We would also note that the IRP attracted more interest and participation from stakeholders than usual with peak on-line call registration in the range of 170. In particular, Municipalities were interested in how the IRP conclusions and implementations align with their policy and program goals.

Finally, we observe that the measures under the actions and roadmap to ensure the plan is evergreen is not spelled out. It may be prudent to offer more clarity on that process using principles of inclusion, science-based conclusions, and a broad range of expert opinions and thinking tested for practicability in the Nova Scotia policy/regulatory environment.

On behalf of QUEST and Marine Renewables Canada, and after consultation with the Smart Grid Innovation Network, the following model is suggested for future engagement on matters associated with future adjustments to the electricity IRP.

### **A Potential Pathway**

To enable a transparent and inclusive process, we suggest an annual or semi-annual extended workshop on climate change and clean technology policies and programs informed by expert views on trends for electricity technologies and costs. The declining costs for technologies such as wind, solar, offshore wind and storage should be a particular focus. The workshop could also include cross-over fuels such as RNG and hydrogen.

The first part of the workshop would be broad stakeholder-based and designed to inform participants and the utility's customers. Key national/global, as well as local/regional thinkers, could be invited. The workshop organization group might also commission papers. Following this event, there could be a more technical session to understand how all this impacts the IRP assumptions and advise on the impact to the 2020 IRP, and whether it is time to do a modelling update.

The first more public-facing workshop could be managed by a not-for-profit organization or a coalition of not for profits on a cost-recovery basis. Sponsors could also be sought with conference surpluses dedicated to research in matters associated with managing the energy transformation agenda.

From this, we suggest that the final Roadmap and Action Plan reference the need for a regular and inclusive informative process to examine changes in the technologies, business models and best practices, and the policies and program initiatives that could impact the IRP assumptions and scenarios. These regular workshop updates could provide useful context and information for broader public engagement needs and the more formal IRP stakeholder engagement process.



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