
Nova Scotia Utility and Review Board

IN THE MATTER OF *The Public Utilities Act*, R.S.N.S. 1989, c.380, as
amended

2022 Load Forecast Report

NS Power

Rebuttal Evidence

Filed: September 26, 2022

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1.0 INTRODUCTION

In accordance with the *Nova Scotia Wholesale Electricity and Renewable to Retail Market Rules*¹, the Nova Scotia Power System Operator (NSPSO) is required each year to provide the Nova Scotia Utility and Review Board (NSUARB, Board) with its 10-year energy and demand forecast by the end of April for the period beginning the following January (Load Forecast Report).

The requirements for preparing the Load Forecast Report are provided in Chapter 3 of the *Nova Scotia Wholesale Electricity and Renewable to Retail Market Rules*. Since 2007, Nova Scotia Power Inc. (NS Power, Company) has filed its annual Load Forecast Reports in compliance with this requirement.

Following the filing of the 2022 Load Forecast Report on April 29, 2022, the Board issued a Hearing Order directing a paper hearing associated with its consideration of the Report.² Interventions were received from the Consumer Advocate (CA), the Small Business Advocate (SBA), counsel for the Industrial Group (IG), EfficiencyOne (E1) and Heritage Gas Limited.

On July 8, 2022, NS Power provided responses to Information Requests (IRs) issued by NSUARB staff, Synapse Energy Economics, Inc. (Synapse) on behalf of NSUARB Counsel, the CA, and E1. Intervenor Evidence was subsequently filed by David White from Synapse and the CA's consultant, John D. Wilson, Resource Insight, Inc. Submissions were also filed by the SBA and E1.

Synapse states that NS Power's 2022 Load Forecast Report seems reasonable and points out that the forecast shows significant increases in energy and peak related to electrification and population and economic growth.³

¹ Nova Scotia Wholesale and Renewable to Retail Electricity Market Rules, effective 2007 02 01, amended 2016 06 01.

² M10569, 2022 Load Forecast Report, NSUARB Hearing Order, May 2, 2022.

³ M10569, Exhibit N-9, Synapse Evidence, July 29, 2022, page 1.

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Synapse's evidence further states that NS Power has been responsive to the recommendations Synapse made on the 2021 Load Forecast Report and which were included in the Board's decision:

Our report from last year included several recommendations and NSPI has moved to address most of them. For the record, we have attached NSPI's replies to Synapse IR-43 and acknowledge its responsiveness. While there are still some issues to consider, this forecast represents a further improvement over the previous one.

In our 2021 report we made some recommendations that were included in the Board encouragements:

- Evaluate the input variables in the residential model and test over a period of time if alternative inputs make the residential model more robust, considering the following:
- Given the recent population growth and housing shortage in Nova Scotia, re-evaluate the use of housing completions for the near term;
- Given the dependence of income on the retail sales variable, the retail sales variable should be re-evaluated, particularly in the near-term given forecast supply-chain issues;
- Re-evaluate the use of the Total Provincial Disposable Income variable as it may be biased by outliers;
- Testing if Median Household Income provides a more accurate indicator of the level of income in the province is encouraged; and
- Consider incorporating household size and age of household residents to determine if a better understanding of demand on the load by time of day is achieved.

We found NSPI to be responsive to these recommendations and are attaching those responses to Synapse IR-43 to this report. We also note that some changes are being delayed to the 2023 forecast.⁴

The Company's response to the above topics and the Intervenor's specific recommendations are set out in this Rebuttal Evidence.

⁴ M10569, Exhibit N-9, Synapse Evidence, July 29, 2022, page 22.

2.0 RESPONSE

As outlined below, the evidence from Synapse, the CA, and E1, as well as the SBA's submission are primarily focused on the following issues:

1. Further details and investigation of the impact to energy and peak from expected electrification over the coming years.
2. Further details and investigation of the impact of new technologies to energy and peak, specifically learnings and potential peak mitigation from the smart grid project, direct control of water heaters, and time variable rates.
3. Improvements to the calculation of weather normalized values for energy and peak.

Analysis of electrification

The most significant change to the forecast in 2022 was the inclusion of the impact of electrification efforts that will be required to meet government mandated reductions to carbon dioxide (CO₂) emissions in the province over the next 30 years. Although these assumptions will inevitably change over time with changes in technology and policy, the work carried out by NS Power's consultant, Energy and Environmental Economics Inc. (E3), provides assistance with the planning for the transition to a low carbon future.

NS Power agrees that further investigation into the impact of these assumptions is required, and as more data is gathered through various ongoing initiatives (the Integrated Resource Plan (IRP) Action Plan and Smart Grid Nova Scotia (SGNS) in particular), they will be incorporated in future forecasts.

Technology

With a forecast of increased sales and, in particular, increased peak demands, mitigating measures will play a key role over the coming years. At a high level, the forecast already includes the projected impact from new rate programs, direct load control, and commercial curtailment as outlined in NS Power's 2020 IRP. Several projects are in progress to evaluate the impact of new technologies, including Smart Grid Nova Scotia and the water heater control project. Intervenors expressed interest in seeing the results of those projects included in the load forecast. While NS Power agrees that they should be included, those projects are still in their preliminary stages and results were not available for the 2022 forecast. As data from the projects is collected and analyzed, results will be included in future forecasts as appropriate. Other developing technologies such as battery storage, heat pump hot water heaters, and induction ovens were also mentioned by intervenors as areas for further investigation, and as more information becomes available on the uptake of these technologies it will also be included in future forecasts. The impact of heat pumps is of particular interest to all parties as it is forecast to play a major role in future electrification. The recently completed analysis of heat pump loads by Itron⁵ will be evaluated for inclusion in the 2023 forecast.

Weather Impacts

The CA recommended NS Power further analyze the impact of three weather-related factors on peak loads: multi-hour temperature averages ("incremental cold"), temperature based on a multi-station average and windspeed. NS Power agrees with these recommendations and will include them in the 2023 Load Forecast.

For clarification, weather normalization refers to an analysis of the variance between forecast and actual values, but it is not an input to the forecast.

⁵ M09321, Exhibit N-9, NS Power On-Bill Financing Report, October 30, 2020.

3.0 RECOMMENDATIONS

Synapse, the CA, SBA and E1 provided additional recommendations for future Load Forecasts. NS Power's responses to those recommendations are set out below.

3.1 Synapse

Synapse states that the Load Forecast Report "represents substantial improvements in an expository sense by providing additional information."⁶ Synapse provides the following recommendations and requests for clarification⁷:

3.1.1 Recommendation 1:

"We ask NSPI to more fully investigate the peak load effects of heat pumps in future forecasts."

NS Power Response:

As more information on heat pumps is gathered it will be incorporated in the forecast. The recent study completed by Itron on the impact of heat pumps will be evaluated for the 2023 Load Forecast.

3.1.2 Recommendation 2:

"We recommend consideration of heat-pump-based hot water heating."

NS Power Response:

Heat pump hot water heaters remain relatively new; as more information is obtained regarding the expected uptake this will be included in the load forecast.

⁶ M10569, Exhibit N-9, Synapse Evidence, July 29, 2022, page 1.

⁷ M10569, Exhibit N-9, Synapse Evidence, July 29, 2022, pages 23-24.

1 The increased initial cost compared to a regular resistance heater tank and the
2 fact that the unit will cool the space in which it is installed will likely temper
3 uptake of this technology in the near term.

4
5 **3.1.3 Recommendation 3:**

6
7 “We ask that NSPI provide updates on the water heating load
8 control project in the next load forecast report, including
9 estimates of the impact of hot water heater device control
10 initiatives on system peak demand.”

11
12 **NS Power Response:**

13
14 A preliminary estimate of 0.5 kW of peak savings per unit was provided in the
15 2022 Load Forecast (page 81 of the report), any updates will be included in the
16 next forecast. Details will also be provided through the joint NS Power / E1
17 demand response pilot project.

18
19 **3.1.4 Recommendation 4:**

20
21 “We ask that more complete results of the SGNS project regarding
22 electric vehicle impacts be included in the next load forecast report.”

23
24 **NS Power Response:**

25
26 Data and learnings are currently being gathered under the SGNS project and
27 corresponding analysis is ongoing. As data and learnings from the SGNS project
28 are obtained, and corresponding conclusions are developed, they will be
29 considered where applicable/appropriate for incorporation into the Load
30 Forecast. Information arising from the SGNS project is reported to the
31 NSUARB through semi-annual reporting under the SGNS project matter.⁸

⁸ M09519.

3.1.5 Recommendation 5:

“We ask that more complete results of the SGNS project regarding battery storage be included in the next load forecast report. We further request that NSPI investigate more fully the use of electric vehicle batteries, especially for peak management”

NS Power Response:

Data and learnings are currently being gathered under the SGNS project and corresponding analysis is ongoing. As data and learnings from the SGNS project are obtained, and corresponding conclusions are developed, they will be considered where applicable/appropriate for incorporation into the Load Forecast. Data and learnings and corresponding conclusions arising from the SGNS project are reported to the NSUARB through mandated semi-annual reporting under the SGNS project matter⁹.

3.1.6 Recommendation 6:

“We also raise a point about the appropriateness of the commercial electrification programs. We ask NSPI to provide further information about their relative benefits and costs.”

NS Power Response:

As provided in the 2021 Load Forecast Report, there are no specific programs undertaken by NS Power related to commercial and industrial electrification. Key account representatives work with customers to identify third party programs or opportunities that may provide a benefit to them.¹⁰ The load impact

⁹ M09519.

¹⁰ Examples of third-party electrification programs or opportunities include the Agriculture Clean Technology Program sponsored by Agriculture Canada, the Net Zero Accelerator Fund (NZAF) which is a stream of the Federal Government’s Strategic Innovation Fund, the Zero Emission Vehicle Infrastructure Program (ZEVIP) and Smart Renewables and Electrification Pathways Program (SREP) from Natural

1 of these activities is not picked up in the underlying models, so estimates of these
2 initiatives are included separately. Beyond the estimated load impact, relative
3 benefits and costs are beyond the scope of the load forecast.
4

5 **3.1.7 Recommendation 7:**
6

7 “It is not clear in the report how much of the commercial and
8 industrial demand savings presented in Figure 36 are contained in
9 the industrial forecast. We ask NSPI to clarify the DSM effects
10 for each sector.’
11

12 **NS Power Response:**
13

14 NS Power confirms that approximately 15 percent of the commercial and
15 industrial demand savings are allocated to the industrial class and 85 percent are
16 allocated to the commercial class.
17

18 **3.1.8 Recommendation 8:**
19

20 “We ask NSPI to further investigate the commercial and
21 industrial electrification impacts after 2027.”
22

23 **NS Power Response**
24

25 NS Power agrees with this recommendation and confirms it will investigate and
26 include commercial and industrial electrification impacts after 2027 in the 2023
27 Load Forecast.
28

Resources Canada, the Small Business Non-Electric Program from Efficiency NS, the Capital Project Retrofit of Municipal Facilities and Signature Initiatives from the Federation of Canadian Municipalities, and the Zero Emission Transit Fund from Infrastructure Canada.

3.1.9 Recommendation 9:

“We’d like further explanation from NSPI about why the commercial and industrial adjustment varies so much from what was used last year”

NS Power Response:

The DSM coefficients vary from year to year and depend on changes to both actual sales and the underlying end uses. The change from 2021 to 2022 is likely the result of changes to the underlying end use data, particularly the commercial lighting efficiency and intensity, which was revised and now shows a lower intensity than in the previous forecast. As this is one of the large end use intensities in the commercial sector, it will have an impact on the estimation of the DSM coefficient.

3.1.10 Recommendation 10:

“If DSM program savings are increased above historical levels, then the adjustment factors probably should be adjusted upward to reflect greater levels of incremental savings.”

NS Power Response:

NS Power agrees with this recommendation. The approved DSM 2023-2025 plan is in line with prior DSM amounts, so the adjustment factors do not need to be adjusted at this time.

3.1.11 Recommendation 11:

“We ask NSPI to investigate what can be done with time-of-use rates and other measures to mitigate the peak load increases for all these components, especially for the commercial and industrial sectors”.

NS Power Response:

NS Power agrees with this recommendation. Current pilot programs include time variable pricing, water heater control and smart grid, all of which will provide insights into peak mitigation options. NS Power is currently developing a pilot version of a General Demand Time of Use tariff applicable to Multi-Unit Residential Buildings that has energy charges only (i.e. no demand charge).

3.1.12 Recommendation 12:

“Please include explicitly the effects of the additional demand response measures, including those after 2026 that are included in the IRP Action Plan in the next forecast.”

NS Power Response:

NS Power agrees with this recommendation. The current demand response estimates, based on the 2019 E1 DSM Potential study, were incorporated based on the 2020 IRP and IRP Action Plan. Any changes to the existing demand response estimates that are developed through the IRP action plan process will be incorporated into future forecasts.

3.1.13 Recommendation 13:

“We ask NSPI to quantify how electric thermal storage could moderate the peak load”

NS Power Response:

NS Power confirms that at present, electric thermal storage is not widely used as either a primary or backup heat source, with only 13,000 customers using the

1 technology. This recommendation could be considered for scenario analysis in
2 future forecasts.

3
4 **3.1.14 Recommendation 14:**

5
6 “Water heating has potential for load control measures which
7 NSPI should fully investigate to manage peak load growth.”
8

9 **NS Power Response:**

10
11 NS Power agrees with this recommendation. Please refer to the response for
12 Recommendation 3.

13
14 **3.1.15 Recommendation 15:**

15
16 “Induction cooking is a new technology that should be evaluated
17 for its effects on energy and peak loads.”
18

19 **NS Power Response:**

20
21 NS Power agrees that induction cooking technology reduces overall energy
22 demand and may reduce peak. As this is relatively new technology and requires
23 specific cookware to function it will likely have a longer term impact on the
24 forecast due to the slow rollover of cooking appliance stock. Although it is not
25 specifically included in the forecast, the efficiency of the “cooking” end use does
26 increase over time and is aligned with a slow uptake of technology such as
27 induction cooking.

28
29 **3.1.16 Recommendation 16:**

30
31 ““We ask NSPI to evaluate commercial heat use more fully as to
32 what is driving it and how the peak impacts could be moderated.”
33

NS Power Response:

NS Power's 2022 Load Forecast report includes a forecast impact of commercial heat growth over the long term as part of the economy-wide net zero transition. NS Power will continue to monitor growth in heating load in this customer class and work with its partners, including E1, on opportunities for firm peak mitigation in alignment with the IRP Action Plan.

3.1.17 Recommendation 17:

"We ask that NSPI review its peak forecasting methodology in light of these discrepancies and evaluate what factors (e.g., DSM, heat pumps, weather) account for the gap."

NS Power Response:

The difference between actual and forecast peak is largely due to the impact of weather. In the 2022 Load Forecast, the peak temperature has been adjusted to reflect gradually warming temperatures. Figures 56 and 57 in the 2023 Load Forecast Report show that in January 2022, when the peak temperature was -15 degrees Celsius (the same as that used for the forecast), both the system peak and firm peak were very close to the previous year's forecast, indicating that the methodology is sound.

3.1.18 Recommendation 18:

"We ask that NSPI provide a 2032 peak sensitivity analysis similar to what was done for energy in Appendix D."

NS Power Response:

NS Power agrees with the recommendation and will provide a peak sensitivity analysis similar to what was done for energy in Appendix D in the 2023 Load Forecast Report.

3.1.19 Recommendation 19:

“We ask that NSPI provide more information about the assumptions and the calculations behind the values in Figure D8.”

NS Power Response:

The purpose of Figure D8 is to show the relative magnitude of various key inputs in the forecast. The details for DSM, Solar, EV current forecast, Battery, and Weather/Economics P10/P90 are all contained in the text of the report. Further details will be provided in the 2023 Load Forecast Report on the EV high and low cases (these are derived from the Dunskey EV Forecast study referenced in the 2021 report in Figure 15).

3.1.20 Recommendation 20:

“We recommend that there be future sensitivity analyses based upon thoughtful/critical examination of realistic but aggressive proactive actions to mitigate projected peak increases using newly available technology.”

NS Power Response:

This analysis is provided in Figure 68, which compares the forecast to various IRP scenarios that include different levels of projected electrification. The 2022 evergreen IRP work will assess scenarios and sensitivities evaluating updated electrification profiles coupled with ranges of DSM programming and other peak

mitigation strategies, intended to provide the necessary context to assess the current forecast with consideration for changes in policy/technology.

3.2 Consumer Advocate

The CA's evidence provides the following recommendations:¹¹

3.2.1 Recommendation 1:

“NS Power states that it will conduct further analysis of weather normalization and the impact of incremental cold on peak loads for the 2023 load forecast. As I will discuss below, I recommend that this analysis also include the effect of wind speed.”

NS Power Response:

NS Power agrees with the recommendation and will include an analysis of the impact of multi-hour temperature averages (incremental cold) and windspeed on the peak in the 2023 Load Forecast Report.

3.2.2 Recommendation 2:

“NS Power should focus its multi-station weather analysis on the peak load. If a meaningful effect is found with respect to peak loads, then it should also re-evaluate whether monthly energy forecasts can be improved as well.

NS Power Response:

NS Power agrees with the recommendation and will investigate multi-station weather with respect to peak load for the 2023 Load Forecast Report. The impact

¹¹ M10569, Exhibit N-8, Evidence of John Wilson, July 29, 2022, pages 2-12.

on energy sales was evaluated in the 2022 forecast (refer to section 4.2) and was determined not to be significant.

3.2.3 Recommendation 3:

“I recommend that the Board direct NS Power to engage stakeholders around its proposed methods for load-weighted temperature data, weather normalization (including multi-hour temperature averages and wind speed) and the impact of incremental cold (and wind speed) on peak loads.”

NS Power Response:

NS Power provides an opportunity for stakeholder feedback through an annual review before the forecast is filed, as well as through the paper hearing process. NS Power confirms that the methods for integrating the weather data will be reviewed with stakeholders prior to filing to the 2023 Load Forecast.

3.2.4 Recommendation 4:

“NS Power should identify the gap between existing electrification measures and trends and those included in its load forecast as necessary to achieve federal and provincial policy goals for electrification.”)

NS Power Response:

As outlined in Section 2, refining the impact of electrification on the load forecast will be undertaken in future forecasts through the inclusion of new learnings and data.

3.2.5 Recommendation 5:

“NS Power should update those same load forecast models to reflect the findings from Itron with respect to real-world impacts of heat pumps and identify the gap between realistic projections of the impacts of heat pump adoption and policy goals for electrification.”

NS Power Response:

NS Power agrees with the recommendation and will evaluate findings from the Itron report for the 2023 forecast. The projections contained in the forecast are considered realistic given the stated targets for carbon reduction, any changes to policy around electrification will be included as they are made available.

3.2.6 Recommendation 6:

“updated its forecast for heat pump water heaters.”

NS Power Response:

Heat pump hot water heaters remain relatively new; as more information is obtained regarding the expected uptake this will be included in the load forecast. The increased initial cost compared to a regular resistance heater tank and the fact that the unit will cool the space in which it is installed will likely temper uptake of this technology in the near term.

3.2.7 Recommendation 7:

“Board should renew its directive to NS Power to complete the line loss determination model. NS Power should report on its progress on a quarterly basis until the project is complete to the satisfaction of the Board.”

NS Power Response:

Line loss determination by rate class is not an input into the system load forecast subject to the annual load report. The line loss by rate class forms an input into rate setting proceedings.

3.3 Small Business Advocate

The SBA's submission contained the following recommendations¹²:

3.3.1 Recommendation 1:

“The SBA recommends the Board further direct NSPI to clarify where and how the SGNS data is incorporated into the Load Forecast, particularly as it relates to EV load and peak contributions.”

NS Power Response:

SGNS project data and learnings are not currently incorporated into the Load Forecast. Data and learnings are currently being gathered under the SGNS project and corresponding analysis is ongoing. As data and learnings from the SGNS project are obtained, and corresponding conclusions are developed, they will be considered where applicable/appropriate for incorporation into the Load Forecast. Data and learnings and corresponding conclusions arising from the SGNS project are reported to the NSUARB through the Company's semi-annual reports.

¹² M10569, SBA Submission, July 29, 2022, pages 2-3.

3.3.2 Recommendation 2:

“The SBA recommends further explicit incorporation of historical data obtained through the SGNS Project, forecasted EV and electric heating adoption rates based upon currently available or planned incentives (including rate incentives and structures), and further evaluation of the bands of uncertainty around adoption rates.”

NS Power Response:

Data to inform future forecasts is and will be gathered from a variety of sources, and includes historic data and projections of likely outcomes. In the 2022 Load Forecast Report, NS Power presented the findings of E3 regarding EV and electric heat adoption rates as they relate to decarbonization targets. As more information is gathered on changes to adoption rates driven by future incentives, whether related to rates or policy/government funding, these will be included in the forecast. As far as uncertainty is concerned, future potential scenarios will be modeled through the IRP action plan and will be compared to future forecasts.

3.4 Efficiency One

E1 provides the following recommendations:¹³

3.4.1 Recommendation 1:

“That the heat pump modelling in the load forecast be updated to reflect the current adoption trends of cold climate heat pumps with a minimum COP of 1.75 at -15oC, and the removal of any ‘lock-out’ temperature that is not aligned with the COP performance of modelled heat pumps.”

¹³ M10569, Exhibit N-10, EfficiencyOne Evidence, July 29, 2022, page 14.

NS Power Response:

The scenario modeled by E3 assumed a COP of 2.3 at -15 degrees Celsius for new heat pumps installed over the forecast period. Additional analysis, including removal of the lock-out temperature, is incorporated into NS Power's ongoing Electrification Strategy work under the IRP Action Plan.

3.4.2 Recommendation 2:

“That NS Power explore electrification scenarios that maintain or expand the use of the following technologies:”

- a. ETS units to shift load to off-peak times and offer grid flexibility;
- b. wood and pellet stoves as supplemental heat for peak times;
- and
- c. gas heating systems as supplemental heat for peak times.

NS Power Response:

NS Power agrees with this recommendation and will explore a hybrid scenario where customers retain their existing (non-electric) heat source as a backup through the 2022 IRP Evergreen analysis. Widespread adoption of the technologies listed would be limited by:

- (a) As outlined in response to Synapse Recommendation 13, ETS units have seen limited uptake despite both rate-based incentives and financial incentives (when replacing resistive electric heating)
- (b) Wood and pellet stoves require physical effort and won't be suitable for all homes and users
- (c) Natural gas availability is limited to portions of a small number of urban areas in the province

3.4.3 Recommendation 3:

“That NS Power provide a plan and explanation for the remaining demand response capacity required to satisfy the projected 2025 capacity, detailing the incremental program options to be utilized and how they relate to E1’s demand response program options. If no such plan exists, then NS Power should adjust the demand response assumptions in the 2022 Load Forecast.”

NS Power Response:

NS Power identified the DR potential in the IRP process using E1’s DR Potential Study (Base Assumption). The Company is in ongoing consultation with E1 and other stakeholders on the specifics of DR implementation as part of the IRP Evergreen process. As executable DR activities are planned and implemented NS Power will engage stakeholders through that process. Similar to DSM activities that are forecast for future years but do not yet have an executable plan associated, the DR is appropriately included in the load forecast as it is a reasonably foreseeable and available opportunity.

3.4.4 Recommendation 4:

“That NS Power apply the same framework when assessing the value provided by different demand response programs.” In particular, E1 suggests that an ELCC factor be applied to each of the LIIR, ELIADC, EV, and other DR interruptible load components in the load forecast.

NS Power Response:

E1 states that “[LIIR] the ELCC is likely to be very close to 1 but it should still be considered given the program does not represent perfect capacity”.¹⁴ This is

¹⁴ M10569, Exhibit N-10, EfficiencyOne Evidence, July 29, 2022, page 12.

1 consistent with NS Power's evidence that it has the ability to ensure that LIIR
2 customers do not contribute to peak demand requirements. NS Power believes that
3 performing a quantitative ELCC analysis of LIIR customers, where both parties
4 believe the effective value is very close to 1, is not needed.

5
6 NS Power does agree that EV charging may have characteristics that are similar to
7 an ELCC adjustment (for example limits on customer responsiveness, event
8 duration and call frequency limitations). NS Power has captured this behaviour in
9 the 2022 Load Forecast by assuming that only 70 percent of the total EV load in
10 the forecast is responsive and follows a managed shape (see page 7 of Appendix
11 E). NS Power is open to reviewing how an ELCC methodology can be applied to
12 EV load shapes as better data on EV managed charging becomes available in the
13 future.

4.0 CONCLUSION

The requirement to file the Load Forecast Report is an annual requirement under the provisions of the Nova Scotia Wholesale and Renewable to Retail Market Rules. Since 2007, NS Power has continued to refine its forecast, with input from Synapse, and over the last several years with input from other parties as part of a public proceeding. Each annual report reflects continuous improvement in methodologies and better explanation of the inputs and models as confirmed by Synapse:

For many years Nova Scotia Power, Inc. (NSPI) has filed a load forecast report, and Synapse has been reviewing them. These reports have changed considerably over time. The 2022 Load Forecast Report represents substantial improvements in an expository sense by providing additional information.¹⁵

We support NSPI's ongoing efforts to improve the transparency and accuracy of the load forecast. There is still more to do; but overall, this report is very well done and better explains the underlying factors driving the forecast.¹⁶

NS Power appreciates the comments and feedback on the forecast. The Company has considered the comments received on this year's report and, subject to the Board's determination in this matter, will incorporate adjustments in the next annual Load Forecast Report as indicated in Section 3.

NS Power respectfully requests that the Board accept the 2022 Load Forecast Report, as filed.

¹⁵M10569, Exhibit N-9, Synapse Evidence, July 29, 2022, page 1.

¹⁶Ibid, page 24.