



Blackburn Law Inc.

July 11, 2024

VIA EMAIL

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

Dear Ms. Henwood:

Re: M11689 – Nova Scotia Power Inc. - 2024 Load Forecast Report

The Small Business Advocate reviewed the 2024 Load Forecast Report (the “Report”) filed by Nova Scotia Power Inc. (NSPI) and submits the following comments for consideration by the Board:

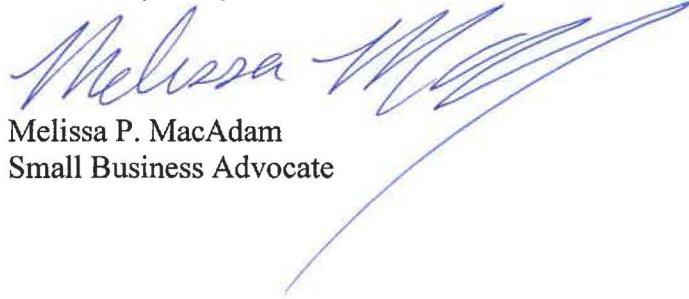
1. The SBA submits that it would be beneficial for NSPI to use the results derived and lessons learned from the Smart Grid Nova Scotia pilot project (as described in the report issued in M11621) as input to the load forecast models.
2. The SBA submits that NSPI should continue to recruit more small business customers to its different pilot load shifting (TVP/TOU/PPP, etc.) programs (as is being explored in M11267) so that the demand response potential of small business can be included in load forecasts (similar to Figure 56 of the Report), going forward. The contribution of small business customers to NSPI’s demand response programs, particularly at peak demand times, could be significant. The impact of their load shifting can then be quantified and compared to other classes of customers, which will directly impact the results of the next load forecast.
3. The SBA submits that the issue of net-zero energy-ready (NZER) building codes is an important matter that is likely to arise in the near future. As Nova Scotia signed onto the Pan-Canadian Framework on Clean Growth and Climate Change in 2016, and therefore agreed to a net-zero energy-ready (NZER) code for new construction by 2030¹ it must be expected that we will see changes to the building codes soon to move towards NZER codes. It would be beneficial for NSPI to provide updates on that

¹ Pan-Canadian Framework on Clean Growth and Climate Change - Canada’s Plan to Address Climate Change and Grow the Economy - https://publications.gc.ca/collections/collection_2017/eccc/En4-294-2016-eng.pdf - Page 17

process in the annual load forecast reports, as once implemented, NZER building codes could potentially have significant impacts on NS Power's long-term load forecasts.

All of which is respectfully submitted this 11th day of July, 2024.

Yours Very Truly,

A handwritten signature in blue ink, appearing to read "Melissa MacAdam", with a long, sweeping flourish extending from the end of the signature.

Melissa P. MacAdam
Small Business Advocate