

August 28 2024

NOVA SCOTIA UTILITY AND REVIEW BOARD

To whom it may concern,

RE: 2024 10 Year System Outlook Report (M11764) – Information Requests

Please see SWEB Development's Information Requests to be directed to Nova Scotia Power regarding the 2024 10 Year System Outlook report (M11764). SWEB looks forward to NSP's responses and continuing to engage on these important electricity matters.

1. Based on publicly available sources, at least two (initially and subsequently) awarded Projects dropped out of the Rate Base Procurement. We kindly ask NSP to share the reasons for such a high drop out rate. Please also provide feedback, whether details of the procurement design could and should be changed in order to avoid similar dropouts during the Green Choice procurement.
2. Based on publicly available sources, several awarded RBP projects will achieve commercial operation later (2025/2026) than initially planned (2024/2025) due to problems connecting the projects in time to the Nova Scotia Power transmission system. Is there a plan in place to ensure that similar issues will not occur during the ongoing Green Choice procurement and if so, what are the details of such plan?
3. Based on the publicly available Green Choice RFP documents, the procurement anticipates that the awarded projects will be delivering electricity in 2027 or 2028. The CPI Adjustment Period for these projects ends in December 2027, in order to incentivize projects to deliver electricity as early as possible. Please explain the differences in the planning between the Green Choice procurement and NSP's assumptions that the Green Choice projects will be in service as of 2028/2029 (figure 6). Further, has the NSPSO shared this information with the Green Choice Program Administrator? Further, considering the delays experienced by NSP for the awarded RBP projects, does NSP believe that the stated in-service dates for the Green Choice Projects of 2028 and 2029 are reasonable? Further, is NSP able to guarantee Green Choice projects to interconnect in 2027 if they wish to do so in accordance with the Green Choice procurement?
4. What is the impact of new generation for hydrogen production on NSP's ability to achieve the 2030 clean energy targets? Specifically, how does NSP foresee the potential to provide adequate transmission interconnection service (capacity) to future wind generation projects specifically built to serve the local Nova Scotia load?

There exists a mechanism for generators to essentially lock-up interconnection capacity without ever having to reach their stated/forecasted in-service dates at the time of initial interconnection request submission. This is evidenced by the number of generators in Figure 12 (such as IR516 – IR598) that have initiated their interconnection requests

several years ago, with varying interconnection milestones met, but having not achieved Commercial Operation.

Does a mechanism exist within the GIP/GIA to remove these projects from the queue, and/or update their Queue Order priority to be more in line with their current forecasted milestone dates?

The above could reasonably be viewed as “queue squatting” and allows projects with non realistic timelines to lock up interconnection capacity (via achieving system impact studies) for indefinite amounts of time.

5. In Section 7.9.1, it is stated that “When the second NS/NB tie is in service, the RoCoF constraint will be removed.”. Does this statement imply that the requirement for IBRs to provide inertia support of 3 MW-s per MVA will be removed with the addition of this second tie line?

Sincerely,



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SWEB Development