

19 August, 2025

NOVA SCOTIA ENERGY BOARD

C/O CRYSTAL HENWOOD (CRYSTAL.HENWOOD@NOVASCOTIA.CA)

Dear Ms. Henwood,

RE:

Intervenor Submission – Evergreen IRP Action Plan & Roadmap Update (M12247)

Energy Storage Canada (ESC) is the national trade association dedicated to accelerating the deployment of energy storage projects and technologies¹. Please accept this letter as ESC's Intervenor Submission in the NS Power Inc. Evergreen IRP Action Plan & Roadmap Update (M12247).

1. ESC notes that: 1,263 MWh of renewable electricity would be curtailed on the day of peak demand in 2030 (8 January) (per NS Power's Response to Natural Forces IR-1 in M12247); and that 23,255 MWh of renewable electricity would be curtailed on the day of peak curtailment in 2030 (5 July) (per NS Power's Response to ESC IR-5 in M12247). Charging energy storage with this curtailed renewable electricity, and discharging it when renewable electricity is less available, represents a very significant opportunity to support competition and innovation in the provision of energy resources in the province, and to boost energy security.
2. ESC supports Synapse's recommendations to undertake a robust analysis soon to carefully evaluate the economics of alternatives to new fossil-fueled resources, and the optimal path forward to meet the province's future firm capacity needs. **ESC recommends that firm capacity resource options considered include: lithium-ion batteries; batteries using other chemistries (e.g., www.e-zinc.ca); pumped storage; compressed air (e.g., www.hydrostor.ca); carbon dioxide (e.g., www.energydome.com); and thermal (e.g., www.antora.com).**

¹ For further information, please visit: www.energystoragecanada.org

3. ESC notes that on the day of peak demand in 2030 (8 January), it could be expected that fossil fuel generation would represent an average of 25% of hourly supply (and up to 48% of hourly supply) (per NS Power's Response to Natural Forces IR-1 in M12247). ESC submits that this level of reliance on imported fossil fuels could run counter to recent provincial energy and environmental policy direction.² **ESC asks that the Board consider asserting (and/or providing guidance) that future IRP modelling can and should consider principles such as "energy security" (i.e., avoiding over-reliance on fuels imported from other countries).** This factor would be in addition to the "...model develops a resource portfolio that meets required customer load, environmental policy compliance and ensures system reliability requirements are met at the lowest cost..." (per NS Power Response to ESC IR-4 in M12247).

Thank you for the opportunity to participate in this important proceeding.

Very best regards,

KL Benson King

Leone Benson-King

Vice President Corporate Services, Energy Storage Canada

(leone.king@energystoragecanada.org)

² For example, Section 2 c) of the *Energy and Regulatory Boards Act* states "the Board shall give appropriate consideration to the extent to which such rates, tolls, charges, tariffs, capital applications or other matters... ensure the provision of safe, secure, reliable and economical energy supply in the Province" [emphasis added]. Section 9n) of the *More Access to Energy Act* prescribes the objects of the IESO to include "engag[ing] in activities to facilitate the diversification of sources of electricity supply by promoting the use of cleaner energy sources and technologies, including alternative energy sources and renewable energy sources".