



October 22, 2026

Nova Scotia Energy Board M12916

IN THE MATTER OF THE PUBLIC UTILITIES ACT

- and -

IN THE MATTER OF NOVA SCOTIA INDEPENDENT ENERGY SYSTEM OPERATOR'S
2026 10-Year System Outlook Report

Thank you for the opportunity to comment on the 2026 10-Year System Outlook Report submitted by Nova Scotia's Independent Electricity System Operator.

The Ecology Action Centre is concerned that the outlook reports the following projections:

- A marginal projected system compliance to the 80 % renewable electricity standard (RES) in 2030;
- An optimistic timeline for completion of new gas generation that may force delays in timely emissions compliance;
- An inadequate planning margin for the two final years, up from one as reported in 2025;
- No projected increase in regional transmission or long-duration energy storage.

Successful plans must anticipate project delays and variation in project outcomes to ensure regulatory limits are met on time, particularly as the electricity system transitions to zero emissions while embracing load growth. Every delay makes further action more challenging and expensive.

In this light, both the zero margin projection for the 2030 Renewable Energy Standard, and reduced planning margin beyond 2034, reveal that current plans are inadequate. While a reported increase of 100 MW of firm imports

from New Brunswick after 2028 is welcome, it demonstrates the lack of ambition in existing plans.

Increased use of variable renewable generation is best supported through strong regional transmission. Yet there is no further import capacity projected over the 10-year outlook period. The load forecast makes no mention of the relative impact of Demand Side Management, and Demand Response projections are small (especially for beyond 2032, where they are based on projections from six years ago).

The Ecology Action Centre would ask the regulator to require the system operator to revise their resource plans to:

1. Demonstrate full compliance, with margin, for the 2030 80 % RES and the system Planning Reserve Margin (PRM) across the full 10-Year Outlook,
2. Accelerate planning with regional stakeholders to increase firm import capacity, and,
3. Undertake a pilot demonstration of long-duration energy storage to better inform future resource plans.

Thank you, again, for the opportunity to comment.

Respectfully submitted by,

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