

Alison Scott & John MacIsaac, Nova Scotia Clean Electricity Solutions Task Force (info@cetaskforce.ca)

13 October, 2023

Dear Ms. Scott and Mr. MacIsaac,

Re: Energy Storage Canada Response to Clean Electricity Solutions Task Force Call For Submissions

As you know, Energy Storage Canada (ESC) is the national trade association dedicated to accelerating the deployment of energy storage projects and technologies¹. Thank you for the recent opportunity to meet with you. Please consider this our formal response to your Call for Submissions. Our recommendations to the Task Force are detailed in the Appendix, and can be summarized as follows:

- 1. In your interim update to Nova Scotians, recognize the heightened importance of: energy storage for maintaining system security and stability; and of strong and clear policy and market signals to project proponents and stakeholders.***
- 2. Prioritize in your recommendations to Government that the Department of Natural Resources and Renewables continue to have the necessary resources to be pro-active in their development and implementation of the Clean Power Plan's enabling policy and regulatory framework.***
- 3. Compare the NSUARB's Cost Rules to those of other regulators, and consider whether they will be appropriate in future given the scale of the transition that the Clean Power Plan presents.***

Thank you once again for the opportunity to participate in this important process.

Very best regards,



Robert Tremblay

Policy Manager, Energy Storage Canada (robert.tremblay@energystoragecanada.org)

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

Appendix: ESC Response to Clean Electricity Solutions Task Force Call For Submissions

1.
 - a. Phasing out coal, and achieving 80% renewable electricity, by 2030 necessitates a different approach to power system planning, design and operation in Nova Scotia. Storing excess supply and managing demand in sync with the availability of renewable energy resource must now (much more than before) be a focal point of this new paradigm. Energy storage – whether standalone, or integrated with generation or load – and whether “short duration” or “long duration” - should now be front-of-mind for policy and system planning decision-making. ***It would send a positive signal to ESC’s Members if the Task Force’s interim update to Nova Scotians recognized the heightened importance of energy storage for maintaining system security and stability, while phasing out coal and ramping-up renewables.***
 - b. The Nova Scotia Clean Power Plan clarifies the province’s direction for energy storage growth by establishing: an initial target of 300 – 400 MW of Battery Energy Storage Solutions (BESS) by 2030; and commitments to explore vehicle-to-grid (V2G), and long duration energy storage (LDES) technologies. In addition to long-term system and supply-mix planning, these targets and commitments are important for project developers, technology and service providers, and their partners to commit additional resources and investment in the province. ***It would send a positive signal to ESC’s Members if the Task Force’s interim update to Nova Scotians recognized the importance to project proponents and stakeholders of: strong and clear policy and market signals, and visibility into when further detail and timelines and stakeholder engagement processes toward their implementation will be available.***
2. The removal of undue burden to the development of energy storage projects is paramount to the realization of the Clean Power Plan. The NSUARB’s Interconnection Process Review (M10905) is an example of how government can pro-actively evolve frameworks before delays and confusion constrain investment. ESC applauds the government’s foresight and leadership in initiating M10905. The importance of the outcomes from this proceeding for energy storage in the province (e.g., technology-specific and - appropriate procedures, fees, timelines and system impact studies for interconnection) cannot be understated. ESC will continue to provide updates on M10905 to the Task Force as they arise. ***ESC recommends that the Task Force prioritize in your recommendations to Government that the***

Department of Natural Resources and Renewables (and other Departments, etc.) continue to have the necessary resources to pro-actively develop and implement the Clean Power Plan’s enabling policy and regulatory landscape (for future issues and needs as they arise).

3. Active participation from experts and affected parties in Nova Scotia Utility and Review Board (NSUARB) proceedings is essential for the Board to receive the best and broadest understanding of issues being considered, and this is to the benefit of ratepayers. Participating in proceedings is very resource-intensive, especially for small non-profit organizations such as associations. It has been ESC’s experience that Section 6 of the Costs Rules (specifically, 6(1) & 6(2) c and 6(2) d) creates too much uncertainty about the potential for partial cost recovery in future, and as a result we cannot participate to our full potential benefit to both the Board and to ratepayers. Nova Scotia’s approach to cost recovery is quite different to for example the Canada Energy Regulator, Alberta Utilities Commission and Ontario Energy Board where advanced confirmation of cost recovery is at times possible for certain parties. ***We encourage the Task Force to explore the NSUARB Cost Rules in comparison to those of other regulators, and to consider whether they will be appropriate in future to enable the collective experiences and expertise of Independent Power Producers and other stakeholders to be brought forward given the scale of the transition that the Clean Power Plan presents.***