

From:
To: <policy@gov.ns.ca>
Date: 2009-03-30 10:20 PM
Subject: Electricity Sector Greenhouse Gas Regulation Discussion Response

Comments on the Department of Environment's discussion paper:
"An Approach to Regulating Electricity Sector Greenhouse Gas and Air
Pollutant Emissions in Nova Scotia"

To whom it may concern,

I have reviewed the proposed regulations and while they are an important first step in immediate action to lower greenhouse gas emissions in Nova Scotia, they fall short of what is achievable in the short and medium term. The desire to operate at arms length from the power utility and it's regulator, the UARB, through low caps does not adequately challenge the utility to take advantage of present, available, renewable and clean generation options.

Nova Scotia's present electricity generation equipment represents several large point source emitters that constitute 40+% of our annual GHG emissions. Other sectors, by contrast, are widely dispersed as buildings and vehicles around the province. Achieving concrete measurable reductions in these areas will take time due to their complexity, wide distribution and shear volume of individuals and institutions involved.

Real and concrete reductions must come disproportionately from the electricity sector in the near term.

There is an added advantage to lower caps in the period leading up to 2020. Caps lower than those recommended in the discussion paper will drive fuel switching at the power utility's thermal plants. Conversion to natural gas plant by plant would provide the responsive load following generation capacity required to support wind generation added above that presently contracted by the utility. As wind capacity is added, combined cycle generation, similar to Tuff's Cove plants 4,5 and proposed 6 could be added as well. These facilities operate at 40% or more thermal efficiency, significantly above the low 30% presently achieved with the existing thermal generation capacity.

The combination of greatly increased wind generation and agile, efficient, natural gas generation would provide a power utility positioned to provide maximum renewable wind energy with the cleanest fossil fuel backup presently commercially available. Excess capacity from increased wind generation capacity would, in the event that Lower Churchill power flow through Nova Scotia, be available for export and possible taxation.

The added cost of these measures would be offset, in part, by the local benefit of new construction and wind energy ownership and operation. It would fall to the province to provide programs for low income electricity consumers through demand side management initiatives. Beyond this, the government must take a leadership position and communicate effectively to our citizens that our electricity rates would remain within the North American norm and that the price stability

provided by renewable energy would protect against cost pressures in the fossil fuel sector from both carbon pricing initiatives and scarcity.

In closing, I strongly urge the proposed caps be reduced further. I would expect that a 2020 cap of 5 to 6 Mt CO₂ EQ would be practical.

Regards,