

November 6, 2019

Doreen Friis, Regulatory Affairs Officer/Clerk
NS Utility and Review Board

Dear Ms. Friis:

On behalf of the Canadian Solar Industries Association (CanSIA), I am writing in support of Nova Scotia Power's Smart Grid Project proposal to be filed with the Nova Scotia Utility and Review Board.

This progressive project based in Amherst will combine utility-scale solar development coupled with battery storage and several EV charging stations.

Project objectives include:

- Testing the ability for distributed resources to provide both end-use customer benefit and grid benefit through centralized, coordinated monitoring and control
- Testing the ability of central monitoring and control of distributed energy resources (DERs) to mitigate the anticipated grid stability challenges they otherwise may present
- Testing a variety of grid support scenarios to help understand the true potential of batteries when combined with solar
- Gaining insight into EV smart charging technology to minimize grid impacts while optimizing customer benefits
- Building the needed data and experience to inform new business models that enable sustainable growth of DERs.

CanSIA views this as a very important pilot project in terms of promoting emerging technologies, creating local green jobs, addressing important GHG and renewable energy targets while promoting solar affordability and access.

While the SolarHomes Program has been a game changer in terms of promoting solar PV across the province, it still does not allow participation from a large segment of Nova Scotia's population. This would include those without the financial means to afford solar, those living in homes without suitable roof conditions, and the many Nova Scotians who live in rental properties. Introducing community solar projects represents the next step in Nova Scotia's solar strategy to make solar technology accessible for all Nova Scotians.

It is important to note that other community solar projects are currently being discussed led by the municipal utilities group Alternative Resource Energy Authority. They are proposing three community solar projects based in Antigonish, Mahone Bay and Berwick.

Under the recently announced Sustainable Development Goals Act, Nova Scotia will move to a net zero carbon footprint by 2050. Introducing more utility-scale solar projects such as this Smart Grid Project will be key in

achieving this goal. And as solar prices continue to fall with the technology continuing to evolve, solar has the potential to become a significant part of both the built and grid landscape.

Under the SolarHomes Program, there are now over 50 solar installer companies registered under Efficiency Nova Scotia's Trade Network. The evolution to larger-scale solar projects will serve to further grow the local solar industry.

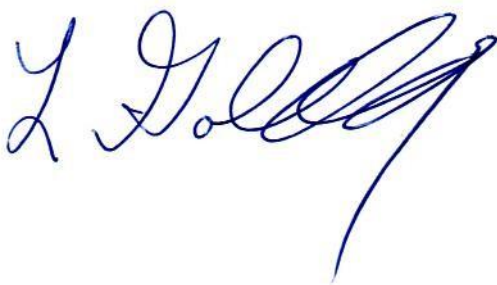
Nova Scotia Power projects anywhere from 30,000 to 100,000 EV's on the road in Nova Scotia by 2030. The proliferation of EV's will result in new peak loads as a result of home charging. This pilot can look at ways to address this new energy demand before EV's become the norm across the province.

We are sensitive to Nova Scotia Power's concern of ensuring that the transition to solar happens in a manner that is sustainable for the long term. That being said, CanSIA's position is to ensure that the regulatory market is open and competitive to enable third parties, in addition to utilities, the opportunity to participate in the development of DERs and large solar projects.

CanSIA also recognizes the important role storage must play in advancing large-scale solar deployment across the province to ensure the grid continues to provide safe, stable and reliable power in the most affordable manner.

We believe this project will help Nova Scotia advance new opportunities for EV growth and solar plus storage by exploring ways that the utility can partner with customers and our growing solar industry.

Sincerely,



Lyle Goldberg, Policy and Regulatory Affairs Manager
Canadian Solar Industries Association

cc: Chrissy Dreger, Manager of Emerging Technologies, Nova Scotia Power
 Shawn Connell, Director, Customer Solutions, Nova Scotia Power