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March 2, 2020

The Honourable Mark Furey
Chair, Standing Committee on Law Amendments

Minister Furey and Members of the Law Amendments Committee:

I am here today on behalf of the Canadian Solar Industries Association and Canadian Wind Energy Association who will be merging as a single organization on July 1, 2020. The new organization will have an expanded renewables mandate to promote solar, wind and energy storage technologies as Canada moves towards zero carbon by 2050.

I want to thank the Committee for giving me the opportunity to speak to you today on Bill 232 which proposes amendments to Chapter 25 of the Electricity Act.

We want to commend the Province for introducing these progressive changes which will create the Green Choice Program - enabling the Province to move forward with its agreement with the federal government to procure 100 per cent renewable electricity for all federally owned facilities by 2022. This initiative has the potential to attract \$200 million of private sector capital investment, creating up to 1000 construction jobs, while eliminating 126,000 tonnes of greenhouse gas emissions annually in Nova Scotia.

We note that the Federal Government's desire to procure renewable electricity is representative of a broader trend that is leading many commercial and industrial consumers of electricity to seek out renewable energy to power their operations for both economic and sustainability reasons. Indeed, such bilateral procurement of renewable energy is a major driver of renewable energy growth in the United States and Europe.

For example, Bloomberg New Energy Finance reported that commercial and industrial customers signed new contracts for almost 9000 megawatts of renewable energy in 2018 in the United States. Customers included AT&T, Walmart, Facebook, Royal Caribbean Cruises, Iron Mountain, Nike, Salesforce, Smuckers and many more.

Given the cost-competitiveness of electricity provided by wind and solar energy today, we believe the new Green Choice Program will be of interest to customers other than the Federal Government, including the commercial, industrial and institutional sectors, as well as municipalities and First Nation communities.

CanSIA and CanWEA look forward to the opportunity of working with the Province in developing the regulations in advance of the program roll-out to explore how it can benefit the growing customer and consumer interest in renewable energy.

We view these legislative changes as a good first step in shifting Nova Scotia's power grid to 100 percent renewable electricity over time. But in order to achieve this goal, the Province will need further strategies to increase our renewable energy deployment, particularly with respect to solar and wind.



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One specific area we recommend the Province consider is developing regulations that support Virtual Net Metering (VNM).

VNM, also known as community solar, refers to when all or a portion of the output of a centrally located solar or wind system is virtually shared among a group of subscribers located off-site. These customers receive credits on their electricity bill for excess energy produced by their share of the renewable energy system.

The advantages of VNM is that it offers customers of all types and sizes a way to lower their electricity bill without the upfront costs or having to install a solar system on their home, building or property. For example, it would enable a family that rents an apartment, or a small business owner without a suitable roof for solar, to "own" or "subscribe" into a VNM project located somewhere else on the grid, and benefit from a lower electricity bill. The VNM model is tried and tested, having been successfully implemented in many jurisdictions throughout North America and Europe. The US Solar Energy Industries Association reports that there are community solar projects currently active in 40 states, and that as of 2018 over 1500 megawatts of solar capacity has been enabled nationwide through community solar programs.

A number of municipalities across the province - including the Town of Kentville, the County of Antigonish and the Town of Bridgewater – have expressed interest in developing these types of projects within their respective jurisdictions. Under the current regulatory framework, only Nova Scotia Power and those municipalities that own their own electric utility have the ability to develop community solar gardens. The Alternative Resource Energy Authority, representing three municipal utilities in the province, has recently issued an RFP to construct three community solar gardens in the towns of Antigonish, Berwick and Mahone Bay.

Transitioning Nova Scotia's electrical grid from fossil fuels to renewables also represents a huge opportunity to create a significant number of green jobs across the province. Consider the following:

- The fastest growing job in the United States is solar installer followed by wind turbine technician.
- A study by Clean Energy Canada concluded nearly 300,000 Canadians were directly employed in clean energy in 2017. That represents nearly 100,000 more than those employed in mining, quarrying, and oil-and-gas extraction and 7.5 times as many people working in the forestry sector.
- CanSIA's Nova Scotia Residential Solar Market Outlook and Labour Force Study, released in April 2019, projected that a favourable policy environment could enable up to 178 megawatts of installed solar by 2030; corresponding to approximately 22,000 residential solar installations and over 1100 jobs.

The uptake of residential solar has grown substantially in Nova Scotia since the launch of Efficiency Nova Scotia's SolarHomes Incentive Program in August 2018. As of January 2020, just over 2000 applications have been received, supporting the installation of approximately 8 megawatts of solar capacity across the province. This has contributed to annual electricity cost savings for homeowners of \$1.5 million. Half of the SolarHomes applications received are from outside of the Halifax Regional Municipality, indicating strong solar interest in both urban and rural communities. There are currently more than 60 solar installer companies registered on Efficiency Nova Scotia's Solar Trade Network. Prior to the SolarHomes Program, there were fewer than 20 installers across the province.



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As you are aware, the Province passed the Sustainable Development Goals Act in October 2019 which aims to reduce Nova Scotia's GHG emissions by 53 percent below 2005 levels by 2030 while moving Nova Scotia to a net zero carbon footprint by 2050. The legislation also states to "expand Nova Scotia's green economy and create jobs". At the same time, Nova Scotia Power is currently undertaking its Integrated Resource Plan consultation process, which will determine Nova Scotia's electricity mix over the next 25 years. CanSIA and CanWEA are both active participants in this process.

Given the aggressive targets of the new Act and the IRP consultation now taking place, CanSIA and CanWEA support Bill 232 as an important tool to meet growing commercial and industrial demand for renewable energy and to advance solar and wind deployment in Nova Scotia. At the same time it is imperative that the Province consider further changes to the Electricity Act - through introducing Virtual Net Metering - that would open up solar access for all different types of Nova Scotia Power customers while at the same time helping the Province achieve net zero carbon by 2050.

Sincerely,

Lyle Goldberg, Policy and Regulatory Affairs Manager

**Canadian Solar Industries Association**