Scotian WindFields
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May 9, 2014

Nova Scotia Power Inc.
1223 Lower Water St.
Halifax, Nova Scotia
B3J 2 W5

RE: Submission of Comments: May 1, 2014 Variable Generation Integration Cost Assumptions.

Hello,

Scotian WindFields would like to submit the below comments and suggestions based on the Variable Generation Integration Cost Assumptions provided on May 1, 2014.

i) Distribution-Connected Variable Generation

The cost assumptions provided indicate that the total projected model of NSPI's 2020 system (current system plus committed wind plus Maritime Link, but excluding other new infrastructure) gives a value of 550-600 MW of total wind general. However, there is no detailed distinction between distribution-connection and transmission-connected generation sources throughout the analysis provided.

In the provided 2014 IRP Draft Assumptions, NSPI models 150-200 MW of COMFIT wind generation in operation by 2020. All COMFIT wind generation is distribution-connected and is limited by the existing substation minimum load, greatly simplifying the considerations for excess generation and localized infrastructure.

Given that this distribution-connected generation accounts for nearly a third of all wind generation on NSPI's 2020 system model, Scotian WindFields requests a clear distinction be made for the integration costs of distribution-connected and transmission-connected wind generation.

ii) Details on Considered Energy Storage Technologies

The cost assumptions provided indicate, on page 5, that "Other Energy Storage" is considered, at a capital cost of $135M/50MW, with 50-100 MW needed. Scotian WindFields requests details of what technologies are considered, how the capital cost estimate were derived, what operational costs exist and in what configuration the resources are planned to tie into the NSPI system.

108F Trider Cres, Dartmouth, NS B3B-1R6|
info@scotianwindfields.ca | www.scotianwindfields.ca

Should you require any clarification or further details on and of the points included in this response, please do not hesitate to contact Scotian Windfields directly. Thank you for your consideration of these comments and we look forward to further discussion and analysis.

Sincerely,

Stephen Thomas, EIT
p.p. Daniel Roscoe, P.Eng.
Chief Operating Officer
Scotian WindFields Inc.

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info@scotianwindfields.ca | www.scotianwindfields.ca