

Ms. Nicole Godbout  
Regulatory Counsel  
Nova Scotia Power  
P.O. Box 910  
Halifax, NS B3J 2W5

October 7, 2014

Dear Ms. Godbout

**Re: CME Submission on Integrated Resource Plan ("IRP")**

Canadian Manufacturers & Exporters (CME) represents industrial operations of all sizes in Nova Scotia as well as other exporters and our suppliers. Our members create jobs and act as the anchor for communities throughout the province, particularly in rural areas. The sector carries a large portion of the electricity costs and surcharges levied by your utility.

Clearly our members are concerned with potential rate impacts that may arise from this process and the ultimately selected plan. Industry needs a competitive environment in order to survive and thrive. Energy is one key component of the cost environment that industry operates in. We need to create an environment that is better than average to attract new industry. The cost impact of decisions made on how we provide electrical energy in the future and how this cost is absorbed by ratepayers may not be the only consideration; but it must be a major factor if we want the province to stay in business. Otherwise where will we, our children and grandchildren find employment? We do not want everyone to move elsewhere to find employment. While affordability in the near term is of obvious importance, we understand the focus of the IRP is a longer term planning exercise designed to ensure least cost electric supply. It is critical that unnecessary longer term rate increases do not occur by focusing planning on the near term alone.

While we recognize that the Electricity Efficiency and Conservation Restructuring (2014) Act now requires a separate formal process to approve the level of Demand Side Management (DSM), the IRP should provide some planning guidance with respect to appropriate future DSM levels. The CME looks forward to working with NSPI, Efficiency Nova Scotia, and other stakeholders to ensure the successful ongoing implementation of flexible and appropriate cost-effective DSM programs in the Province, which will have both system cost benefits and direct energy efficiency savings for CME's members.

Thank you for the opportunity to comment on this important plan for Nova Scotia's energy future. Please accept our organization's comments on the "2014 IRP Draft Report" recently circulated by Nova Scotia Power Inc. (NSPI).

Sincerely,



David Haire  
Regional Vice President, Atlantic Region  
Vice President, NL Division & Vice President, Best Practices and Lean Management, Atlantic Region  
Canadian Manufacturers & Exporters, Nova Scotia Division  
Telephone: 709-685-5820      Email: [David.haire@cme-mec.ca](mailto:David.haire@cme-mec.ca)