

BEFORE THE NOVA SCOTIA UTILITY AND REVIEW BOARD

In the Matter of the *Public Utilities Act* and  
In the Matter of a review of Nova Scotia Power Incorporated's  
Final Report for the Smart Grid Nova Scotia Project

(NSUARB M11621)

**Evidence of  
Melissa Whited**

**On Behalf of  
Counsel to Nova Scotia Utility and Review Board**

**May 28, 2024**

**Table of Contents**

I. INTRODUCTION AND QUALIFICATIONS..... 1

II. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS ..... 3

III. INTRODUCTION AND OVERVIEW..... 5

IV. LEARNINGS FROM NB POWER PROJECTS ..... 10

V. AFFORDABILITY AND EVALUATION OF ALTERNATIVES ..... 10

VI. GREATER TRANSMISSION AND DISTRIBUTION BENEFITS CAN BE ACHIEVED  
NOW ..... 13

VII. TRACKING LOW INCOME ENROLLMENT IN THE SOLAR GARDEN ..... 17

VIII. DISPOSITION OF ASSETS..... 18

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1     **I. INTRODUCTION AND QUALIFICATIONS**

2     **Q. Please state your name, title, and employer.**

3     A. My name is Melissa Whited. I am a Vice President at Synapse Energy Economics, Inc.  
4       ("Synapse"), located at 485 Massachusetts Avenue, Cambridge, MA 02139, USA.

5     **Q. Please describe Synapse Energy Economics.**

6     A. Synapse is a research and consulting firm specializing in electricity and gas industry  
7       regulation, planning, and analysis. Our work covers a range of issues, including economic  
8       and technical assessments of demand-side and supply-side energy resources; energy  
9       efficiency policies and programs; integrated resource planning; electricity market  
10      modeling and assessment; renewable resource technologies and policies; and climate  
11      change strategies. Synapse works for a wide range of clients, including attorneys general,  
12      offices of consumer advocates, public utility commissions, environmental advocates, the  
13      U.S. Environmental Protection Agency, U.S. Department of Energy, U.S. Department of  
14      Justice, the Federal Trade Commission, and the National Association of Regulatory  
15      Utility Commissioners. Synapse's staff includes over 35 professionals with extensive  
16      experience in the electricity industry.

17    **Q. Please summarize your professional and educational experience.**

18    A. I have 13 years of experience in economic research and consulting. At Synapse, I have  
19      worked extensively on issues related to utility regulatory models and rate design. I have  
20      been an invited speaker in numerous industry conferences, including as a panelist for the  
21      National Association of Regulatory Utility Commissioners (NARUC) Subcommittee on  
22      Rate Design at the 2021 Winter Policy Summit and the 2018 Annual Meeting.

1 I have sponsored testimony before the Newfoundland and Labrador Board of  
2 Commissioners of Public Utilities, the Massachusetts Department of Public Utilities, the  
3 Illinois Commerce Commission, the New Hampshire Public Utilities Commission, the  
4 Georgia Public Service Commission, the Rhode Island Public Utilities Commission, the  
5 Maine Public Utilities Commission, the California Public Utilities Commission, the  
6 Hawaii Public Utilities Commission, the Public Service Commission of Utah, the Public  
7 Utility Commission of Texas, the Virginia State Corporation Commission, and the  
8 Federal Energy Regulatory Commission. I hold a Master of Arts in Agricultural and  
9 Applied Economics and a Master of Science in Environment and Resources, both from  
10 the University of Wisconsin-Madison. My resume is attached as Appendix A.

11 **Q. Have you previously testified before the Nova Scotia Utility and Review Board?**

12 A. Yes. I testified in Matter Nos. M11441, M09777, M10176, M10431, M10810, and  
13 M10832.

14 **Q. On whose behalf are you providing evidence in this case?**

15 A. I am providing evidence on behalf of Counsel to the Nova Scotia Utility and Review  
16 Board (“Board”).

17 **Q. What is the purpose of your evidence?**

18 A. My evidence addresses certain aspects of Nova Scotia Power Incorporated’s (NS Power)  
19 Final Report for the Smart Grid Nova Scotia (SGNS) Project related to learnings from  
20 New Brunswick Power’s projects; affordability of distributed energy resource (DER)  
21 programs tested in the SGNS Project relative to alternatives; maximizing transmission

1 and distribution benefits; tracking low income enrollment in the Solar Garden project;  
2 and options for asset disposition.

3 **II. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS**

4 **Q. Please describe your conclusions.**

5 A. My conclusions are as follows:

- 6 • Because the completion date for New Brunswick Power’s projects was extended  
7 to March 2024, results and lessons learned were not included in NS Power’s Final  
8 Report.
- 9 • The Company’s conclusion regarding the potential affordability value of central  
10 management of DERs and deployment at scale is overly optimistic and does not  
11 adequately address the potential for there to be lower-cost alternatives to central  
12 management of DERs that could provide many of the same benefits.
- 13 • The Company did not specifically target programs under the SGNS Project to  
14 constrained areas of the Company’s system, which may have impacted the  
15 magnitude of the potential benefits achieved through these programs.
- 16 • There currently appear to be missed opportunities for maximizing benefits to the  
17 transmission and distribution system through demand-side management (DSM)  
18 programs delivered by E1 or NS Power.
- 19 • The Company has not complied with the Board’s directive in M10176 to track  
20 and report information regarding low-income enrollment in its Solar Garden Pilot  
21 project.
- 22 • The Company has not provided sufficient information regarding the options  
23 available for asset disposition, including the cost implications for customers, to  
24 allow for an evaluation of the options.

1 **Q. What are your recommendations?**

2 A. I recommend that the Board:

- 3 • Direct NS Power to submit an addendum to its Final Report that contains  
4 learnings from NB Power’s projects by September 30, 2024.
- 5 • Clarify that any future application to deploy a distributed energy resource  
6 management system (DERMS) or full-scale deployment of programs similar to  
7 those tested in the SGNS Project must include an evaluation of the potential to  
8 achieve affordability, reliability, and emissions benefits through lower-cost  
9 alternatives, such as time-varying rates.
- 10 • Direct NS Power to continue to strengthen its partnership with E1 and evaluate  
11 the potential for DSM projects to avoid or defer transmission or distribution  
12 infrastructure upgrades on its system now and going forward through:
- 13 ○ Developing and maintaining information related to the capacity currently  
14 available on its system at the transmission, sub-transmission, substation,  
15 and feeder level;
- 16 ○ Developing and maintaining forecasts related to the capacity available in  
17 the future (i.e., 5 – 10 years out) on its system at the transmission, sub-  
18 transmission, substation, and feeder level;
- 19 ○ Publicly sharing information related to current and forecasted transmission  
20 and distribution capacity constraints on an annual basis, including the  
21 hours during which the equipment is projected to experience peak demand  
22 and the load reduction (in MW) required to avoid or defer future upgrades;  
23 and
- 24 ○ Continuing to develop estimates of the constrained and unconstrained  
25 value of deferring transmission and distribution upgrades.

- 1           • Direct NS Power to ask customers during the Solar Garden enrollment process  
2           whether they identify as low-income customers (using the applicable Market  
3           Basket Measure thresholds or similar metrics).
- 4           • Direct NS Power to provide the Board and other stakeholders with more  
5           information regarding the options for asset disposition and benefits to ratepayers  
6           associated with each option within 60 days of the Board’s order in this matter.

7           **III. INTRODUCTION AND OVERVIEW**

8           **Q. Please provide an overview of Nova Scotia Power’s SGNS Final Report.**

9           A. On March 15, 2024, NS Power filed its Final Report under the SGNS Project. The SGNS  
10          Project was designed to “assess use cases for management of various DERs, gather  
11          corresponding data and learnings, aid in the development of a business case, and  
12          generally report on the outcome of the effectiveness of the deployment of these  
13          technologies in delivering customer value while stacking on grid benefit.”<sup>1</sup>

14          NS Power’s Final Report and associated appendixes provide detailed information  
15          regarding the Project and the Company’s findings regarding the benefits and feasibility of  
16          DER programs and a DERMS platform. A key conclusion reached by the Company is  
17          that “there is potential for significant customer and system benefit in management of  
18          DERs.”<sup>2</sup>

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<sup>1</sup> M09985. NS Power. Smart Grid Nova Scotia Project Final Report (“Final Report”), March 15, 2024, at 12.

<sup>2</sup> Final Report, at 10.

1 **Q. What conclusions did NS Power reach regarding each asset class?**

2 A. NS Power assessed the affordability, reliability, and environmental benefits of multiple  
3 DER assets, including electric vehicles (EVs), residential and commercial and industrial  
4 (C&I) batteries, smart inverters, building management systems, and a community solar  
5 garden. The Company's findings of benefits depend on the DER asset class and can be  
6 summarized as follows:

- 7 • **EV Smart Charging and Vehicle-to-Grid EV Charging:** Showed long-term  
8 affordability benefits, energy cost savings for participants, and both short- and  
9 long-term reductions in greenhouse gas (GHG) emissions.<sup>3</sup>
- 10 • **Residential Batteries:** Provided high availability of backup power. Although data  
11 were limited, results also indicated the potential for fuel savings and emissions  
12 reductions.<sup>4</sup>
- 13 • **Commercial & Industrial Batteries:** Indicated the potential for fuel savings and  
14 emissions reductions, but with limited data from which to draw conclusions. The  
15 project also demonstrated proof of concept regarding power factor correction.<sup>5</sup>
- 16 • **C&I Smart Solar Inverters:** Provided proof of concept results regarding power  
17 factor correction, with the potential to enhance renewable energy integration,

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<sup>3</sup> Final Report, at 26 and 29.

<sup>4</sup> *Id.*, at 32.

<sup>5</sup> *Id.*, at 36.



1 contribute to reliability through advanced inverter functions, and reduce emissions  
2 through increased integration of on-site renewable energy.<sup>6</sup>

- 3 • **C&I Building Management Systems:** Demonstrated demand response benefits  
4 contributing to affordability, as well as indicated the potential for fuel cost  
5 savings and emissions reductions through load shifting that is closely optimized to  
6 cost and emissions curves.<sup>7</sup>

- 7 • **Solar Garden:** Delivered clean energy and reduced carbon emissions, although  
8 direct reliability benefits were not observed.<sup>8</sup>

9 **Q. What were NS Power’s findings regarding the overall economics of central**  
10 **management of DERs?**

11 A. The Company states that “The overall economics of central management of DERs is  
12 promising. While the economic benefit of the management of DERs may not fully offset  
13 DER capital and operational costs, there are verifiable cost savings to utilities offsetting  
14 potential DER asset deployment in service of achieving other non-economic benefits.”<sup>9</sup>

15 **Q. What were the Company’s conclusions regarding the DERMS platform?**

16 A. Nova Scotia Power found that a DERMS platform can be a powerful tool for central  
17 management of DERs for customer and utility benefits, but that other options for DER  
18 management are available and effective while adoption rates are low. Further, NS Power

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<sup>6</sup> *Id.*, at 40.

<sup>7</sup> *Id.*, at 42.

<sup>8</sup> *Id.*, at 43.

<sup>9</sup> *Id.*, at 86.

1 found that effective DERMS platforms require robust monitoring, control capabilities,  
2 seamless integration, real-time communication, coordination protocols, and advanced  
3 analytics.<sup>10</sup>

4 **Q. Is anything missing from the Company's Final Report?**

5 A. Yes. The Project is part of the larger Smart Grid Atlantic initiative, developed in  
6 partnership with multiple other parties, including New Brunswick Power (NB Power).  
7 Because the completion date for NB Power's projects was extended to March 2024, the  
8 NB Power project results, including lessons learned, were not included in NS Power's  
9 Final Report.<sup>11</sup>

10 **Q. Do you agree with NS Power's conclusions?**

11 A. Only in part. From my review of the information provided in the Final Report, I agree  
12 that the Project appears to have provided NS Power with valuable hands-on experience  
13 with managing DERs through a utility DERMS; Nova Scotia-specific information  
14 regarding how system benefits can be stacked to deliver affordability, reliability and  
15 environmental benefits for a variety of DER types; and encouraged closer coordination  
16 and partnership with EfficiencyOne (E1) for the effective delivery of demand response.<sup>12</sup>

17 However, I am concerned that the Company's conclusion regarding the potential  
18 affordability value of central management of DERs and deployment at scale is overly  
19 optimistic and does not adequately acknowledge the potential for there to be lower-cost

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<sup>10</sup> *Id.*, at 85-86.

<sup>11</sup> NSPI (Synapse) IR-7.

<sup>12</sup> NSPI (NSUARB) IR-24.

1 alternatives to central management of DERs that could provide many of the same  
2 benefits. Specifically, NS Power’s conclusions regarding the potential affordability  
3 benefits of various DER programs appear grossly overstated, given the magnitude of the  
4 benefits relative to the costs of the DER programs evaluated. I therefore have concerns  
5 with the Company’s overall finding that “there is potential for significant customer and  
6 system benefit in management of DERs,”<sup>13</sup> and that the “overall economics of central  
7 management of DERs is promising.”<sup>14</sup> Further, I am not convinced that the results of the  
8 Project provide “great promise in realization of benefits if deployed at larger scale,”<sup>15</sup> at  
9 least in the near-term. I elaborate on these concerns in subsequent sections of my  
10 evidence.

11 **Q. Do you have any other comments or concerns related to NS Power’s SGNS Project**  
12 **Final Report?**

13 A. Yes, I have two additional comments and concerns:

14 1) The Company has not complied with the Board’s directive in M10176 to track  
15 and report information regarding low-income enrollment in its Solar Garden  
16 Pilot project.

17 2) The Company has not provided sufficient information regarding the options  
18 available for asset disposition (e.g., removal and sale of the assets, allowing  
19 participating customers to purchase the asset already installed on their

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<sup>13</sup> Final Report, at 10.

<sup>14</sup> Final Report, at 86.

<sup>15</sup> Final Report, at 25.

1 premises, continued use through full-scale program deployment, etc.),  
2 including the cost implications for customers, to allow for an evaluation of the  
3 options.

4 I discuss all of these comments and concerns in more depth in the remainder of my  
5 evidence.

6 **IV. LEARNINGS FROM NB POWER PROJECTS**

7 **Q. Given that learnings from NB Power’s projects were not available at the time of NS**  
8 **Power’s Final Report, what do you recommend regarding reporting on learnings**  
9 **from NB Power’s projects?**

10 A. I recommend that the Board direct NS Power to submit an addendum to its Final Report  
11 that contains learnings from NB Power’s projects by September 30, 2024, which is six  
12 months following the completion of NB Power’s projects.

13 **V. AFFORDABILITY AND EVALUATION OF ALTERNATIVES**

14 **Q. What is your concern regarding the Company’s characterization of the potential for**  
15 **benefits from central management of DERs and deployment at scale?**

16 A. One of the primary objectives of the Project was to evaluate customer benefits regarding  
17 affordability, which the Company defines as “reducing upward pressure on revenue  
18 requirement.”<sup>16</sup> To provide affordability benefits to both participating and non-

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<sup>16</sup> Final Report, at 9.

1 participating NS Power customers, a DER program should reduce revenue requirements  
2 more than it increases them, at least compared to alternatives.

3 Because the SGNS Project was primarily intended to collect information regarding  
4 potential affordability benefits of the projects studied, the Company did not conduct a  
5 comprehensive comparison to potentially lower-cost alternatives. While this is  
6 understandable, it is important that the Company acknowledge the potential for lower-  
7 cost alternatives to provide such benefits in its conclusions and discuss its plans for  
8 conducting a comprehensive assessment of the full suite of alternatives in the future prior  
9 to submitting an application for broader deployment of the programs and technologies  
10 tested in the SGNS Project. Instead, the Company's conclusions focus narrowly on the  
11 possibility of achieving affordability benefits for customers through programs tested in  
12 the SGNS Project, while largely ignoring the possibility that such savings could  
13 potentially be achieved at lower cost through other programs (such as time-varying rates)  
14 that do not necessarily require a DERMS, and through maximizing the ability of other  
15 demand-side management programs to achieve capacity savings at the transmission and  
16 distribution levels. In other words, the Company's conclusions are not properly  
17 contextualized in terms of how the potential benefits of a DERMS and the DER programs  
18 evaluated in the SGNS Project might compare to alternatives. In focusing exclusively on  
19 the potential benefits of DER programs tested in the SGNS Project, the Company misses  
20 an important and obvious conclusion: in the near-term, it is unlikely that centrally-  
21 managed DERs through a DERMS platform will prove more cost-effective than  
22 alternative programs, particularly time-varying rates.

1 It is critical that prior to investing in a DERMS or proposing a full-scale deployment of  
2 DER programs similar to those tested in the SGNS Project, the Company:

- 3 • Evaluate the potential to achieve affordability, reliability, and emissions benefits  
4 through lower-cost alternatives, such as time-varying rates; and
- 5 • Ensure that it is maximizing the benefits to the transmission and distribution  
6 system through locationally-targeted energy efficiency and demand response  
7 programs in collaboration with E1, as described more in section VI.

8 **Q. Please provide an example of how benefits could potentially be achieved at lower**  
9 **cost through other programs.**

10 A. When asked to identify the DER type that presents the most benefits to customers and the  
11 grid, NS Power responded that “a stand-out DER that may represent the most benefit to  
12 customers, the grid, and overall customers and grid are EVs and EV smart charging  
13 technologies.”<sup>17</sup> However, none of the DER programs, including the EV programs  
14 (ev.energy and ChargePoint), demonstrated benefits that were anywhere close to  
15 offsetting the costs of the programs, as shown in the table below.

16 **Table 1. Program Net Present Value of Revenue Requirements versus Benefits**

	<b>NPVRR Costs (\$M)</b>	<b>NPVRR Benefits (\$M)</b>	<b>Benefit-Cost Ratio</b>
ev.energy	1.57	0.07	0.04
ChargePoint	0.52	0.04	0.08
Residential Batteries	2.78	0.23	0.08
C&I Solar + Battery	4.54	0.27	0.06

17 *Source: Derived from SGNS Final Report, Table 4, p. 50.*

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<sup>17</sup> NSPI (NSUARB) IR-12.

1 While pilot programs do not need to demonstrate cost-effectiveness, the cost-  
2 effectiveness of a program is a key consideration for full scale deployment of similar  
3 DER programs. The costs of the EV Smart Charging program would have to be reduced  
4 by 91 percent in order for the benefits to offset the costs in a future roll-out.<sup>18</sup> For the  
5 ChargePoint program, the cost of the incentives alone was 4.5 times higher than the  
6 benefits of the program.<sup>19</sup> These dismal economics suggest that a cost-effective full-scale  
7 deployment of such programs will be difficult to achieve. Instead, alternatives such as  
8 expanded enrollment in time-varying rates (for example through default enrollment) may  
9 provide similar benefits at a lower cost.

10 **VI. GREATER TRANSMISSION AND DISTRIBUTION BENEFITS CAN BE**  
11 **ACHIEVED NOW**

12 **Q. Please explain your recommendation that the Company maximize the benefits that**  
13 **can be provided to the transmission and distribution system through locationally-**  
14 **targeted programs that can be deployed now and in the future.**

15 A. The Company states that the testing conducted under the Project “provides robust data  
16 and learnings contributing to the understanding of the potential for DERMS and  
17 associated DER asset/programs to replace or partially avoid traditional investments in  
18 generation, **transmission, and distribution** [emphasis added].”<sup>20</sup> While avoiding  
19 distribution and transmission investments is a potential benefit of a DERMS and  
20 associated DER programs, NS Power did not specifically target SGNS Project activities

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<sup>18</sup> Final Report, at 57.

<sup>19</sup> Based on data presented in Figure 4 on page 52 of the Final Report.

<sup>20</sup> NSPI (CA) IR-1(e).

1 to constrained areas of the Company’s system,<sup>21</sup> which hampered its ability to evaluate  
2 the potential for transmission and distribution system cost reductions through the Project.  
3 Because inclusion of such benefits may improve the benefits of deploying DER programs  
4 in the future, I recommend that any future analysis conducted by NS Power regarding  
5 similar DER programs and DERMS deployment include a detailed accounting of the  
6 potential benefits associated with avoiding transmission and distribution upgrades in  
7 constrained areas.

8 Further, NS Power does not appear to be fully exploiting the opportunity to achieve  
9 transmission and distribution savings now through other programs, including those  
10 delivered by, or in partnership, with E1. An important outcome of the SGNS Project was  
11 that NS Power and E1 “established a broader productive and collaborative working  
12 relationship, with a focus on how to best implement and achieve DR initiatives and  
13 goals.”<sup>22</sup> The Company reports that in 2019, E1 and NS Power established a Joint  
14 Demand Response Working Group (DRWG), which focuses on development of cost-  
15 effective DR initiatives that provide verifiable system and customer benefits.<sup>23</sup>

16 While I am encouraged by the closer coordination and collaboration between NS Power  
17 and E1, there currently appear to be missed opportunities for maximizing benefits to the  
18 transmission and distribution system through programs delivered by E1 alone, by NS  
19 Power alone, or through a partnership between E1 and NS Power. For example:

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<sup>21</sup> NSPI (Synapse) IR-4.

<sup>22</sup> Final Report, at 82.

<sup>23</sup> Final Report, at 78.



- 1           • NS Power does not currently maintain information related to the distribution  
2           capacity available on its system at the sub-transmission, substation, or feeder  
3           level, which hinders its ability to deploy programs to reduce demand in  
4           constrained areas, or for its partners (particularly E1) to target demand  
5           management programs to the highest-value locations.<sup>24</sup>
- 6           • NS Power states that it provides E1 with “a snapshot summary of the constrained  
7           distribution feeders and transformers in each region,”<sup>25</sup> but such snapshots appear  
8           to be provided to E1 infrequently, and it is unclear whether such snapshots  
9           contain important information regarding (1) the timing (hours) of peak demand on  
10          the constrained equipment, and (2) the magnitude of demand reduction that would  
11          be required to avoid or defer upgrades. Further, these snapshots do not appear to  
12          be based on forecasted future distribution system constraints. To effectively avoid  
13          or defer future transmission and distribution projects, NS Power must forecast  
14          transmission and distribution system constraints well in advance to provide  
15          adequate lead time to deploy demand side management solutions that could defer  
16          traditional infrastructure investments.
- 17          • NS Power does not yet provide a constrained system avoided cost of energy  
18          metric for transmission and distribution, although it states that this is an ongoing  
19          component of its avoided cost of (DSM) work through the Demand Side

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<sup>24</sup> NSPI (Synapse) IR-3 (b). NS Power states that “information related to the peak demand [on various components of its distribution system] is not currently available.”

<sup>25</sup> NSPI (Synapse) IR-2.

1 Management Advisory Group (DSMAG).<sup>26</sup> An estimate of the avoided cost  
2 associated with transmission or distribution infrastructure upgrades is important  
3 for evaluating the cost-effectiveness of programs and maximizing value to  
4 ratepayers.

5 I recommend that NS Power continue to strengthen its partnership with E1 and evaluate  
6 the potential for DSM projects to avoid or defer transmission or distribution infrastructure  
7 upgrades on its system now and going forward, regardless of whether it ultimately invests  
8 in a DERMS or deploys DER programs similar to those tested in the SGNS Project.

9 Specifically, I recommend that NS Power:

- 10 1) Develop and maintain information related to the capacity currently available on its  
11 system at the transmission, sub-transmission, substation, and feeder level;
- 12 2) Develop and maintain forecasts related to the capacity available in the future (i.e., 5 –  
13 10 years out) on its system at the transmission, sub-transmission, substation, and  
14 feeder level;
- 15 3) Publicly share information related to current and forecasted transmission and  
16 distribution capacity constraints on an annual basis, including the hours during which  
17 the equipment is forecast to experience peak demand and the load reduction (in MW)  
18 required to avoid or defer future upgrades; and

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<sup>26</sup> NSPI (Synapse) IR-2.

- 1           4) Continue to develop estimates of the constrained and unconstrained value of deferring  
2           transmission and distribution upgrades for use in cost-effectiveness analysis and  
3           targeting DSM programs.

4       **VII. TRACKING LOW INCOME ENROLLMENT IN THE SOLAR GARDEN**  
5       **PROJECT**

6       **Q.     Please describe the requirement for NS Power to report on low-income enrollment**  
7       **in the Solar Garden Pilot project.**

8       A.     An important justification for pursuing community solar is that it “offers a solution for  
9       equitable access to solar energy by allowing individuals and businesses to benefit from  
10       solar power generation without relying on rooftop installations or on adjacent land.”<sup>27</sup> As  
11       the Company noted in its Solar Garden Rider application, the Solar Garden project  
12       provides access to solar to “customers **without the financial resources** or property to  
13       install roof-top solar [emphasis added].”<sup>28</sup> To determine whether the Solar Garden is  
14       succeeding in providing access to solar for customers without the financial means to  
15       install rooftop solar, Synapse recommended that NS Power report on low-income  
16       enrollments in the program, to the extent possible. In its decision approving the Solar  
17       Garden Pilot Rider, the Board noted that NS Power accepted Synapse’s recommendation  
18       that the Company report low-income participation statistics,<sup>29</sup> and the Board directed NS  
19       Power to provide these and other statistics in its Smart Grid Project Reports.<sup>30</sup>

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<sup>27</sup> Final Report, at 43.

<sup>28</sup> M10176. Smart Grid Nova Scotia Solar Garden Pilot Rate Rider, Nova Scotia Power Application. June 29, 2021, at 3.

<sup>29</sup> M10176. Decision dated November 10, 2021, paragraph 50.

<sup>30</sup> M10176. Order dated November 25, 2021.

1 **Q. Did NS Power track or report statistics regarding low-income enrollment in the**  
2 **Solar Garden project?**

3 A. No. NS Power states that it “relies on customers to self-identify as low income,” and that  
4 “No subscribers have identified themselves as low income.” The Company then explains  
5 that “NS Power is otherwise unable to discern the level of low-income participation.”

6 **Q. Did NS Power ask participants whether they identified as low-income?**

7 A. No. NS Power states that "Customers may opt to self-disclose as low-income at any time  
8 by emailing NS Power, but are not asked specifically to disclose this as part of the  
9 subscription process."<sup>31</sup>

10 **Q. Does NS Power’s reliance on customers to email NS Power regarding their income**  
11 **status reflect a reasonable effort to identify low-income participation in the Solar**  
12 **Garden project?**

13 A. No. NS Power should ask customers during the enrollment process whether they identify  
14 as low-income customers (using the applicable Market Basket Measure thresholds<sup>32</sup> or  
15 similar metrics).

16 **VIII. DISPOSITION OF ASSETS**

17 **Q. Please explain your concern regarding the information provided to evaluate options**  
18 **for asset disposition.**

19 A. In NSPI (Synapse) IR-6, Synapse asked NS Power to identify the options for asset  
20 disposition (e.g., removal and sale of the assets, allowing participating customers to

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<sup>31</sup> NSPI (Synapse) IR-16.

<sup>32</sup> Current Market Basket Measure thresholds are available at  
<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1110006601>.

1 purchase the asset already installed on their premises, continued use through full-scale  
2 program deployment, etc.), discuss the cost implications for customers, and explain  
3 whether there are any specific requirements for asset disposition applicable to the SGNS  
4 Project.<sup>33</sup> Rather than providing the requested information, NS Power simply responded,  
5 “Details regarding the disposition of assets have not yet been fully determined but will be  
6 made available in a future filing with the NSUARB, and will take into account any  
7 feedback received from the Board consultant, intervenors and their consultants, and  
8 Board direction arising from this proceeding.”

9 To properly evaluate the best options for asset disposition, NS Power should provide  
10 information about how and to what extent the assets can continue to be deployed to  
11 provide benefits to customers, the potential value to customers associated with removal  
12 and sale of the assets, and any requirements regarding asset disposition that are unique to  
13 the SGNS Project due to agreements with other parties.

14 **Q. What do you recommend regarding asset disposition?**

15 A. I recommend that the Board direct NS Power to provide the Board and other stakeholders  
16 with more information regarding the options for asset disposition and benefits to  
17 ratepayers associated with each option, within 60 days of the Board’s order in this matter.

18 **Q. Does this conclude your evidence?**

19 A. Yes, it does.

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<sup>33</sup> NSPI (Synapse) IR-6.