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

October 7th, 2014

Dear Ms. Godbout,

## RE: M05522 – 2014 Integrated Resource Plan Ecology Action Centre Comments on Draft IRP Report

The Ecology Action Centre will keep this submission brief and reiterate a recommendation made over email to all stakeholders upon receipt of the draft IRP report.

As highlighted by this draft report, Demand Side Management (DSM) has become the critical resource for Nova Scotia's electricity system. The "high" DSM case provides the lowest revenue requirements over the study period and the base case provides the least cost plan if end effects are excluded.

At this stage, we strongly recommend running further scenarios with the "mid" case found with the efficiency potential study. The "mid" case provides energy savings at a significantly lower cost per kilowatt-hour saved than the high case. Further information on different levels of energy efficiency investment could provide valuable information to the UARB and stakeholders.

Sincerely,

**Catherine Abreu** 

**Energy Coordinator Ecology Action Centre**