

**SUBMISSION TO LAW AMENDMENTS COMMITTEE
BILL 64, ELECTRICITY ACT
MAY 10, 2010**

The Halifax Regional Municipality is pleased to see the legislative follow through on the recent policy announcements by the Premier within the Renewable Electricity Plan.

HRM is not new to wind projects and in fact, explored the acquisition of 40% of its total corporate energy supply through 2 contracts in 2007 with 2 Nova Scotian wind developers. This would have enabled 13 MW of wind power construction to be financed through HRM contractual support. This did not materialize because of the need for supporting Electricity Act amendments, so we are very excited by the opportunities presented by Bill 64.

HRM would recommend two changes to Bill 64:

- ▶ The deletion of 3A(2)(b) relating to NPSI ownership of carbon credits and green attributes generated by these projects. The financing of these projects is very challenging and to be forced to turn the project carbon credits to NPSI negatively impacts the financing of the project.
- ▶ The amendment of s.3A(4) to allow customers to be able to generate up to 2 MW versus 1MW as part of a net metering program. This would improve the economics of single turbine projects which are challenging to finance. Increasing the net metering provision from 1MW to 2 MW would create little or no technical issues at the distribution level.

Thank you for the opportunity to submit our comments on Bill 64.

Respectfully submitted,

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