



Submission to Law Amendments Committee – Dec. 7, 2015

Subject: Proposed Changes to Netmetering Program - Bill 141

Member of the Legislative Assembly,

I am writing to express my concerns about the proposed changes to the Enhanced Netmetering program in Bill 141. In Section 23 4(b) it is proposed to reduce the nameplate capacity of such project to from 1 MW to 20kW. This 50 fold decrease in the size of such projects, limits the ability of businesses, municipalities, universities and non-profit groups from adopting renewable energy projects that would allow them to reduce their energy usage and carbon footprint.

For example, Kings County is planning to build a net-zero energy municipal complex that would need a 100 kW Solar Photovoltaic (PV) system to be able to generate all the energy it uses. If the proposed changes go through, they will be limited to a 20 kW Solar PV system which will only generate 20% of their energy instead of 100%.

Further, under Section 23 (8)-(11), it is proposed that a new tariff structure is created for the Netmetering Program. Current rate structure allows the user to be compensated for the energy generated by their renewable energy system equal to the rate that they are paying on their power bill and use the grid as temporary energy storage to store the excess energy resulting in an annual net zero excess energy production. The new tariff structure proposes to apply a different rate for any excess energy put back on the grid at any point in time which could dramatically impact economic viability of these projects.

For example, currently any excess solar electricity energy production during the summer will be credited at the same rate as the energy is purchased. This credit is then used during winter, resulting in an annual net-zero excess energy to the grid. However, if a lower energy tariff is applied to the excess energy, the economic viability of such projects are significantly affected.

It is important to strongly consider the detrimental and unintended consequences and impacts of this decision. This proposed limitation also does not support the mandate of Greener Economy Strategy to develop the clean technology sector and accelerate the greening of companies, product and services (<https://www.novascotia.ca/nse/dept/docs/Greener-Economy-Strategy.pdf> - Page 5).



As a board member of Solar Nova Scotia and a manager of a renewable energy company, I do not believe that adequate stakeholder consultation was carried out to enable the government to make this policy decision on limiting the ability of businesses, municipalities, universities and non-profit groups to adopt renewable energy for their facilities. It is in fact surprising to see this type of legislation being proposed on the heels of the COP 21 Paris where new target are being set for the future and when we need all the tools to enable us to make more efforts to reduce our carbon footprint.

I request that further consultation with stakeholders should be carried out prior to any changes regarding the nameplate capacity and rate structure of renewable energy project under Enhanced Netmetering program in Bill 141.

Regards,

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