

Category	Participant	Comment	NSP Response
<p>1.0 Analysis Plan General</p>	<p>E1 – Feb 14 2020</p>	<p>Clarify at what steps plans are assessed for removal from consideration</p> <p>Clarify data relationship among long term strategy, roadmap and action plan – will they be based on quantitative modelling findings</p> <p>What process if emissions regulations are more stringent after IRP? How determine whether decision gate, and if so, how reassess plans?</p>	<p>Please refer to the final Scenarios and Modeling Plan for additional details on the process and modeling phases.</p> <p>NS Power will bring both qualitative insights and quantitative results from the modeling phases into the Roadmap and Action Plan</p> <p>NS Power’s approach to the 2020 IRP is to model a wide range of potential futures in order to identify options that are robust across many outcomes, including emissions profiles that are SDGA compliant and more stringent than current emissions limits.</p>
<p>1.1 Analysis Plan Evaluation Criteria General</p>	<p>E1 – Feb 14 2020</p>	<p>How will evaluation criteria be measured, when will resource plans be screened, and what are screening criteria?</p>	<p>NS Power confirms that NPV of Revenue Requirement will be the primary metric on which candidate resource plans are scored for a particular modeling scenario.</p> <p>NS Power also considers other factors to be important which is why additional metrics have been proposed for qualitative consideration during the preparation of the Roadmap and Action Plan.</p>
<p>1.2 Analysis Plan Evaluation Criteria Rate effects</p>	<p>E1 – Feb 14 2020</p>	<p>Not clear how 10-year NPV revenue requirement assesses timing & magnitude of rate effects – show why important metric and whether best proxy</p>	<p>To the extent that a shorter NPV period provides insight on near term rate effects, NS Power will consider this metric as one of the Evaluation Criteria used in the 2020 IRP.</p>

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1.2 Analysis Plan Evaluation Criteria Rate effects	CA - Resource Insight	Revise to bill effects metric (customers more concerned about bills than rates): <ul style="list-style-type: none"> • Allocate RRQ to customer classes w/ simplified allocation metric Calculate average monthly bill by class based on forecast count and demand by class	NS Power will use the 10-year NPV evaluation criteria as a method of understanding near-term rate impacts of various resource portfolios.
1.3 Analysis Plan Evaluation Criteria Reliability requirements	E1 – Feb 14 2020	Eliminate plans that do not meet reliability requirements Confirm all metrics to be considered are listed on slide 4 row 3 or list all others	NS Power agrees that plans which do not meet the standards of the Resource and Operability Screening phases will not be considered as viable resource portfolios. NS Power’s evaluation criteria are included in the Final Scenarios and Modeling Plan document.
1.3 Analysis Plan Evaluation Criteria Reliability Requirements	Bates White	The IRP should find the optimal reserve margin, not simply hard code PRMs into the model across a small number of scenarios. Use modeling tools to test LOLE impact of different PRMs with goal of finding lowest PRM that still meets NPCC LOLE requirements.	The current PRM target was recently recalculated as part of the pre-IRP work as being the appropriate method to meet the 0.1 days/year reliability metric. NS Power will use the UCAP accounting method with ELCC contributions from Thermal and Hydro units, and then resolve back to ICAP during the Reliability and Operability Assessment phase of the modeling. Iteration will be possible if required to ensure that the PRM target is met; this may be particularly relevant for resource plans that are significantly different than the current system.

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1.4 Analysis Plan Evaluation Criteria Essential grid services	E1 – Feb 14 2020	Eliminate plans at reliability/operability screening if they do not meet requirements for essential grid services Consider integration costs (additional/supp grid services) in cost of NPV List grid services and evaluation criteria or thresholds assigned to each	NS Power agrees that plans which do not meet the standards of the Resource and Operability Screening phases will not be considered as viable resource portfolios. NS Power agrees and will be considering integration costs of wind at levels defined in the PSC Stability Study. Examples of grid services to be considered in the Reliability and Operability Screening phases are listed in the final Assumptions document.
1.5 Analysis Plan Evaluation Criteria Plan robustness	E1 – Feb 14 2020	Confirm if possible to combine plan robustness with 25-year NPV by assessing NPV rev req under high and low sensitivity analysis	Due to the number of potential sensitivities requested by stakeholders, NS Power does not believe that this combination would yield appropriate results to generate relative rankings of resource plans.
1.5 Analysis Plan Evaluation Criteria Plan robustness	CA - Resource Insight	Calculate explicit measure of risk. Consider using stochastic analytics capability to model financial risk or uncertainty re plan cost risk Use stochastic analysis capability to determine how driver uncertainty affects portfolio cost; calculate risk/benefit ratio by comparing cost of greater than average cost outcomes with benefit of less than average cost outcomes	Risk elements are considered as part of the Plan Robustness evaluation which will consider how resource portfolios perform against different sensitivity assumptions. NS Power will consider opportunities to run stochastics if appropriate
1.5 Analysis Plan Evaluation Criteria Plan robustness	E1 – Feb 14 2020	Will NSP do stochastics and if so, on what variables? How will end effects be handled?	NS Power will consider opportunities to run stochastics if appropriate

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1.6 Analysis Plan Evaluation Criteria Emissions reduction	E1 – Feb 14 2020	Quantify / provide total emissions per plan Consider total emissions per plan rather than reductions compared to a[n undefined] base case	Total NS Power fleet emissions of CO ₂ , Hg, NO _x , and SO ₂ under each plan will be considered and quantified. NS Power is quantifying CO ₂ reductions relative to 2005 actual emissions as a metric of reduction magnitude.
1.7 Analysis Plan Evaluation Criteria: Flexibility	E1 – Feb 14 2020	How will qualitative assessment of timing of investments be used? Risk of pushing all decisions out 25 years and delaying benefits of grid modernization / emission reductions not captured in rev requirement	NS Power will review the timing of capital investments in each plan to better understand the practicalities associated with their implementation.
1.7 Analysis Plan Evaluation Criteria: Flexibility	E1 – Feb 14 2020	Specify metric to evaluate DSM flexibility Clarify how flexibility to be scored for DSM (incl. EE and DR)	NS Power is not proposing to evaluate DSM flexibility as part of the evaluation criteria. Timing of DSM investments will be considered along with capital spend timing in the qualitative evaluation of a given resource plan’s flexibility.
1.8 Analysis Plan Evaluation Criteria **New metric**	CA - Resource Insight	Add qualitative resiliency metric considering how leading portfolio alternative perform in two resiliency scenarios Could use simple quantitative metrics to inform review, but judgment call because no good method for quantifying scenario probability	NS Power has added this consideration as part of the qualitative evaluation of Plan Robustness included in the final Scenarios and Modeling Plan document.
2.0 Scenarios General	CA - Resource Insight	Test “spliced” scenarios to see which portfolios most resilient	NS Power will evaluate a number of Scenarios paired with different Resource Strategies and Sensitivities in order to evaluate a broad range of potential outcomes during the IRP process.

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2.0 Scenarios General	CA - Resource Insight	Objective should be to spread out portfolios so each portfolio tested under all scenarios.	NS Power does not believe it would be valuable to test all portfolios under all scenarios, as some may be incompatible (e.g. resource plan developed for a particular scenario may not be able to serve the load contained in another scenario). NS Power will examine a broad range of outcomes as part of this IRP and will focus sensitivity analysis on the scenarios which show the most commonality to all plans or have other attributes of significant interest.
2.0 Scenarios General	Natural Forces	Should be recognition of risk premium (implementation risk) associated w/ different scenarios (reliance on new/unproven technology, ambitious DSM) - additional implementation risk and risk of failure	Plan Robustness is a qualitative metric that NS Power has included in the Evaluation Criteria in order to provide a mechanism to consider the risks associated with a particular resource plan.
2.0 Scenarios General	Synapse	Determine capacity & unit commitment requirements in association w/ TUC to allow PLEXOS parameterization for possible economic retirement.	The IRP Plexos model does not contain must run requirements for TUC generation.
2.0 Scenarios General	E1 – March 6 2020	Should not conduct quantitative comparisons of revenue requirement across electrification scenarios because of incompatibility [plans occupying different scenarios do not compete against each other] Since utility costs of electrification will not be accounted for in revenue requirement, inappropriate to quantitatively compare resulting revenue requirement between any two CRPs that rely on different electrification assumptions.	NS Power agrees that it would not be consistent to directly compare the NPV of Revenue Requirement associated with serving different electrification scenarios.

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2.1 Scenarios Drivers GHG	Bates White	<p>Include value of Cap & Trade allowances and capture NSP ability to sell allowances to net buyers.</p> <p>Assume a value \geq\$20/tonne Cap & Trade allowance in modeling</p>	NS Power will evaluate the value of selling GHG credits in the Nova Scotia cap and trade market as part of the Resource Screening stage. Additional details on the agreed approach and pricing assumptions are available in the final IRP Assumptions.
2.1 Scenarios Drivers GHG	Synapse	<p>Suggested 3 additional carbon emissions path benchmarks:</p> <ul style="list-style-type: none"> • Baseline (aligned w/ NS Absolute Zero trajectory) • Steeper path w/ zero emissions in 2045 EAC path of 1MT CO₂ by 2030 	NS Power has refined the proposed CO ₂ e paths that will be modeled in the 2020 IRP based on stakeholder feedback.
2.1 Scenarios Drivers GHG	Synapse	<p>Incremental renewable energy amounts for Federal greening initiatives would accelerate renewable energy use. Bill 232 impacts pace of transitioning to greater renewable energy levels.</p> <p>Consider whether further modeling parameterization may be necessary to address the Federal greening and Bill 232 initiatives.</p>	This is addressed by the accelerated GHG reductions proposed in 2 of the 3 CO ₂ curves which are designed to be SDGA compliant; this will drive increased levels of renewable or non-emitting generation without explicitly modeling the Federal Green Building Initiatives
2.1 Scenarios Drivers GHG Thermal Units	Synapse	<p>More stringent emissions criteria (“net zero”), avoidance of sustaining capital costs (as well as fuel and fixed & variable O&M costs), and cap & trade regulations could lead to optimal retirement outcomes within model.</p>	Additional consideration has been given to all 3 of these elements, as described in the final Assumptions Set.

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2.1 Scenarios Drivers GHG	CA - Resource Insight	Generate very diverse portfolios for evaluation If portfolios perform well tested against other scenarios, infer resilient to natural disaster or sudden carbon shifts	NS Power will evaluate a number of Scenarios paired with different Resource Strategies and Sensitivities in order to evaluate a broad range of potential outcomes during the IRP process. NS Power has also added Resiliency considerations as part of the qualitative evaluation of Plan Robustness included in the final Scenarios and Modeling Plan document.
2.2 Scenarios Drivers Load Avoided T&D Costs	E1 – February 14 2020	Consider avoided T&D costs and how calculated in order to avoid sub-optimal DSM amounts in IRP	Avoided T&D costs will not be an input to the IRP model; methodology for estimating avoided T&D costs will be developed through this IRP process.
2.2 Scenarios Drivers Load Avoided T&D	E1 – March 6 2020	Avoided T&D costs part of separate process; NSP to calculate avoided T&D costs on narrower set of portfolios. Confirm avoided T&D costs cannot be calculated using IRP model and will not be an input to IRP model.	Please see above
2.2 Scenarios Drivers Load	E1 – February 14 2020	How are municipal electrical utilities modeled? How much load & peak demand in these forecasts and should there be any adjustments	Please refer to the 2019 Load Forecast for details on how municipal utility load has been forecasted; no adjustments have been made to this component of the IRP load forecast.
2.2 Scenarios Drivers Load	E1 – March 6 2020	Select one electrification scenario on basis of likelihood of each electrification scenario occurring; determination by E3 and NSP with opportunity for Stakeholder input	NS Power will evaluate a number of Scenarios paired with different Resource Strategies and Sensitivities in order to evaluate a broad range of potential outcomes during the IRP process.

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2.2 Scenarios Drivers Load T&D	Digby	Transmission grid (69 kV line) from Tremont to Yarmouth impedes area’s ability to contribute to greening of environment & sustainable solutions	The capacity expansion modeling of the IRP is, in general, not location or project specific; therefore candidate locations for new generation resources would be considered as part of specific project planning post-IRP.
2.2 Scenarios Drivers Load	Bates White	NSP to provide transparent forecast of peak load. 2019 10-YSO peak load forecast projected decrease in peak, but IRP scenarios show peak load growth, incl. significant growth for moderate & high electrification cases. NSP should include costs of discretionary ratepayer-funded electrification, DSM and EE in modeling; costs should be considered variable for purposes of determining optimal resource portfolios.	Please see the Assumptions slides for final load assumptions. All costs of the electrification being considered in the IRP are being treated as exogenous to the model as agreed with Bates White.
2.2 Scenarios Drivers Load	Bates White	NS Power should explicitly address the effects of Port Hawkesbury Paper’s load	PHP’s interruptible load does not contribute to firm system peak. Their energy consumption will be modeled as part of the IRP.
2.2 Scenarios Drivers Load	CA - Resource Insight	Consider Electrification of building & transportation	The load forecast assumptions were informed by the PATHWAYS work, which considers several electrification scenarios for the Nova Scotia economy that produce a wide range of long-term outcomes in terms of both peak and energy requirements.
2.2 Scenarios Drivers Load	Synapse	Critical to test mid-DSM and max achievable DSM pursuant to parameters in E1 Potential Study	Please see the Final Scenarios and Modeling Plan
2.2 Scenarios Drivers Load	E1 – March 6 2020	Confirm Pathways agnostic regarding costs, mechanisms and delivery entities for electrification	Confirmed

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2.2 Scenarios Drivers Load	E1 – March 6 2020	It seems the best path forward for the 2020 IRP, given the current data and desire to explore electrification scenarios, is to allow the four DSM Potential Study scenarios to be paired with the three electrification scenarios	Due to the complexity of modeling NS Power is not able to test all DSM profiles across all modeling scenarios. Please see the Scenario and Modeling Plan for additional details on DSM sensitivities.
2.2 Scenarios Drivers Load	Synapse	Availability of load management critical in addition to peak period load reduction from EE. Support inclusion of all cost-effective DR peak reductions in E1 potential study.	DR will be modeled as outlined in the Assumptions slides.
2.2 Scenarios Drivers Load	Synapse	Use E1 Potential Study to inform costs and quantities of DSM.	DSM Potential study is the source of DSM assumptions used in the IRP
2.2 Scenarios Drivers Load	CA - Resource Insight	Test all 4 DSM levels across all scenarios	Due to the complexity of modeling NS Power is not able to test all DSM profiles across all modeling scenarios. Please see the Scenario and Modeling Plan for additional details on DSM sensitivities.
2.2 Scenarios Drivers Load	E1 – March 6 2020	Allow 4 DSM scenarios to be paired with 3 electrification scenarios	Please see above
2.2 Scenarios Drivers Load [GUO]	Synapse	Determine costs & achievable potential for peak-load reducing DR, with specific cost & quantity curves to allow for resource selection based on DSM resources or scenario analysis using alternative peak load and annual energy projections. Use Navigant achievable cost-effective DR in modelling	DR will be modeled as outlined in the Assumptions slides.

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2.3 Scenarios Drivers Coal Closure	Synapse	Identify next candidates for coal retirement after LIN2. Rank order to identify best to worst economic performers. We anticipate this will occur following the results of the modeling runs.	NS Power agrees that the sequence of coal unit retirements will be an output of the portfolio modeling phase.
2.5 Scenarios Candidate Scenarios	CA - Resource Insight	<p>Instead of Scenario 2 – Net zero – high electrification suggest:</p> <p>Accelerated 1.0 Mt 2050; high electrification + higher industrial/marine demand / coal end 2030</p> <p>High electrification logical w/ coal phase-out</p> <p>Pathways excluded industrial & marine sectors from electrification or other load growth drivers but technology trends will shift more industrial use to electricity. Supply-side option development will also support electrification of marine vessels and other equipment. Marine load higher electrification w/ high load factors or off-peak charging.</p> <p>Test early coal closure w/ current landscape strategy (not just renewable integration). Phasing out coal may otherwise be economic.</p>	<p>Please refer to the final Scenarios and Modeling plan as well as the Final Assumptions for how stakeholder feedback on scenarios has been incorporated.</p> <p>NS Power’s intention is to test a broad range of scenarios in the IRP modeling in order to capture the uncertainty of potential futures.</p> <p>The IRP model will be able to retire coal units when economic; the Current Landscape scenario with coal closure in 2040 will allow this option to be tested.</p>

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3.0 Screening RESOLVE	Bates White	<p>RESOLVE modeling should be subject to same level of preview & disclosure as PLEXOS runs.</p> <p>Confirm RESOLVE runs will use same assumptions as agreed on in this pre-IRP development process.</p> <p>Explain differences b/w RESOLVE runs, assumptions and scenarios from PLEXOS and what vetted by stakeholders to date.</p> <p>Disclose & explain results of RESOLVE modeling and allow time for review & discussion of results with Working Group and stakeholders before PLEXOS runs.</p>	<p>NS Power will endeavour to use the same modeling inputs in both PLEXOS and RESOLVE in order to ensure consistency. Inputs will be adjusted as required by the unique aspects of each modeling tool in order to ensure they are considered appropriately.</p> <p>RESOLVE modeling results will be shared with Stakeholders as part of the Interim Modeling update and workshop.</p>
3.0 Screening RESOLVE	Synapse	Use consistent, transparent inputs and make RESOLVE data available for review	<p>NS Power will endeavour to use the same modeling inputs in both PLEXOS and RESOLVE in order to ensure consistency. Inputs will be adjusted as required by the unique aspects of each modeling tool in order to ensure they are considered appropriately.</p>
3.0 Screening RESOLVE	Synapse	Support use of RESOLVE to test whether different scenarios produce significantly different capacity expansion plans.	NS Power agrees with this approach
3.0 Screening RESOLVE	Synapse	<p>Compare economics of replacing existing CTs with newer fast-ramping generation.</p> <p>Use RESOLVE to address this.</p>	<p>Existing CT resources will be considered for economic retirement during the Resource Screening phase of the Modeling Plan.</p> <p>NS Power will use RESOLVE to execute this analysis.</p>

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3.0 Screening RESOLVE	Synapse	Incorporate shadow carbon price on incremental emissions beyond NSP allocation and allowance sales opportunity for any decreased NSP emissions. Consider a floor price.	NS Power agrees and this will be considered during the Resource Screening phase; additional details have been shared with the IRP working group and are include in the final Assumptions slides.
3.1 Screening Reliability RECAP	Synapse	Using RECAP to assess overall reliability of a portfolio may resolve issues that may arise about whether a portfolio exhibits LOLE values greater or less than 0.1 days/year reliability/resource adequacy criteria; may prevent PLEXOS from overbuilding capacity resources. Adjust PRM constraint or adjusting ELCC values as inputs in PLEXOS.	NS Power will use a UCAP (ELCC) method to calculate PRM during the 2020 IRP Capacity Expansion modeling. This will be reconciled to ICAP PRM and ELCC will be tested and confirmed to meet the 0.1day/year LOLE target during the Reliability and Operability Screening phases of the Modeling Plan. If the PRM is significantly exceeded by a resource portfolio of interest, NS Power will iterate on the PRM constraint as needed and revalidate against reliability and operability constraints.
3.1 Screening Reliability RECAP	Synapse	There may be synergies between low levels of storage resource and high wind levels. Critical to use RECAP to ensure economically optimal mix of wind/storage tested or considered.	Diversity benefits of wind and storage or solar and storage combinations will be considered in the PRM calculation. Additional detail is contained in the final Assumptions Slides. The model is free to select pairings of renewable resources and storage as part of the capacity expansion model in order to minimize NPVRR.
3.1 Screening Reliability	Dalhousie	Need to show how grid resiliency modelled in scenarios	Applicable reliability targets will be met by viable resource portfolios. Transmission & Distribution considerations for storm hardening and resiliency are not considered by the IRP model as it is in general not location specific.

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3.1 Screening Reliability	Synapse	Iterate early to ensure LOLE targets not significantly exceeded (</>) for any optimized resource plan	NS Power will use a UCAP (ELCC) method to calculate PRM during the 2020 IRP Capacity Expansion modeling. This will be reconciled to ICAP PRM and ELCC will be tested and confirmed to meet the 0.1 day/year LOLE target during the Reliability and Operability Screening phases of the Modeling Plan.
3.1 Screening Reliability	Synapse	Establish requirements to allow increased wind on the system looking at second NB tie line and assessment of Tx system and related support services (for stability and voltage criteria). Model unlimited wind runs, and potential 1000 MW total. Discuss curtailment practices in PLEXOS.	NS Power agrees and will not constrain the maximum amount of wind on the system during the Initial Portfolio Assessment. Increasing amounts of wind on the system will be tied to particular reliability requirements as detailed in the PSC Stability study (pre-IRP work). Resulting resource plans of interest will then be assessed during the Reliability and Operability Screening phases of the Modeling Plan.
3.1 Screening Reliability	Synapse	Confirm that Tx and operating reserve requirements regarding TUC will be relaxed or eliminated in PLEXOS.	The IRP model will not include must run requirements for TUC related to transmission flows. Operating reserve requirements are not tied to specific generating units on the system.
3.1 Screening Reliability	Synapse	Determine lowest PRM to meet NPCC requirements rather than assessing whether 20% is compliant. Assess reliability and economics for a range of PRMs. Use iterative techniques to address this issue.	NS Power will use a UCAP (ELCC) method to calculate PRM during the 2020 IRP Capacity Expansion modeling. This will be reconciled to ICAP PRM and ELCC will be tested and confirmed to meet the 0.1day/year LOLE target during the Reliability and Operability Screening phases of the Modeling Plan.
3.1 Screening Reliability	Synapse	Runs with and without NB intertie may require review to ensure reliability and operational stability. To be discussed as runs developed.	NS Power agrees and plans to consider this during the Reliability and Operability Screening phases of the Modeling Plan.

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4.0 Strategies General	CA - Resource Insight	Why test only one strategy under comparator case? Provide information re relative performance of several resource strategies under current policy scenario	Since the Comparator case is non-compliant with the SDGA, NS Power does not believe it would add value to consider additional Resource Strategies under the Comparator scenario. NS Power has added Scenario 2.0 which combines a Low Electrification load with an SDGA compliant GHG trajectory which will be tested against both the Current Landscape and Regional Integration resource strategies.
5.0 Portfolios	E1 – February 14 2020	Request a preferred resource plan as directed by UARB in 2014 IRP Preferred resource plan necessary to calculate DSM avoided energy & capacity costs	In their subsequent comments on March 6 2020 E1 stated they “recommend[s] that NS Power select one electrification scenario on the basis of perceived likelihood of each scenario occurring. This determination should be made by NS Power and E3, with opportunity for comment and input from Stakeholders. NS Power then select a PRP from within the ‘most likely’ electrification scenario. E1 believes the above to represent a fair and transparent means of PRP selection.” This appears to be a reasonable approach and will continue to discuss with stakeholders as the modeling phase progresses.
6.2 Sensitivities Mersey	Bates White	Since Mersey cap ex vetted through IRP, at least one set of PLEXOS runs should exclude Mersey expenditures	NS Power will include a sensitivity run which assumes the Mersey system to be retired (with associated decommissioning costs)

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6.4 Sensitivities No New Emitting	Synapse	<p>Establish requirements to allow increased wind on the system looking at second NB tie line and assessment of Tx system and related support services (for stability and voltage criteria).</p> <p>Model unlimited wind runs, and potential 1000 MW total. Discuss curtailment practices in PLEXOS.</p>	<p>NS Power agrees and will not constrain the maximum amount of wind on the system during the Initial Portfolio Assessment. Increasing amounts of wind on the system will be tied to particular reliability requirements as detailed in the PSC Stability study (pre-IRP work). Resulting resource plans of interest will then be assessed during the Reliability and Operability Screening phases of the Modeling Plan.</p>
6.4 Sensitivities No New Emitting	Synapse	<p>Support relaxation of any limitations of Plexos to choose economic levels of new wind (even beyond 1000 MW)</p>	<p>Agree – Plexos will not have hard constraints on quantities of wind but will pair them with the integration strategies identified in the PSC Renewable Integration study.</p>
6.4 Sensitivities No New Emitting	CA - Resource Insight	<p>No new emitting might be better tested as sensitivity rather than distinct strategy. See what new emitting resources arise from modeling runs and apply as portfolio sensitivity to runs to see what non-emitting alternative is.</p>	<p>NS Power agrees with this approach and has made this adjustment in the final Scenarios and Modeling Plan.</p>
6.5 Sensitivities Pricing	CA - Resource Insight	<p>Consider sensitivity for price paid for power exported from NS. Model to follow import price? Will there be significant exports (> Tx and wind)?</p>	<p>NS Power’s base assumption is that due to the correlated nature of wind in the Maritimes, times of peak generation (and most significant opportunity for exports) will be correlated with times of peak generation in neighbouring jurisdictions, depressing any export prices.</p>