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To:

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and

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The Environmental Assessments for the Proposed Marshdale and Saltspring Gas Plants In Nova Scotia Should be Summarily Dismissed, and the Projects Cancelled

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Neal Livingston has had an independent career in Nova Scotia in energy production for over 45 years from domestic to commercial grid scale, in hydroelectric, wind, and solar. Parallel to this commercial career, as a volunteer he has been worked to promote clean energy solutions for Nova Scotia. Between 2010 and 2020 he was a founding member of a volunteer community group *Clean Power Now,* that worked to get Nova Scotia off fossil fuels by importing electricity from Hydro Quebec. This included holding meetings at the federal level with executive assistants to the federal minister of energy, provincial level meetings with senior staff in Quebec, New Brunswick, and Nova Scotia, and meetings with the Vice-President levels at Nova Scotia Power, and Hydro Quebec.

Dear Ministers of Environment:

Unacceptable EAs - Dismiss the two 300 MW gas plant proposals for Nova Scotia:

The Environmental Assessments for two proposed 300MW gas plants lack independent non-biased scrutiny. They fail completely, to do in a professional manner, the requirement to examine project alternatives. Instead, these EAs only adopt the biased position of the proponent, which wrongly states that there are no viable alternatives to building these two gas plants. These EA's simply promote the need for the construction of these two massive gas

burning, and polluting, electrical generating factories. It is embarrassing that these two environmental assessments, probably costing a half million dollars or more, have failed to look at project alternatives in a competent manner.

The capital cost of these plants is not stated, although it is likely $1 billion dollars each. It is not just the capital cost of the gas plants, but the long-term fuel and operating and maintenance costs, over 40 years, that need to be examined in these EAs. Not examining the alternatives properly in the EAs, is a total failure in these EAs to seek such approvals.

Oil and gas industry lobbyists have influenced governments in this region to think that gas plants are now needed. To now see that such biased project ideas have already proceeded to have EAs completed, on behalf of the Nova Scotia Independent Energy System Operator, and at public cost is unacceptable. **These EAs, and these proposed plants, should be summarily dismissed**.

There is nothing smart or reasonable about building gas plants that are not needed. These plants will be a major user of fossil fuels, and producer of related greenhouse gases and pollution that will degrade air quality, water quality and public and environmental health for 40 or more years. This is the poorest decision making one could imagine for Nova Scotia's energy future.

These EAs do not even provide a real project alternatives section. What little there is, less than 2 pages, relies on repeating general comments provided by the proponent, and do not even examine properly the alternatives that the proponent claims to have look at. The couple of vague negative references to alternatives in the EAs, cannot be found to exist either in their Appendix, or even an internet search.

<u>The Alternatives Are Obvious- They Are Available Now:</u>

1) Existing Coal Fired Power: For an 80% reduction in carbon from electrical generating sources in Nova Scotia, there is no need to turn off all the coal fired power plants. One 150 MW coal fired power plant can provide significant backup on the few days a year when power from wind, solar, hydro plants, and battery back up are insufficient. This is known. In a meeting and tour of part of the Nova Scotia Power management facility in February 2025(*1), I was shown, and then discussed the fact that Nova Scotia Power has learned how to run their coal fired power plants to be fast acting, even if they need to start up from 0 kw, to then quickly be backing up wind power. This last coal plant can be retired as soon as other back up options are in place, as described below.

2) Weather Forecasting:

-Nova Scotia is in a very fortunate position, because we have very good winds for generating power on land.

-Predicting available wind power and solar is more or less an exact science. Nova Scotia Power has years of experience in how to fill in around wind power from other sources on days where there is not sufficient wind.

3) Hydro Quebec: The proponent rejects using power from Hydro Quebec, because they claim they cannot contract for firm power. This is the wrong question to ask, and displays a bias that is ignorant of operations management, intentionally so.
- On June 13th, 2018, at a meeting with senior New Brunswick Government officials, our Clean Power Now group were advised that 300MW or under could be booked for space on New Brunswick power lines to import power from Quebec, over existing transmission lines.
-With the installation of a 345kv line underway from Nova Scotia into New Brunswick, it is likely that 600MW could be booked as firm power from Quebec.
- In the autumn 2018, we met in Ottawa with the NRCAN Minister's head policy advisors, to request that they convene a meeting of all parties to make such a deal happen, but no steps were taken to do this.
- Nova Scotia, Nova Scotia Power, and Quebec Hydro have never convened a meeting to come to a contract offer, to provide part of Nova Scotia's needs with firm power. There is an inherent bias in Nova Scotia, and also at Nova Scotia Power, against Hydro Quebec. NSP doesn't want to be a secondary player to Hydro Quebec. NSP's parent EMERA considers themselves as a competitor to Hydro Quebec.
- Over the last 15 years has NSP or Nova Scotia ever asked Hydro Quebec to bid for firm contracts when they become available? Can Nova Scotia get one of these firm contracts instead of Hydro Quebec renewing contracts with U.S. utilities? This discussion simply hasn't happened, nor is it a future option being discussed or planned. It should be.
-The question that needs to be asked is: how much power and at what cost over existing lines as of 2030 can be delivered to Nova Scotia, as firm power, or/and also on occasion as non-firm power?
-Nova Scotia Power already regularly buys some amount of power from Hydro Quebec.
-When power is needed to support the Nova Scotia grid, if our wind and solar and hydro are not able to provide the proper amount that we need, then whoever the system operator is, contacts Hydro Quebec, likely a few days in advance of needing some power, to request how much power Hydro Quebec can sell to Nova Scotia.
-This is an active relationship. For example, on any given particular day for the subsequent 36 hours or three days, or five days, Hydro Quebec would indicate how much power they have available and at what price, so both utilities would quickly know if that that amount of power could be moved through New Brunswick and into Nova Scotia.
The failure to understand or consider the dynamic nature of this existing relationship, as part of the alternative to these proposals for gas plants that are not needed, is a fundamental failure of these EAs.

4) Battery Storage: The EAs say that battery backup (likely 300MW by 2030) is being built, but is not appropriate or enough, but they do not indicate why such a judgement on this is being made, or prove that this is valid.
- More battery storage could be built, and at a cheaper cost, compared to two 300 MW gas plants. (*2)

-Contrary to information in these EAs, if you look up the reference that batteries are not sufficient in these EAs, you find that the Federal government infrastructure bank is giving $138 million to one of the First Nation communities in Nova Scotia to partner to construct 150 MW ofbattery storage, to provide fast acting grid backup, and to be online by 2030. This EA reference is exactly the opposite of what these EAs lead the reader to believe in these EAs. (*3)
-If you want to have 300 MW of battery storage it is going cost around $300-400 million. Quite economical compared to each 300 MW gas fired power plant costing $1 billion just to construct. Then, there is the additional costs of the gas, and ongoing operating and maintenance of these gas plants.
-Grid scale batteries are long lasting, and almost always charged up at the lowest cost price from renewables.
-These battery storage units are already being distributed around the province to reduce transmission losses. These batteries can be charged up in off-peak times.
-600 MW of battery storage costing no more than $1 billion dollars, may be sufficient, based on wind and solar science, to cover any power needs. What sizing we actually need, to not build these gas plants, is not examined, an inexcusable failure of these EAs.

5) **Battery Backup:** Both EAs in the project alternatives section, identical in both, refer to a report that we cannot reference, that grid scale batteries won't work for fast acting backup, which is nonsense. Does such a report even exist?

6) **Better Options:** The cost and price risk to ratepayers is less with battery backup, and other sources of backup already discussed, including one 150MW coal plant- already paid for.
- use 300MW of more or battery backup – when built.
-The cost of power from Hydro Quebec, through New Brunswick is not examined.
--organize the grid to accept power from EVs, with a program to get people to buy EVs with a 50% subsidy, and a clause for 10 years, that requires these cars be available for grid supply, 50,000 cars x 80KW battery is 4,000,000 KWH.
-how much is available from solar, can there be 100MW+ of solar available.
It is unacceptable that these options, not properly explored, have been dismissed in the EA's.

7) **Backup Requirements:** Vice-Presidents at NSP have explained to me and others in meetings of our CLEAN POWER NOW group, over the last decade, that maybe, and only maybe, there is the need of significant backup for only 5-7 days a year. Hardly justification for spending $2 billion dollars when you have multiple system options on those days, which can be predicted several days in advance.

8) **What NSP presently does as low wind days approach:**
- Determine how much they can procure from Hydro Quebec, or any extra that can be had from Newfoundland, PEI and New Brunswick.
- Notify the Interruptible Power Rate customers that they may have to shut down, and then about 100-150MW is then available.
- In the future keep a coal plant which is already paid off, available for those few days a year.

9) **The cost of the gas for 40 years:** Think about the cost of the gas for the next 40 years. Is anybody able to come up with any idea of what the cost on the world market of this gas is going to be? Or its availability? And what about the cost to public health and environment?

10) **Power Rates will go up a huge amount:** Nova Scotia ratepayers, are going to be paying off through their power bills the $2 billion cost of building these proposed, *unnecessary gas plants,* and in addition, the cost of the gas. The amount that our electricity bills will go up because of the cost of gas cannot be estimated. Building these gas plants, is a huge mistake with costs that will harm Nova Scotia for many years.

11) **Independent System Operator – Independent or the Premier's Yes Men?**

- Nova Scotia has a new government agency called the Independent Energy System Operator.
-Why suddenly is their first major undertaking two 300 MW gas fired power plants? Where is the evidence that this is needed, and the best option? And how did the IESO decide this? The need, and the process that has gone on here, has certainly not been justified in the EAs.
- What is the purpose of the Independent Energy System Operator in Nova Scotia? Nova Scotia Power is operating the energy system properly, and was planning their decarbonization to meet the 2030 deadline.
-There is a significant financial cost to setting up and running the IESO as a new arm of government. How do these costs compare to the status quo that we've had, relative to the cost on our bills as ratepayers?
-There might be some rationale why Ontario and Alberta have IESOs, but those jurisdictions have massive and complex power needs, we don't.
-Is the IESO just the Premier's front for control of our electric power system?
-You don't decarbonize by building gas plants, but you sure can make your friends wealthy building these plants. This looks like classic Pork Barrel politics.

12**) These 2 Proposed Gas Projects Are A Two Billion Dollar PORK BARREL:** The optics are very bad here, so let's discuss them.

- In his first term, Premier Houston decided that we needed an Independent Energy System Operator, which came into being after a study was done for the Province/Premier (*4). Rob Batherson, the former President of the Conservative Party of Canada, and former President of the Progressive Conservative Party of Nova Scotia, was paid $100,000 to assist with administrative duties for this study (*5).
- Did the Premier want to have an Independent Energy System Operator, so that he could more closely control electricity procurement in Nova Scotia. This report is written to say what the Premier wanted.
-The next step in this process once the IESO was being set up, at significant public cost, was to appoint the IESO Board of Directors, chosen by the Premier. The Directors are certainly a group of qualified professional people, management executives, but none of them represent, experience in renewables, and what is the best mix of power sources for decarbonizing the grid in Nova Scotia.
-In 2025, having been re-elected, Premier Houston appointed himself as the Minister of Energy.

-The next step the Premier takes as the Minister of Energy, is that the IESO calls for a party to build and own these $2 billion for these proposed gas plants, that are to be huge construction projects located as close as possible to the Premier's home riding.
-It is shocking to see shortyl after this that the IESO releases EAs for these two gas plants. They were obviously commissioned secretly months before. Were these tendered contracts? Is their cost known? Where are similar studies examining other renewable power supply options instead of just these gas plants? Not done.
-The Premier is also very public about the fact that he fantasizes that Nova Scotia will be a major gas producing province through fracking. Fracking is strongly opposed by the Nova Scotia public. That public opposition led to a legislative ban against fracking in 2014. Premier Houston removed that ban on fracking in 2025 without public consultation or public support.
-Will the Premier soon proclaim his fantasy that Nova Scotia fracked gas will be used for these gas plants. In any case the gas, local or not, gas would be provided at world market prices.
-These gas plants by desire, rather than legitimate process or need, are similar to when John Buchanan was Premier. Buchanan had built coal fired power plants that were not needed, and we have a legacy of having the dirtiest electricity in Canada on a per capita basis.
-The difference between the Buchanan days and now, is that Premier Houston has organized this process in a more sophisticated manner than 30 - 40 years ago, to try to avoid these proposed gas plants being seen for what they really are, a two billion dollar pork barrel of construction projects, as near to the Premier's home riding as possible.
-Look up the definition of Pork Barrel in Canada, and this fits the description perfectly.

13) **The Failures of Building Gas Plants:** Both Quebec and Ontario built gas fired electricity plants in the last 30 years, and in both provinces these have been huge mistakes, a massive costly liability, not needed or even used. Now it seems that Eastern Canadians are about to be the next fools stepping up for gas plants, that are not needed. (*7)
-If these proposed gas plants are built, Nova Scotians for up to two more generations, will be saddled with major polluting electrical energy, and be a laggard in Canada for getting off fossil fuels. This will lock Nova Scotia into long-term economic and environmental harm.
-The mindset that gas is the next step for clean energy, is a direct step backwards from decarbonization.

14) **A Failure of Decision Making:**
-The problem with all this, is that none of it is in step with best policy decisions, and best practices, that are taking place in many jurisdictions, that are already adopting high levels of renewables, decarbonization, and battery backup. If we even need an IESO, this new organization should search the world, hiring the best experts, for what are the best options for Nova Scotia's energy system planning and decarbonization.
-The Premier's decision to spend what will be billions to provide infrastructure for offshore wind, will leave our communities stuck in the same rut we have been in for years, lacking proper funds for infrastructure that we need, from good roads to public transportation, schools to recreation facilities, to funds for public service, public safety or health care. One more stupid mega project idea, that drains money away from where it is most needed.

15) **Why Fix What Is Not Broken?**

-The cost to Nova Scotia electricity consumers for this new power, should have been part of these environmental assessments for these proposed gas plants. This is a very big issue relative to proposing to build these gas plants. How can such proposed projects as these be justified? They would add billions of dollars of costs to our power bills, and an unknown long term future cost for the fuel, will certainly cause significant increases in our power bills.

-Reducing Nova Scotia's carbon footprint from electricity by 80% by 2030 does not mean that NSP turns off 100% of the coal plants. Operating an existing, paid for coal fired power plant that would need to operate somewhere between five and thirty days a year makes the need to construct two 300 MW gas plants at a likely cost of $2 billion dollars look like what it is- ridiculous.

-Importing some amount of power from Quebec through system planning, on an ongoing basis, also eliminates the need to build two 300 MW gas plants.

-Construction of 150 MW of battery storage is already being undertaken with assistance from the Federal Infrastructure Bank. Why not simply add another 150 megawatts, or 300 megawatts, or more? 600Mw of batteries, would cost less than these two proposed billion dollars each gas plants, and be cheaper to run.

This not a happy situation. It's actually a sad situation to live in a province where system planning has suddenly become so politically biased, so as to not even be able to clearly examine best alternatives, and make the right decisions that are best for the price of electricity in Nova Scotia. Here comes our mega project that will be like Newfoundland's Muskrat Falls fiasco, to Nova Scotia's economy.

16) **Biased Decision Making:** The proposed construction of these billion dollars each gas plants, has the same biased assumptions that led to how we got the Maritime Link, and Newfoundland and Labrador's Muskrat Falls. For example;

-If there had been an unbiased analysis, Newfoundland would have instead built wind projects across the province over 2 decades instead of Muskrat Falls, at a fraction of the cost.

-When NSP decided on the Maritime Link versus Hydro Quebec power almost 13 years ago, Nova Scotia did a biased comparative study in 2013, by studying 300MW from Newfoundland versus 500 MW from Quebec. You couldn't bring 500MW from Quebec but you could have brought 350MW. (*8). While the Maritime Link today may be a good asset for power in the region, the original study was biased and led to a decision that was not the best cost option for Nova Scotians.

-Biased decision making and biased studies, have led to a history of bad decision making, that has plagued Nova Scotia for generations. It is time to put an end to the idiotic mega-project mentality, that proposes gas plants for 2030.

-The bias is clear, the politics are clear, and these gas plant projects should be rejected at the outset.

Spending $2 billion dollars to lock us into gas plants is as regressive as it gets. Nova Scotia can be a leader in its transition to renewables, but not unless we decarbonize.

As Ministers you should be saying NO to building two 1 billion dollar 300 MW fossil fuel gas plants in Nova Scotia. There are cheaper, better, available options.

I would be pleased to speak with you at your request.

Sincerely

Neal Livingston

Neal Livingston

References

1) Neal Livingston, Nov 21, 2024 meeting with **Dragan Pečurica, P. Eng. |** Director, Energy and Risk Management **| Nova Scotia Power**

2) https://spaces.hightail.com/receive/8EVH8GlEXU

3) https://spaces.hightail.com/receive/TdNiHwEBmw

4) *Clean Electricity Solutions Task Force*
*T*he task force of two was comprised of Alison Scott, a former Nova Scotia deputy minister of Energy and former member of the National Energy Board, and John MacIsaac, a former senior vice-president of Nalcor Energy in Newfoundland and Labrador from 2016-2019.

5) Additionally, Rob Batherson, a Conservative Party operative, was extended a non-publicized $100,000 contract to assist Scott and MacIsaac with "administrative" duties.
https://www.halifaxexaminer.ca/economy/energy/task-force-recommends-sweeping-reforms-of-nova-scotia-power-and-uarb/

7) **Ontario Gas Plant Failures & Controversies**

-Ontario:

- **The 2011/2013 Scandal ($1B+ Cost):** The Liberal government cancelled two gas-fired power plants (Oakville and Mississauga) in 2011 to save seats in a provincial election, a move that cost taxpayers an estimated $1 billion.
  https://taf.ca/ontarios-next-gas-plant-scandal/

-Quebec:

Failed Past Project (Bécancour): Hydro-Québec previously paid over **$1-billion in compensation** to TransCanada Corp. for a "hardly-used" gas plant in Bécancour, which was mothballed.

Jan 14, 2016 — *Hydro-Québec has found it cheaper to pay TransCanada not to produce power* rather than to pay for electricity from Bécancour and resell it on the ...

8) https://spaces.hightail.com/receive/UOcJO5nnzz

Analysis of Proposed Development of the Maritime Link and Associated Energy from Muskrat Falls Relative to Alternatives

Prepared for:

Nova Scotia Department of Energy

January 16, 2013

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