



# Clean Annapolis River Project

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Honourable Bill Dooks  
Nova Scotia Department of Energy  
400 – 5151 George Street  
P.O. Box 2664  
Halifax, NS, B3J 3P7

Dear Minister Dooks,

## RE: Consultation on Energy Strategy and Climate Change Action Plan

Thank you for the opportunity to comment on revisions to Nova Scotia's Energy Strategy and Climate Change Action Plan. This consultation represents an important junction for the province, allowing re-focusing of policy and actions to address the challenges of the coming decades. Our recommendations are as follows.

### 1. Creating Price Signals

Implement regulatory changes to introduce price signals for all provincial energy users, encouraging them to use less energy, and choose less carbon-intensive sources of energy. Two examples of such changes are:

- A carbon tax levied on all energy sources, where the amount of tax is proportional to the carbon-intensity of the fuel source (e.g. coal would be taxed at a higher rate than natural gas).
- Graduated motor vehicle licensing fees that are linked to the fuel efficiency of the vehicle (e.g. the licensing fee of a fuel efficient vehicle would be less than that for a fuel in-efficient vehicle).

These two examples have been successfully implemented in other jurisdictions, such as the United Kingdom, for more than five years.

### 2. Focus on Conservation

Energy conservation and demand side management should become a central focus of the government's energy policy, addressing the needs of residential, commercial, institutional and industrial energy users. This focus should be supported and enshrined in legislation and accomplished through a blend of:

- Incentives for consumers and industries to use less energy (e.g. incentive programs for small businesses to conduct energy audits and replace in-efficient electronic equipment).
- Regulatory changes to raise minimum energy efficiency standards (e.g. improving the energy efficiency standards within the Building Code).

An important compliment to energy conservation is water conservation. The water which we use on a daily basis must be purified, pumped, heated and disposed of; each of these activities requiring electricity. Reducing water consumption can thus make a significant contribution to energy conservation.

Energy conservation measures should be provided with consistent, dedicated funding, administered by an agency at arms-length from the government. Funding should be through an energy efficiency charge on utility bills. It is recommended that 100% of the carbon tax revenues, identified above, should also be allocated to conservation activities.

### **3. Mandated GHG Reductions**

The Environmental Goals and Sustainable Prosperity Act (2007) introduced a 10% reduction target of greenhouse gas (GHG) emissions, by 2020. While this provides a useful first step, the government must mandate much more significant and far-reaching reductions in GHG emissions. The past two years have seen the significant development in our understanding of global climatic models. The global scientific consensus is now suggesting that reductions of GHG emissions in the order of 50 to 70% may be needed in order to avoid the catastrophic effects of climate change. The government should therefore institute a set of mandated reductions in GHG emissions, in line with the global scientific consensus.

### **4. Increased Renewables**

The government should introduce minimum, and progressively increasing, targets for the inclusion of renewable sources into the energy mix of electricity utilities. This approach has been used successfully in other jurisdictions, such as the United Kingdom, to provide clear direction to utilities and allow them to choose the most cost effective renewables.

### **5. Improved Grid Access**

The government should open energy markets to allow other renewable energy producers, be they independent producers or rural communities, access to the electricity grid by implementing an electricity feed-in tariff system.

Thank you again for the opportunity to provide these recommendations. Please do not hesitate to contact me should you have any further questions.

Yours truly,

Stephen Hawboldt  
Executive Director