



DALHOUSIE
University

9 January 2008

Peter W. Gurnham, Q.C.
Nova Scotia Utility and Review Board
3rd Floor, Summit Place
1601 Lower Water Street
Halifax, Nova Scotia B3J 3P6

Dear Mr. Gurnham,

Re: NSUARB-P-887 2007 NSUARB 174

As you are no doubt aware, Ms. Mandeep Dhaliwal and I were formal interveners at the recent Fuel Adjustment Mechanism (FAM) for Nova Scotia Power Incorporated (NSPI). As interveners, we participated in the hearings when time permitted. In addition, we spent considerable time and effort researching and writing two submissions for the Board regarding NSPI's Fuel Adjustment Mechanism.

In our submissions, we described the need for time-of-use meters to be used in conjunction with NSPI's Fuel Adjustment Mechanism. Our proposal showed that time-of-use meters would allow consumers to be charged accurately for the fuel used in generating the electricity they consumed. This would, amongst other things, ensure that consumers with limited peak consumption would not cross-subsidize consumers with large peak consumption.

You can therefore imagine our surprise when the proposal for time-of-use metering was neither included nor discussed in the Board's final decision. Your decision to ignore our work raises two questions:

- Why did the Board ignore the proposal for NSPI to include time-of-use metering as part of the trial run of its Fuel Adjustment Mechanism?
- What is the point of anyone being a "formal intervener" if the Board selectively ignores their submissions?

I look forward to your reply.

Yours sincerely,

Larry Hughes, PhD
Professor

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