



April 22, 2024

Re: SaskPower's Long-Term Supply Plan: Draft Summary

Thank you for the opportunity to submit comments. Major changes are necessary in Saskatchewan's electricity generation sector to greatly reduce greenhouse gas emissions.

The Saskatchewan Environmental Society (SES) would like to see the following actions prioritized by SaskPower:

1. Reduce greenhouse gas emissions to reach net-zero in Saskatchewan.

- SaskPower's Long-Term Supply Plan must strive to achieve net-zero generation well before 2050 if we are to have any chance at achieving net-zero for the entire economy by 2050, as required by the Paris Agreement and sound climate science.

2. Phase out coal-fired power plants by 2030 while working to discontinue the expansion of natural gas-fired electricity generation.

- SaskPower should phase-out conventional coal-fired power stations as rapidly as possible while at a pace that ensures energy security during the winter months. If needed, units should be kept on standby for use on extremely cold weeks. A new cogeneration facility may need to be considered to complete the coal phase-out. Conventional coal plants, including Shand, must retire by 2030 to meet federal regulations.
- Any new natural gas-fired power stations should be equipped with carbon capture and storage (CCS) technology. That said, SES tends to view retrofitting CCS into currently operating gas- or coal-fired power stations as a remote possibility.
- Generating power with coal and natural gas are getting more expensive, and there are reliable, cost-effective, and sustainable alternatives available to SaskPower now.

3. More focus on renewable energy technologies and energy conservation/efficiency, and less focus on nuclear and SMRs.

- Saskatchewan has the best solar resource in Canada and excellent wind resources that are readily available. Wind is also the lowest cost new generation. In tandem with the global focus on clean energy, we expect to see more renewable power in SaskPower's supply mix (5,000 MW of wind and solar should be deployed in the decade ahead and should be combined with energy storage).

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- SaskPower should expand its electricity conservation and efficiency programs and hire enough staff to do comprehensive outreach with electricity users. The goal should be to achieve 300 MW of energy saving over the next six years, which is a much better option than constructing a small modular nuclear reactor (SMR), with its dangerous radioactive wastes and \$5 billion price tag.
- Industrial users of power should be charged higher rates to encourage energy conservation and the adoption of renewables. Some jurisdictions like Ontario use peak power billing of industrial consumers on the top five days of the year to encourage conservation.

4. Advance grid modernization and smart infrastructure upgrades that support the shift to electrification.

- SaskPower should ensure sufficient resources are available (regarding aging infrastructure, extreme weather events, and load variability/growth, etc.).
- Demand side management (DSM) should be of the highest priority because this represents the most cost-effective method to address capital requirements and limits to our existing infrastructure. While SaskPower has had a DSM program since 2008, the achievement of only 150 MW of demand reductions since that time represents less than 4% of the peak demand. It seems reasonable and prudent to set a minimum DSM goal to reduce demand by 300 MW by 2030.
- Increase energy storage and interconnections with our neighbouring jurisdictions.

5. Implement increased interconnections with neighbouring jurisdictions.

- It is encouraging that SaskPower is expanding interconnections to the USA with the 650 MW connection to the SouthWest Power Pool, but we should also be expanding our interconnections to Manitoba as well as Alberta, particularly because there are numerous federal funding programs that would support these connections and Alberta's grid instability demonstrates that our neighbours could use our help to stabilize the system.
- Specifically, a new 1,000 MW transmission link between Saskatchewan and Manitoba should be built to trade renewable energy back and forth, increase the penetration of renewable energy on the grid, and increase energy security.

We appreciate SaskPower's continued transparency in sharing information on all the supply options you are investigating. We also appreciate the consideration of our priorities.

Sincerely,

A handwritten signature in black ink that reads "Allyson Brady". The signature is written in a cursive, flowing style.

Allyson Brady
Executive Director, Saskatchewan Environmental Society

A handwritten signature in blue ink that reads "Megan Van Buskirk". The signature is written in a cursive, flowing style.

Megan Van Buskirk
Associate Director, Saskatchewan Environmental Society