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Nova Scotia  
Utility and Review Board

IR-1

Reference: Evidence page 9, lines 8-14. “Under the proposed regulation, and consistent with the amended *Electricity Act*, meter aggregation is now expanded to a Distribution Zone. A single customer may net-meter more than one electric service account against its generator, if those metered accounts are owned by the same customer, and if the metered accounts and the generator are connected to NSPI distribution feeders emanating from a single distribution supply transformer within a substation (i.e. a Distribution Zone).” See also Evidence page 5, lines 1 and 2 and Appendix B, page 2, Section 3.6.3.1.

Please provide clarification of the definition of a defined “Distribution Zone” as well as the boundaries for each defined Distribution Zone. If boundaries are not available, include approximate geographic area.

IR-2

Reference: Evidence, page 6, lines 9-17. “Under the proposed regulation, and consistent with the amendments to the *Electricity Act*, maximum net generating capacity is increased to 1 MW. The capacity of the customer’s generator may now be sized to meet the annual consumption of the customer, allowing for aggregation of multiple meters under one account within a defined distribution zone. The intention of the enhanced net metering program is still to enable customers to offset part or all of the customer’s own electrical requirements. NSPI will work with customers to help ensure their generator is sized to meet the expected annual consumption of the customer, as required by Section 3A(2)(c) of the *Electricity Act*.” See also Evidence, page 4, lines 31 and 32 and Appendix B, page 1, Section 3.6.2.

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(a) Please indicate the method NSPI will use to determine the customer's expected annual consumption with respect to determining the maximum size of a customer's net metered generation system.

(b) Please indicate how much excess energy generation will be considered acceptable over the expected customer's annual consumption when determining the maximum size of the customer's net metered generation system (i.e. how much flexibility will be provided in determining the maximum size of customer's net metered generation system, considering the demand and some of the energy sources which will qualify for net metering will both vary to some degree from year to year)?

**IR-3**

**Reference: Evidence, page 6, lines 19-22. “NSPI proposes two classes of service for net metering customers as follows:**

**Class 1: up to and including 100 KW**

**Class 2: >100 kW to 1MW”**

**See also Evidence, Appendix B, page 1, Section 3.6.2.**

Please provide an explanation or rationalization for the two classes of net metered generation, and why the Class 1 (generators up to 100kW) capacity has been reduced from the former upper limit of approximately 12MW to the proposed value of 5MW.

**IR-4**

**Reference: Evidence page 4, lines 13 and 14. “NSPI's proposed program establishes a maximum capacity of 20MW, apportioned between the two proposed classes”.**

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59 (a) Please provide an explanation or rationalization of why the maximum allocation under net  
60 metering of 20MW is appropriate and provide all analysis and studies conducted by NSPI to  
61 determine this amount.

62 (b) Did NSPI consider the impact of increasing the maximum capacity above 20MW? If so,  
63 explain why 20MW is the optimum amount. If not, why not?  
64

65 **IR-5**  
66

67 **Reference: Evidence, pages 4, lines 26 to 30 and Appendix B, page 3. “(b) as a condition**  
68 **of participation, the customer transfer or assign all emission credits or allowances**  
69 **arising from the use of renewable energy sources to the public utility to enable the public**  
70 **utility to comply with the requirements of any enactment regulating emissions, but for no**  
71 **other purpose.”**  
72

73 (a) Please explain why NSPI should receive the customer’s emissions credits for electricity  
74 where the electricity is consumed directly by the customer, and not purchased by NSPI  
75 or does not use NSPI’s distribution lines or system.

76 (b) Please explain how acquiring emission credits or allowances directly related to self-  
77 generation enables NSPI to comply with any enactment regulating emissions relating to  
78 NSPI’s generation.

79 (c) Please explain what happens to excess emission credits or allowances once NSPI is in  
80 compliance with any enactment regulating emissions.  
81

82 **IR-6**  
83

84 **Reference: Evidence, page 6, lines 31-32 and page 7, lines 1-2. “All distribution**  
85 **connected generation of 100 kW or greater currently falls into NSPI’s distribution**  
86 **interconnection process. As such, net metered generators of this size will similarly**  
87 **undergo assessment, and where applicable, study of system impacts and determination**  
88 **of facility requirements before interconnecting.”**  
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90 (a) For the Class 2 projects, will the process follow the current interconnection process or is  
91 NSPI considering other ways to streamline the application process and any system  
92 impact analysis or studies that may be needed?

93 (b) Please explain in detail why application process and system impact analysis or studies  
94 you will require for Class 2 projects.

95  
96 **IR- 7**

97  
98 **Reference: Evidence, Appendix B, page 1, Section 3.6.1. “Net Metering service is a**  
99 **metering and billing practice that enables electricity consumers to generate electricity**  
100 **from renewable, low-impact, generators to offset part or all of their own electrical**  
101 **requirements.” See also Appendix B, page 4, Section 3.6.6. clause (b), subclause (i)**  
102 **“Utilizes only a renewable, low-impact source of energy as defined in the Renewable**  
103 **Electricity Regulation for the purposes of Section 3A of Chapter 25 of the *Electricity Act*.”**  
104

105 HRWC has opportunities to generate clean renewable energy from capturing excess energy  
106 from pressure reducing valve chambers and the combustion of biodiesel. Please confirm that  
107 these will be considered eligible for Net Metering, and if not why.

108  
109 **IR- 8**

110  
111 **Reference: Evidence, page 9, lines 8 to 19. “Under the proposed regulation, and**  
112 **consistent with the amended *Electricity Act*, meter aggregation is now expanded to a**  
113 **Distribution Zone. A single customer may net-meter more than one electric service**  
114 **account against its generator, if those metered accounts are owned by the same**  
115 **customer, and if the metered accounts and the generator are connected to NSPI**  
116 **distribution feeders emanating from a single distribution supply transformer within a**  
117 **substation (i.e. a Distribution Zone). This enhancement is consistent with the statutory**  
118 **language which requires that a customer’s generated electricity be for his/her own use**  
119 **and that aggregation be limited to a distribution zone. The amended *Electricity Act* does**  
120 **not define ‘distribution zone’.” See also Appendix B, page 2, Section 3.6.3.1.**

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121 The amendments to the *Electricity Act* require that the Net Metering Regulation permit  
122 customers to have multiple meters under one account within a defined distribution zone, but  
123 there is no definition or further analysis of a defined distribution zone, and as such NSPI  
124 indicates that its proposed definition is consistent with the statutory language. However, the  
125 amendments to the *Electricity Act* do not prohibit the Net Metering Regulation from allowing  
126 customers to have multiple meters under multiple accounts within multiple defined distribution  
127 zones or from having different approaches for Class 1 or Class 2 generators for net metering  
128 customers, and so long as it permits customers to have multiple meters under one account  
129 within a defined distribution zone this would also be consistent with the statutory language.

130  
131 (a) Please explain and provide copies of any documentation or studies as to whether NSPI  
132 believes or projects that many customers will be able to take advantage of aggregated  
133 metering, given that many customers with multiple electrical loads spread over a large  
134 geographical area and which are separately metered are generally not likely to have more  
135 than one meter on a “distribution zone”.

136 (b) Please explain any possible definitions of “Distribution Zone” which could permit broader  
137 access to net metering than the limitations invoked by restricting net metering to customers  
138 with multiple meters under one account within NSPI’s definition of Distribution Zone, and  
139 explain why NSPI has not put such definitions forwarded under its recommendations for the  
140 Net Metering Regulation?

141 (c) Please explain why the proposed Net Metering Regulation does not permit customers to  
142 have multiple meters under multiple accounts within multiple defined distribution zones, and  
143 if there are technical, system impact or other concerns relating to the Nova Scotia Power  
144 System Operator (“NSPSO”) please explain how those concerns could be addressed to  
145 permit broader access to net metering than the limitations invoked by restricting net  
146 metering to customers with multiple meters under one account within NSPI’s definition of  
147 Distribution Zone?

148 (d) Please explain in detail why the proposed Net Metering Regulation does not permit  
149 customers with multiple electrical loads spread over a large geographical area and which  
150 are separately metered to utilize clean renewable energy for net metering where they are  
151 using (i) a Class 1 generator, regardless of the Distribution Zone into which they are to

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feeding the energy produced, or alternatively as long as the Nova Scotia Power System Operator deems it acceptable based on the load on the distribution zone where the generator is located and other factors; and/or (ii) a Class 2 generator, and the generator is connected to NSPI distribution feeders emanating from any distribution supply transformer within a substation, if the Nova Scotia Power System Operator deems it acceptable based on the load on the distribution zone where the generator is located and other factors.

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