



October 1, 2026

Jessie Wallace
Manager, Regulatory Strategic Planning and Innovation
Nova Scotia Power Inc.
PO Box 910, 1223 Lower Water Street
Halifax, NS B3J 3S8

Re: M12177, Distributed Energy Resource Integration Roadmap: Input for the October 30, 2026 Update

Dear Ms. Wallace:

Solar Nova Scotia welcomes the DER Integration Roadmap and agrees with the Board that it is "an informative and helpful planning tool" (Board letter, September 23, 2026). Enabling customer-sited batteries and other DERs to compete on a level playing field with centralized resources, and to be compensated for the grid value they provide, is a priority for our industry. Fair competition also serves ratepayers by helping identify the lowest-cost solutions that meet grid needs.

We offer the following input for NS Power's October 30 update.

1. Governance

The Roadmap identifies delivery as a shared responsibility involving government, utilities, market participants and other stakeholders (M12177, Exhibit N-1, Attachment 1, Foreword, p. 4 of 68). We support the Board's request for a governance model clarifying roles among NS Power, EfficiencyOne and IESO Nova Scotia, and recommend that it also include:

- An explicit leadership role for the Department of Energy on policy matters, including DER compensation, procurement and cost allocation, with independent facilitation considered for the stakeholder process.
- Formal representation for the DER industry, consumer advocates and other stakeholders in the proposed advisory groups.
- Transparent, consistent criteria for comparing DERs and non-wires alternatives with conventional investments, including their ability to meet the same grid need.

2. Visibility into grid constraints

NS Power's avoided-cost values for 2025, reproduced in M12282, put transmission and distribution benefits in constrained areas at \$179.15 per kW-year, almost three times the system-wide value of \$61.14 (Exhibit E-7, E1 response to Synapse IR-05, p. 2 of 3). These planning values illustrate the importance of location; actual project value depends on the relevant grid need and reliable delivery during the required hours.

The DSM Plan record indicates that NS Power has identified constrained feeders. EfficiencyOne confirms that effective locational targeting depends on receiving reliable, current feeder data, and that NS Power has agreed to provide the data it requested (M12780, Exhibit E-23, pp. 29–30; Exhibit E-41, pp. 2 and 7). We request:

- Public release of the list of constrained feeders and substations, including the nature of each constraint, relevant seasons and hours, and the anticipated timing and magnitude of capacity needs, where available. Publishing this information would let DER developers and customers direct projects to where they deliver the most grid value, as NS Power's recently updated hosting-capacity table already does for generation.
- A timetable for providing current feeder-constraint data to EfficiencyOne.

3. Accelerating key initiatives

The Roadmap's indicative horizons associate Evolving initiatives with 5 to 10 years and Emerging initiatives with 10 or more years, while allowing priorities and timing to change (Exhibit N-1, Attachment 1, pp. 58–59 of 68). Given the 2030 coal phase-out and IESO Nova Scotia's September 11 announcement of an October RFQ for storage and other on-demand generation, earlier progress is warranted. We ask that the implementation plan advance the following initiatives along the Path to 2030:

- 1.3.2 Non-Wires Alternatives Framework (Evolving)
- 1.4.3 Locational/Seasonal DER Forecasts and Analysis (Evolving)
- 2.2.5 DER Compensation Framework Modernization (Evolving)
- 2.3.1 DER Procurement Framework (Emerging), including coordination with IESO Nova Scotia's procurements and potential participation by aggregated customer-sited resources
- 1.5.1 Regulatory Gap Assessment (Emerging), to identify required regulatory and provincial direction early

For each initiative, we would welcome a proposed commencement date, interim deliverables, implementation milestones and an accountable lead organization. We recognize the Board's expectation that the initial plan may be high level; where dates cannot yet be established, it would be helpful to identify the dependencies and when a more detailed schedule will be available.

Early action does not need to wait for every framework to be finalized. We ask that the plan identify near-term pathways, such as pilots, interim programs or targeted procurements, that allow customer-sited resources to deliver, and be compensated for, grid value while the full frameworks are developed, along with the regulatory or provincial direction each pathway would require. Practical experience from these early steps would also inform the final frameworks.

4. DERMS access and public reporting

NS Power's DERMS application describes integration with utility-owned DERs, demand response platforms and DER aggregators (M13083, Exhibit N-1, pp. 2 and 4 of 8). We ask NS Power to explain the pathway and timing for independent third-party aggregators and customer-owned devices to participate on open, non-discriminatory terms, including transparent eligibility, interoperability and technical requirements.

We also recommend public reporting at least annually against Roadmap milestones, identifying completed work, delays, revised schedules and next steps.

We would welcome NS Power's response to these recommendations in the October 30 update, and Solar Nova Scotia would be pleased to discuss their implementation.

Respectfully,

A handwritten signature in black ink, appearing to read "Dave Brushett", written over a horizontal line.

Dave Brushett, P.Eng.
Chair, Solar Nova Scotia

cc:
Nova Scotia Department of Energy
EfficiencyOne
IESO Nova Scotia