

August 19, 2025

NOVA SCOTIA ENERGY BOARD

C/O CRYSTAL HENWOOD (CRYSTAL.HENWOOD@NOVASCOTIA.CA)

Dear Ms. Henwood,

RE: SOLAR NOVA SCOTIA (SNS) – Intervenor Submission - M12247

Solar Nova Scotia (SNS) is a not-for-profit society whose mission is to promote and facilitate the adoption of solar energy in Nova Scotia. Please accept this letter as SNS' Intervenor Submission in M12247.

NS Power has been directed to file the Distributed Energy Resource Integration Roadmap (DERIR) report by September 30, 2025 (NSEB, M11621). Key findings from preliminary research in the DERIR process includes that “[l]eading utilities are systematically integrating Distributed Energy Resources (DERs) as a resource in Integrated Resource Plans (IRP), and in distribution planning. While NS Power has an IRP process that considers DERs, the jurisdictional scan highlights opportunities to enhance DERs considerations...”¹ SNS wishes to highlight the importance and urgency of enhancing DER considerations in supply-mix and system planning, and implementing initiatives to better enable and integrate DERs, in time for NSIESO planning and procurement initiatives in 2026. We are concerned that due to the fact that the outputs of the DERIR process are used as inputs into the NSIESO planning and procurement initiatives and the NS Power Load Forecast, any delays in the conclusion of the DERIR process could result in DERs not having the opportunity to meaningfully participate. We are also concerned that this could result in major new investments in utility-scale transmission and generation proceeding, which will negatively impact the opportunity for Nova Scotian ratepayers to benefit from these potentially more innovative and cost-effective demand-side and customer led solutions.

Thank you for the opportunity to participate in this important proceeding.

Very best regards,

Roby Douglas, Chair of the SNS Industry Committee, on behalf of the SNS Board of Directors

¹ Paraphrased from Dunskey (August 7, 2025) “Nova Scotia DER Integration Roadmap Stakeholder Workshop #1”, slide 36 of 36