Nova Scotia Energy Board

IN THE MATTER OF *The Public Utilities Act,* R.S.N.S. 1989, c.380, as amended

M12247

2025 Evergreen IRP Action Plan and Roadmap Update

NS Power
Reply Submission

September 4, 2025

NON-CONFIDENTIAL

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1.0 INTRODUCTION

On April 30, 2025, Nova Scotia Power Inc. (NS Power, Company) filed its annual Evergreen Integrated Resource Plan (IRP) Action Plan and Roadmap Update (IRP Update) with the Nova Scotia Energy Board (NSEB, Board). The NSEB subsequently established a written hearing proceeding by letter on May 23, 2025. NS Power held a stakeholder session to review the IRP Update on June 6, 2025. Responses to Information Requests (IRs) from the NSEB, Synapse (Board Counsel Consultant), Consumer Advocate (CA), Small Business Advocate (SBA), Industrial Group (IG), Energy Storage Canada (ESC), and Natural Forces (NF) were filed by NS Power on July 15, 2025. Synapse filed comments on the IRP Update on August 5, 2025. The Consumer Advocate, Small Business Advocate (SBA), Solar Nova Scotia (SNS), Energy Storage Canada (ESC), and Natural Forces (NF), filed their comments on August 19, 2025.

The CA, in their submissions, acknowledged the general reasonableness of the IRP update. The CA provided the following:

> On review of the information provided, the Consumer Advocate accepts the IRP Update as reasonable, and is generally supportive of the recommendations provided by Synapse.[1]

Each submission provided substantive feedback on several aspects of IRP update. This is the Company's reply to Synapse's and stakeholder comments.

[1] CA Submission, Re: M12247 – Nova Scotia Power Inc. – 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 1.

2.0 TRANSITION OF THE IRP TO THE NSIESO

Most submissions reference transition of IRP work to the Nova Scotia Independent Energy System Operator (NSIESO) going forward.

For example, Synapse provided the following:

> Given that NSPI has not conducted new modeling in the IRP matter since the 2022/2023 Evergreen IRP study, it will be important not to delay the process of conducting the next IRP with updated core assumptions. Currently, Nova Scotia is in the process of transitioning IRP responsibilities from NSPI to a newly created entity called the Nova Scotia Independent Energy System Operator ("NSIESO" or "IESO") per the provisions of Bill 404. This bill requires that the IESO commence its first IRP exercise within one year of that section of the Bill coming into force. It is crucial to support the formation of NSIESO's capabilities to conduct a new Evergreen IRP as soon as possible.[2]

Grid Strategies on behalf of the CA provided the following:

> NS Power's 2025 IRP Update is generally reasonable, but the Board should direct NS Power to initiate work – to be completed by the NSIESO – on IRP modeling, particularly considering the urgency of proceeding with some level of fast-acting generation procurement. In addition, the Board should direct several other areas of inquiry and consideration in that IRP modeling, as discussed below. But it may be necessary for expedited modeling to be completed for direct support of any fast-acting generation procurement, with broader modeling to be completed subsequently, but also without delay.
>
> While the NSIESO is expected to take responsibility for system planning in the next four months, delays in such administrative transfers can and often do occur. The Board should not allow for delay of critical system planning work to begin while the NSIESO transfer process is completed.[3]

[2] Synapse Submission, Re: Comments on Nova Scotia Power's 2025 Integrated Resource Plan Action Plan and Roadmap Update (M12247), August 5, 2025, page 1-2.
[3] CA Submission, Re: M12247 – Nova Scotia Power Inc. – 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 1.

Additionally, the SBA provided the following:

> Under Bill 404, the Nova Scotia Independent Energy System Operator (NSIESO) will be the entity responsible for conducting the IRP going forward. However, based on the dynamic conditions of the electricity system, including market conditions, regulatory and policy changes, load requirements, and reliability needs, it is imperative that there is no gap in continuous system planning responsibilities. NS Power's understanding is that the next IRP, including all modeling, will be conducted by NSIESO. However, the transition process is "uncertain at this time," and NS Power has noted that "an IRP process and communications related to a future IRP have not been initiated."[4]

The submissions by SNS and NF also reference future work to be eventually conducted by the NSIESO. Concern has been raised regarding the transfer of system planning responsibilities to the NSIESO and potential gaps in work as that transfer occurs over time.

To date, the NSIESO has established a Board of Directors, filed its first Expenditure and Revenue Requirement application (M12412) with the NSEB, and hired a Chief Executive Officer. In its Notice of its Expenditure and Revenue Requirement application, the NSIESO provided the following:

> As a newly constituted organization, the NSIESO is in the early stages of setting up its internal capabilities to perform its executive, administrative and operational functions. The NSIESO is in the process of scaling as an organization, including building out its executive and various business units, and coordinating the transition of certain operational functions from Nova Scotia Power Inc. ("NSPI") in a phased approach. To this end, during the test period, the NSIESO will begin exercising responsibility over its functions including System Planning and Grid Interconnection, and plan for the operational functions of System Operations to transition from Nova Scotia Power Inc. to the NSIESO. The full transition is not expected to be complete until Q2 2027.[5]

[4] SBA Submission, Re: M12247 - Nova Scotia Power Inc. (NS Power) - 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 1.

[5] NSIESO, IN THE MATTER OF an application by the Nova Scotia Independent Energy System Operator for an Order or Orders made pursuant to Section 29 of the Act for the review of its proposed expenditure and revenue .requirements for the fiscal year ending March 31, 2026 (M12412), August 5, 2025, page 1, lines 14-21.

Moreover, the NSIESO's Expenditure and Revenue Requirements application provided the following regarding the first phase of the transition:

> In the first phase of the transition, the system planning, transmission interconnection and energy and capacity procurement functions will be assumed by the NSIESO. This phase is expected to occur during Q4 of 2025.[6]

Accordingly, the NSIESO will take on responsibilities of the next IRP update process under its system planning responsibilities in 2025. The expected timeline for the transition of IRP responsibilities is also outlined in the NSIESO's Expenditure and Revenue Requirements application:

> The responsibility for conducting Integrated Resource Planning will be transitioned to the NSIESO by October 2025 as the Act requires that the NSIESO commence its first integrated resource planning exercise by October 24, 2025.[7]

It is NS Power's understanding that the NSIESO is planning to start their IRP work by October 23, 2025.

In light of the foregoing, the comments and recommendations provided by Synapse and stakeholders regarding future IRP studies will be mostly applicable for consideration by the NSIESO, given the transfer of responsibility of this function in the near future. NS Power's responses provided in this reply are intended as clarifications and guidance that will ultimately be for the NSIESO's consideration when they begin their work on the next full Evergreen IRP update.

In the short term, and in reply to the related concerns raised in stakeholder submissions, NS Power will continue to advance work relevant to the IRP, and will assist the NSIESO in its transition to

[6] NSIESO, IN THE MATTER OF an application by the Nova Scotia Independent Energy System Operator for an Order or Orders made pursuant to Section 29 of the Act for the review of its proposed expenditure and revenue .requirements for the fiscal year ending March 31, 2026 (M12412), Exhibit N-1, August 5, 2025, page 8, lines 7 – 9.
[7] NSIESO, IN THE MATTER OF an application by the Nova Scotia Independent Energy System Operator for an Order or Orders made pursuant to Section 29 of the Act for the review of its proposed expenditure and revenue .requirements for the fiscal year ending March 31, 2026 (M12412), August 5, 2025, page 21, lines 12 – 14.

those activities, such that there is no gap in work required to set-up the NSIESO for success. Namely, NS Power will continue to advance work on the Effective Load Carrying Capacity (ELCC) study, as well as continued participation in the Net Zero Atlantic Hybrid Peak study being conducted by the Province.

In addition, NS Power would like to reinforce the applicability of the Evergreen IRP's outcomes and additional PLEXOS modeling conducted in other proceedings (for example, the Reliability Intertie application (M12217)) as it relates to the changes observed in the planning environment. Specifically, comments provided by intervenors with respect to the forecasted Fast Acting Generation capacity additions, the updates to the Clean Electricity Regulations, and the impacts of hybrid-peak heating program are well reflected in the existing Evergreen IRP and the Reliability Intertie modeling (in which 600MW of fast acting generation was economically selected, considering updated costs, load forecast including hybrid peak benefits, and environmental policy assumptions). The currently available modeling work provides an appropriate representation for the current planning environment until the completion of the NSIESO's first IRP.

3.0 SYNAPSE SUBMISSION

Synapse provided four recommendations as follows:

> 1. After establishment of the IESO, we recommend a rapid ramp-up of the capability to conduct a new Evergreen IRP… The previous IRP modeling efforts associated with the Evergreen IRP submitted in August of 2023 commenced in 2019, and thus an update to outdated assumptions is critically needed. The IESO should strive to complete a new Evergreen IRP modeling exercise by late 2026 or early-to-mid 2027 to provide sufficient time to consider procurement for any required resources beyond those procurements currently underway…
>
> 2. When conducting updated modeling for the next Evergreen IRP exercise, modelers must include updated assumptions for all considered resource options...
>
> 3. We recommend deliberative and stakeholder-informed examination by the IESO for any new fast-acting generation and battery energy storage resources, in combination with considering the current path for new renewable wind and solar PV resources required to meet renewable generation requirements in Nova Scotia…
>
> 4. In the next IRP assessment, the IESO must include scenarios that exclude Mersey rehabilitation and avoid the capital investment that would be required for such upgrading. All scenarios that include Mersey (with capital upgrades) must fully incorporate the current cost estimates for its rehabilitation. This will enable a direct comparison of the costs (net present value of revenue requirements) of resource plans with and without Mersey.[8]

Notably, Synapse's recommendations are directed to the NSIESO, in recognition of the fact that IRP matters will soon transfer to them as noted in Section 2 above. With respect to recommendation 4, NS Power notes that a review of the Mersey system as part of the broader resource plan will benefit from work to be completed by NS Power in accordance with Board direction arising from its recent 2025 ACE Plan Decision and Order.[9]

[8] Synapse Submission, Re: Comments on Nova Scotia Power's 2025 Integrated Resource Plan Action Plan and Roadmap Update (M12247), August 5, 2025, pages 16 – 17.
[9] NSUARB Order, Re: 2025 ACE Plan (M12012), August 19, 2025, page 2.

In its evidence Synapse comments extensively on the capacity of new combustion turbines needed by 2030 and its submission that the 600 MW of new CTs included in *The Path to 2030* and recent 10-Year System Outlook Reports is misaligned with the Evergreen IRP resource plan. NS Power offers the following comments as additional context to Synapse's evidence on this matter:

- NS Power acknowledges that 450 MWs of CTs is selected by 2030 in the Evergreen IRP resource plan for Scenario CE1-E1-R2 (the preferred plan), but notes that in the preferred plan and all other resource plans, CT capacity continues to be added across the planning horizon, including an additional 150 MW by 2033 in the preferred plan, bringing the total to 620 MW.

- When the Load Forecast was updated in 2023 there was an increase in the firm peak forecast[10] and subsequently the Load and Resource Outlook in the 2023 10-Year System Outlook Report[11] demonstrated that 600 MW of firm capacity was needed to maintain the target 20 percent Planning Reserve Margin (PRM) in 2030.

- In the 2024 10-Year System Outlook Report, which included the incremental 250 MW of 4-hr battery capacity additions identified in the Province's Clean Power Plan and an updated load forecast, the Load and Resource Outlook continued to demonstrate that approximately 600 MW of new firm capacity was needed to maintain the target PRM in 2030.[12]

- The 2025 10-Year System Outlook Report demonstrates that, after considering the other elements of the Clean Power Plan including an incremental 250 MW of 4-hr storage and planned renewable generation additions and unit fuel conversions, approximately 500 MW

[10] 2023 Load Forecast Report (M11108), April 28, 2023, Figure 2: Historical and Predicted Annual System Peak, page 8.
[11] 2023 10 Year System Outlook Report (M11221), June 30, 2023, Figure 19: NS Power 10-Year Load and Resource Outlook, page 45.
[12] 2024 10 Year System Outlook Report (M11764), June 27, 2024, Figure 20: NS Power 10-Year Load and Resource Outlook, page 49.

of new firm capacity is required to maintain the target PRM in Winter 2029/30.[13] Additional firm capacity is needed immediately in subsequent years to maintain the PRM.

- In the Reliability Intertie modelling, 600 MW of fast acting CTs was economically selected by 2030. While not an IRP, this work built on the Evergreen IRP, and included updated resource and fuel costs, an updated load forecast which included hybrid peak benefits, and updated environmental policy assumptions.

In its evidence, Synapse does not dispute the need for the first 300 MW of fast-acting generation, which it identifies is a common outcome across all planning scenarios in the Evergreen IRP,[14] and is identified in the Province's Clean Power Plan.[15] In the NSIESO's Expenditure and Revenue Requirements application, it identifies it is planning for a Request for Proposal for 300 MW of fast acting generation and states the RFP is expected to be issued in the Fall of 2025.[16] NS Power is fully supportive of procurement activities advancing for 300 MW of fast acting generation and notes that up to an additional 300 MW of firm capacity, whether from additional fast acting generation or other resources, will be needed to fully transition off of coal as detailed in the 2025 10-Year System Outlook Report.

Beyond Synapse's recommendations, NS Power provides the following comment on a specific statement provided by Synapse. In its evidence Synapse, paraphrasing NS Power, states as follows:

> NSPI stated that it would progress its Thermal Plant Retirement, Redevelopment and Replacement plan, which included the following steps:

[13] 2025 10 Year System Outlook Report (M12386), July 14, 2025, Figure 20: NS Power 10-Year Load and Resources Outlook, page 46.
[14] Synapse Submission, Re: Comments on Nova Scotia Power's 2025 Integrated Resource Plan Action Plan and Roadmap Update (M12247), August 5, 2025, page 4.
[15] nova-scotia-clean-power-plan-presentation-en.pdf, page 21.
[16] NSIESO, IN THE MATTER OF an application by the Nova Scotia Independent Energy System Operator for an Order or Orders made pursuant to Section 29 of the Act for the review of its proposed expenditure and revenue .requirements for the fiscal year ending March 31, 2026 (M12412), August 5, 2025, pages 25 – 26.

> Proceed with retiring Trenton 5 on the 2027/2028 timeline from the Evergreen IRP modeling. Minimize utilization of other thermal resources to reduce sustaining capital investment. Continue to develop coal retirement plan for remaining units.[17]

NS Power would like to make the following clarifications about this statement:

- The retirement of any coal fired generation, including Trenton 5, is contingent on the procurement of replacement firm capacity and the established reliable operation of said capacity, as outlined in the 2025 10-Year System Outlook Report, Section 3.2.7 Nova Scotia System Operator Transition – Combustion Turbines and BESS.

- The changing utilization of thermal units like Trenton 5 will have an effect on sustaining capital investments and minimizing utilization can result in the lowering of sustaining capital costs. However, the lower utilization factor for the thermal units as 2030 approaches is due to the changing role the thermal resources play in meeting customer load (shifting towards being used as peaking facilities) as more renewable resources are added to meet the 2030 decarbonization goals. This type of flexible operation can require sustained capital investment even as the capacity factor decreases on units. NS Power has outlined the projected utilization factors of thermal units in the 2025 10-Year System Outlook Report.[18]

[17] Synapse Submission, Re: Comments on Nova Scotia Power's 2025 Integrated Resource Plan Action Plan and Roadmap Update (M12247), August 5, 2025, page 4.
[18] 2025 10 Year System Outlook Report (M12386), July 14, 2025, Figure 11: Forecast Unit Utilization Factors, page 28.

4.0 CONSUMER ADVOCATE SUBMISSION

Grid Strategies, on behalf of the CA, provided comments regarding "Update to Evergreen IRP", "Stage 2 of the NS-NB Reliability Intertie Project Application", "Procurement Schedule for Fast-Acting Generation Project", and "Relative Rate Impact Evaluation".

Regarding an update to the Evergreen IRP, Grid Strategies mostly refers to Synapse's various recommendations in its submission, and requests the Board "direct NS Power to make substantial progress on the next IRP modeling effort even prior to the transfer of system planning responsibilities to the NSIESO".[19] Please refer to NS Power's comments in the Transition of IRP to the NSIESO and Synapse Submission sections above.

Regarding Stage 2 of the NS-NB Reliability Intertie Project application, Grid Strategies notes that "NS Power does not identify a schedule for the Stage 2 Reliability Intertie" and that "[t]his project should be carefully studied, similar to the Mersey redevelopment project, in the next Evergreen IRP update".[20] NS Power agrees with Grid Strategies: any potential Stage 2 to the Reliability Intertie will need careful study, but restates for additional clarity and context its response to Department of Energy IR-9 from the NS-NB Reliability Intertie Project proceeding:

> The NS Government and NB Government identified the addition of a new 345 kV transmission line from Salisbury to Point Lepreau as a potential Phase 2 project. However, the scope of any Phase 2 work and hence the new import/export opportunities is still to be determined. NS Power is currently focused on Phase 1, the proposed NS-NB Reliability Intertie. NS Power is not engaged in Phase 2 discussions with NB Power. Therefore, any new import/export opportunities from a Phase 2 are not being factored into NS Power's resource or transmission planning at this time.[21]

[19] CA Submission, Re: M12247 – Nova Scotia Power Inc. – 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 2.
[20] CA Submission, Re: M12247 – Nova Scotia Power Inc. – 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 2.
[21] Department of Energy IR-9, NS-NB Reliability Intertie Project (M12217), May 30, 2025.

Regarding the procurement schedule for fast-acting generation, Grid Strategies provides in part the following: "To protect customers from inefficient investment choices, it is essential that NS Power and the NSIESO move forward quickly with updated IRP modeling, and then to adjust resource procurement decisions accordingly."[22] Please refer to NS Power's comments in Section 2.0 above.

Regarding a relative rate impact evaluation, Grid Strategies provided the following:

> The last relative rate impact evaluation was provided in the 2020 IRP. In any direction the Board makes to the NSIESO, it should identify an update to the relative rate impact evaluation as an important component of the report. NS Power currently has no plans to conduct such an analysis. This information was useful in placing the findings of the 2020 IRP in context, and should be included in IRP model updates at least every five years.[23]

NS Power's response to CA IR-7 provided the following:

> NS Power anticipates the next general rate application (GRA) will be filed during 2025. This will provide an indication of the near-term impact on rates that will reflect components of The Path to 2030 resource plan. In addition, once operational, the NSIESO will complete an updated IRP. Any comparative rate assessments would be of more value based on the future updated resource plan outcomes (beyond 2030). For these reasons, NS Power will not be undertaking an update to the relative rate impact comparison document from the 2020 IRP at this time.[24]

Accordingly, the Company clarifies that any comparative rate analysis is contingent first on an NSIESO updated IRP. NS Power is happy to conduct such an analysis when appropriate to do so, at the request of the NSIESO as part of its updated IRP work or at the direction of the NSEB.

[22] CA Submission, Re: M12247 – Nova Scotia Power Inc. – 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 3.
[23] CA Submission, Re: M12247 – Nova Scotia Power Inc. – 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 3.

[24] CA IR-7, Re: 2025 Evergreen IRP Action Plan and Roadmap Update (M12247), July 15, 2025.

5.0 SMALL BUSINESS ADVOCATE SUBMISSION

The SBA "identified several key issues that are critical for effective long-term resource planning to serve Nova Scotia customer needs in a safe, reliable, and economical manner", including "NS Power – NSIESO collaboration", "capacity needs", "completion of supporting analysis", and "offshore wind".[25]

Regarding NS Power collaboration with the NSIESO in support of the NSIESO's upcoming updated IRP, the SBA stresses the importance of NS Power cooperation with the NSIESO and continued IRP related analysis by NS Power. Please refer to NS Power's comments in Section 2.0 above. The Company will collaborate with the NSIESO as needed in any IRP related effort, and work continues on some IRP related analyses.

Regarding capacity needs in the near term and as noted above, the Evergreen IRP and the NS-NB Reliability Intertie regulatory filing modeling outcomes are in alignment with the fast-acting generation capacity additions noted in *The Path to 2030* and the current 10-Year System Outlook Report. The range of fast-acting generation capacity additions by 2030 identified in the 2023 Evergreen IRP was 300 MW to 900 MW, depending on the scenario modeled. In addition, the modeling completed in support of the NS-NB Reliability Intertie application economically selected 600 MW of additional fast-acting generation by 2030 to support the phase out of coal and to support peak demand on the system.

Regarding completion of supporting analysis for the next IRP, the SBA makes note of CT price assumptions and the updated ELCC Study. The ELCC study, although an important input for the next IRP, is not anticipated to provide significantly different ELCC values as compared to the pre-2020 IRP ELCC study results.

[25] SBA Submission, Re: M12247 - Nova Scotia Power Inc. (NS Power) - 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 1.

Regarding the implication of the potential offshore wind development, the SBA notes that "[w]hile the timing and scale of future offshore wind development is highly uncertain, given the large potential impact on the grid, it is important to have analysis regarding how province-directed offshore wind resources could impact the optimized resource portfolio for Nova Scotia".[26] NS Power notes it included offshore wind as a resource option in the 2023 Evergreen IRP and anticipates that Offshore Wind will be included as a resource option in the NSIESO's IRP update, with updates to the cost assumptions and the ELCC of the resource based on the outcomes of the updated ELCC study.

[26] SBA Submission, Re: M12247 - Nova Scotia Power Inc. (NS Power) - 2025 Evergreen IRP Action Plan and Roadmap Update, August 19, 2025, page 4.

6.0 SOLAR NOVA SCOTIA SUBMISSION

SNS provided comments regarding the ongoing Distributed Energy Resources Integration Roadmap (DERIR) work and stakeholder consultation process (M11621). In that proceeding, the NSEB directed NS Power to conduct DERIR work and stakeholder consultation, and file a progress report by September 30, 2025.

SNS expressed concern regarding the timing of the completion of the DERIR and the consideration of any outcomes in the next IRP:

> 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.[27]

As noted in Section 2 above regarding the transition of the IRP to the NSIESO, the Company expects that the next IRP update work will begin before end of year 2025. Based on past precedent, a full IRP update can take 12 to 18 months to complete. Accordingly, NS Power believes that any relevant outcomes associated with the DERIR stakeholder engagement and September 30, 2025 progress report will be completed in time for the NSIESO to take into consideration as part of their IRP update.

[27] SNS Submission, Re: SOLAR NOVA SCOTIA (SNS) – Intervenor Submission - M12247, August 19, 2025, page 1.

7.0 ENERGY STORAGE CANADA SUBMISSION

ESC provided three points in its submission related to curtailment, consideration of various battery technologies, and energy security. NS Power takes no position and offers no submissions on ESC's comments. ESC's comments may be considered by the NSIESO in its IRP update.

8.0 NATURAL FORCES SUBMISSION

Natural Forces submission highlights its Pumped Storage Hydro project and provides three related requests:

- Natural Forces asks that the Board broadens Synapse's recommendations on modelling batteries in the next IRP to include non-BESS storage generally, and Touquoy Pumped Storage Hydro specifically;

- Natural Forces asks that the Board provide guidance on how a project's contribution to sustainable prosperity can and should be considered in the next IRP, in the event that the project contributes significantly to sustainable prosperity, but is not deemed to be "lowest cost" by the IRP model; and

- Natural Forces asks that it be ensured that the next IRP enables all energy resources to maximize their value-stack generally, and their ability to monetize the ancillary services that they provide specifically.[28]

NS Power notes that these recommendations are directed to the Board and are intended for consideration in the context of the next IRP, which will be led by the NSIESO. As such, NS Power takes no position on Natural Forces' requests. These matters will fall within the scope of the NSIESO's future IRP work, and it will be for that entity, in coordination with the Board and stakeholders, to determine how such considerations are addressed going forward.

[28] Natural Forces Submission, Re: M12247 - NS Power: Evergreen IRP Action Plan and Roadmap Update, August 19, 2025.

9.0 CONCLUSION

It appears that stakeholders broadly recognize that responsibility for the IRP is transitioning from NS Power to the newly established NSIESO, as outlined in Bill 404. Several submissions emphasize the need to avoid delays in initiating the next IRP and underscore the importance of maintaining continuity in system planning during the transition period.

NS Power acknowledges these concerns and will continue advancing key planning activities, such as the ELCC study and participation in the Net Zero Atlantic Hybrid Peak study while supporting the NSIESO as it builds capacity. NS Power understands that the NSIESO is preparing to initiate its first IRP, as required by October 2025.

In the meantime, existing modeling from the Evergreen IRP and related proceedings remains reflective of current system needs, including fast-acting generation requirements and finalized CERs. NS Power's responses are intended to provide clarity and guidance for the NSIESO's future IRP work and to support a smooth and effective transition of responsibilities.