

File No: SM064773-00003

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August 8, 2025

Delivered by E-mail

Crystal Henwood
Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
3rd Floor, 1601 Lower Water Street
PO Box 1692, Unit "M"
Halifax NS B3J 3S3

Dear Ms. Henwood:

Re: M12339 – Renewall Energy Inc. Request for Tariffs for the Renewable to Retail (RtR) Market

These submissions are filed on behalf of Renewall Energy Inc. ("**REI**").

On June 19, 2025, REI requested the Board set a process to either amend existing tariffs or to create a new tariff(s) to enable REI, as the first (and still only) Licensed Retail Supplier ("**LRS**") to (a) purchase contracted renewable energy from small renewable energy generators connected to the distribution system, rather than at the transmission level, and (b) purchase surplus customer generation from distribution-connected customers, generally discussed as "net billing" and approved by the Board as part of Schedules C and D in the Small Volume Customer matter (M10293, July 23, 2024 Order). The request was made pursuant to s. 3G(1) of the *Electricity Act*, SNS 2004, c.25, s. 83(1) of the *Public Utilities Act*, RSNS 1989 c.380, and s. 6(2) of the *Energy and Regulatory Boards Act*, SNS 2024, c.2.

The Board stated that it intended to establish a process and timeline for the tariff request and solicited NSPI's response to the issue raised by REI. On July 23rd, NSPI took the position that "net metering/billing is not available in the RtR market under the current legislative and regulatory framework". NSPI's July 23rd letter did not directly address the purchase of renewable energy from distribution-connected generators.

The Board considered that this jurisdictional issue should be determined before engaging in a process to consider the adequacy or appropriateness of the existing tariff structure for the RtR market. It invited submissions to address the issue of whether REI's request to amend or create a new tariff to enable distribution-connected generation and net billing is allowed under the *Electricity Act*; and whether the *Board Electricity Retailers Regulations (Nova Scotia)*, NS Reg 246/216 ("**BER Regulations**") and the *Code of Conduct for Renewable Low-Impact Electricity Sales in Nova Scotia* ("**Code**") are consistent with the authorized sale of "renewable low-impact electricity generated within the Province" under s. 3C of the *Electricity Act*, or whether amendments are needed.

For reasons elaborated upon below, REI states that distribution-connected generation and net billing, as requested, are each permitted under the *Electricity Act* and related regulations, and the Board has the jurisdiction to address the tariff structure.

Governing Legislation

In its initial letter application, REI referenced s. 3G of the *Electricity Act* as enabling distribution-connected generation and net-billing. This reliance is not, as asserted by NSPI, a suggestion that NSPI has “an ongoing duty to facilitate any and all aspects of Renewall’s business plans”. Rather, it is a matter of statutory interpretation and a request for the necessary tariffs to enable REI to serve its customers in a more open and competitive market as originally envisaged. This is in keeping with the legislative framework around the RtR market, and the promotion of competition in this sector.

The *Electricity Act*, in s. 3G(1), mandates that NSPI develop and seek the Board’s approval of tariffs and procedures “necessary to facilitate the purchase of renewable low-impact electricity as provided for in Section 3C.”

Nova Scotia Power Incorporated obligations

3G (1) Notwithstanding Section 77 of the Public Utilities Act, on or before the applicable date prescribed by the regulations, Nova Scotia Power Incorporated, or the IESO in relation to matters falling under its scope of authority pursuant to the More Access to Energy Act, shall develop in consultation with stakeholders, and file with the Board for approval, any tariffs, procedures and standards of conduct and any amendments to existing tariffs, procedures and standards of conduct that are necessary to facilitate the purchase of renewable low-impact electricity as provided for in Section 3C, including

- a) a new or amended open access transmission tariff;*
- b) a distribution tariff;*
- c) a new or amended backup/top-up service tariff;*
- d) a new or amended non-dispatchable supplier spill tariff;*
- e) new or amended interconnection procedures;*
- f) new or amended market rules; and*
- g) any other tariffs, procedures or standards of conduct prescribed by the regulations or that the Board requires Nova Scotia Power Incorporated to develop or amend in order to facilitate the purchase of renewable low-impact electricity as provided for in Section 3C.*

Section 3C sets out reciprocal requirements for selling by a “retail supplier” who meets the licensing requirements, and purchasing by a “retail customer”, (as those terms are defined in s. 2(1) (b - c)) and then goes on to assign to the Board “all the power and authority necessary to implement this Section” (s. 3C(3)).

NSPI refers to s. 3AA, 3A and its legacy Net Metering under Regulation 3.6 as limiting the *customers* who may connect and export to the grid and directs NSPI to be the buyer of excess generation from *customers*. NSPI has correctly described the limits on its own customers being able to connect and sell into the grid. However, the RtR market has “retail customers” as

described in s. 3C, not “customers” and so references to s.3AA, s.3A and NSPI's Net Metering program have no applicability to retail customers of the LRS and the RtR market.

The Board's authority over a LRS is not akin to regulation of a public utility, like NSPI. Section 3B(a) confirms that an LRS is not a public utility, and it is not regulated as such. “[T]he Board's role in regulating retail suppliers is not that of an economic regulator. The Board does not approve the electricity rates charged by retail suppliers.”¹ Rather, the Board licenses retail suppliers, oversees their marketing and sales activities, and approves the necessary tariffs, procedures and rules to enable the market to function.

The *Electricity Act* does not, and need not, address every aspect of the RtR Market, or mandate specific programs and billing. The LRS may be a generator itself or may purchase renewable low-impact electricity. It is axiomatic that to transmit the generation to the retail customer, that electricity must be transported across the wires of NSPI as the monopoly provider of transmission and distribution services. The legislation does not frame the specific programs in which an LRS is able to purchase renewable low-impact electricity.

Silence in the legislation, does not equate to a restriction on an LRS from purchasing renewable energy generated at the distribution level or purchasing excess electricity from its retail customers. NSPI's position is premised on the assumption that explicit authority must be granted under the legislation, (like has been done with respect to the net metering programs requiring that NSPI purchase surplus energy spilled on the grid from its own customers) for an LRS to voluntarily purchase and compensate for this excess energy or distribution-connected renewable generation. REI disagrees.

In establishing the RtR Market, the *Electricity Act* at s. 3G(1) mandates that NSPI consult with stakeholders to develop and file with the Board for approval any tariffs or procedures that are “necessary to facilitate the purchase of renewable low-impact electricity”. There are no limiting words that mandate that the LRS purchases be at the transmission level, nor that it cannot include spilled energy from retail customers. Rather, the Board has the discretion to determine any tariffs, procedures or codes of conduct to facilitate the purchase of renewable low-impact electricity, (s. 3G(1)) and has been given “all the power and authority necessary to implement this section” (s. 3C(c)).

There is no legislative gap; there is a tariff gap in relation to the appropriate compensation for use of NSPI's distribution lines. This gap is left to the Board to address (or government by regulation).

Net Metering and Excess Electricity Aggregation

The *Electricity Act* currently provides for several programs in which individual NSPI customers can self-generate and be compensated for excess energy that flows back to the distribution grid for NSPI's use: the residential net-metering program (grandfathered and enhanced), commercial net metering and the community solar program. These are the examples given by NSPI in its letter dated July 23, 2025.

More recently, the *Electricity Act* was amended to further add a mechanism that requires NSPI to credit self-generating solar spill under the Community Solar Program (“**CSP**”). Sections 3AE to 3AK of the Act set out requirements regarding the development of a CSP that permits any NSPI customer (individual), group of customers, or third-party to generate, use, and sell any excess

¹ Renewall Energy Inc. (Re), 2024 NSUAR 66, at para 4.

solar energy to NSPI. This is similar to the net metering provisions, but the customer is provided a credit on their NSPI bill. NSPI obtained Board approval of the Solar Energy Credit Rider, in M11911.

With respect to RtR retail customer self-generation, there is no legislated program, which is unsurprising given how it is regulated. The process proposed by REI would mirror the mechanisms currently set for NSPI customers to receive a credit for excess solar generation or excess electricity under the residential net metering program. Additionally, REI is seeking to have the ability to aggregate that distributed energy and redistribute to other customers.

Within the current scheme, if a retail customer were to spill excess electricity onto NSPI's distribution grid, NSPI would be the gratuitous beneficiary with no correlative obligation to compensate the retail customer for that energy. This could be viewed as a windfall to NSPI, which would be unfair and offend the general principle that customers of NSPI should be net neutral from the RtR market.

There is no need for mandatory language in the *Electricity Act* or its Regulations to require the LRS to credit its retail customers for spilled energy as NSPI has been directed to do. That is a matter of contract as between the LRS and its retail customer. Indeed, this has already been approved by the Board as part of REI's Small Volume Customer documents as "net billing" in 2024². This was meant to compare the options for LRS customers, to the programs for NSPI customers, in determining which service to take. Within Schedule C to the July 23, 2024, Board Order, there is an explicit offer of "Additional Services" to residential customers which include net billing/net metering:

*Renewall offers Net Billing where a customer can install behind-the-meter generation and isn't limited to a maximum capacity. Surplus energy produced on-site will be purchased by Renewall. Up to 50% of the customer's Average Annual Load will be purchased at the Retailer Charge and anything above 50% of the customer's Average Annual Load will be purchased at 70% of the Retailer Charge. Additional information can be found in Renewall's Terms and Conditions. Net Billing may have income tax implications and impose GST/HST obligations. Additional information is available from Renewall.*³

The exact same is offered for Small General customers in Schedule D.⁴ There is an explicit comparison to behind-the-meter generation and net metering programs offered by NSPI.

When the Small-Volume Customer documents were approved by the Board, REI understood that it would be afforded the opportunity to purchase and aggregate the self-generated excess electricity that flows onto the distribution grid, and provide credit for this comparable to the options for NSPI customers. Throughout the process, NSPI never took issue with that comparison. The issue only arose afterwards when trying to determine the mechanism for REI to receive and aggregate that surplus electricity.

² *Renewall Energy Inc. (Re)*, 2024 NSUARB 66

³ M10293, July 23, 2024 Order, Schedule C – Electricity Rate Comparison Information, Residential, page 2 of 2.

⁴ M10293, July 23, 2024 Order, Schedule D – Electricity Rate Comparison Information, Small General, page 2 of 2

As it stands, while REI may credit retail customers for self-generated excess electricity under the approved net billing, absent the reciprocal ability to receive and aggregate that energy on the distribution lines for other RtR customers, it is simply a gratuitous payment. There is a willing retail seller and willing retail customers; in the middle is NSPI with a monopoly and control of the transmission and distribution system.

The REI submits that not only does the *Electricity Act* afford the Board with the ability to require that NSPI create a tariff of this nature, which is necessary to facilitate the purchase of renewable low-impact electricity, but it would be counterintuitive to a “competitive” market if it did not do so. The Board’s very broad authority to regulate the RtR market, includes the creation of this type of tariff. Any concerns by NSPI regarding use of its distribution system could be addressed in the structure of the tariff (or tariff amendment) and would necessarily be premised on the legislative principle that other customers be kept whole.

Distribution-Connected Generation

There is similarly no legal impediment in the *Electricity Act*, or otherwise, that would prevent small distribution-connected generating facilities to sell to an LRS. Rather, the legislative scheme suggests that this is contemplated, although not explicitly required. As outlined in REI’s June 19, 2025, letter to the Board, NSPI’s original application in M06214 was premised on both transmission and distribution-connected generators. NSPI even provided a graphical representation of this in the disaggregated market showing the LRS purchasing renewable energy from the RtR generator and offered commentary that “RtR generation could also be connected to the NS Power distribution system”.

Under the scheme of RtR market, a LRS who meets the requirements of the *Board Electricity Retailer Regulations* may sell to retail customers (s. 3C, s. 3E). Part of the requirement to be licensed is a compliance plan to contract with “renewable low-impact electricity generators” (s. 5(i)), defined with reference to the *Renewable Electricity Regulations*, NS Reg 155/2010, s.2(1):

“renewable low-impact electricity generation facility” means a facility in the Province that generates renewable low-impact electricity and has received all approvals and permits required under these regulations or any other applicable enactment;

“renewable low-impact electricity generator” means a person who owns or operates a renewable low-impact electricity generation facility in the Province;

The *Renewable Energy Regulations* further outline the requirements for electricity standard approval, from the Minister, which is needed to be an approved generation facility. The definitions and requirements in the Regulations do not restrict generation to transmission-connected, and it appears the same hurdles would apply for a distribution connected generator to be certified as such.

There are regulations for the interconnection of a prescribed renewable low-impact electricity generation facility to the electrical grid of a public utility. NSPI maintains that the LRS may not use NSPI’s distribution system to contract for renewable low-impact electricity from small generation facilities. Accordingly, while REI is at liberty to contract with independent power producers that are distribution connected (which are certified as a generation facility), the issue is using NSPI’s distribution lines for the purposes of aggregating these small amounts of energy and redistributing that energy to RtR customers, whether that be within or outside of a particular distribution zone.

The OATT is available for the transmission system but there is no comparable for the distribution system, with only the distribution tariff in place to send energy to the retail customer.

There is no reason that purchase of small distribution-connected renewable energy cannot, and should not, be allowed under a tariff. To the contrary, this will promote the goals and objects of recent legislation to increase production of renewable energy and allow for a more competitive electricity market.

Indeed, the *Nova Scotia Wholesale and Renewable to Retail Electricity Market Rules*, which outline the rules relating to participation in the RtR market, at s 2.1.2.1 specifically contemplate generation at the distribution level:

2.1.2.1, An eligible person may be a Market Participant in one or more of the following classes:

a) Generation Market Participant: A Generation Market Participant is a Market Participant in respect of

i) a Generating Facility connected to the Transmission System; or

ii) a Generating Facility connected to a Distribution System and registered with the NSPSO.

b) Load Market Participant: A Load Market Participant is a Market Participant in respect of

i) a Load Facility connected to the Transmission System; or

ii) a Distribution System connected to the Transmission System.

c) Licenced Retail Supplier Market Participant: A Licenced Retail Supplier Market Participant is a Market Participant in respect of the aggregate of the Retail Customer load subscribed to the Licenced Retail Supplier.

As noted, in Matter M12014, ECI did not weigh in to interpret the tariffs, but did make some comments in its Report to the Board dated April 22, 2025, that suggest there *could* be distribution-connected generation. The Report recognizes there can be behind-the-meter sales, and modifies the description of the calculation in section 13 for *BERR* to more explicitly detail that behind-the-meter sales, be netted out of both Sales and Generation:

- The calculation of losses will depend on whether the LRS' supply and the LRS' customers are connected at the distribution or transmission level. An LRS may have a mix of transmission- and distribution-connected generation and customers. This makes it complicated to articulate in a formula in the Board Regulations. One aspect of the calculation of losses is that the behind-the-meter sales should be excluded from the calculation of losses as these sales are made without NS Power's transmission or distribution systems (emphasis added) (p.16).⁵*

⁵ M12014, Exhibit N-3, Update to Board Regulations, Responses to Parties rev1.

As part of its license, REI is required to submit an annual compliance plan to the Board of its forecasted sales to customers, purchases from generators and its own generation. Attached are copies of the public versions of REI's 2023 and 2024 Annual Report to the Board. In those Reports, Section C, REI included reference to its first distribution-connected project which was approved. REI contracted to purchase all of the output of a small solar project. This project has been delayed due to the owner of the facility, but at the time, NSPI approved and executed the Standard Small Generator Interconnection Agreement, and the Board did not take issue with the counting of this renewable electricity as part of REI's filing.

The current legislative framework all points to the ability to have the output of distribution-connected generation purchased by an LRS, however, NSPI appears to require a more explicit direction to create the requisite tariffs for the RtR market to open. REI submits that there is no legislative restriction for the aggregation and purchase of distribution connected energy by an LRS. Rather, the Board has broad authority to ensure the requisite tariffs are in place for the RtR market.

Board Electricity Retailers Regulations and Code of Conduct

At this stage, REI does not have specific recommendations with respect to the Board Electricity Retailers Regulations ("**BERR**") or Code of Conduct. If the Board determines that it has the jurisdiction to establish a process to amend existing tariffs or create new tariffs for distribution-connected generation and net billing, REI recommends that the BERR and Code of Conduct be reviewed concurrently.

One example may be consideration of and treatment of "behind-the-meter" ("**BTM**") sales in the BERR. As defined, self-supply BTM is appropriately excluded from the LRS's compliance period purchases and sales plan (s. 10, s.11). Significantly, the definition of BTM sales excludes spilled energy to the transmission or the distribution system:

s. 2(2) For greater certainty, the electricity that is sold from a renewable low-impact electricity generation facility to a directly-connected party is behind-the-meter, while electricity that is sold from the same facility to another party through the use of NS Power's transmission or distribution facilities is not behind-the-meter.

This definition of BTM further supports the request for tariffs to facilitate the LRS being able to receive excess energy, account for it, redistribute it and compensate its retail customers.

Conclusion

It is respectfully submitted that the *Electricity Act*, and regulations which apply to the creation and regulation of the RtR market permit tariffs to enable net billing and distribution-connected generation by an LRS. Not only that, amending or creating a tariff to allow this use of the distribution system by an LRS will promote the goals of the legislation to develop a competitive RtR market, and fundamentally, it will allow for fair service to Nova Scotians participating in the RtR market. Moreover, enabling small distribution-connected renewable energy generators can potentially reduce grid congestion, and increase the amount of low impact renewable energy in Nova Scotia thereby advancing Nova Scotia's Clean Power Plan.

Thank you for the opportunity to make these submissions.

Yours truly,

A handwritten signature in blue ink, appearing to read 'N. Rubin', followed by a horizontal line.

Nancy G. Rubin, K.C.

A handwritten signature in blue ink, appearing to read 'B. Rudderham', followed by a horizontal line.

Brianne E. Rudderham

NGR/BER/lmc

Attachments

cc Jennifer Power, NSPI
William Mahody, K.C., Board Counsel
Intervenors in M12339



October 28, 2022

Crystal Henwood
Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
1601 Lower Water Street, 3rd Floor
P.O. Box 1692, Unit "M"
Halifax, NS B3J 3S3

Dear Ms. Henwood:

Re: M10293 – Roswall Development Inc – Application for a Renewable to Retail Supplier License 4363174 Nova Scotia Limited – (E-GEN-21)

Attached is the Annual Forecast for the Compliance Period of 2023-2024 for 4363174 Nova Scotia Limited.

In accordance with Board Regulatory Rules, Rule 12, 4363174 Nova Scotia Limited is seeking confidential treatment of Appendix B as the information represents sensitive Commercial Information. Appendix B emailed to the Board separately.

In addition to the required information attached, we would also like to confirm with the Board that:

- 4363174 NS Limited has entered into a Market Participation Agreement with NS Power as of June 29th, 2022.
- An effective date for the Renewable Electricity Retail Sale Regulations was put in place via Order in Council on October 18, 2022.

As a result of these two milestones, we request that the list of approved Renewable to Retail licence holders on the UARB Website be updated to reflect our Licence.

Thank you for your time and welcome any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Roscoe".

Daniel Roscoe, P.Eng
4363174 Nova Scotia Limited
President



Board Electricity Retailers Regulations (Nova Scotia) Annual Forecast

- a) Sales plan showing the forecasts of the sales of renewable low-impact electricity, including numbers of customers differentiated by NS Power's rate classes and forecasts of sales by customer, but not including any behind the meter sales**

See Appendix A

- b) Forecasts of renewable low-impact electricity purchases from renewable low-impact electricity generators at the point of interconnection**

See Appendix A

- c) Copies of any contractual arrangements with renewable low-impact electricity generators demonstrating that the license holder has secured a sufficient supply to meet its forecast in (b)**

4363174 Nova Scotia Limited has entered an agreement with Mersey River Wind Inc. to purchase all energy output from their wind project, totaling 540,000 MWh/year. All phases of the wind project are expected to be in service by December 2025. Phase 1 of the project is expected to be in service December 2023, refer to IR 597 for related information. The output from Phase 1 is expected to be 136,902 MWh/year. Contract is attached in Appendix B.

4363174 Nova Scotia Limited is negotiating an agreement with a new medium industrial customer to purchase all energy output from their solar project. The Solar project is expected to be in service May 2023, refer to IR 676 for related information. The energy output is reflected in appendix A.

- d) Copies of the certification required in subsection 17(1) for each renewable low impact electricity generator that the license holder contracts with**

Permits for the wind project and solar project are being secured by the renewable low-impact electricity generator. Certifications will be provided when available.

- e) Copies of the certification required in subsection 17(2) for each renewable low impact electricity generation facility that the license holder owns or operates**

4363174 Nova Scotia Limited does not own or operate any generation facilities.

- f) Forecasts of renewable low-impact electricity generation at the point of interconnection if the license holder owns and operates a renewable low-impact electricity generation facility, net of any behind-the-meter sales**

4363174 Nova Scotia Limited does not own or operate any generation facilities.



g) Forecast of transmission and distribution losses

See Appendix A



Appendix A

Compliance (MWh)													
		2023	2024										
Forecasted MWh		7894	138158										
Capacity Factor		43%	43%										
T&D Losses		5.3%	5.3%										
			Est. # of Customers		0	1	5	50	0	150	0	1500	
			Percentage of Load		0%	41%	10%	4%	0%	24%	0%	11%	10%
Year	Month	Purchases	Generation MW	Losses	Industrial Transmission	Industrial Large	Industrial Medium	Industrial Small	General Large	General	General Small	Residential	Over/Under Supply
2023	January	0	0	0	0	0	0	0	0	0	0	0	0
2023	February	0	0	0	0	0	0	0	0	0	0	0	0
2023	March	0	0	0	0	0	0	0	0	0	0	0	0
2023	April	0	0	0	0	0	0	0	0	0	0	0	0
2023	May	145.63	0	7.66	0	0	22.50	0	0	0	0	0	115.47
2023	June	156.01	0	8.21	0	0	22.50	0	0	0	0	0	125.31
2023	July	160.05	0	8.42	0	0	37.50	0	0	0	0	0	114.13
2023	August	149.63	0	7.87	0	0	37.50	0	0	0	0	0	104.26
2023	September	120.26	0	6.33	0	0	52.50	0	0	0	0	0	61.44
2023	October	84.38	0	4.44	0	0	94.50	0	0	0	0	0	-14.56
2023	November	49.22	0	2.59	0	0	165.00	0	0	0	0	0	-118.37
2023	December	7028.82	0	184.83	0	2009.85	1047.27	269.92	0	1488.23	0	758.43	1270.28
2024	January	13069.96	0	687.39	0	4450.55	1076.66	503.42	0	3077.76	0	1678.34	1595.84
2024	February	12821.27	0	674.31	0	4074.39	971.47	482.62	0	2900.65	0	1456.01	2261.81
2024	March	14061.92	0	739.56	0	4282.10	1036.73	484.05	0	2989.99	0	1457.76	3071.72
2024	April	13806.44	0	726.13	0	4284.24	1033.14	461.81	0	2595.76	0	1165.56	3539.81
2024	May	11153.85	0	586.62	0	4595.66	1020.85	465.45	0	2463.99	0	1046.36	974.93
2024	June	8087.53	0	425.35	0	4427.33	1068.72	485.90	0	2495.33	0	856.78	-1671.87
2024	July	11811.09	0	621.18	0	4822.68	1067.74	493.92	0	2690.24	0	861.18	1254.14
2024	August	7515.23	0	395.25	0	5172.29	1068.89	492.99	0	2613.67	0	843.41	-3071.28
2024	September	10280.90	0	540.71	0	4881.33	1041.11	460.82	0	2420.20	0	844.80	91.93
2024	October	9324.86	0	490.43	0	4758.93	1049.76	424.42	0	2519.45	0	973.28	-891.40
2024	November	12205.70	0	641.94	0	4684.41	1028.07	465.51	0	2620.82	0	1139.78	1625.18
2024	December	14019.44	0	737.33	0	4019.70	1047.27	539.84	0	2976.46	0	1516.86	3181.98



October 25, 2023

Crystal Henwood
Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
1601 Lower Water Street, 3rd Floor
P.O. Box 1692, Unit "M"
Halifax, NS B3J 3S3

Dear Ms. Henwood:

Re: M10293 – Roswall Development Inc – Application for a Renewable to Retail Supplier License 4363174 Nova Scotia Limited – (E-GEN-21)

Attached is the Annual Forecast for the Compliance Period of 2024-2025 for Renewall Energy Inc. Appendix A Detail and Appendix B & C have been uploaded to the Board's confidential repository.

In accordance with Board Regulatory Rules, Rule 12, Renewall Energy Inc. is seeking confidential treatment of Appendix A Detail and Appendices B & C as the information represents sensitive Commercial Information.

Thank you for your time and welcome any questions or comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel Roscoe", written in a cursive style.

Daniel Roscoe, P.Eng
Renewall Energy Inc.
President



Board Electricity Retailers Regulations (Nova Scotia) Annual Forecast

- a) Sales plan showing the forecasts of the sales of renewable low-impact electricity, including numbers of customers differentiated by NS Power's rate classes and forecasts of sales by customer, but not including any behind the meter sales**

See Appendix A

- b) Forecasts of renewable low-impact electricity purchases from renewable low-impact electricity generators at the point of interconnection**

See Appendix A

- c) Copies of any contractual arrangements with renewable low-impact electricity generators demonstrating that the license holder has secured a sufficient supply to meet its forecast in (b)**

Renewall Energy Inc. is updating its agreement with Mersey River Wind Inc. to purchase all energy output from their wind project, totaling 475,000 MWh/year. All phases of the wind project are expected to be in service by December 2025. Phase 1 of the project is expected to be in service in December 2024, refer to IR 597 for related information. The output from Phase 1 is expected to be 116,683 MWh/year. The current proposed contract is attached in Appendix B, and the schedule is to have this new document executed before the end of 2023.

The medium industrial customer from whom Renewall Energy Inc. will be purchasing the excess energy from their solar project (IR676) has been delayed until September 2025. The energy output is reflected in Appendix A. A final contractual agreement will be available at a later date.

Renewall Energy Inc. has entered into an agreement with the Medway River Wind Project to purchase all energy output, totaling 359,000 MWh/year. This project is forecasted to have its first two turbines online in December 2025. The project is expected to be complete by the end of 2026. Refer to IR739 for related information. The contract is attached in Appendix C

- d) Copies of the certification required in subsection 17(1) for each renewable low impact electricity generator that the license holder contracts with**

Certification for the wind projects and solar project are being secured by the renewable low-impact electricity generator. Certifications will be provided when available upon commercial operation of the project.

- e) Copies of the certification required in subsection 17(2) for each renewable low impact electricity generation facility that the license holder owns or operates**

Renewall Energy Inc. does not own or operate any generation facilities.



- f) Forecasts of renewable low-impact electricity generation at the point of interconnection if the license holder owns and operates a renewable low-impact electricity generation facility, net of any behind-the-meter sales**

Renewall Energy Inc. does not own or operate any generation facilities.

- g) Forecast of transmission and distribution losses**

See Appendix A