



Blackburn Law Inc.

April 22, 2026

VIA EMAIL

Ms. Crystal Henwood
Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
Halifax NS B3J 3S3

Dear Ms. Henwood:

Re: M12524 – Nova Scotia Power Inc., Concentric FERC Order 2023 Report

On October 23, 2025, Nova Scotia Power Incorporated (“NS Power”) submitted, pursuant to the Nova Scotia Energy Board’s (the “Board”) directive in M12174, the Concentric FERC Order 2023 Report, which was also the last filing requirement for M10905 (the “Report”).

The purpose of the Report was to review and provide recommendations for NS Power’s Interconnection Process (initially filed in M10905), based on a review of the U.S. FERC Order 2023, which was first presented to stakeholders in an August 2025 workshop. As such, this matter draws upon documents and filings from related matters M10905 and M12174.¹

Recognizing that the responsibility for the Interconnection Process (“IP”) ultimately would change at some point, in its letter dated December 23, 2025 the Board requested confirmation whether either NS Power or Independent Energy System Operator of Nova Scotia (“IESO-NS”) will respond to the Report’s recommendations:

The panel intends to seek comments about Concentric’s report and recommendations from participants in Matters M10905 and M12174, and other interested parties including any other parties who may have participated in the stakeholder workshops leading to Concentric’s report. However, the Board notes that NS Power’s letter advised “... that consideration of FERC Order 2023 pertains primarily to transmission system interconnection processes, the responsibility for which is expected to transfer to the Independent Energy System Operator of Nova Scotia (IESO-NS) in the near future.”

As an initial step in the Board’s intended process, it will require NS Power or the NSIESO to indicate whether the recommendations are formally accepted and outline a plan and timeline for implementing those that are².

¹ M10905 Nova Scotia Power Inc. - Board Review of NS Power’s Interconnection Processes, M12174 Nova Scotia Power Inc. - Interconnection Processes Proceeding – Annual Report, November 28, 2025.

² M12524, Board letter dated December 23, 2025, Page 1.

Subsequently, IESO-NS acknowledged that it has the responsibility to address the Report recommendations³ and the Board responded with a request to provide a timeline for implementing the recommendations.⁴

In correspondence dated February 12, 2026, IESO-NS accepted the Report recommendations, with some exceptions, and proposed a timeline of 2026 to complete the implementation of the recommendations that it accepted or that the Board ordered it to adopt. IESO-NS did not provide a specific date for the implementation of any of the accepted recommendations. After noting that the existing interconnection process documents will require amendments, IESO-NS stated:

Accordingly, IESO Nova Scotia will carry out consideration of potential revisions, implement revisions, consult stakeholders on proposed revisions throughout 2026, with a target submission date to the Board by the end of December 2026, with the understanding that if submission to the NSEB can be made sooner, IESO Nova Scotia will do so.⁵

IESO-NS also identified those recommendations it expected to require “work” and further consideration to be implemented, which includes Cluster Studies, Transmission Heat Map, and Information Tracking Systems.⁶

However, IESO-NS’s letter did not address how much it would cost to address and implement the recommendations from the Report, or whether the cost was included in IESO’s proposed 2026/2027 Revenue Requirement Application⁷. IESO-NS did note to the Board that it is still in the early stages of formation and until the Board approves the revised standard generation interconnection procedure (SGIP), both IESO-NS and NS Power will work “to codify a more immediate interim solution for administration” ... and ... “expects that this agreement will be finalized and entered into in Q1 2026.”⁸ As far as the Small Business Advocate (SBA) is aware, that agreement, which was expected to be entered into by this point, has not been filed by IESO-NS.

Review by the SBA

IESO-NS summarized the Concentric Report’s nine recommendations and then described four that it would implement only with exceptions. Below are the SBA’s comments with respect to IESO-NS positions:

R1: Cluster Studies: IESO-NS reserves the flexibility to conduct cluster studies for Interconnection Requests based on its professional judgement and may not meet the two cluster studies per year minimum. It is not clear whether this means that IESO may conduct as few as zero cluster studies in a year.

³ M12524 IESO-NS letter dated January 19, 2026.

⁴ M12524 Board Letter dated January 26, 2026.

⁵ M12524 IESO-NS letter dated February 12, 2026, page 5, last paragraph.

⁶ M12524 IESO-NS letter dated February 12, 2026, page 5, lines 1-2 and table.

⁷ M12663 IESO-NS 2026/2027 Revenue Requirement Application

⁸ M12524 IESO letter dated February 12, 2026, page 6, para 1.

- R4: Transmission Capacity Heat Map: IESO-NS proposes to create “fit-for-purpose options” and providing this information “in the most cost effective manner”, but without defining what these options and manners are and without acknowledging that capacity heat maps have already been provided, as stated in NS Power’s Hosting Capacity Map: Stakeholder Workshop, M11626, April 17, 2025, or explaining why this ability is no longer available.
- R5: Study Deposit Structure: IESO-NS states, without providing any detail, that the cost of these studies have increased due to the complexity of EMT analysis required to integrate inverter-based resources and concludes that it may need to make appropriate revisions to the SGIP. Since the SGIP has already been approved in M10905 and reviewed by potential project developers, it is respectfully submitted that this conclusion would have benefited from prior stakeholder input.
- R6: Penalty Structure: IESO-NS recognized that, as a transmission provider, it would be subject under existing rules to a penalty if it does not meet transmission study deadlines. IESO-NS takes exception to this liability because it is a not-for-profit organization and says that this recommendation should receive further consideration (but not others mentioned above). The SBA respectfully submits that this is an important issue and needs fulsome consideration in an expedient manner.

The SBA reviewed the Report and the correspondence cited above and respectfully submits that IESO-NS’s failure to obtain stakeholder input with respect to the above-noted four recommendations, and its failure to file an annual report, is unsatisfactory. The four exceptions summarized above can have significant implications for integrating inverter-based resource projects, including unknown costs and availability.

Submissions

The SBA respectfully submits that the Board should consider requiring IESO-NS to:

1. Provide confirmation whether the additional costs relating to the implementation of the Recommendations are already included in its 2026/2027 Revenue Requirements and, if not, provide an estimate of the cost increase.
2. Explain why it is unable to provide a transition capacity heat map given that the ability to do so already exists and present a comparison of the previously available transmission capacity heat map to the one that it plans to improve upon.
3. Propose specific dates in the near future for stakeholder workshops to review the Report’s nine recommendations, its proposed exceptions to them and respond to feedback.

The SBA is encouraged to see that IESO plans to improve its ability to serve both current and new projects and hopes that it can make timely progress to support the Province’s Path to 2030.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 22nd day of April, 2026.

Yours truly,

A handwritten signature in blue ink, appearing to read "Melissa MacAdam", with a stylized flourish at the end.

Melissa P. MacAdam
Small Business Advocate