REDACTED (CONFIDENTIAL INFORMATION REMOVED)

Nova Scotia POWER
An Emera Company

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February 20, 2026

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

Re: M12686 Community Solar Program 2025 Report – Confidentiality Treatment

Dear Ms. Henwood:

Nova Scotia Power (NS Power, Company) submitted the Community Solar Program (CSP, Program) 2025 Report on January 30, 2026, which included confidential Attachment 1. By letter dated February 6, 2026, the Nova Scotia Energy Board (NSEB, Board) established a timeline for review of the 2025 Report and directed NS Power "to provide the required evidence and information relating to its confidentiality claims by Friday, February 20, 2026."[1]

Solar Nova Scotia (SNS) filed comments regarding 2025 Report confidentiality on February 18, 2026. The Company notes the Board-established timeline provides for intervenor comments on confidentiality by February 26, and for NS Power to provide reply comments, as required or necessary, by March 2. The Company provides this correspondence in accordance with the directive in the Board's February 6 letter. If necessary, NS Power will provide its response to SNS, and other intervenor comments that may be received, by March 2.

Under the Program, applicants submit project information to the Minister of Energy (Minister), including a proposed energy rate informed by project-specific economics (e.g. capital costs, financing structure, operating costs, anticipated returns). The Minister determines the awarded energy rate under the regulatory framework, taking into account the information submitted in the application.[2] As the Board's February 6

[1] M12686 – Board Letter, 327718, page 2. February 6, 2026.
[2] DOE's Community Solar Program Guide, at page 8, provides: "Your proposed power purchase rate

letter described, the awarded CSP Power Purchase Agreement (PPA) energy rates "do not appear to be derived directly from a formal competitive process, but on the exercise of discretion by the Minister of Energy to allow more than the minimum rate set out in the regulations, on a case-by-case basis, when considering program applications from proposed developers."[3] Pursuant to s.7 of the *Community Solar Program Regulations*, the Minister may assign an energy rate above the $70 per MWh minimum.

Recognizing the Program is administered by the Department of Energy (DOE, Department), NS Power sought the Department's review and confirmation regarding the preferred treatment of CSP energy rate information. DOE responded by letter, provided as Attachment 2, indicating support of NS Power's request for confidential treatment of energy rate information. In its letter, the Department "submits that the Community Solar Program's intake process is inherently competitive" and "[m]aintaining confidentiality of power purchase rates remains essential to protecting the integrity of this competitive intake process."

With potential exceptions assessed on a case-by-case basis, the Company's established practice is to treat PPA energy rates as confidential due to the commercially sensitive nature of these arrangements. Although the process for CSP PPAs differs from solicitations administered by NS Power, the underlying commercial construct – long-term purchases from third-party project owners – is comparable. The confidential treatment of certain information in the 2025 Report reflects this practice, given the current Program context, as described below.

As of December 31, 2025, four projects representing approximately 9 percent of Program capacity have been approved,[4] Program intake remains open, and DOE materials indicate applications may continue to be accepted until the 100 MW limit is reached.[5] In this context, the disclosure of awarded energy rates provides prospective proponents with direct insight into the final energy rates prescribed by the Minister for comparable projects. This information may be treated as a benchmark, hindering the submission of cost-reflective, project-specific proposed rates which, given NS Power's obligation to purchase all CSP Solar Garden output,[6] may place upward pressure on customer rates. From the Company's perspective, confidential treatment of energy rate information warrants consideration because, at this stage,

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must consider all of your sources of funding, financing, and the impact (if any) your proposed rate would have on rate payers. If your project is approved, your awarded power purchase rate will be based on the information you submit in your application. Although you will propose a power purchase rate in your application, the Minister of Energy will decide the final rate in the PPA."

[3] M12686 – Board Letter, pages 1-2.

[4] As reported on the '2025 CSP Summary' tab of Attachment 1 to the 2025 Report.

[5] DOE's Community Solar Program Guide, at page 37, provides: "We will continue to accept applications until we reach program capacity of 100 MWac. However, the Minister reserves the right to close or pause the program to applications at any time."

[6] *Community Solar Program Regulations*, section 28.

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Program intake remains open and applicants are required to propose project-specific energy rates under the Program framework.

This is particularly relevant for the 2025 reporting year.[7] The public disclosure of the ‘total cost for PPA purchased energy’ figures alongside the ‘total amount of energy purchased’ effectively reveals the energy rate for the single project operational in 2025.

In light of the foregoing, and with consideration to the positions provided in DOE’s February 18 letter (Attachment 2), the Company respectfully requests the Board grant confidential treatment to the “Total Cost for the Purchased Energy under the Program's Power Purchase Agreements” figures, as reflected in Partially Confidential Attachment 1.

Yours truly,

Karynne Munroe
Manager, Regulatory Affairs

[7] In 2025 only one CSP Solar Garden was in operation.

Community Solar Program Annual Report

Reporting Requirements of the *Community Solar Program Regulations*

For the Reporting Year: January 1 to December 31, 2025

No.	Project	Commercial Operation Date	Address or Location	Approved Nameplate Capacity (kW)	Remaining (unsubscribed) Nameplate Capacity at December 31 (kW)
1	Pine Tree Park Estates (New Dawn Enterprises Limited)	01-Dec-24	55 Military Road, Sydney NS	555.0	0.0
2	Brooklyn Solar	TBD	Brooklyn Rd, Annapolis NS	4,800.0	n/a
3	Sydney Solar	TBD	0 Grand Lake Road, Sydney, NS	1,700.0	n/a
4	Petpeswick Solar	TBD	West Petpeswick Road, Halifax NS	2,200.0	n/a

Notes:

1. Projects 2-4 have not achieved commercial operation; therefore, no subscription-related data is available in the Reporting Year.

2. The PPAs for Projects 2-4 are reported in the table above but are excluded from the data on the 'M11911 Directives' tab, as those Projects did not achieve commercial operation in the Reporting Year.

Community Solar Program Annual Report

Reporting Requirements of the *Community Solar Program Regulations*

For the Reporting Year: January 1 to December 31, 2025

No.	Project	Commercial Operation Date	January				February				March			
			Residential		Non-Residential		Residential		Non-Residential		Residential		Non-Residential	
			Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)
1	Pine Tree Park Estates (New Dawn Enterprises Limited)	01-Dec-24	-	-	-	-	-	-	-	-	43	9.9	1	131.3
2	Brooklyn Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-
3	Sydney Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-
4	Petpeswick Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-

Community Solar Program Annual Report

Reporting Requirements of the *Community Solar Program Regulations*

For the Reporting Year: January 1 to December 31, 2025

No.	Project	Commercial Operation Date	April				May				June			
			Residential		Non-Residential		Residential		Non-Residential		Residential		Non-Residential	
			Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)
1	Pine Tree Park Estates (New Dawn Enterprises Limited)	01-Dec-24	43	9.9	1	131.3	43	9.9	1	131.3	43	9.9	1	131.3
2	Brooklyn Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-
3	Sydney Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-
4	Petpeswick Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-

Community Solar Program Annual Report

Reporting Requirements of the *Community Solar Program Regulations*

For the Reporting Year: January 1 to December 31, 2025

No.	Project	Commercial Operation Date	July				August				September			
			Residential		Non-Residential		Residential		Non-Residential		Residential		Non-Residential	
			Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)
1	Pine Tree Park Estates (New Dawn Enterprises Limited)	01-Dec-24	43	9.9	1	131.3	43	9.9	1	131.3	43	9.9	1	131.3
2	Brooklyn Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-
3	Sydney Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-
4	Petpeswick Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-

Community Solar Program Annual Report

Reporting Requirements of the *Community Solar Program Regulations*

For the Reporting Year: January 1 to December 31, 2025

No.	Project	Commercial Operation Date	October				November				December			
			Residential		Non-Residential		Residential		Non-Residential		Residential		Non-Residential	
			Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)	Avg. Number of Subscribers	Avg. Subscription Size (kW)
1	Pine Tree Park Estates (New Dawn Enterprises Limited)	01-Dec-24	43	9.9	1	131.3	43	9.9	1	131.3	43	9.9	1	131.3
2	Brooklyn Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-
3	Sydney Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-
4	Petpeswick Solar	TBD	-	-	-	-	-	-	-	-	-	-	-	-

Community Solar Program Annual Report

Additional Reporting in accordance with the Board's M11911 Decision (Community Solar Energy Credit Rider)

For the Reporting Year: January 1 to December 31, 2025

	Jan 1 to Dec 23, 2025:[4]	Since Nov 20, 2024:
(1) Total Amount of Energy Purchased under the Community Solar Program:[3]	768,334.84 kWh	798,016.92 kWh
(2) Total Cost for the Purchased Energy under the Program's Power Purchase Agreements:[3]	[redacted]	[redacted]

(3) Total Amount of Credits Paid to Community Solar Energy Credit Rider (CSECR) Subscribers, by Rate Class:

Rate Class	CSECR Credits Paid[1] energy amount (kWh)	CSECR Credits Paid[1] dollars ($)
Domestic	521,367	$ 10,427
Small General	0	$ -
General	0	$ -
Large General	161,486	$ 3,230
Small Industrial	0	$ -
Medium Industrial	0	$ -
Large Industrial	0	$ -
Municipal	0	$ -
Total[2]	682,853	$ 13,657

Notes:

1. CSECR credits remitted from March 1, 2025 to December 23, 2025. Please also refer to Note 2.

2. The difference in total amounts of energy between that reported in item 1 and reported in item 3 is due to Project 1 being in operation from November 20, 2024 to February 28, 2025 and selling its output to NS Power, prior to the Board's approval of the CSP PPA and the CSECR (the mechanism with which credits are issued to subscribers).

3. Refers to the totals since the first Project began operation (in November 2024); this includes energy purchased under the interim arrangement and the CSP PPA at the same Energy Rate.

4. The total amount of energy purchased and total cost for energy purchased in the Reporting Year is measured to, and including, December 23, 2025 as the daily meter data from this Project is not currently able to be retrieved remotely as a result of the cyber incident. Energy generated December 24 to December 31, 2025 will be included in the 2026 Report.

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Energy

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February 18, 2026

Crystal Henwood
Clerk of the Board
Nova Scotia Energy Board
1601 Water Street, 3rd Floor
Halifax, NS B3J 3P6

Re: M12686 Community Solar Program – 2025 Report

Dear Ms. Henwood,

In its letter dated February 6, 2026, the Board requested Nova Scotia Power Inc. (NSPI) to provide "more evidence to support the claim that a competitive threat relating to the setting of future energy rates exists in the circumstances" regarding the NSPI's request for confidential treatment of Attachment 1 to the Community Solar Program's 2025 Report.

While the Board noted that power purchase rates "do not appear to be derived directly from a formal competitive process" and are ultimately determined through Ministerial discretion on a case-by-case basis, the Department submits that the Community Solar Program's intake process is inherently competitive. Each application undergoes a structured evaluation using defined criteria, scoring metrics, and financial benchmark analyses that assess project capital and operating costs, as well as the financial viability and ratepayer impacts of the proposed power purchase rate. This rigorous assessment framework drives competition among proponents seeking to secure limited program capacity (up to 100 MW) and ensures cost-effective and socially beneficial program outcomes.

Maintaining confidentiality of power purchase rates remains essential to protecting the integrity of this competitive intake process. Although the Minister assigns the final power purchase rate, the decision relies directly on each proponent's application and on the evaluation committee's analysis and recommendations against the established criteria. Ministerial discretion therefore functions within the competitive framework on which the Program relies.

The Department recognizes the Board's commitment to open and transparent proceedings. However, in this instance, the public interest in maintaining a competitive intake process outweighs the benefits of disclosing financial details, particularly while the intake remains active. To date, the Program has successfully enrolled projects that help mitigate ratepayer impacts and advance its core objectives, supported by this rigorous evaluation framework. These protections directly support the goals of the Community Solar Program.

For these reasons, the Department supports Nova Scotia Power's request for confidentiality over cost-related information in Attachment 1 of the 2025 Report.

Yours sincerely,

Keith Collins
Executive Director, Clean Energy
Department of Energy
Province of Nova Scotia