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February 26, 2026

Nancy G. Rubin, K.C.
Direct Dial: 902.420-3337
nrubin@stewartmckelvey.com

Delivered by E-mail

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

Dear Ms. Henwood:

Re: M12686 - NSPI - Community Solar Program - 2025 Report

These comments on the issue of confidentiality are submitted on behalf of the Industrial Group.

On January 20, 2026, NSPI filed its 2025 Report on the Community Solar Program. Attachment 1, an excel spreadsheet, was filed confidentially in its entirety. When called on to justify confidentiality claims, NSPI responded by letter of February 20, 2026, appending Attachment 1, now in pdf, with a limited redaction on page 6 for the total cost for the purchased energy under the Program's Power Purchase Agreements (PPAs). NSPI stated that its established practice is to treat PPA energy rates as confidential due to the commercially sensitive nature of these arrangements.

Had NSPI filed a pdf with limited redactions at the outset, it may not have been called upon to further justify the limited redaction proposed. In this case, there is currently only one project in commercial operation and accordingly, disclosing the total cost for the purchased energy could lead to disclosure of the energy rate. Accordingly, and specifically with respect to the 2025 Report, the Industrial Group does not object to the limited redaction in Attachment 1, page 6.

In future years, however, the Industrial Group suggests that the total cost for all PPAs should be publicly disclosed as there would be no ability to determine individual PPA rates from a *total* dollar value. In addition, and by analogy to public announcements for procurements under the Green Choice Program or Rate Base Procurement, the *average* price for all projects should be disclosed.

The Industrial Group also observes that NSPI's practice of filing an entire spreadsheet in confidence rather than providing a public version edited for the limited row, column or cells which need to be redacted has led to a lack of transparency. The Industrial Group would encourage NSPI to file both versions at the outset, to comply with the statutory requirement to limit redactions to that which is necessary.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Nancy G. Rubin', with a long horizontal flourish extending to the right.

Nancy G. Rubin

A handwritten signature in blue ink, appearing to read 'Brianne Rudderham', with a long horizontal flourish extending to the right.

Brianne Rudderham

BER/NGR/lmc

cc Participants