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April 13, 2026

VIA WEB PORTAL

Crystal Henwood, Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
P.O. Box 1692, Unit "M"
Halifax, NS B3J 3S3

Dear Ms. Henwood:

Re: M12686 NSPI to NSEB 2025 Community Solar Program

Please accept the following submission from the Consumer Advocate regarding the above-noted matter.

Background

On January 30, 2026, Nova Scotia Power Inc. ("NS Power") filed its Community Solar Program Report, pursuant to the Nova Scotia Energy Board's ("NSEB" or the "Board") decision in Proceeding M11911. In that decision, the Board required NS Power file a copy of the Utility's annual report to the Minister and to include the following additional information:

- The total amount of energy purchased under the Community Solar Program.
- The total cost for the purchased energy under the power purchase agreements for the Program.
- The total amount of credits paid to customers under the Program in both the amount of energy (kWh and dollars), by rate class.[1]

[1] Report, Exhibit N-1 (the "Report"), p. 2

Based on the information filed on the record, NS Power's Community Solar Program (the "CSP" or the "Program") remains lightly subscribed, with only approximately 9% of the total program capacity approved, and only 0.5% in commercial operation.[2] NSP indicates 3 additional commercial PPAs have received approvals with commercial operating expected to begin in 2026 and final in-service dates in 2027.[3]

The Report indicates that, consistent with a Board directive in proceeding M12178, NS Power notified the five low-income Solar Garden Rate Rider (SGRR) subscribers of the option to transition to CSP and provided an explanation of the timing and availability of this option. NS Power indicates there is no available capacity at present for new subscribers to CSP solar gardens but it will keep SGRR subscribers informed including providing details on how to apply.[4] In response to IR SBA-3 (a) NSPI indicated that on March 18, 2026 it provided an update on an interest list for intake to the three approved projects under development.

At this time, NS Power is not proposing any changes to the CSP.[5]

CA Comments

The Consumer Advocate has reviewed the Report and NS Power's responses to Information Requests. On review, the Consumer Advocate states the following:

- Self-Financing: In Board Matter M11911, the Consumer Advocate had requested a project cost and benefit analysis for a sample CSP project, which also included a request to document and justify all assumptions (including project size, capacity factor, and other variables). In its response, NS Power confirmed its assumption that program administration would be self-funded, and further stated that "when the energy cost of the PPA plus the subscribed credits is less than the cost of fuel to replace that generation, and the attributes of that generation, then there will be fuel savings realized for the benefit of FAM customers, and vice versa."

  In response to CA IR-2 in this matter, NS Power confirmed that its "assumption that program administration would be self-funding remains accurate; however, should the administrative fee continue to deviate from the base assumptions in future Power Purchase Agreements, then NS Power anticipates that program administration may no longer be self-funding." The Consumer Advocate notes that NS Power also confirmed that the four projects that have been awarded Power Purchase Agreements are "not

[2] Page 4 of 10 of Exhibit N-2 in Proceeding M12686 which shows a total of 9,255 kW approved out of a potential 100,000 kW total program capacity. Only one of the approved projects appeared to be in commercial operation as of December 31, 2025.
[3] NSEB IR 5 (a).
[4] Report, p. 3
[5] CA IR 1.

consistent with the minimum power purchase rate or the maximum administrative fee," as prescribed in the *Community Solar Program Regulations.*

It is unclear from NS Power's response why the maximum administrative fee has not been included in the four awarded Power Purchase Agreements. The Consumer Advocate submits that NS Power should provide an explanation for this deviation. Going forward, the Consumer Advocate recommends that NS Power include information on whether the program costs are self-financing in future reporting and if not, to provide an explanation and discuss options to return to self-financing.

In addition, the Consumer Advocate would request that in future reports NS Power include sufficient information to understand the impact the CSP is having on customers, including any potential fuel savings offsets.

- Billing System Upgrades: In Matter M11911, the Industrial Group inquired into NS Power's planned updates to its billing system to accommodate the CSP. NS Power stated that it planned certain "enhancements to accommodate the automation of the Community Solar Program (CSP) on a larger scale in 2025."[6] The planned enhancements were to focus on the automation of billing credits to subscriber accounts, and the scope of automation that was to apply to credits generated from data from one single meter (the generator) to many, unrelated accounts (the subscribers) at the correct time and place." In this matter, the Consumer Advocate requested an update on whether NS Power had completed the billing system upgrades contemplated in Matter M11911 given the low subscription volumes. NS Power indicates that the billing system upgrades were not completed in 2025 as planned, and will be timed to coincide with an increase in subscriber volume.[7] The Consumer Advocate submits that it is reasonable to defer the billing system enhancements until such time as program volumes require them. At this time, the Consumer Advocate would recommend that NS Power be directed to isolate the costs of any billing system enhancements that solely benefit community solar generation subscribers and ensure such costs are recovered through program administration fees.

- Low-Income Customers: In its Report, NS Power indicated it had provided an update to low-income SGRR customers on how to access an interest list for the currently approved projects under development. However, NS Power did not describe how this update was provided (e.g. phone, mail, email). Given the barriers that low-income customers often face in accessing programs, the Consumer Advocate requests that the Board direct NS Power to report on the methods used to contact SGRR customers and the number of customers that have transitioned to the CSP in future reporting.

[6] M11911, IG IR-3
[7] CA IR-3

The Consumer Advocate thanks the Board for the opportunity to participate in this matter and provide these submissions.

Yours truly,

PINK LARKIN

Michael Murphy on behalf of
Consumer Advocate
MTM/aw