

Approval of NERC Reliability Standards – Fourth Quarter 2025
(Nova Scotia Energy Board M12717)

Nova Scotia Independent Energy System Operator (IESO Nova Scotia)
Responses to Nova Scotia Energy Board Information Requests

NON-CONFIDENTIAL

Request IR - 1

The *Wholesale and Renewable to Retail Market Report 2025* submitted by NS Power (M12725), currently lists only NS Power and Alternative Resource Energy Authority (AREA) as generation market participant, as shown on page 11, Figure 2. However, although the report identifies only these two entities, numerous independent power producers are connected to the transmission system. Furthermore, the recent 2025 10-Year System Outlook report (M12386) lists several entities providing, or that will provide, various forms of generation, such as Port Hawkesbury Paper (Wind), NS Community Solar, and wind rate base procurements.

The Independent Energy System Operator of Nova Scotia (IESO-NS), in its letter dated March 25, 2026, commenting on NERC’s fourth-quarter 2025 application, stated that:

Some of NS Power's NERC Registered roles will be transitioning to the IESO-NS. Accordingly, implementation of and compliance with applicable NERC reliability standards related to those roles and adopted in Nova Scotia will become the responsibility of IESO-NS as those registered roles are transferred.

The Board is aware that s. 69 of the *More Access to Energy Act*, which is not in force yet, will require an “...owner, operator or user of the bulk electricity system who carries out prescribed functions to which an approved reliability standard applies...” to register with the Board for reliability purposes. The Board is further aware that s.94(c) of the *More Access to Energy Act*, also not yet proclaimed, will require any entities who “...provide or convey, or cause to be provided or conveyed, electricity or ancillary services into, through or out of the IESO-controlled grid ...” to be licensed by the Board. To supplement the record because of this background, please provide the following clarifications:

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- a) Could the IESO-NS provide a list of Nova Scotia entities that are currently registered under the NERC Compliance Registry Criteria referenced in the NERC fourth-quarter 2025 application?
- b) If the Boards approve the application, other than those listed in the answer to a), please provide a list of entities currently connected to the transmission system, if any, that will meet the definitions of *Generator Owner* and *Generator Operator* as described in the NERC fourth-quarter 2025 application.
- c) If the Board approves the application, could IESO-NS provide its view on the tracking and management of NERC compliance registration for the entities mentioned in the answer to b)?
- d) Could the IESO-NS provide comments on how the new generation expected to come online in the next three years would be affected by approval of this application, and provide any applicable list of potentially impacted entities?
- e) Assuming ss. 69 and 94 of the *More Access to Energy Act* are proclaimed, can the IESO-NS provide a list of the entities it currently anticipates will require registration with, or licensing by, the Board within the next three years?

Response IR - 1

- (a) Nova Scotia entities currently registered under the NERC Compliance Registry Criteria can be found at NERC's website at the following link: <https://www.nerc.com/programs/registration/compliance-registry-files>. At present, only IESO Nova Scotia and Nova Scotia Power are registered Nova Scotia entities under NERC's compliance registry.

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- (b) The list of facilities which would be anticipated to meet the revised definition of Category 2 GO or GOP for their corresponding entities are as follows:

Plant Name	Resource Type	Gross Nameplate Rating (MVA)	Voltage at Point of Interconnection (kV)
102V-Ellershouse	Wind	28.95	69
IR 673 - Benjamin Mill Wind	Wind	33.6	138
98V-Gulliver's Cove	Wind	33.34	69
IR662: Spider Lake BESS	Batteries (BESS)	50	138
IR664: Bridgewater BESS	Batteries (BESS)	50	230
89N-Nutby Mountain	Wind	51	69
106W-Pubnico Point	Wind	34	69
91N-Dalhousie Mountain	Wind	55.01	230
93N-Glen Dhu	Wind	66.7	138
92N-Amherst	Wind	34.4	138

- (c) It is the IESO's understanding that the responsibility of registering under NERC's compliance registry belongs to individual GOs and GOPs. Pursuant to the list of facilities provided in part b), once they have registered with NERC, these entities would be audited by the NPCC, and a findings report would be anticipated to be provided to the NSEB by the audit team.

- (d) Potentially impacted entities would be the owners of applicable facilities listed in the Active Transmission Interconnection Requests queue (currently posted on the NS Power

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OASIS site) with an active queue position and which meet the definition of Category 2 GO or GOP. Please refer to part e). Entities will be required to register with NERC. All new future generation facilities/entities meeting the new NERC definition will be required to register.

With respect to how eligible new generation might be affected, although the Nova Scotia Transmission System Interconnection Requirements (TSIR) place the same requirements on transmission connected generation as NERC reliability standards as a minimum, NERC registration may impose additional requirements on the facility.

(e) The IESO notes that whereas those sections of the MAEA have yet to be proclaimed, how those sections might specifically apply to entities subject NERC reliability standards and what specific mechanisms relating to them might be has not yet been determined. Further to that point, MAEA section 69(2) provides that “The Governor in Council shall make regulations regarding registration for the bulk electricity system, notification processes for registration and appeal processes”; to the IESO Nova Scotia’s knowledge, those regulations have yet to be developed.

On the assumption that MAEA section 69 pertains to NERC reliability standards, then the list of facilities whose entities may be required to register with NERC as GO/GOP or

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Category 2 GO/GOP is in the table that follows, taken from the Active Transmission
Interconnection Requests queue as noted in part (d).

Plant Name	Resource Type	Gross Nameplate Rating (MVA)	Voltage at Point of Interconnection (kV)	GO/GOP Category
IR574 Ellershous III	Wind	66.72	138	2
IR597 Mersey I	Wind	36	130	1 (when combined facility with IR675)
IR670 Kmtnuk	Wind	94.4	230	1
IR671 Bear Lake	Wind	88.96	138	1
IR668 Weavers Mtn	Wind	94.4	230	1
IR618 Goose Harbour Lake I	Wind	130.2	230	1
IR675 Mersey II	Wind	112.5	138	1
IR677 Wedgeport	Wind	80	138	1
IR697 White Rock BESS	Battery	50	138	2
IR686 Windy Ridge	Wind	336	345	1
IR739 Greenfield	Wind	90	138	1
IR742 Goose Harbour Lake II	Wind	35	230	1 (combined facility with IR618)
IR728 Upper Afton I	Wind	120	230	1
IR824 Upper Afton II	Wind	48	230	1 (combined facility with IR728)
IR732 Eigg Mtn	Wind	149.6	230	1
IR826 Sugar Maple	Wind	112	230	1