

Nova Scotia Energy Board

**North American Electric Reliability
Corporation**

M12717

**2025 Q4 Application for Approval of
Reliability Standards**

IESO Nova Scotia Recommendations

March 25, 2026

NON-CONFIDENTIAL

NERC Q4 Reliability Standards - IESO Nova Scotia Comments

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1.0 INTRODUCTION

In its application dated February 25, 2025, the North American Electric Reliability Corporation (NERC) applied to the Nova Scotia Energy Board (NSEB, Board) revised definitions for the terms Generator Owner and Generator Operator for inclusion in the Glossary of Terms used in NERC Reliability Standards (“NERC Glossary”).

NERC’s application states as follows:

The North American Electric Reliability Corporation (“NERC”) hereby submits to the Nova Scotia Energy Board (“NSEB”) an application for approval of revised definitions for the terms Generator Owner and Generator Operator for inclusion in the Glossary of Terms used in NERC Reliability Standards (“NERC Glossary”) that were approved by the United States Federal Energy Regulatory Commission (“FERC”) during the fourth quarter of 2025 (from October 1, 2025 through December 31, 2025). NERC requests that the revised definitions for the terms Generator Owner and Generator Operator be made mandatory and enforceable for users, owners, and operators of the Bulk-Power System (“BPS”) within the Province of Nova Scotia.

The revised definitions are for the following terms:

- Generator Owner
- Generator Operator

By letter dated February 25, 2026, the NSEB requested comments from Nova Scotia Power (NS Power) and the Nova Scotia Independent Energy System Operator (IESO Nova Scotia) on NERC’s Application by March 25, 2026.

As noted in NS Power’s comments on NERC’s 2025 Q2 Application for Approval of Reliability Standards (M12436) on October 20, 2025, “Some of NS Power's NERC Registered roles will be transitioning to the Independent Energy System Operator of Nova Scotia (IESO-NS). Accordingly,

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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.”¹

IESO Nova Scotia is a not-for-profit corporation established under the More Access to Energy Act (the Act). Parts of the Act were proclaimed on October 24, 2024. IESO Nova Scotia’s mandate is central to the Act’s stated purpose; to implement these purposes, the Act mandates IESO Nova Scotia to certain enumerated objects, and to carry out certain activities. IESO Nova Scotia has a statutory mandate that includes, among other aspects, maintaining the adequacy and reliability of the bulk power system and facilitating the operation of a competitive electricity market in Nova Scotia. IESO Nova Scotia has pursued a phased transition of the system operator functions from NS Power to IESO Nova Scotia, commencing with energy procurement, system planning and generation interconnection functions. Accordingly, IESO Nova Scotia will provide its comments on the NERC reliability standards quarterly applications going forward.

IESO Nova Scotia provides comments and recommendations on this matter in the sections below.

1.1 Effective Dates

On June 30, 2010, NERC submitted its first set of Reliability Standards to the Nova Scotia Utility and Review Board (NSUARB) for approval. The NSUARB issued a Decision and Order approving these standards on July 20, 2011. In its Decision, the NSUARB also approved a quarterly review process.² On April 1, 2025, on proclamation of the Energy and Regulatory Boards Act, S.N.S. 2024, c. 2, Sch. A, the Utility and Review Board was succeeded by the Nova Scotia Energy Board (NSEB, Board) for all applications related to electric utilities.

IESO Nova Scotia notes that in each case where NERC recommends approval of a Reliability Standard, it has recommended an effective date in Nova Scotia. NERC Reliability Standards and NPCC Regional Reliability Criteria only become mandatory in Nova Scotia upon approval by the

¹ NS Power Recommendations Re: M12436 – NERC 2025 Q2 Application for Approval of Reliability Standards, October 20, 2025, p.5.

² M03324, NERC-R-10, NSUARB Order, July 20, 2011.

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NSEB. However, NERC's Applications usually contain a table showing the NERC effective dates in the United States for each of the applicable Reliability Standards (such as the table from NERC's Q3 2025 application reproduced above). When commenting on NERC's quarterly applications, IESO Nova Scotia requests that the NSEB confirm in its Order the effective date in Nova Scotia in each case.

In this case, NERC applied for approval of revised glossary definitions for Generator Owner (GO) and Generator Operator (GOP) with an effective date of January 1, 2026. The IESO notes that the effective date is retroactive but does not anticipate any related negative impacts. Alternatively, the IESO does not object to a future effective date at the discretion of the NSEB.

2.0 GLOSSARY DEFINITIONS

NERC requested approval of the following revised glossary definitions in their Q4 2025 Application:

- Generator Owner (GO): The entity that: 1) owns and maintains generating Facility(ies) (Category 1 GO); or 2) owns and maintains non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV (Category 2 GO).
- Generator Operator (GOP): The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resources(s) that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV (Category 2 GOP).

The IESO recommends NSEB approval these revised glossary definitions.

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3.0 CONCLUSION

In summary, IESO Nova Scotia has reviewed the Q4 NERC Reliability Standards application and recommends the NSEB approve the revised definitions of Generator Owner and Generator Operator. The IESO does not foresee negative impacts related to a retroactive effective date of January 1, 2026. Alternatively, the IESO does not object to a future effective date at the discretion of the NSEB.