

2025 Wholesale and Renewable to Retail Market Report (NSEB M12725)
NSPI Responses to NSEB Information Requests

BOARD CONFIDENTIAL (Attachment Only)

1 **Request IR-1:**

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3 **On page 19, the report states that**

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5 **“NPCC initiated a Critical Infrastructure Protection (CIP) and Operations &**
6 **Planning (O&P) Audit on December 6, 2024, which continued into 2025.”**
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8 **Due to the cyber attack, NPCC extended the duration of the Audit with interviews completed**
9 **in September 2025 instead of May 2025, and the final report being provided in January 2026.**
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11 **(a) Please provide a copy of the January 2026 CIP and O&P Audit Report for the period**
12 **June 18, 2022, to December 6, 2024.**
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14 **Response IR-1:**
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16 **(a) Please refer to Confidential Attachment 1.**

**2025 Wholesale and RTR Report Board Confidential IR-1
Attachment 1 has been removed due to confidentiality.**

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Request IR-2:

On page 11, Figure 2 shows NS Power and AREA as generation market participation.

(a) Could the utility clarify why only two entities are listed as generation market participants, given that numerous independent power producers are connected to the transmission system.

(b) Who represents these entities under the market rules, and why?

Response IR-2:

(a-b) There are currently only two Generation Market Participants in the Nova Scotia Wholesale and Renewable to Retail Market. The numerous Independent Power Producers (IPPs) connected to the Nova Scotia Transmission System are not market participants. These IPPs are facilities that sell their output to NS Power, registered as a Generation Market Participant, under long-term Power Purchase Agreements (PPAs). Effectively, for the life of the applicable PPAs, they are equivalent to NS Power owned generation.

Please also refer to NSEB IR-3.

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Request IR-3:

On page 11, Figure 3 lists no applicants for accreditation to become a market participant as of December 31, 2025. In the recent 2025 10-Year System Outlook report, the report lists several entities providing various forms of generation, such as Port Hawkesbury Paper (Wind) and NS Community Solar and wind rate base procurement.

(a) Could the utility clarify why the new generation expected to come online soon has not been included as generation market participants.

(b) When would a new independent power producer be classified as a market participant and when would it not?

(c) What criteria will be used to classify an entity as a load market participant?

(d) What criteria will be used to classify an entity as a generation market participant?

Response IR-3:

(a) New generation sites expected to come online soon are not included as generation market participants in Figure 3 because each is expected to be represented by an existing (or soon to be registered) Generation Market Participant. For the cited example of Port Hawkesbury Paper Wind, the Goose Harbour Lake Wind Farm will operate under Power Purchase Agreement with NS Power, with NS Power registered as the Generation Market Participant.

(b) New Independent Power Producers (IPP) under Power Purchase Agreement with a registered Generation Market Participant would not be required to independently register as a Generation Market Participant. If an IPP were to build a generation facility for export, that IPP would need to register as a Generation Market Participant.

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(c-d) The criteria used to classify an eligible customer as a load or a generation market participant is found in the Nova Scotia Wholesale and Renewable to Retail Electricity Market Rules, Chapter 2: Market Administration. Section 2.1.2, reproduced in part as follows, provides for class of load and generation market participants. Note that though the *More Access to Energy Act* (MAEA) changes the definition of “market participant,” “market rules,” and “Market Rules and Procedures,” the current market rules continue to apply until the market rules are amended by the IESO Nova Scotia in accordance with the MAEA.

2.1.2, Classes of Market Participants

2.1.2.1, An eligible person may be a Market Participant in one or more of the following classes:

- a) Generation Market Participant: A Generation Market Participant is a Market Participant in respect of
 - i) a Generating Facility connected to the Transmission System;
or
 - ii) a Generating Facility connected to a Distribution System and registered with the NSPSO.
- b) Load Market Participant: A Load Market Participant is a Market Participant in respect of
 - i) a Load Facility connected to the Transmission System; or
 - ii) a Distribution System connected to the Transmission System.¹

Further, an entity would need to meet the eligibility requirements to participate in the market, which are found in Market Rules, Chapter 1: Introduction, section 1.1.4, reproduced in part as follows:

¹ The Nova Scotia Wholesale and Renewable to Retail Electricity Market Rules are posted on the Open Access Same-time Information System site at the following link: <https://www.nspower.ca/oasis/wholesale-market-documents>

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1.1.4, Scope of eligibility for participation in the wholesale electricity market and Renewable to Retail electricity market

1.1.4.1, Eligibility for participation in the wholesale and Renewable to Retail electricity markets is defined in the Legislation and Regulations and in the Transmission Tariff.

a) The present definition of eligible persons for the wholesale electricity market is:

i) In accordance with the Electricity Act, S.N.S. 2004 c.25:

a Wholesale Customer

ii) In accordance with the Transmission Tariff:

“(1) Any electric utility (including the Transmission Provider and any power marketer), power marketing agency, or any person generating electricity for sale or resale is an Eligible Customer under the Tariff. Electric energy sold or produced by such entity may be electric energy produced in the United States, Canada or Mexico; and

(2) Any retail customer taking unbundled transmission service pursuant to a provincial or regulatory requirement that the Transmission Provider offer the transmission service is an Eligible Customer of the Tariff.”

b) The present definition of eligible persons for the Renewable to Retail electricity market is:

i) In accordance with the Electricity Act, S.N.S. 2004, c. 25:
(1) a Licenced Retail Supplier²

² The Nova Scotia Wholesale and Renewable to Retail Electricity Market Rules are posted on the Open Access Same-time Information System site at the following link: <https://www.nspower.ca/oasis/wholesale-market-documents>
