
Nova Scotia Energy Board

IN THE MATTER OF *The Public Utilities Act*, R.S.N.S. 1989, c.380, as
amended

Commercial Net Metering Program – 2025 Annual Report

NS Power

March 31, 2026

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Commercial Net Metering – 2025 Annual Report
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TABLE OF CONTENTS

1	1.0	Introduction.....	4
2	2.0	Updates on M10872 and 2024 Report In-Progress Items.....	6
3	2.1	Revisions to Regulation 3.6.....	6
4	2.2	2024 Report Items	6
5	3.0	2025 Report.....	8
6	3.1	CNMP Service Standards	9
7	3.2	Updates & Refinements to Hosting Capacity Analysis.....	11
8	3.3	Planned or Pending CNMP Improvements.....	12
9	3.4	Additional Statistics & Reporting under the RE Regulations.....	12

Commercial Net Metering – 2025 Annual Report
Non-Confidential

LIST OF APPENDICES

Appendix A Commercial Net Metering Program – 2025 Report (Electronic Only)

Commercial Net Metering – 2025 Annual Report
Non-Confidential

1.0 INTRODUCTION

This annual report was established in accordance with Section 37E of the *Renewable Electricity Regulations* (RE Regulations) and the Nova Scotia Energy Board's (NSEB, Board) November 1, 2023 Order in which the Board issued the following directives:

4. NS Power is directed as follows

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c. In accordance with the Renewable Electricity Regulations, NS Power will file an annual report with the Board. The first annual report will be filed on or before March 31, 2024. This report will include:

- i. details on NS Power's ability to meet its Service Standards;
- ii. updates on its progress refining and updating the hosting capacity analysis and the Interconnection Process from matter M10905;
- iii. all the information outlined by Synapse in Items (2) and (3) in its response to Q23 in Exhibit N-9, broken out separately for Class 1 and Class 2; and
- iv. any planned or pending Commercial Net Metering Program improvements.¹

The first Commercial Net Metering Program (CNMP, Program) annual report, for the 2023 calendar year, was filed on March 28, 2024. By letter dated July 17, 2024, the Board approved the 2023 Report and directed "[...] NS Power to incorporate the additional metrics note[d] in Section 2.4 of its Reply to Closing Submissions in future CNMP Annual Reports."²

On March 27, 2025, the Company filed the 2024 Report. In its September 10, 2025 letter, the Board issued the following directive:

The Board finds that the proposed revisions to the Execution of CNMP Participant Agreement service standard from 5 to 10 business days and changing the start date to the date of the final inspection are reasonable. The Board agrees with intervenors and directs NS Power to begin tracking and reporting the reasons for delays when Participant Agreement execution times are more than 15 business days after the final electrical inspection, along with the cause of the delay and steps being taken to address the issue in subsequent reports.

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¹ M11872 – Board Order, NS Power Commercial Net Metering Program Application, 308596, November 1, 2023.

² M11626 – Board letter, NS Power Commercial Net Metering Program – 2023 Annual Report, 314325, page 4, July 17, 2024.

Commercial Net Metering – 2025 Annual Report
Non-Confidential

1 To ensure the consistency of indicators, the Board directs NS Power to replace all
2 calendar day metrics with business days in future CNMP reports. Additionally, NS
3 Power is directed to provide an update in the 2025 annual report on the information
4 it was unable to provide in this matter due to the recent cybersecurity incident
5 (Board IR-1 and Synapse IR-2).³
6

7 The Company submits this correspondence as the 2025 CNMP Report. In alignment with the
8 requirements of the RE Regulations, the 2025 Report includes details pertaining to CNMP
9 participants for the calendar year (i.e. January 1 to December 31, 2025). Details pertaining to ‘all
10 active generators,’ provided in **Appendix A**, are reported as of December 31, 2025. All metrics in
11 **Appendix A** are presented in business days, in accordance with the Board’s direction in the 2024
12 Report.
13

14 The 2025 Report incorporates the revisions to the ‘Execution of CNMP Participant Agreement’
15 service standard including the Board-directed tracking and reporting, as applicable. Updates on
16 the remaining in-progress item from the Board’s July 2023 Decision under M10872,⁴ and the
17 information NS Power was not able to address (Board IR-1 and Synapse IR-2) in the 2024 Report
18 are provided in the section that follows.

³ M12164 – Board letter, NS Power Commercial Net Metering Program – 2024 Annual Report, 323707, pages 4-5. September 10, 2025.

⁴ M10872 – Board Decision, 303485, pages 4-6, July 4, 2023.

Commercial Net Metering – 2025 Annual Report
Non-Confidential

2.0 UPDATES ON M10872 AND 2024 REPORT IN-PROGRESS ITEMS

2.1 Revisions to Regulation 3.6

In the 90-day, 2023 Report, and 2024 Report, the Company reported that necessary revisions to Regulation 3.6 (February 2, 2023) resulting from Bill 145 and M10872, continue to be identified.

On November 29, 2024, the Company filed its Interconnection Process Compliance Report (M10905). In accordance with the Board's direction to, "[d]evelop a cost allocation straw proposal for distribution network upgrades,"⁵ the NS Power System Operator (NSPSO) recommended a straw proposal, applicable to both Class 1 and 2 projects,⁶ which was updated in the Company's January 17, 2025 reply comments under the same proceeding. The Board provided additional direction with respect to the cost allocation and refund provisions for distribution network upgrades in its decision in M10905/M12174.⁷ NS Power has responded to this direction in its 2025 Annual Interconnection Process Proceeding Report. Revisions to Regulation 3.6 are pending; as noted in the Company's January 17, 2025 reply submission under M10905, "the NSPSO will provide a draft regulation for the NSUARB's review and approval subject to acceptance of the cost allocation proposal [...]."⁸

NS Power has commenced a comprehensive review of its Regulations. As part of this broader effort, the Company is reviewing Regulation 3.6 and considering appropriate updates, including to address considerations arising from M10905. Any changes would be considered within the context of this ongoing review.

2.2 2024 Report Items

In its September 10, 2025 letter on the 2024 Report, the Board issued the following directive:

⁵ M10905 – Board Decision, 313775, page 53. June 11, 2024.

⁶ M10905 – NS Power Interconnection Processes Compliance Report, Section 3.10, pages 28-32. November 29, 2024.

⁷ M10905/M12174 – Board Decision, 325725, page 6-7. November 14, 2025.

⁸ M10905 – Compliance Report, Reply Comments, page 10. January 17, 2025.

Commercial Net Metering – 2025 Annual Report
Non-Confidential

1
2 Additionally, NS Power is directed to provide an update in the 2025 annual report
3 on the information it was unable to provide in this matter due to the recent
4 cybersecurity incident (Board IR-1 and Synapse IR-2).⁹
5

6 As a result of the cybersecurity incident, NS Power was unable to fully recover the time and date
7 information for when CNMP Participant Agreements were received and executed by NS Power in
8 2024. As this information is required to re-calculate the average service levels for 2024 using the
9 scenarios requested in NSEB IR-1 and Synapse IR-2 (a) and (b), NS Power is unable to provide
10 responses to these information requests.

⁹ M12164 – Board letter, NS Power Commercial Net Metering Program – 2024 Annual Report, 323707, pages 4-5, September 10, 2025.

Commercial Net Metering – 2025 Annual Report
Non-Confidential

3.0 2025 REPORT

The 2025 Report provides annual updates in response to directives contained in the Board Order under M10872 (CNMP Application), Board letters in M11626 (2023 Report) and M12164 (2024 Report), and in accordance with Section 37E of the RE Regulations. The 2025 Report is organized within this section as follows:

- (1) CNMP Service Standards – sets out the details on NS Power’s ability to meet its Service Standards.
- (2) Updates & Refinements to Hosting Capacity Analysis – provides updates on the Company’s progress to refine and update the hosting capacity analysis.
- (3) Planned or Pending CNMP Improvements – provides detail on any planned or pending CNMP improvements, exclusive of refinements/updates to hosting capacity analysis.
- (4) Additional Statistics & Reporting under the RE Regulations – summarizes the highlights contained within **Appendix A** to the 2025 Report, specifically:
 - all information outlined by Synapse Energy Economics in Item (2) in its response to Q23 in Exhibit N-9 (M10872), broken out separately for Class 1 and Class 2;
 - the reporting requirements set out in Section 37E of the RE Regulations that are not already covered in Sections 1 to 3;
 - the additional metrics noted in Section 2.4 of NS Power’s Reply to Closing Submissions from the 2023 Report (M11626); and
 - status of renewable energy certificates (i.e. number of opt-ins and annual volume of renewable energy certificates) and available details on the contribution of CNMP to NS Power’s Renewable Electricity Standard (RES).

Commercial Net Metering – 2025 Annual Report
Non-Confidential

3.1 CNMP Service Standards

In the CNMP Application proceeding (M10872), the Board directed NS Power propose Class 1 service standards. On August 3, 2023, NS Power confirmed that Class 1 Commercial Net Metering (CNM) Service was implemented and proposed its targeted service standards for Class 1 CNM Service. On October 20, 2023, the Board issued a second Decision Letter, in which the Board directed NS Power to “include details on its success in meeting [Class 1 service] standards in its annual performance standards filings with the Board.”¹⁰

In the 2025 calendar year, NS Power met four of the six Class 1 service standards. The Class 1 service levels for 2025 are summarized in Table 1. In accordance with the Board’s direction in the 2024 Report (M12164), the service standard for the ‘Execution of CNMP Participant Agreements’ has been revised, as reflected in Table 1.¹¹

Details on the two service standards that were not met in 2025 is provided following Table 1.

Table 1 – Summary of 2025 Class 1 Service Levels

Task Group	Task	Service Standard	2025 Avg. Service Levels	Met
Review & Pre-Approval	Interconnection Request Review	10 business days	2 business days	Y
	Electrical Plans Review	15 business days	8 business days	Y
Field Inspections	Rough-in Electrical Inspection	10 business days	5.8 business days	Y
	Final Electrical Inspection	10 business days	7.8 business days	Y
Finalization & Authorization	Execution of CNMP Participant Agreement	10 business days	13 business days	N
	Account Setup	5 business days	6.3 business days	N

¹⁰ M10872 – Board Decision, 308250, page 4, October 20, 2023.

¹¹ In its September 10, 2025 letter on the 2024 Report, the Board provided “[t]he Board finds that the proposed revisions to the Execution of CNMP Participant Agreement service standard from 5 to 10 business days and changing the start date to the date of the final inspection are reasonable.”

Commercial Net Metering – 2025 Annual Report
Non-Confidential

1 With respect to the missed service level target for the ‘Execution of the CNMP Participant
2 Agreement’ task, this was the result of three outlier accounts. Based on the timing of receipt of
3 these CNMP Participant Agreements in late-April 2025 and subsequent cyber security incident,
4 NS Power was unable to retrieve these documents for execution for an extended period. With these
5 three accounts omitted, the 2025 average service level target of 10 business days was met for this
6 task and averaged 9.3 business days.

7
8 In total, NS Power had 12 CNMP Participant Agreements (including the outliers referenced above)
9 that had a service level for execution exceeding 15 business days in 2025. The Company has
10 tracked the reasons for delay.¹² Many of these delays were caused by administrative challenges
11 introduced by the cyber security incident. In all cases, the extended service level for the execution
12 of these agreements had no impact on the customers’ ability to begin operation of their equipment
13 and the effective date was made retroactive to align with final electrical inspection of the
14 customer’s equipment. NS Power will continue to closely monitor any delays and will take the
15 necessary steps to reduce the number of outliers and accounts exceeding the targeted service level.

16
17 In respect to the missed service level target for “Account Setup” task, this was the result of a single
18 application and delay in the installation of the customer’s bi-directional meter. As a result of the
19 cyber security incident, NS Power had lost the ability to complete over-the-air meter configuration
20 changes which required all new net metering participants to have their meters changed to enable
21 bi-directional billing. With this account omitted, the 2025 average service level target of 5 business
22 days was met for this task and averaged 5 business days.

23

¹² In accordance with the Board’s directive in the 2024 Report, “[t]he Board agrees with intervenors and directs NS Power to begin tracking and reporting the reasons for delays when Participant Agreement execution times are more than 15 business days after the final electrical inspection, along with the cause of the delay and steps being taken to address the issue in subsequent reports.”

3.2 Updates & Refinements to Hosting Capacity Analysis

In the Board’s decision on the 2023 CNMP Report, NS Power was directed to address prior recommendations for future hosting capacity analysis made by Synapse¹³ in its hosting capacity stakeholder workshop and file a report with the Board.¹⁴ NS Power held this workshop on April 17, 2025 and filed its Post-Workshop Compliance Report on July 17, 2025.¹⁵ The Board accepted this Report and confirmed the directive was satisfied in its July 18, 2025 letter, which also provided:

NS Power added that its recent cybersecurity incident impacted some of its business applications such that the hosting capacity map and table “remain temporarily unable to be updated. This is expected to affect the timeline for planned 2026 enhancements”. NS Power does not have an estimated timeframe for restoring the hosting capacity map or implementing enhancements. NS Power stated that it will continue to provide updates through its Commercial Net Metering Program annual reports.¹⁶

As described through the Monthly Cybersecurity Updates, the Incident impacted some of NS Power’s business applications such that the hosting capacity map and table remain temporarily unable to be updated. This has affected the timeline for planned 2026 enhancements. The Incident resulted in the unavailability of GIS applications, which prevents updates to online maps and displays, including the hosting capacity map. Since the Incident, the Company has continued to update data and models offline to ensure accurate information is provided in related preliminary assessments of distribution connection requests.

The Company remains committed to continuously improving its hosting capacity analysis and enhancing the transparency of information provided to customers. Planned improvements,

¹³ M12164 – Evidence of M. Whited (Synapse, BCC), page 11, line 1-8 and page 12, lines 5-10. June 11, 2025.

¹⁴ M11626 – Board letter, 314325, page 4, July 17, 2024.

¹⁵ M11626 – Commercial Net Metering Program 2023 Annual Report – Compliance Report on the Hosting Capacity Analysis Stakeholder Workshop, July 17, 2025.

¹⁶ M11626 – Board letter, 323019, page 1, July 18, 2025.

Commercial Net Metering – 2025 Annual Report
Non-Confidential

including the integration of AMI data, GIS enhancements, and expanded modeling capabilities, will continue to support development of the Program.

The timing of restoration for the hosting capacity data and map is dependent on the GIS recovery timeline and the associated integrations between GIS and CYME software. GIS service restoration work continues with the necessary integrations required to restore hosting capacity targeted for restoration toward the end of Q2 2026, at which point, the Company will be in a position to assess the timing for completion of planned enhancements.

3.3 Planned or Pending CNMP Improvements

The information outlined by Synapse, in Item 3 of its response to question 23, was as follows:

3. NS Power should provide qualitative updates on developments that are relevant to the net metering program (e.g., interconnection process improvements) as well as any planned or pending improvements to the net metering program (e.g., hosting capacity analysis mapping, changes to upgrade cost allocation, technical screen development, pre-application report development).¹⁷

Other than the hosting capacity analysis updates and refinement described in the prior section, the Company does not have any planned or pending CNMP improvements to report.

3.4 Additional Statistics & Reporting under the RE Regulations

Consistent with prior reports, **Appendix A** includes the data collection and reporting requirements outlined in Section 37E of the RE Regulations,¹⁸ the information outlined by Synapse in Item 2 of its response to question 23 under M10872,¹⁹ and the following additional metrics (as noted in Section 2.4 of NS Power's Reply to Closing Submissions under M11626):

¹⁷ M11872 – Evidence of Tyler Fitch, on behalf of Counsel to Nova Scotia Utility and Review Board, as filed February 24, 2023.

¹⁸ *Renewable Electricity Regulations*, NS Reg 138/2022.

¹⁹ *ibid*

Commercial Net Metering – 2025 Annual Report
Non-Confidential

- Nameplate capacity (kWh) and power rating (kW) of interconnecting energy storage;
- Details from the energy storage section of the table in Section 2(a) of the Participant Agreement, specifically whether the storage system limits export, the export limitation method (if applicable), and the export capacity (kW); and
- Total number of pending/active net metering projects with energy storage and the representative MW capacity, by net metering category.

In the 2023 Report proceeding, the Company offered to provide the estimated contribution of CNMP to NS Power's RES where data is prepared and available. Further, the Company agreed to continue to update the Board on the status of renewable energy certificates (RECs) under the Program through the annual report. The CNMP estimated contribution to 2025 RES and a RECs status update (i.e. number of opt-ins and annual REC volumes) is provided in **Appendix A**.

Consistent with prior reports, interconnection requests for which no CNMP Application have been received are excluded from the data set. This is due primarily to the staging for interconnection requests and CNMP applications, particularly for Class 2 applicants where the interconnection request could be for a number of program options and the requirement to identify the specific program comes at a later stage in the process.

**2025 Commercial Net Metering Report Appendix A has
been filed electronically only.**