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Request IR-1:

Reference: Report, p. 6

... 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 [...]."

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.

(a) What is the expected date of completion for NS Power's review of its Regulations?

(b) What is the rationale for reviewing Regulation 3.6 as part of the broader review, instead of conducting a more targeted review in a more timely way?

(c) What involvement, if any, will IESO NS have in reviewing Regulation 3.6?

Response IR-1:

(a) NS Power continues to assess the changes that may be required to Regulation 3.6 as part of its broader Regulation review. No specific completion date has been established at this time as the scope and nature of any amendments continue to be evaluated. Proceedings such as this Commercial Net Metering Program Annual Report review provide relevant context and information that help inform that work.

(b) NS Power's Regulations form an integrated framework, and the Company's view is that a comprehensive review, rather than a series of isolated, targeted amendments, is the most effective and efficient approach to ensuring that any changes are internally consistent,

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1 operationally workable, and aligned with the Board’s directives. Reviewing Regulation 3.6
2 within that broader context allows the Company to appropriately consider
3 interdependencies across the Regulations as a whole.

4
5 (c) NS Power would expect that, to the extent appropriate, all relevant stakeholders including
6 IESO Nova Scotia would have the opportunity to participate and provide input in any
7 proceeding in which proposed amendments to Regulation 3.6 are considered, consistent
8 with the Board's usual practice.

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1 **Request IR-2:**

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3 **Reference: Report, p. 7**

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

11
12 **(a) Does NS Power anticipate ever being able to recover the time and date information?**

13
14 **(b) Has NS Power considered whether other methodologies to calculate average service**
15 **levels for 2024 may apply?**

16
17 **Response IR-2:**

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19 **(a) Please refer to NSEB IR-2.**

20
21 **(b) As the service levels are, by definition, based on the time and date information for when**
22 **NS Power received completed or amended CNMP Participant Agreements. As such, the**
23 **average service levels for 2024 cannot be accurately calculated without this time and date**
24 **information.**

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1 **Request IR-3:**

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3 **Reference: Report, p. 9-10**

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

10
11 **(a) With respect to the two service standards that were not met, please advise if failure**
12 **to meet these standards resulted in any additional costs to the system, or to customers.**
13 **If so, please quantify.**

14
15 **(b) NS Power indicates that the cyber security incident may have prevented NS Power**
16 **from meeting two of the five service standards:**

17
18 **(i) Please identify the “administrative challenges introduced by the cyber security**
19 **incident.”**

20
21 **(ii) Please identify whether these challenges also impacted NS Power’s ability to**
22 **meet the other service standards; if so, please identify how, and please also**
23 **explain why NS Power was nevertheless still able to meet the service standards.**
24 **If these challenges did not impact NS Power’s ability to meet other service**
25 **standards, then please explain why not.**

26
27 **Response IR-3:**

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29 **(a) No additional system or customer costs were introduced as a result of these two Class 1**
30 **standards not being met. For delays in account setup and/or CNMP Participant Agreement**
31 **execution, NS Power made the appropriate retroactive adjustments to align with the final**
32 **electrical inspection and approval of the customer’s generator.**

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- 1 (b) (i) The administration challenges introduced by the cyber incident included the loss of
2 required systems and data to support the day-to-day administration of net metering
3 programs. Please refer to the Company’s Monthly Cybersecurity Incident Reports
4 in M12273.
5
- 6 (ii) The cyber incident created challenges in other net metering processes; however, not
7 all processes were directly impacted or the impact was limited. For example, the
8 loss of some net metering data created delays in NS Power’s ability to process
9 applications as some information had to be recovered or, if unrecoverable, re-
10 created or requested again from the customer. Other processes that did not require
11 specific customer documentation or data were less impacted by the cyber incident,
12 allowing NS Power to meet its targeted service level for those tasks.

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1 **Request IR-4:**

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3 **Reference: Report, p. 12**

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

11
12 **Please confirm whether the loss of hosting capacity data and map has created any costs for**
13 **the system or customers. If so, please quantify.**

14
15 **Response IR-4:**

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17 **No. The hosting capacity map is for informational purposes only, and the data within is not relied**
18 **upon for CNMP processes. Network upgrades and other costs are estimated in the preliminary**
19 **assessment, studied in detail during the Distribution System Impact Study, and customers are billed**
20 **on actual costs.**