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**Request IR-1:**

**In the 2023 Commercial Net Metering Program (CNMP) Report, matter M11626, Nova Scotia Power Inc. (NS Power) outlined joint work on an audit model that sought to improve inspection times with the Department of Labour Skills and Immigration. In the 2024 CNMP Report in matter M12164, the response to IR-3 confirmed that the model was not complete and that engagement with the Department of Labour Skills and Immigration resulted in two inspection types to be piloted.**

**(a) Is the model complete and fully incorporated in the CNMP?**

**(b) Please provide an update on the status of the inspection pilot.**

**Response IR-1:**

(a) The virtual inspection process model is in active pilot stage with approximately 30 electrical contractors participating. The pilot participants represent the electrical contractors who complete the largest volume of solar installations in the province. The current timeline is to have the virtual inspection process implemented fully in Q3 2026.

(b) The pilot is now in the third and final phase. This phase is focused on testing a technology-based submittal process with electrical contractors participating in the pilot. The results of the pilot are reviewed weekly by the project team and the Provincial Chief Electrical Inspector, Labour Skills and Immigration as it moves to full implementation. Final approval by the Department of Labour Skills and Immigrations is expected in the coming weeks in alignment with Q3 full implementation.

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1 **Request IR-2:**

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3 **Page 7 of the Report states that NS Power cannot recover the time and date information of**  
4 **its CNMP Participant Agreements that were received and executed by NS Power in 2024 and**  
5 **needed to calculate the average service levels for 2024 as requested in IR-1 by the Board and**  
6 **IR-2(a) and (b) in matter M12164.**

7  
8 **(a) Has NS Power lost this information?**

9  
10 **(i) If not, when does NS Power anticipate recovering the information?**

11  
12 **Response IR-2:**

13  
14 **(a) Yes. NS Power does not expect to recover this information.**

15  
16 **(i) Not applicable.**

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**Request IR-3:**

**Page 10 refers to three accounts that became outliers in meeting the service level target for execution of the CNMP Participant Agreement due to their submissions coinciding with NS Power's cyber security incident.**

**(a) Please provide the number of business days NS Power took to execute each of the Participant Agreements for three outlier accounts following the dates of the final inspections.**

**(b) Please provide a table with the 12 CNMP Participant Agreements that had a service level for execution exceeding 15 business days in 2025 with the following headings:**

**(i) Application ID**

**(ii) Application Received**

**(iii) Application Stage**

**(iv) Application Status**

**Response IR-3:**

**(a) For the three outliers, the number of business days between final inspection, or the later date between final inspection or receipt of the customer's CNMP Participant Agreement (PA), to when NS Power executed each PA was:**

- Application ID 50 – 56 business days;
- Application ID 67 – 120 business days; and
- Application ID 78 – 54 business days.

**(b) Please refer to the table below. Since the application stage for these 12 participants is complete, NS Power has included the System Status rather than Application Status (which is "complete" for all 12 participants).**

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| <b>Application ID</b> | <b>Application Received</b> | <b>Application Stage</b> | <b>System Status</b> |
|-----------------------|-----------------------------|--------------------------|----------------------|
| 41                    | 2024-12-19                  | Complete                 | In Service           |
| 47                    | 2025-03-07                  | Complete                 | In Service           |
| 49                    | 2024-11-12                  | Complete                 | In Service           |
| 51                    | 2024-10-31                  | Complete                 | In Service           |
| 53                    | 2024-10-21                  | Complete                 | In Service           |
| 120                   | 2025-03-12                  | Complete                 | In Service           |
| 125                   | 2024-03-12                  | Complete                 | In Service           |
| 127                   | 2023-10-31                  | Complete                 | In Service           |
| 142                   | 2025-06-27                  | Complete                 | In Service           |
| 145                   | 2025-08-20                  | Complete                 | In Service           |
| 179                   | 2025-01-13                  | Complete                 | In Service           |

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**Request IR-4:**

**Page 10 references a single application that missed the service level target for Account Set-up.**

**(a) Did NS Power's delay in setting up this customer's account delay the installation of the customer's bi-direction meter?**

**(b) How many business days did it take NS Power to set up this Account?**

**Response IR-4:**

**(a) No. The delays in the setup of the customer's account did not result in a delay in the installation of the customer's bi-directional meter.**

**(b) 73 business days.**

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**Request IR-5:**

**Pages 11 and 12 discuss delays in updating the hosting capacity map and table but that the GIS service restoration work is expected to restore the map and table toward the end of Q2 2026. Please confirm the date for the hosting capacity map and table restoration and the expected completion of the planned enhancements.**

**Response IR-5:**

The capabilities required to perform modifications and updates to the map are expected to be restored by the end of May 2026. Regular updates to the map and tables will be resumed as soon as practicable following the restoration, with a target date of June 26 for the first update.

The expected steps and target timeline, which remains subject to adjustment, is as follows:

- May 31 – restoration of GIS service.
- June 1-12 – verify data integration from GIS to CYME.
- June 15-26 – run analysis to update hosting capacity map data and publish to public map.

The target for finalizing enhancements to the map is Q4 2026.

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**Request IR-6:**

- (a) Please confirm that the estimated value totals in Appendix A, Worksheet 2025 CNMP Summary, Cells G50 and L50 are the estimated annual value of sales offset by CNMP generation. Please clarify whether this is the amount of energy that was exported to the grid by CNMP customers or the amount of energy that was provided to them at a later time and offset by credits from generation. If these two amounts are different, please provide both.**
- (b) Please provide the total annual avoided costs for solar generation that was produced by the CNMP customers and consumed behind the meter, based on the avoided cost at the time when the energy was generated.**
- (c) Please provide the total annual avoided costs for solar generation that was produced by the CNMP customers and exported to the grid, based on the avoided cost at the time when the energy was generated.**
- (d) Please compare the avoided cost for CNMP energy exported to the grid by customers to the incremental cost of providing them with energy that is offset by the bill credits provided to the CNMP customers for the energy that was exported to the grid.**

**Response IR-6:**

Preamble: please refer to M12783 NSEB IR-4. As with the analysis conducted in M12783 NSEB IR-4, the Company has developed this analysis, as requested in parts (b) to (d), using calculated load profiles of a “representative customer” across five rate classes (Domestic Standard Offer, Domestic Time-of-Day, Small General, General, and Small Industrial) to capture differences in load profiles, tariff structures, and system impacts. These load profiles were developed using AMI hourly consumption and exported generation data for Legacy Net Metering and Self-generating

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1 Option (NM) customers only.<sup>1</sup> Commercial net metering impacts were inferred from the NM  
2 Report analysis, using relative solar array sizes and program sample sizes to estimate results.<sup>2</sup>

3  
4 Total estimated solar generation was matched to Appendix A of the Report, with behind-the-meter  
5 generation calculation as the difference between total generation and measured exports. Displaced  
6 energy was estimated by allocating the difference across consumption hours using an irradiance-  
7 based weighting approach.<sup>3</sup> Avoided fuel costs were approximated using hourly marginal fuel  
8 prices, supported by a comparison of marginal generating unit capacity to total solar capacity.<sup>4</sup>  
9 The incremental cost to serve during times when consumption exceeds generation was broken into  
10 the additional cost of fuel, average non-fuel costs, and riders. Consistent with the avoided fuel  
11 analysis, the use of hourly marginal cost of fuel was used to calculate the additional fuel costs at  
12 the incremental load at the time in which it is required by the customer and otherwise offset by a  
13 bill credit. Average non-fuel costs and DSM (Program Cost Recovery only) and FAM AA/BA  
14 riders, were incorporated by rate class using tariff structures and pricing applicable in 2025.<sup>5</sup>

15  
16 This methodology captures the representative effects associated with the timing of net metering  
17 energy flows, including the cost relationship between the value of exported generation and the cost  
18 of subsequent consumption that is offset by energy credits. As such, this analysis provides an

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<sup>1</sup> Customers who added generation or who began service partway through the 2025 are not included in the calculation of a representative customer.

<sup>2</sup> No commercial net metering customers were in service until partway through 2025. All load profiles were developed using 2024 metered data.

<sup>3</sup> Irradiance is the amount of radiant power (energy) incident upon a surface per unit area and is used to gauge the immediate solar power available for conversion into electricity. Estimated total solar production less the known exported energy defines the estimated displaced energy behind-the-meter; however, it does not determine when this displacement occurs. To determine how much of the displaced energy should be allocated to each hour in the year, solar irradiance data was used to weigh the dispersion. As such, periods of higher irradiance would have greater displaced energy behind-the-meter.

<sup>4</sup> To determine whether the marginal fuel cost was representative of the avoided cost of fuel, NS Power compared the estimated total in-province solar generation (MW) to the maximum capacity (MW) of the marginal unit in each hour. The result indicated that 94 percent of the time that solar energy was being generated, its generation was less than the total capacity of the marginal unit. This finding provided confidence that the use of marginal fuel cost was a reasonable proxy to avoided fuel costs.

<sup>5</sup> The BA component of the DSM Rider and the Storm Cost Recovery Rider were excluded as these mechanisms serve as true-up mechanisms for prior year balances. As the 2025 FAM AA/BA Riders provide for recovery of costs on a longer-term (i.e. the \$117M Invest Nova Scotia receivable and the \$500M Maritime Link Supplement Assessment), both the 2025 AA and BA riders were included.

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1 indicative estimate of the associated costs and benefits in response to parts (b) to (d) of this IR.  
2 Subject to data availability and the Board's determination in this process, a similar analysis could  
3 be provided in the 2026 CNMP Annual Report.  
4

5 (a) The values referenced in Appendix A of the Report represent the total production of all  
6 CNMP generation, including displaced energy behind-the-meter and exported to the grid,  
7 valued at the applicable retail rate (as a proxy value). These values are based on total  
8 installed capacity by rate class and estimated annual output based on the previously  
9 established average capacity factor of 12.3 percent for behind-the-meter solar.  
10

11 For clarity, using the model outputs from the analysis provided in parts (b) and (c), below,  
12 NS Power calculated that the representative General rate class customer exports 49,728  
13 kWh to the grid, displaces 106,375 kWh behind-the-meter, and produces a total of 156,104  
14 kWh annually.  
15

16 (b) In 2025, the total annual avoided cost of energy displaced by solar generation behind-the-  
17 meter at the time it was generated is estimated at \$374,000.<sup>6</sup> Metrics and results by  
18 representative customer segment are provided in Table 1.  
19

20 (c) In 2025, the total annual avoided cost of energy displaced by solar generation exported to  
21 the grid at the time it was generated is estimated at \$244,000.<sup>7</sup> Metrics and results by  
22 representative customer segment are provided in Table 1.  
23

24 (d) In 2025, the estimated annual incremental cost of providing energy to solar CNMP  
25 customers during hours that are offset with energy credits is \$475,000.<sup>8</sup> Compared to the

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<sup>6</sup> Avoided costs are calculated at the generation and, therefore, include both transmission and distribution loss factors, reflecting energy consumed on-site.

<sup>7</sup> Avoided costs include transmission loss factors only and exclude distribution losses, reflecting delivery of energy to the distribution grid. Values are based on metered hourly exports.

<sup>8</sup> Hourly excess solar generation is banked as energy credits and applied to future net consumption until all banked energy credits have been applied to consumption or no net consumption remains, at which point remaining energy credits are forfeited.

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value of the avoided costs of CNMP customer exported energy (part (c)), the value of the credits provided exceeded the system savings by \$231,000.<sup>9</sup> Metrics and results by representative customer segment are provided in Table 1.

**Table 1: Summary of CNMP Analysis Metrics and Results, by Representative Customer**

| <b>Metric</b>                                                                                                                         | <b>Domestic Standard Offer</b> | <b>Domestic Time-of-Day</b> | <b>Small General</b> | <b>General</b> | <b>Small Industrial</b> | <b>Total</b> |
|---------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------------------------|----------------------|----------------|-------------------------|--------------|
| Participants                                                                                                                          | 7                              | 1                           | 14                   | 33             | 6                       | 61           |
| Average solar array size (kWac)                                                                                                       | 55.67                          | 100.00                      | 62.65                | 142.82         | 93.22                   | 108.8*       |
| Percent share of annual CNMP solar energy production                                                                                  | 5.6%                           | 1.4%                        | 12.5%                | 67.2%          | 8.0%                    | 95%**        |
| Part (b) – avoided cost of displaced energy                                                                                           | \$11,614                       | \$2,914                     | \$19,576             | \$307,301      | \$32,784                | \$374,189    |
| Part (c) – avoided cost of exported energy                                                                                            | \$24,206                       | \$6,301                     | \$60,929             | \$133,654      | \$19,246                | \$244,335    |
| Part (d) – incremental cost to serve energy that is offset with a bill credit                                                         | \$56,705                       | \$11,736                    | \$135,943            | \$234,362      | \$36,013                | \$474,758    |
| Incremental cost to serve energy that is offset with a bill credit (part (d)) less avoided cost of exported energy (part (c)) – total | \$32,499                       | \$5,434                     | \$75,014             | \$100,708      | \$16,767                | \$230,423    |

Numbers may not sum due to rounding.

\*Weighted average based on participant count.

\*\*Medium industrial rate class excluded due to insufficient data during the AMI sample year (2024).

<sup>9</sup> \$231,000 = \$475,000 – \$244,000. Transmission and distribution loss factors are both applied to the incremental cost to serve. This calculation does not include energy displaced behind the meter.

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**Request IR-7:**

**In Reference to Appendix A, worksheet 2025 CNMP Summary, regarding the costs of additional upgrades from the Preliminary Assessments, please provide the following.**

**(a) A brief description of the upgrades required.**

**(b) The actual cost of the upgrade if completed.**

**(i) If the upgrades are not completed, please provide the expected final completion date.**

**(c) The number of upgrades required across NS Power's infrastructure.**

**Response IR-7:**

**(a-c)** The reported cost of additional distribution upgrades provided at the Preliminary Assessment stage are an estimated range; actuals are developed through the system impact study, and finalized at project completion. No network upgrades were required for those Class 2 CNMP Interconnection Requests.

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1 **Request IR-8:**

2  
3 **Did NS Power provide any project modification recommendations to customers facing**  
4 **distribution system upgrades to reduce or avoid the cost of the upgrades?**

5  
6 **(a) If so, please list these instances and describe the types of recommendations that NS**  
7 **Power made.**

8  
9 **(b) If not, why not?**

10  
11 Response IR-8:

12  
13 (a-b) No, there were no network upgrades required for the referenced Class 2 CNMP  
14 Interconnection Requests.

15  
16 More generally, when a required network upgrade is identified, NS Power engages with  
17 the interconnection customer at multiple stages of the DGIP process to explain anticipated  
18 network upgrade requirements and alternative interconnection options. As part of the  
19 Preliminary Assessment, NS Power develops a high-level cost estimate which is reviewed  
20 and discussed at a meeting with the interconnection customer. Before advancing to DSIS,  
21 interconnection customers may choose to modify project parameters – such as generation  
22 size, point of interconnection, or other design elements – prior to advancing in the process  
23 in order to avoid or reduce the scope and cost of required upgrades.

24  
25 Where multiple feasible interconnection options exist, NS Power evaluates and presents  
26 least-cost solutions for the interconnection customer's consideration as part of the DSIS.  
27 These customers are provided further opportunity to make adjustments prior to finalization  
28 of the DSIS to mitigate upgrade requirements.

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**Request IR-9:**

**Were any of the applications made, as referenced in Appendix A worksheet 2025 CNMP Applications, withdrawn and not resubmitted?**

**(a) If customers withdrew their CNMP applications, please provide a table with information about these applications, including an estimated distribution system upgrades estimate for each project (if any) and the costs of such upgrades (if applicable).**

**Response IR-9:**

**(a) One Class 1 CNMP application was withdrawn at the customer's request. As the customer made an application under Class 1 CNMP, a preliminary assessment was not required or completed, and no distribution system upgrades were identified.**