

2 **NOVA SCOTIA ENERGY BOARD**3 **IN THE MATTER OF:** *The Electricity Act*

4 **IN THE MATTER OF:** A review of NOVA SCOTIA POWER INCORPORATED's 2025
5 Annual Report for the Commercial Net Metering Program in
6 accordance with the *Electricity Act* and Section 37C(1) of the
7 *Renewable Electricity Regulations*

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9 **INFORMATION REQUESTS**

To: Nova Scotia Power Incorporated ("NSPI")

From: The Industrial Group

Responses Due: May 26, 2026

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11 Issued at Halifax, Nova Scotia, this 5th day of May 2026.

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13 **Request IR-1:**14 **Reference:** N-1, page 6, Section 2.1.

15 **Preamble:** NSPI has briefly outlined the procedural history for changes to Regulation
16 3.6 and the prior Board direction to develop a cost allocation proposal for distribution
17 network upgrades, as previously discussed in Matters M10905 and M12174. NSPI has also
18 confirmed, at lines 20-23:

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

(a) Please elaborate on the scope of the comprehensive review of its Regulations, and the work completed to date to review and revise Regulation 3.6.

(b) Please provide NSPI's current working draft of any proposed amendments to that Regulation.

(c) Please confirm that the cost allocation and refund methodology described in Matter M12778, the 2025 Annual Interconnection Process Proceeding Report, reflects NSPI's proposed approach responding to Board's direction in Matters M10905 and M12174, and that NSPI has not yet filed a draft of the proposed Regulation 2.12. If not confirmed, please explain.

(d) Considering NSPI's position regarding the methodology to be used for cost allocation, please explain how NSPI proposes to record and report these amounts in its Annual Reports so that the actual net costs borne by non-participating ratepayers can be accurately tracked over time (including the treatment of any refunds).

(e) When does NSPI anticipate filing proposed amendments to Regulation 3.6 and Regulation 2.12 for Board review and approval? Please identify specifically any preconditions to completion and whether these are within NSPI's control or outside.

(f) In the absence of a Board decision approving a cost allocation regulation, please explain whether NSPI recovered any distribution network upgrade costs in 2025 and, if so, how those costs were recorded.

Request IR-2:

Reference: N-1, pages 7, 10, and 11.

Preamble: The 2025 Annual Report refers to the impact of a cybersecurity incident on CNMP administration, including delays in executing Participant Agreements, disruption to bi-directional meter configuration, and the loss of hosting capacity map functionality.

(a) Have the impacts described since been fully resolved and the affected functions restored? If not, please describe what remains outstanding and provide an expected timeline for completion.

(b) Please provide NSPI's estimate of the total incremental costs incurred for CNMP administration as a result of the cybersecurity incident, including a brief description of the main cost categories and the period over which the costs were incurred.

(c) Please confirm whether any of the incremental costs noted are being (or will be) recovered from ratepayers.

Request IR-3:

Preamble: The 2025 Annual CNMP Report does not include any analysis of the cost of the Commercial Net Metering Program to the system or to non-participating ratepayers.

(a) Please provide NSPI's total cost of the CNMP to the system for the 2025 calendar year, broken down by the following categories:

(i) Administrative and operational costs of operating the Program (e.g., staffing, application processing, inspections, and metering);

(ii) Distribution network upgrade costs attributable to CNMP interconnections; and

(iii) Any other costs NSPI attributes to the CNMP.

(b) To the extent any of the costs identified are recovered from non-participating ratepayers through rates, please identify the recovery mechanism(s) and quantify the amounts recovered from each customer class, including the Medium and Large Industrial classes.

(c) Where NSPI has taken the position that the cost allocation methodology should include a refund over a period of up to 20 years (as outlined in Matter M12778), please confirm whether the costs reported for any given year represent only that year's portion of costs and/or refunds (and therefore do not reflect the total costs attributable to CNMP interconnections over the full 20-year accrual period).

1 **Request IR-4:**

2 **Reference:** Appendix A, Tab 2025 CNMP Summary.

3 **Preamble:** The data shows that for all Class 2 projects that reached in-service status in
4 2025, the actual cost of distribution network upgrades was \$0 across the board —
5 maximum, mean, and median. This is despite estimated costs ranging up to \$25,000 at the
6 preliminary assessment stage.

7 (a) Please clarify whether the estimated costs (ranging up to \$25,000) are
8 intended to represent the total estimated cost of distribution network
9 upgrades for each individual interconnection or some other value. If the
10 latter, please explain what the estimate represents and how it was
11 calculated.

12 (b) Where no actual costs are reported in Appendix A, please confirm whether
13 this means: (i) no upgrades were ultimately required; (ii) upgrades were
14 required but the associated costs were recorded elsewhere; and/or (iii)
15 some other explanation applies. Please explain and, if applicable, identify
16 where such costs are recorded.

17 (c) Please confirm whether Intervenors and the Board can access the System
18 Impact Study referenced. If so, please identify where it can be accessed; if
19 not, please provide a copy.

20 (d) Please confirm that, for all Class 1 projects where the upgrade cost metrics
21 are reported as “Not Applicable”, it is anticipated there will never be
22 associated distribution system upgrade costs. If not, please explain what
23 “Not Applicable” signifies and how/where any such costs are recorded.

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