



Blackburn Law Inc.

June 11, 2026

VIA EMAIL

Ms. Crystal Henwood
Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
Halifax NS B3J 3S3

Dear Ms. Henwood:

**Re: M12782 - Nova Scotia Power Incorporated's 2025 Annual Report for the
Commercial Net Metering Program (CNMP)**

On March 31, 2026, Nova Scotia Power Incorporated ("NS Power") filed its Commercial Net Metering Program - 2025 Annual Report (the "Report") and responded to Information Requests from the Consumer Advocate, the Industrial Group, the Board and the Small Business Advocate (SBA) on May 26, 2026. The SBA appreciates the opportunity to provide the following submissions in this matter.

Hosting Capacity Map

The need for a hosting capacity map was identified several years ago in other matters¹ but updates to the hosting capacity map have been paused due to the 2025 cybersecurity breach². The SBA respectfully submits that the restoration of the hosting capacity map and the ability to use AMI meters to allow for bi-directional billing is critical to the success of the CNMP program and its current and future participants (including those represented by the SBA)³. NS Power has committed to reconfiguring AMI meters to allow for bi-directional billing by the end of Q2 – presumably this means by June 30th 2026⁴.

¹ Including M10905 Nova Scotia Power Inc. - Board Review of NS Power's Interconnection Processes and M12174 Nova Scotia Power Inc. - Interconnection Processes Proceeding - Annual Report.

² M12782, Exhibit N-5, NS Power Responses to SBA Information Request 3(d), Page 2 of 2.

³ M12782, Exhibit N-1, Commercial Net Metering Program - 2025 Annual Report, 3.1 CNMP Service Standards, Page 10 of 13, Lines 17-22.

⁴ M12782, Exhibit N-3, NS Power Responses to Industrial Group Information Request 2(a), Page 1 of 2.

In response to NSEB IR-5, NS Power stated that expected to have restored GIS service by May 31st; to publish the public hosting capacity map by June 15-26, 2026, and set a target date for finalizing the map by Q4 2026⁵.

The SBA respectfully requests the Board require NS Power to demonstrate to intervenors and CNMP participants (e.g., via a webinar) that the hosting capacity map is functional at this time (or at such time as it is functional), and to confirm the status of AMI reconfiguration to show how bi-directional billing would work to support current and future CNMP projects.

Appendix A, Worksheet 2025 CNMP Summary

In the Board's IR-6, NS Power was asked to confirm that the estimated value totals in Appendix A, Worksheet 2025 CNMP Summary to the Report are the estimated annual value of sales offset by CNMP generation. NS Power responded with a lengthy preamble explaining how it inferred net metering impacts based on relative solar array sizes and program sample sizes to estimate results and described the methodology it uses to capture the effects of timing of net metering energy flows⁶.

The end result for 2025 of the process explained by NS Power was an estimated annual avoided cost of energy displaced by solar generation behind the meter of \$374,000⁷; an estimated annual avoided cost of energy displaced by solar generation exported to the grid at the same time of \$244,000⁸, and an estimated annual incremental cost of providing energy to solar CNMP customers during hours that are offset with energy credits of \$475,000⁹. NS Power also said that the value of credits provided exceeded the system savings by \$231,000¹⁰, and summarized these values in Table 1 Summary of CNMP Analysis Metrics and Results, by Representative Customer¹¹.

The SBA respectfully requests that the explanation provided by NS Power is sufficiently complex as to merit further review by intervenors and CNMP participants and a separate stakeholder session should be arranged, during which NS Power can further explain the assumptions made and the sources for estimates so that participants could become comfortable with the range of potential

⁵ M12782, Exhibit N-4, NS Power Responses to Nova Scotia Energy Board Information Request 5, Page 1 of 1, Line 16-20.

⁶ M12782, Exhibit N-4, NS Power Responses to Nova Scotia Energy Board Information Request 6, Page 1 of 4, Lines 24-29; Page 2 of 4, Lines 1-18; and Page 3 of 4, Lines 1-3.

⁷ M12782, Exhibit N-4, NS Power Responses to Nova Scotia Energy Board Information Request 6(b), Page 3 of 4, Lines 16-17.

⁸ M12782, Exhibit N-4, NS Power Responses to Nova Scotia Energy Board Information Request 6(c), Page 3 of 4, Lines 20-21.

⁹ M12782, Exhibit N-4, NS Power Responses to Nova Scotia Energy Board Information Request 6(d), Page 3 of 4, Lines 24-25.

¹⁰ M12782, Exhibit N-4, NS Power Responses to Nova Scotia Energy Board Information Request 6(d), Page 4 of 4, Lines 1-2.

¹¹ M12782, Exhibit N-4, NS Power Responses to Nova Scotia Energy Board Information Request 6(d), Page 4 of 4, Line 5.

system savings. The SBA also would like NS Power to explain where the system savings can be found in the regular reporting NS Power provides to the FAM SWG.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 11th day of June, 2026.

Yours truly,


Melissa P. MacAdam
Small Business Advocate