

June 24, 2026

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

Re: M12782 Commercial Net Metering Program 2025 Report – NS Power Reply Submission

Dear Ms. Henwood:

Nova Scotia Power Incorporated (NS Power, Company) filed the Commercial Net Metering Program (CNMP, Program) 2025 Report with the Nova Scotia Energy Board (NSEB, Board) on March 31, 2026. The Company filed responses to information requests from Board Staff, the Consumer Advocate (CA), the Small Business Advocate (SBA), and the Industrial Group (IG) on May 26, 2026.

On June 11, 2026, NS Power received submissions from the SBA; the CA confirmed it “does not intend to make any submissions on the Report.” In accordance with the Board-established timeline, the Company provides the following as its reply submission.

Hosting Capacity Map Functionality and Bi-directional Meter Reconfiguration

The SBA provided:

The need for a hosting capacity map was identified several years ago in other matters but updates to the hosting capacity map have been paused due to the 2025 cybersecurity breach. 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).

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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.¹

The Company agrees that the hosting capacity map is a useful tool that supports customer awareness and transparency. In relation to its criticality to the success of the Program, as clarified in IR responses,² the hosting capacity map is informational in nature and is not relied upon for interconnection studies, cost determination, or the progression of CNMP applications, which are conducted through the Preliminary Assessment and Distribution System Impact Study processes.

While updates to the underlying data have been paused due to the cybersecurity incident, the hosting capacity map remains available and functional.³ As reported in the Company's Monthly Cybersecurity Update 9 (M12273), the capabilities required to modify and update this data remain "[d]ependent on the GIS recovery and integration between GIS and CYME Software. ETA for this is September 2026,"⁴ with additional enhancements targeted for completion in Q4 2026, as described in IR responses.⁵ The Company continues to provide monthly restoration updates in M12273 and the hosting capacity map remains available and functional; as such, NS Power submits that a webinar or demonstration of the map's functionality is not required.

With respect to AMI functionality, the restoration of over-the-air (OTA) meter reconfiguration relates specifically to the Company's ability to remotely reconfigure a customer's meter from standard to bi-directional operation. For clarity, this does not reflect an inability to conduct bi-directional billing. As provided in NS Power's Monthly Cybersecurity Update 9, "meters have been restored to normal operation"⁶ – this includes bi-directional meters for billing purposes. The restoration of OTA functionality represents an operational efficiency improvement rather than a prerequisite for net metering participation or billing.

In the interim, for new net metering customers where meter reconfiguration is required, the Company has implemented processes to configure and install bi-directional meters manually. These processes have been effective in supporting customer interconnections and minimizing impacts to customers. As provided in IG IR-2, the ability to perform OTA reconfiguration is forecast to be restored by the end of Q2 2026 and, at the time of this submission, NS Power remains on track to achieve this forecast timeline.

¹ M12782 – SBA Submission, pages 1-2. June 11, 2026.

² CA IR-4 provided "No. The hosting capacity map is for informational purposes only, and the data within is not relied upon for CNMP processes. Network upgrades and other costs are estimated in the preliminary assessment, studied in detail during the Distribution System Impact Study, and customers are billed on actual costs." SBA IR-3 part (d) provided "Updates to the Hosting Capacity Map have been paused, pending full restoration of GIS services. The status or availability of this map has no bearing on NS Power's internal analyses or on the progression of projects through the DGIP. Contingency services are being used to complete studies and analysis."

³ The hosting capacity map is accessible at: <https://www.nspower.ca/oasis/distribution-hosting-capacity>.

⁴ M12273 – Cybersecurity Incident Monthly Update 9, Attachment 2, page 4. June 12, 2026.

⁵ Please refer to the details provided in SBA IR-1 and NSEB IR-5 in this proceeding.

⁶ M12273 – Cybersecurity Incident Monthly Update 9, Attachment 2, page 1.

Further Review of Solar PV Analysis

The SBA provided:

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 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.⁷

The Company supports the SBA's request for further discussion of NS Power's solar PV analysis and is open to conducting a technical session with interested stakeholders to review the methodology, key assumptions, and results of this analysis.⁸

With respect to the reporting of "system savings," the Company clarifies that the values presented in response to NSEB IR-6 are modeled estimates developed to illustrate the relationship between net metering exports, avoided costs, and the incremental cost of serving load offset by banked energy credits. These values do not correspond to discrete line items within the Fuel Adjustment Mechanism (FAM) or other regulatory reporting, nor do they translate directly into FAM calculations. Rather, they are indicative analytical results intended to inform understanding of net cost impacts associated with CNMP participation.

To the extent that net metering exports displace utility generation, the associated impact is embedded within overall system fuel costs, reflecting the opportunity cost of avoided generation rather than a separately tracked or attributable reduction. As such, any "system savings" are inherently counterfactual in nature, as they depend on assumptions regarding what generating resources may have operated in the absence of customer generation.

The Company suggests that further explanation be included in the solar PV analysis technical session requested by the SBA.

Yours truly,



Karynne Munroe
Manager, Regulatory Affairs

⁷ M12782 – SBA Submission, pages 2-3.

⁸ Specifically to review the analysis provided in NSPI (NSEB) IR-6 in this proceeding and NSPI (NSEB) IR-4 in M12783.