

July 22, 2026

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Dear Parties:

M12717 – North American Electric Reliability Corporation – Quarterly Application for Approval of Reliability Standards – Fourth Quarter 2025

M12882 – North American Electric Reliability Corporation – Quarterly Application for Approval of Reliability Standards – First Quarter 2026

The Board Member assigned to this matter, Richard J. Melanson, LL.B., has reviewed the filings in the NERC Fourth Quarter 2025 application(M12717) for approval to amendments to the NERC Glossary of Terms. Board Member Melanson has also reviewed NERC's First Quarter 2026 (M12882) application for approval of reliability standards. Both applications have aspects related to specified Inverter Base Resources (IBRs). In Nova Scotia, IBRs which are potentially impacted by these reliability standards are certain wind farms, and battery energy storage systems (BESS).

In the Fourth Quarter 2025 application, NERC sought approval to amendments to the Glossary of Terms. The application and its potential impacts are summarized by NERC, as follows:

Under the revised Registry Criteria, owners and operators of non-Bulk Electric System ("BES") Inverter-Based Resources ("IBR") that individually or collectively have an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV will meet the "Category 2" criteria and be required to register with NERC as Generator Owner or Generator Operator, as applicable. The revised definitions of Generator Owner and

Generator Operator would carry these FERC approved changes forward in the NERC Glossary and thereby the Reliability Standards in which these terms are used.

[M12717 Exhibit N-1, p.8]

Currently, only NS Power and the Independent Energy System Operator-Nova Scotia (IESO-Nova Scotia) are registered with NERC. The Board initiated the review process for the Fourth Quarter 2025 application by seeking comments from these entities. In assessing comments about the implementation date, the Board wanted to assess the impact of the new definitions on existing and future IBRs.

According to information obtained from the IESO-Nova Scotia the following existing IBRs might fit the new Category 2 criteria:

Plant Name	Resource Type	Gross Nameplate Rating (MVA)	Voltage at Point of Interconnection (kV)
102V-Ellershouse	Wind	28.95	69
IR 673 - Benjamin Mill Wind	Wind	33.6	138
98V-Gulliver's Cove	Wind	33.34	69
IR662: Spider Lake BESS	Batteries (BESS)	50	138
IR664: Bridgewater BESS	Batteries (BESS)	50	230
89N-Nuttby Mountain	Wind	51	69
106W-Pubnico Point	Wind	34	69
91N-Dalhousie Mountain	Wind	55.01	230
93N-Glen Dhu	Wind	66.7	138
92N-Amherst	Wind	34.4	138

[M12717, Exhibit N-2, p.3]



Also, there are several planned IBRs that might be captured by the new definitions:

Plant Name	Resource Type	Gross Nameplate Rating (MVA)	Voltage at Point of Interconnection (kV)	GO/GOP Category
IR574 Ellershouse III	Wind	66.72	138	2
IR597 Mersey I	Wind	36	130	1 (when combined facility with IR675)
IR670 Kmtnuk	Wind	94.4	230	1
IR671 Bear Lake	Wind	88.96	138	1
IR668 Weavers Mtn	Wind	94.4	230	1
IR618 Goose Harbour Lake I	Wind	130.2	230	1
IR675 Mersey II	Wind	112.5	138	1
IR677 Wedgeport	Wind	80	138	1
IR697 White Rock BESS	Battery	50	138	2
IR686 Windy Ridge	Wind	336	345	1
IR739 Greenfield	Wind	90	138	1
IR742 Goose Harbour Lake II	Wind	35	230	1 (combined facility with IR618)
IR728 Upper Afton I	Wind	120	230	1
IR824 Upper Afton II	Wind	48	230	1 (combined facility with IR728)
IR732 Eigg Mtn	Wind	149.6	230	1
IR826 Sugar Maple	Wind	112	230	1

[M12717, Exhibit N-2, p.5]

Several existing IBRs that might be subject to NERC reliability standards are not owned or operated by either NS Power or the IESO-Nova Scotia. That will also be the case for most of the planned IBRs. Non-public utility entities, who are not currently registered with NERC, could be captured by the new Glossary of Terms definitions and may become responsible for reliability standards obligations they do not currently have. The Board recognizes that a potential regulatory regime for these types of entities has not been finalized under the *More Access to Energy Act*. Nevertheless, this application can be processed now as any potential approval does not impact on the Board's ultimate jurisdiction.

On a go-forward basis, the Board proposes to seek input from all known entities who could be impacted by the approval of IBR-related definitions and standards from the IBRs listed above. The Board has some concerns about creating confusion in the wind farm community, given the current state of applicable legislation. However, it has applications before it that must be processed and parties who could, in future, be impacted by the standards.

While the Board is generally aware of the ownership of these various wind farms through filings in various matters, along with publicly available data, it does not have regular communications with most of these entities. For those entities with power purchase agreements with NS Power, the Board assumes that the utility would have contact particulars. The Board assumes NS Power or the IESO-Nova Scotia would have up to date contact particulars for those future IBRs listed above that are in the queue for wind farm approvals.



Therefore, the Board seeks the assistance of NS Power and the IESO-Nova Scotia in providing the names and contact particulars for the owners of the IBRs and contemplated IBRs listed above so they can be provided with notice of these applications. The Board would ask for these contact particulars, if they can be made available, as quickly as possible. The Board will complete the process for the Fourth Quarter 2025 application upon receipt of the requested information, as well as initiate the review process for the First Quarter 2026 application. In an event, a response would be appreciated by Friday, August 7, 2026.

Should the recipients of this letter have any questions or comments about the contents of this letter, they can be forwarded to the clerk of the Board.

Yours truly,



Crystal Henwood
Clerk of the Board

c: Lauren Perotti, NERC
 Sonia Mendonca, NERC
 Lauren Perotti, NERC
 Sarah P. Crawford, NERC
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