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Request IR-1:

Page 2 of the application states that the amount for the Distribution Aggregation Service (DAS) Tariff has not been established but it will be included in the 2027 Annually Adjusted Rates (AARs). When does Nova Scotia Power (NS Power) intend on filing the 2027 AAR application?

(a) NS Power referenced a possible scenario in which the DAS Tariff is not approved before the Board's decision on the 2027 AARs, operating costs will be deferred for future recovery. Will the same treatment be applied if the Standby Service, Energy Balancing and Distribution Tariffs are not approved prior to the effective date?

Response IR-1:

The Company intends to file the 2027 AAR Application by November 7, 2026, in accordance with the Board's direction in M12551 (2026 AARs).

(a) The DAS Tariff is a new tariff for which no Board-approved rates or charges currently exist. In contrast, the Standby Service (SS), Energy Balancing Service (EBS), and Distribution (DT) tariffs are existing Board-approved tariffs with existing Board-approved rates and charges.¹ Accordingly, the rates and charges approved through the AAR process would apply, and any tariff amendments approved in this proceeding would be incorporated into those existing Board-approved tariffs.

For clarity, the Company's Application in this proceeding relates to the tariff provisions associated with enabling distribution-connected generation and net billing within the RtR market in accordance with the Board's direction in M12339, whereas the AAR process is

¹ The rates and charges applicable to the SS and EBS tariffs were most recently approved in M12551. DT rates and charges are typically set through General Rate Applications (GRA) and were most recently approved in the 2026-2027 GRA (M12451).

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1 designed to update tariff rates using established methodologies and would normally not
2 include amendments to tariff structures or provisions. Should the Board's decision in the
3 2027 AAR proceeding be issued prior to a decision in this proceeding, the Company would
4 not expect the DAS Tariff to become effective until a decision has been rendered in this
5 proceeding. To the extent RTR market development and administration costs associated
6 with other RTR services are not recovered through the other tariffs, these costs would be
7 deferred for future recovery.

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Request IR-2:

Page 3 of the application references a commercial commitment required of the Licensed Retail Supplier (LRS) to allow NS Power to recognize the LRS's resources as providing long-term capacity value to NS Power's electricity system. Please elaborate on this commitment, and the benefits to both parties.

(a) Please explain if this commercial commitment applies specifically to Renewal or any LRS.

Response IR-2:

The commercial commitment referenced at page 3 of the application is described in more detail in CA IR-2(a) under special condition (5)(vi). The commercial commitment benefits both parties. The Licensed Retail Supplier (LRS) receives a capacity credit (Capacity Contribution Factor) against its capacity charges under the Standby Service Tariff (SST) and NS Power receives access to the associated capacity, (Effective Load Carrying Capacity) for the purposes of longer-term resource adequacy assessments and resource planning.

(a) This commercial commitment applies to any LRS seeking to claim a Capacity Contribution Factor under the SST. As set out on page 3 of the Application, these provisions are based on terms previously approved for inclusion in the Wholesale Market Backup/Top-up Tariff for the same purpose.

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Request IR-3:

Page 3 references administrative related updates to align with approved definitions in related tariffs. Please list, by tariff, the administrative-related updates in this application and their associated costs.

Response IR-3:

The administrative-related updates referenced on page 3 of the Application are limited to the Licenced Retail Supplier (LRS) Terms and Conditions (T&C). These updates are housekeeping in nature and were made to align references, definitions, and terminology with related RtR market documents. The Company has not identified costs associated with these administrative-related updates. Accordingly, no separate costs have been attributed to the items identified in the table below.

No.	Update to LRS T&C	Related Tariff(s)/Document(s)	Refer to (within LRS T&C)
1	Addition of definition for Distribution-connected Aggregation Service (DAS) Tariff	DAS Tariff	Definitions, p. 3-4
2	Addition of definition for Distribution-connected Generation	DAS Tariff, Distribution Tariff (DT), Energy Balancing Service (EBS) Tariff, and Standby Service (SS) Tariff	Definitions, p. 4-5
3	Addition of Storm Cost Recovery Charges definition	DT, specifically the Storm Cost Recovery Rider terminology approved as part of M12451	Definitions, p. 7-8
4	Addition of references to the DAS Tariff within the definition of Bundled Service.	DAS Tariff	Definitions, p. 3
5	Addition of references to the DAS Tariff within the definition of LRS Tariffed Services	DAS Tariff	Definitions, p. 6

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No.	Update to LRS T&C	Related Tariff(s)/Document(s)	Refer to (within LRS T&C)
6	Addition of references to the DAS Tariff in provisions describing the services obtained by an LRS	DAS Tariff	Sections 7, 8 and 10
7	Addition of references to the DAS Tariff in billing, settlement, and Load Settlement provisions	DAS Tariff, EBS Tariff, SS Tariff, and existing approved Renewable to Retail Market Transition Tariff (RTT)	Definitions, and Section 15

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Request IR-4:

Attachment 3, pdf page 65, states that the Nova Scotia Independent Energy System Operator of (IESO-NS) may assume responsibility for oversight of the RtR market. Please discuss NS Power's expectations of the IESO-NS's role in relation to the RtR market and outline NS Power's oversight of the RtR Market.

Response IR-4:

The Nova Scotia Power System Operator (NSPSO) currently administers both the competitive Wholesale and Renewable to Retail (RtR) markets in Nova Scotia. With the planned transition of market functions including grid operations, real-time dispatch, resource procurement, long-term system planning, and market oversight from NSPSO to the Independent Energy System Operator Nova Scotia (IESO-NS), the IESO-NS may assume responsibility for oversight of the RtR market as part of that transition. The potential roles of NSPSO and IESO-NS in the administration of the RtR market remains to be determined.

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Request IR-5:

In Appendix 2, pdf page 23, which outlines the Proposed Changes for the Distribution Tariff, Power Advisory references ongoing uncertainty about incremental system costs from allowing RtR supply to include distribution connected generation and surplus net billing and how charges apply.

(a) Please discuss the charges that NS Power believes would apply to the generator/customer.

(b) Please outline the potential incremental system costs NS Power believes may be incurred through allowing RtR to account for behind the meter generation on NS Power's distribution system and how these are unique from NS Power's net metering programs.

Response IR-5:

(a-b) Please refer to CA IR-3. These potential incremental system costs, including distribution system upgrades and distribution system losses, are like those incurred under NS Power's net metering programs, but their treatment is different. Incremental costs for NS Power net metering are covered by the utility as a legislated requirement whereas the RtR market is founded on a cost neutrality principle whereby customers who remain with NS Power are not adversely impacted by customers transitioning to RtR suppliers. Therefore, incremental costs associated with distribution connected generation and surplus net billing RtR would be borne by RtR market participants.

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Request IR-6:

Attachment 3, pdf page 60, identifies system changes to perform separate tracking of import and export transactions. Please explain how and why tracking customers' imports and exports from net metering customers will be different from the current tracking process NS Power uses for its customers.

Response IR-6:

The tracking of customer imports and exports for Renewable to Retail (RtR) net billing customers will be done the same way as NS Power net metering customers – using a bidirectional revenue meter with separate registers for import and export. The referenced statement was meant to convey that the RtR tariff billing solution will require refinements to accommodate the net billing surplus generation captured in the export register of the meter.

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Request IR-7:

Attachment 3, pdf page 68, refers to losses associated with distribution-connected generation.

What is the value of losses associated with NS Power's net metering customers?

(a) Why would the RtR distribution-connected generation be different?

(b) Does NS Power consider that the treatment of these losses as significant enough to warrant compensation/adjustment?

Response IR-7:

The value of losses associated with NS Power net metering customers has not been calculated.

(a-b) Losses associated with distribution-connected generation would be similar, regardless of if that generation is connected to serve Renewable to Retail customer load or NS Power customer load. Please refer to CA IR-4.

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1 **Request IR-8:**

2
3 **Attachment 4, pdf page 72, Distribution-Connected Aggregation Service Tariff, the**
4 **Administration Charge estimates the monthly charge using the forecast number of LRS'**
5 **subscribed as part of the denominator.**

6
7 **Response IR-8:**

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9 **Confirmed.**

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Request IR-9:

Attachment 4, pdf page 72, Distribution-Connected Aggregation Service Tariff, Special Conditions, with reference to special condition 2, please provide a copy of the written operating agreement that the LRS' customers and generators will be expected to agree to.

(a) Please list the conditions under this agreement that differ from the operating agreement between NS Power and its net metering customers.

Response IR-9:

For the RtR market, distribution-connected generation and net billing customers with generation greater than 100 kW will be directed through the Distribution Generator Interconnection Procedures (DGIP), the same as for NS Power net metering customers with the caveat that the NS Power net metering program is limited to a maximum generator size of 1000 kW. Under the DGIP, RtR customers and NS Power net metering customers are required to execute the same Standard Small Generator Interconnection and Operating Agreement¹ (SSGIA).

For NS Power net metering installations greater than 27 kW, up to 100 kW, the proponent is required to execute the Commercial Net Metering Participant Agreement² (CNMPA). The operating agreement for the same sized RtR market distribution-connected generation/net billing installations has not yet been developed; however, it is expected to mimic the CNMPA, modified to remove requirements specific to the NS Power Commercial Net Metering program.

(a) The operating agreement for RtR market distribution-connected generation/net billing installations has not yet been developed. As per the above, the operating agreement is

¹ The SSGIA is available on the Open Access Same-time Information System (OASIS) website at this link: https://www.nspower.ca/docs/default-source/pdf-to-upload/class-2-master-ssgia---clean-copy---approved-by-executives---september-10-2013.pdf?sfvrsn=b6bac8cd_6

² The Commercial Net Metering Participant Agreement is available on the NS Power website at the following link: https://www.nspower.ca/docs/default-source/pdf-to-upload/commercial-net-metering-program-participant-agreement.pdf?sfvrsn=a2c019b5_1

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1 expected to mimic the CNMPA, modified to remove terms specific to the net metering
2 program such as payment terms, expiry of banked energy credits, and specific rights and
3 obligations under the net metering program. The agreement is expected to include the
4 following.

- 5
- 6 • Participant eligibility requirements
- 7 • Generator/facility eligibility requirements
- 8 • Interconnection and technical compliance requirements
- 9 • Safety, regulatory, and permitting obligations
- 10 • Customer responsibility for interconnection and upgrade costs
- 11 • Metering and data requirements
- 12 • Access rights for inspection, metering, and maintenance
- 13 • Operation and maintenance obligations
- 14 • Curtailment, interruption, and disconnection rights
- 15 • Liability, indemnification, and insurance requirements
- 16 • Transfer, assignment, termination, and default provisions.

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1 **Request IR-10:**

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3 **Attachment 7, pdf page 106, Special Condition (5)(v) states that the LRS's resource will run**
4 **to meet NS Power's reliability requirements. In Power Advisory's jurisdictional scan, was a**
5 **similar stipulation found in one of the utilities?**

6
7 **(a) If so, please cite which utility and which specific Special Condition or requirement**
8 **applies this condition in an agreement with a LRS or similar agency?**

9
10 **Response IR-10:**

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12 **This IR response has been provided by Power Advisory.**

13
14 No, Power Advisory's jurisdictional scan did not identify a comparable stipulation. However, this
15 reliability commitment reflects standard language and is consistent with the provisions contained
16 in NS Power's Wholesale Market Backup/Top-up Service Tariff.

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Request IR-11:

In Attachment 12, the addition 9.8 on pdf page 176, requires the LRS to tell its customers who generate electricity that is exported to NS Power's grid, that if the LRS ends its net billing arrangement in the RtR market and returns to NS Power service and wants to participate in the net metering program, there may be a de-rating of the customer's distribution-connected behind-the-meter generator to adhere to the legislated limits of the net metering options as stipulated in the Electricity Act. Please explain why and under what conditions a new or returning NS Power customer may have their behind the meter generator de-rated.

Response IR-11:

The NS Power net metering program requires that a customer's generator be sized to meet, but not exceed, the customer's projected annual electricity consumption, subject to a maximum nameplate capacity of 1,000 kW or 200 kW, depending on the customer's rate class or attributes of the customer's facility (e.g., winery, farm, aquaculture plant). These legislated generator capacity limits apply solely to NS Power net metering options and do not apply to retail customers who may participate in a net billing offering in the RtR market.

If an RtR customer installs a generator that exceeds the capacity limits of the NS Power net metering program and later chooses to return to NS Power bundled service and participate in net metering, the generator would not meet the eligibility requirements of NS Power's legislated net metering options. In that case, the generator would need to be de-rated to comply with the applicable capacity limits that apply to NS Power's net metering options.