

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: *The Public Utilities Act*, R.S.N.S. 1989, c.380, as amended

IN THE MATTER OF: **An Application by Nova Scotia Power Inc.** made pursuant to
Section 3G(1) of the Electricity Act or Section 83(1) of the Public
Utilities Act for approval of Changes to the Renewable to Retail
Market associated Tariffs and Terms and Conditions

INFORMATION REQUESTS
(NON-CONFIDENTIAL)

To: **Jennifer Power**
Director, Regulatory Affairs
Nova Scotia Power, Inc. (NS Power)

From: Small Business Advocate

Responses Due: October 1, 2026

Copies: 1 electronic copy (PDF searchable)

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Issued at Bedford, Nova Scotia on this 9th day of September, 2026

1 **Request IR-1:**

2 Refer to M13008, Exhibit N-1, NS Power Application for Renewall Energy Requested Updates to
3 Renewable to Retail Market Elements, dated July 31, 2026, pages 1-5 (the “Application”);
4 Attachments 1 through 12 that comprise the “RtR Market Elements Update”; and specifically,
5 Attachment 3, RTR Tariff Application – Distribution Connected Generation and Net-Billing
6 Update Stakeholder Meeting (M12339) July 23, 2026.

- 7
- 8 a) Does NS Power anticipate that Renewall Energy will provide service to customers who are
9 directly connected to the Company’s Transmission system? If so, does NS Power plan to
10 provide a revision to its Transmission tariff?
- 11 b) How do NS Power’s existing and revised tariffs accommodate an RtR customer providing
12 service to a customer who is directly connected to NS Power’s Transmission system?
- 13 c) How does NS Power accommodate spill energy currently?
- 14 d) In Attachment 3, page 4 of 14, NS Power proposed handling the potential for spilled energy
15 as follows:

16 “Any distribution connected generators will go through DGIP process to confirm
17 distribution capacity per zone and flag any possible transmission spill”

18 Has this process been approved by all parties at this time? Will requiring these generators
19 to go through the DGIP process delay their commercial operations?

- 20 e) Will the occurrence of spill energy at the transmission level cause inconsistencies with the
21 current approved allocated cost of service for each customer class? If so, please explain.
22

23 **Request IR-2:**

24 Refer to Exhibit N-1 the Application, Page 3 of 5, paragraph 2:

25

26 The changes to the existing tariffs are limited and focused primarily on the requirement to
27 segregate LRS customer load imported from the NS Power system for consumption by the
28 retail customer and distribution-connected generation exported to the NS Power system for
29 sale in the RtR market. The segregation is required because supply of electricity to retail
30 customers and aggregation of distribution-connected energy (whether customer-owned
31 behind-the-meter generation or LRS standalone generation) are two distinct services.
32 Additionally, it is required because the OATT and Distribution Tariff employ customer
33 load information only, while the SS and EBS tariffs require both customer load information
34 and the LRS generation information in the development of the tariff charges. The
35 segregation is enabled by the Company’s Advanced Metering Infrastructure (AMI)
36 technology which allows the creation of separate electricity import and export channels for
37 the recording, communication, and billing of the bi-directional electricity flows. (Emphasis
38 added)
39

1 Refer also to the NS Power OATT Schedules 1-10 ([https://www.nspower.ca/docs/default-](https://www.nspower.ca/docs/default-source/monthly-reports/oatt-schedules(pdf).pdf?sfvrsn=a5db547_7)
2 [source/monthly-reports/oatt-schedules\(pdf\).pdf?sfvrsn=a5db547_7](https://www.nspower.ca/docs/default-source/monthly-reports/oatt-schedules(pdf).pdf?sfvrsn=a5db547_7)) which includes Schedule 4A:
3 Generation Forecasting Service on page 11 of 23, which states: :

4 This Generation Forecasting Service set out in Schedule 4A of the OATT applies to
5 Licenced Retail Suppliers only and is not applicable to any other Eligible Customer.
6 Generation Forecasting Service addresses the accuracy of generation scheduling by
7 Licenced Retail Suppliers.

8 ...

9 To the extent that such schedules or forecasts of hourly production of the aggregate of a
10 Licenced Retail Supplier's RtR generation resources deviate from the actual production for
11 reasons other than those that occur as a result of actions directed by the Operating Area
12 operator the following charges shall apply:

13
14 An hourly deviation band of +/- 10 percent of the aggregate hourly scheduled or forecast
15 quantity (with a minimum deviation band of +/- 2 MW) will be applied hourly to any
16 forecast discrepancy that occurs as a result of the Transmission Customer's scheduled
17 transaction(s).

18 • Hourly forecast discrepancies falling outside the hourly deviation band during peak hours
19 will be charged at 10% of the average on-peak system marginal cost for the billing month.
20 • Hourly forecast discrepancies falling outside the hourly deviation band during non-peak
21 hours will be charged at 10% of the average non-peak system marginal cost for the billing
22 month.

- 23
- 24 a) Under Schedule 4A it says the Licenced Retail Supplier (LRS) is required to provide hourly
25 generation forecasts; is this a supply forecast and when was this Schedule 4A added to the
26 OATT and why?
- 27 b) Is NS Power allowed to charge the LRS when the latter's hourly discrepancies fall outside
28 the hourly deviation band of +/- 10 percent of the LRS' aggregate hourly scheduled forecast
29 quantity for forecasted or actual generation, or both?
- 30 c) Is NS Power is allowed to charge the LRS for each hour that these discrepancies occur or
31 is there a longer period of time during the day when one hour's discrepancy above the 10
32 percent band could be offset by the next hour's discrepancy below the 10 percent band? In
33 other words, are the discrepancies reconciled each hour or over some longer period of time?
- 34 d) Schedule 4A also says the deviations may occur as a result of actions directed by the
35 Operating Area operator. What party or entity performs the role of the Operating Area
36 operator today and will it remain the same party or entity in 2027 as well as after 2027?
- 37 e) Will the LRS' load forecast deviations be tracked by NS Power's AMI system or another
38 system? Which of these systems will track the charges that would accumulate due to

1 deviations under this provision of Schedule 4A and how will the compensation or credit be
2 recorded?

- 3 f) If these forecast deviations were to occur and they were not tracked and reconciled with
4 the LRS, what costs would be incurred and how would NS Power recover those costs?
- 5 g) Schedule 4A also requires each LRS to use “commercially reasonable efforts to provide
6 accurate schedules and forecasts of production from renewable low-impact generators that
7 are not dispatchable.” Is the term “commercially reasonable efforts” defined in the
8 Application Attachment 12 “Licensed Retail Supplier Terms and Conditions” and if not, is
9 this term defined elsewhere?
- 10

11 **Request IR-3:**

12 Refer to Exhibit N-1, Application, Attachment 11, Standby Service Tariff redline additions for
13 Availability (3) at page 1 of 5; Determination of Monthly Standby Contract Demand, 2nd and 5th
14 bullets on page 3 of 5, and Special Conditions on page 5:

15

- 16 a) Does the description included in the Availability paragraph (3) of the flow of hourly
17 imports and exports correspond accurately to the Stakeholder Engagement presentation on
18 May 14, 2026, provided by Power Advisory, pursuant to M12339, in the Application,
19 Attachment 2, page 10 of 50? Does the description in the Availability paragraph (3)
20 describe only the flow of energy or both energy and costs?
- 21 b) Which tariff classes are expected to receive LRS service upon approval of this Application?
- 22 c) Will the source for distribution system losses be what was approved in the most recent
23 GRA or be determined separately? In either case, please provide the source for distribution
24 losses.
- 25 d) Please provide the ELCC, as set out in the most recently approved IRP, including the matter
26 number and date of Board approval.
- 27 e) As described in the 5th bullet on page 3 of 5 referenced above, how long would operating
28 conditions of the generator likely have to depart from NS Power’s assumptions before
29 being subject to adjustment and what operating conditions would be reviewed for this
30 adjustment to take place?
- 31 f) For Special Conditions, 5 (iv), please provide the terms for recall that have been determined
32 and approved by all parties or are still under negotiation. How did NS Power determine
33 that the NSPSO has the unilateral option to recall export transactions utilizing energy from
34 the LRS’s resource?
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1 **Request IR-4:**

2 Refer to Exhibit N-1, the Application, Attachment 4, Distribution-Connected Aggregation Service
3 Tariff, DAS Tariff Review, page 3 of 3:
4

- 5 a) Given the mid-year timing of this Application, does NS Power anticipate a decision by the
6 Board by the end of this year?
- 7 b) If a Board Order is delayed or a separate filing must be made to accommodate revisions,
8 how will this impact the availability of NS Power's other tariffs included with this
9 Application to allow RtR service to commence in 2027?
- 10 c) Does NS Power intend to request that this tariff, and related tariffs included in this
11 application, be available as a pilot program? If so, what would be the term for this pilot?

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13 **Request IR-5:**

14 Refer to Exhibit N-1, the Application, Attachment 9, Energy Balancing Service Tariff,
15 Applicability (3) (4) and (5), on pages 1-2 of 4:
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- 17 a) Referring to Applicability 3, Pages 1 - 2 of 4, what is the source for the deduction of
18 transmission locational losses, as applicable to the geographic zone in which the generating
19 facility is interconnected? In your response, please include a list or map of the geographic
20 zones involved.
- 21 b) Referring to Applicability (4), how is the "compliance period" determined?
- 22 c) Referring to Applicability (5), what is the mechanism or process to compel the LRS to
23 provide a proposal to mitigate "Spill capacity" and within what time frame? What is the
24 definition of "Spill Capacity" as opposed to spill energy?
- 25 d) Will the terms of the Energy Balance Service, Standby Service, Distribution Access tariff
26 and Licensed Retail Supplier Terms and Conditions all be reviewed and subject to revision
27 as part of the Annually Adjusted Rates application each year or will they be reviewed under
28 a separate application process going forward?
- 29