



Blackburn Law Inc.

October 16, 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: M13008 – Nova Scotia Power Inc. (NSPI) Application for approval of Changes to the Renewable to Retail (RtR) Market associated Tariffs and Terms and Conditions

The Small Business Advocate (SBA) has reviewed NSPI's Application for approval of Renewable Energy-requested Updates to Renewable to Retail Market Elements, (the "Application")¹ filed July 31, 2026, as well as NSPI's responses to Information Requests, filed on October 1, 2026, and provides the following comments for the Board's consideration.

The SBA does not have any substantive concerns with the proposed changes as detailed in the Application, but notes that if the review of the tariffs are not undertaken until after the end of 2028, meaning in 2029, that could result in any changes not being implemented until 2030. The SBA submits that this creates a potentially significant delay in addressing issues if they were to arise in 2027. It is therefore respectfully submitted that NSPI should be required to make note of any issues that arise with respect the tariffs and their implementation, and the RtR Market generally, during 2027 and 2028 and to raise any significant concerns to the Board at the earliest opportunity, even if that occurs before the scheduled review at the end of 2028.

The SBA respectfully submits that it is crucial to identify issues early, especially as the functioning of the RtR Market is still somewhat unknown. For example, in response to a question from the Consumer Advocate regarding the engineering specifications and other information that NSPI required from Licensed Retail Suppliers (LSRs) to satisfy the requirements of special condition 5(i) – (vi), NSPI stated that "engineering specifications and contractual provisions have not yet been fully developed..."². In addition, in response to a Board question regarding the Independent Energy System Operator – Nova Scotia (IESO-NS) taking over responsibility for the RtR Market, NSPI stated only that, along with taking over responsibility for other market functions, "IESO-NS

¹ M13008 – Exhibit N-1, Nova Scotia Power Inc (NSPI) Updates to RTR Market Elements Application, (the "Application"), July 31, 2026.

² M13008 – Exhibit N-2, NSPI's Responses to Consumer Advocate Information Request, IR-2, Page 1 of 3, Lines 11-13.

may assume responsibility for oversight of the RtR Market...The potential roles of NSPSO and IESO-NS in the administration of the RtR market remains to be determined”³. These responses from NSPI suggest that there remains uncertainty with how things will progress with the RtR Market and the SBA respectfully submits that close attention must be paid, with concerns raised to the Board as soon as they are identified.

The SBA appreciates this opportunity to provide its comments to the Board in this matter.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 16th day of October, 2026.

Yours truly,


Melissa P. MacAdam
Small Business Advocate

³ M13008 – Exhibit N-3, Responses to Nova Scotia Energy Board Information Request, IR-4, Page 1 of 1, Lines 11-15.