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1 **Request IR-14:**

2
3 **Reference: ECI-IR-1**

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5 **Preamble: NS Power states that all RtR tariffs should apply fully to the RtR transactions**
6 **for behind-the-meter applications.**

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8 **(a) With reference to item (i) in the response to ECI-IR-1, please explain the differences**
9 **between a supplier selling a customer behind-the-meter generation equipment**
10 **(exclusively for the customer's own use) versus a supplier installing the same**
11 **equipment and selling metered electricity to that customer.**

12
13 **(b) Please highlight the reasons why RtR tariffs would apply to the latter scenario in (a)**
14 **but not the former.**

15
16 **(c) Please explain whether each scenario in (a) was permitted prior to the introduction**
17 **of the RtR framework.**

18
19 **(d) Does NS Power have any tariffs that allow a customer to utilize non-renewable**
20 **generation that does not meet the 2000 kW threshold of the Generation**
21 **Replacement and Load Following Tariff?**

22
23 **Response IR-14:**

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25 **(a) The difference is that**

26
27 **(i) there is no retail sale of electricity if a customer uses electricity generated by**
28 **equipment that it owns, and**

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1 (ii) there is a retail sale of electricity if a customer purchases electricity from another
2 party that owns generation, including on the customer's premises.

3
4 (b) Under scenario (i) the customer may, subject to the Net Metering regulation, be eligible
5 for Net Metering service.

6
7 Retail sales of electricity under scenario (ii) will be permitted under Section 3C of the
8 *Electricity Act* upon the effective date of the Board's Decision in this matter, but only by
9 an LRS in accordance with the RtR provisions and thus subject to the RtR tariffs.

10
11 (c) The introduction of the RtR framework does not affect scenario (i) eligibility under the
12 Net Metering regulation. If scenario (ii) had arisen prior to the RtR framework it would
13 have been a matter for determination under the *Public Utilities Act* and, if permitted,
14 subject to the provisions of an applicable tariff. At present, NS Power does not have a
15 tariff to support this type of configuration other than the Generation Replacement and
16 Load Following (GRLF) Tariff.

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18 (d) No.

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1 **Request IR-15:**

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3 **Reference: ECI-IR-5**

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5 **Please confirm whether the loss factors provided to the LRS in the settlement**
6 **documentation supporting each invoice will be sufficient for the LRS to demonstrate its**
7 **compliance with S.10 as required by S.23 of the Retailers Regulations. If not confirmed,**
8 **please explain what additional information can be provided by NS Power to enable each**
9 **LRS to comply with S.10 and S.23.**

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11 Response IR-15:

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13 Confirmed. NS Power anticipates that the transmission and distribution loss factors will enable
14 the LRS to determine the transmission and distribution losses as required by S.10 and S.23 of the
15 Retailers Regulations as a component of the LRS's compliance reports to the Board.

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1 **Request IR-16:**

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3 **Reference: ECI-IR-12**

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5 **Please provide additional reasons and support for NS Power's position that a LRS cannot**
6 **opt out of supplier-consolidated billing.**

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8 Response IR-16:

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10 Throughout the RtR market design process, NS Power and Stakeholders identified and
11 considered options for NS Power consolidated billing, split billing, and LRS consolidated billing.
12 Stakeholders' feedback indicated a clear preference for LRS consolidated billing. As a result,
13 the RtR framework and procedures have been designed and developed on the basis of LRS
14 consolidated billing, providing appropriate cash flow and payment security provisions between
15 NS Power and the LRS as well as procedures for non-payment.

16

17 Enabling a LRS to be able to choose an alternate billing method by opting out of supplier-
18 consolidated billing would require the development and implementation of a parallel set of
19 business processes for meter data management, settlement and billing. This would result in
20 higher development and implementation costs and would increase the ongoing administrative
21 burden, complexity and associated costs for the RtR market participants.

22

23 Under a Split-Billing arrangement, the procedures in response to non-payment would be
24 different, as would the requirements for LRS credit assurance. For example, failure of an RtR
25 customer to pay NS Power for DT Charges could result in disconnection of the customer by NS
26 Power in accordance with the NS Power Regulations. As such, the LRS would not be able to
27 supply the customer until they were re-connected.