

IN THE MATTER OF AN APPLICATION by Nova Scotia Power Incorporated
(“NSPI”) for approval of capital work orders CI# 39323, Digby Wind Project
(\$70,758,698); CI# 39626, Digby Wind Project Substation (\$4,586,277);
CI# 39627, Digby Wind Project Network Upgrades (\$4,156,325); and CI# 39628
Digby Wind Project Interconnection \$3,270,060), for a total cost of \$82,771,360

NSUARB - NSPI - P-128.10

Consumer Advocate Information Requests to NSPI

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Request IR-1:

Please state the date(s) on which 324 NSL “purchased all of Skypower’s assets and rights
in the Digby project, as well as the outstanding development rights held by Partners
Corporation” (Application, p. 3).

Request IR-2:

Please provide the contracts and agreements through which 324 NSL purchased the assets
and rights in the Digby project from Skypower and Scotian Windfields.

Request IR-3:

Please provide the data and documents demonstrating that “the pricing offered by EUS to
324 NSL is superior to the other pricing offered to Skypower following its RFP for this
project.” (Application p. 13)

Request IR-4:

Please provide the computation of each of the labour AO values for each of the four
Digby projects in Appendix 2.

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Request IR-5:

Please explain the meaning of the abbreviation "COPS" in Appendix 2.

Request IR-6:

Please explain the nature of the "Thermal & Hydro Contracts AO" in Appendix 2.

- a. Please explain whether these costs are an allocation of NSPI overheads, EUS overheads, or something else.

Request IR-7:

Please provide the derivation of the "Thermal & Hydro Contracts AO" for the Digby Wind Project in Appendix 2.

- a. Please explain whether the method used for computing "Thermal & Hydro Contracts AO" has been approved by the NSUARB, and if so, in what docket.

Request IR-8:

Were any overheads included in the costs of any of the four Digby projects in Appendix 2 computed differently for costs incurred by 324 NSL than for costs incurred by NSPI?

- a. Please explain and quantify any such differences.

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1 **Request IR-9:**

2
3 For each labour category in Appendix 2, please explain whether the labour is by NSPI
4 employees, EUS employees, or someone else.

- 5 a. If the labour is by NSPI employees, is it removed from NSPI's costs for revenue
6 requirements purposes?

7
8 **Request IR-10:**

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10 Please provide a breakdown of the "materials" line of Appendix 2 Page 3, showing
11 separately each category of equipment or purchase exceeding \$1 million.

12
13 **Request IR-11:**

14
15 Please provide a breakdown of the "Power Production Contracts" line of Appendix 2
16 Page 3, showing separately each category of equipment or purchase exceeding \$1
17 million.

18
19 **Request IR-12:**

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21 Please provide a breakdown of the "028 – Consulting" line of Appendix 2 Page 3, showing
22 separately each contractor and the type of consulting service provided.

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Request IR-13:

Please provide an update to Appendix 11, Tables 4.1–4.4, to include data through
September 2010, or the most recent available month.

Request IR-14:

Please provide an update to Appendix 11, Tables 6.3–6.4, including data through
September 2010, or the most recent available month.

Request IR-15:

For each value in to Appendix 11, Tables 6.5–6.6, that is computed other values in that
table, please provide the formulae used to compute the dependent values.

Request IR-16:

Appendix 15 and Application page 23, indicating the actual milestone dates or current
expectations.

Request IR-17:

Please provide the spreadsheet(s) from which Appendix 16 was derived, with all
formulae intact.

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Request IR-18:

Please provide the spreadsheet(s) from which Appendix 17 was derived, with all
formulae intact.

Request IR-19:

Please provide a comparison of the capital costs of the Digby Project (and associated
transmission, substation and interconnection costs) with the other NSPI-owned wind
project from the 2007 solicitation (Nuttby and Point Tupper).

- a. Please provide the costs (in \$/MW or \$/turbine) for each such project
equivalent to the "Power Production Contracts" line of Appendix 2 Page 3, and
explain the differences among those costs.

Request IR-20:

Please provide the Quarterly Development Reports for each project for the 4th quarter of
2009 and the 1st and 2nd quarters of 2010, to supplement what was provided in NSUARB
P-172 and NSUARB P-128.09.

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