ORIGINAL

Exhibit - N-33

NOVA SCOTIA UTILITY AND REVIEW BOARD

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

-and-

IN THE MATTER OF: An Application by Nova Scotia Power Incorporated and a Hearing for Approval of Certain Revisions to its Rates, Charges and Regulations.

RESPONSES TO INFORMATION REQUESTS

To: **Nova Scotia Power Incorporated**

From: **Halifax Regional Municipality**

Question IR-1 **Reference Evidence of Robert D. Greneman, page 13**

For each of the three recommendations, provide separately (i) the amount of revenue requirement dollars (based on the Application as filed) that would be saved by HRM? How much of these savings would be shifted to other classes if Mr. Greneman's recommendation is accepted versus the NSPI proposal and (ii) the dispersion of those dollars among the other respective rate classes?

Response IR-1 The information requested is contained in the two-page schedule accompanying this response. Page 2 of this schedule develops allocation factors using alternate weightings for the unmetered class for a particular case. On page 1, the factors are applied to specific cases.

Lines 1-3 on page 1 of the attached schedule show the results of using a weighting factor of 2.0 for the unmetered class in factor C-3 and applying that factor to Billing Services and the Call Centre. This replicates NSPI's methodology and shows results that are consistent with NSPI's allocation of these activities as reported in Exhibit 6, page 4 of 4 in Appendix G. This allocation serves as a reference from which the recommended changes are measured.

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Nova Scotia Utility
and Review Board

NOVA SCOTIA UTILITY AND REVIEW BOARD

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Question IR-1 (cont'd)

Lines 4-7 show the results of using individual weighting factors rather than a composite factor. Based on the relationship of billing services costs to call centre costs in NSPI's filing, while there are differences in the class allocations for each activity as compared with the reference case, there are no changes to the class totals.

Lines 8-11 show the effect of the recommendation to revise the unmetered weighting factor for billing services downward from 4.78 to 0.84. This change reduces the revenue requirement for unmetered by $275,000 as shown in column (K), line 11. A corresponding amount is allocated among NSPI's other classes as shown on line 11.

Lines 12-15 show the effect of the recommendation to revise the unmetered weighting factor for the call centre downward from 1.04 to 0.80. This change reduces the revenue requirement for unmetered by $48,000 as shown in column (K), line 15. A corresponding amount is allocated among NSPI's other classes as shown on line 15.

The combined effect of the three recommendations is shown on line 16. The result is a reduction in the unmetered revenue requirement of $321,000, with a corresponding amount allocated among NSPI's other classes as shown on line 16.

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Question IR-1 (cont'd)

Other cost allocations that appear to be dependent upon the allocation of billing services and the call centre include costs that are allocated on factors O-6, O-7, O-12B and O-13, shown in Exhibit 8B, page 2 of 2 in Appendix G. The effect of the recommended changes on these and any other costs that are dependent on billing services and the call centre were not quantified as any results would be uncertain without the use of NSPI's cost of service model.

NOVA SCOTIA POWER, INCORPORATED

EFFECT OF RECOMMENDATIONS ON BILLING SERVICES AND CALL CENTRE COSTS

Line	Factor	Description	Total Company	Domestic	Small General	General	General Large	Small Industrial	Medium Industrial	Large Industrial	Extra LI Interr.-2	Municipal	Unmetered
			(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
		Per NSPI Filed											
1	C-3(a)	Call Centre	11,522	8,981	488	1,173	38	239	123	63	4	13	401
2	C-3(a)	Billing Services	4,243	3,307	180	432	14	88	45	23	2	5	148
3		Total	15,765	12,288	668	1,605	51	327	168	86	6	17	549
		Recommendation: Discontinue use of a rounded composite weighting factor											
4	C-3(c)	Call Centre	11,522	9,133	497	1,193	38	243	125	64	4	13	212
5	C-3(b)	Billing Services	4,243	3,155	172	412	13	84	43	22	1	4	337
6		Total	15,765	12,288	668	1,605	51	327	168	86	6	17	549
7		Shift and dispersion with respect to per NSPI Filed	-	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	0
		Recommendation: Revise weighting factor for Billing Services downwards from 4.78 to 0.84 (Call Centre at 1.04)											
8	C-3(c)	Call Centre	11,522	9,133	497	1,193	38	243	125	64	4	13	212
9	C-3(d)	Billing Services	4,243	3,375	184	441	14	90	46	24	2	5	63
10		Total	15,765	12,508	680	1,633	52	333	171	87	6	17	275
11		Shift and dispersion with respect to per NSPI Filed	-	221	12	29	1	6	3	2	0	0	(273)
		Recommendation: Revise weighting factor for Call Centre downwards from 1.04 to 0.80 (Billing Services at 4.78)											
12	C-3(e)	Call Centre	11,522	9,172	499	1,198	38	244	126	64	4	13	164
13	C-3(b)	Billing Services	4,243	3,155	172	412	13	84	43	22	1	4	337
14		Total	15,765	12,327	670	1,610	52	328	169	86	6	17	500
15		Shift and dispersion with respect to per NSPI Filed	-	39	2	5	0	1	1	0	0	0	(48)
16		**Combined effect of recommendations**	-	260	14	34	1	7	4	2	0	0	(321)

NOVA SCOTIA POWER, INCORPORATED

DEVELOPMENT OF ALLOCATION FACTORS

Line	Factor	Description	Total Company	Domestic	Small General	General	General Large	Small Industrial	Medium Industrial	Large Industrial	Extra LI Interr.-2	Municipal	Unmetered
			(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
		Factor C-3 (As-Filed)											
1		Average Customers	477,168	430,332	23,406	11,239	18	2,293	236	30	2	6	9,606
2		Weighting Factor		1.00	1.00	5.00	100.00	5.00	25.00	100.00	100.00	100.00	2.00
3		Weighted Total	552,110	430,332	23,406	56,195	1,800	11,465	5,900	3,000	200	600	19,212
4	C-3(a)	% Responsibility	100.00%	77.94%	4.24%	10.18%	0.33%	2.08%	1.07%	0.54%	0.04%	0.11%	3.48%
		Discontinue use of a composite weighting factor											
		A. Billing Services goes from 2.0 (composite) to 4.78 (individual)											
5		Average Customers	477,168	430,332	23,406	11,239	18	2,293	236	30	2	6	9,606
6		Weighting Factor		1.00	1.00	5.00	100.00	5.00	25.00	100.00	100.00	100.00	4.78
7		Weighted Total	578,815	430,332	23,406	56,195	1,800	11,465	5,900	3,000	200	600	45,917
8	C-3(b)	% Responsibility	100.00%	74.35%	4.04%	9.71%	0.31%	1.98%	1.02%	0.52%	0.03%	0.10%	7.93%
		B. Call Centre goes from 2.0 (composite) to 1.04 (individual)											
9		Average Customers	477,168	430,332	23,406	11,239	18	2,293	236	30	2	6	9,606
10		Weighting Factor		1.00	1.00	5.00	100.00	5.00	25.00	100.00	100.00	100.00	1.04
11		Weighted Total	542,888	430,332	23,406	56,195	1,800	11,465	5,900	3,000	200	600	9,990
12	C-3(c)	% Responsibility	100.00%	79.27%	4.31%	10.35%	0.33%	2.11%	1.09%	0.55%	0.04%	0.11%	1.84%
		Billing Services (Unmetered weighting factor at 0.84)											
13		Average Customers	477,168	430,332	23,406	11,239	18	2,293	236	30	2	6	9,606
14		Weighting Factor		1.00	1.00	5.00	100.00	5.00	25.00	100.00	100.00	100.00	0.84
15		Weighted Total	540,967	430,332	23,406	56,195	1,800	11,465	5,900	3,000	200	600	8,069
16	C-3(d)	% Responsibility	100.00%	79.55%	4.33%	10.39%	0.33%	2.12%	1.09%	0.55%	0.04%	0.11%	1.49%
		Call Centre (Unmetered weighting factor at 0.80)											
17		Average Customers	477,168	430,332	23,406	11,239	18	2,293	236	30	2	6	9,606
18		Weighting Factor		1.00	1.00	5.00	100.00	5.00	25.00	100.00	100.00	100.00	0.80
19		Weighted Total	540,583	430,332	23,406	56,195	1,800	11,465	5,900	3,000	200	600	7,685
20	C-3(e)	% Responsibility	100.00%	79.61%	4.33%	10.40%	0.33%	2.12%	1.09%	0.55%	0.04%	0.11%	1.42%

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Question IR-2 According to HRM's own records (i.e. not data originally provided by NSPI), how many street light fixtures does HRM operate? Please provide a breakdown by fixture type.

Response IR-2 HRM is paying for the following units as per each rate code, through the Street Light account.

See Attachment 1 regarding Rate Code Totals

HRM has made requests to NSPI to perform an updated detailed inventory audit, where the GPS location and type of fixture would be identified and inputted to the HRM GIS database for future operations reference. HRM is willing to share the cost of this detailed audit 50% with NSPI. HRM is paying for the units as per each rate code, through its Street Light account as shown in Attachment 1.

Halifax Regional Municipality
Sum of Rate Codes – Street Lighting

NSPI Rate_Code	Wattage Type	Total
101	125 Mercury Vapour	513
102	175 Mercury Vapour	466
103	250 Mercury Vapour	82
104	400 Mercury Vapour	61
106	1000 Mercury Vapour	7
111	Fluorescent	2
118	Fluorescent	3
120	Fluorescent	1
121	250 High Intensity	893
122	400 High Intensity	72
123	70 High Intensity	15973
124	100 High Intensity	6800
125	150 High Intensity	1492
131	180 Low Pressure	9
140	400 Metallic Additive	21
141	1000 Metallic Additive	8
150	Fluorescent	13
201	125 Mercury Vapour	9
221	250 High Intensity	2006
222	70 High Intensity	6223
223	100 High Intensity	2755
224	150 High Intensity	1782
231	180 Low Pressure	9
326	400 High Intensity	101
935	1000 Miscellaneous	14
979	1000 Miscellaneous	12
Total		39407

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To: **Nova Scotia Power Incorporated**

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Question IR-3 How many intersections in HRM are controlled with traffic lights?

Response IR-3 As of January 1, 2007, HRM owns and maintains 246 Signalized Intersections.

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Question IR-4 According to HRM's own records (i.e. not data originally provided by NSPI), how many traffic light fixtures does HRM operate? How many individual lamps does this comprise? Please provide the number of LED and incandescent separately.

Response IR-4 HRM is currently in the process of taking a detailed inventory of the number of fixtures installed. The number of fixtures, both LED and incandescent, is currently unknown. There are approximately 50 lamps per intersection.

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To: **Nova Scotia Power Incorporated**

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Question IR-5 Please provide a list of all HRM intersections that have been converted to LED to date.

Response IR-5 As of January 1, 2007, HRM has 46 intersections which are fully installed with LED's Signals. See Attachment 1 for the list of intersections. Of these, 26 have been converted from incandescent to LED, and 20 intersections were installed as new with LED's. Of the 26 converted intersections, 16 were located in Sackville, the NSPI conversion forms in respect of which were e-mailed in one batch in April, 2006, a copy of one of which is found in Attachment 2. HRM has also been gradually replacing the red LED signals (during repair work). It is HRM's practice to only notify NSPI and request a billing adjustment when the complete intersection has been converted.

HRM Intersections Using LED Lights

New Intersections	Signal Upgrades
Bayers Rd / Oxford St	Windmill Rd / Akerley
Portland St / Prince Arthur	Bayers / Young / Windsor
Barrington St / Niobe Gate	Portland St / Pleasant St
Wright Ave / Joseph Zatzman / Raddall	Dunbrack / Lacewood Dr
Countryview / McClury	Bedford Hwy / Hammonds Plains Rd
Countryview / Shubie	Main St / Lake Major Rd
Commodore / Countryview	Donaldson / Dunbrack St / Kearney Lake Rd
Commodore / Brownlow	Main St / Montague Mines / Hillsboro
Hammonds Plains Rd / Kingswood	Cole Harbor Rd / Otago
Cobequid / Zinck / Freer	Pleasant St / Hwy 111
Inglis / Tower Rd	Sackville Dr / Beaverbank Rd
Dartmouth Rd / Ridgevale	Sackville Dr / Millwood
Joseph Howe Dr / Springvale Ave	Sackville Dr / Riverside Dr
Akerley / Mosher	Sackville Dr / Pinehill
Bedford Hwy / Southgate	Sackville Dr / Skyridge Ave
Burnside Dr / Wright Ave	Sackville Dr / Superstore / Walmart
Forest Hills Parkway / Auburn Dr	Sackville Dr / Sackville Cross Rd
Kearney Lake Rd / Parkland	Glendale Dr / Metropolitan Ave
Portland St / Bus Depot	Sackville Dr / Downsview Mall
Bedford Hwy / Larry Uteck	Sackville Dr / Millwood
Wright Ave / Finlay (under construction)	Beaverbank / Millwood / Stokil
Finlay / McClury (under construction)	Glendale Dr / Riverside
Finlay / Shubie (under construction	Glendale Dr / Beaverbank Rd
Pleasant St / Acadia (under construction)	Metropolitan Dr / First Lake Dr
	Sackville Dr / Florence / Leaside
	Glendale Dr / Cobequid Rd

NOVA SCOTIA POWER INC.
TRAFFIC CONTROL LIGHT CONVERSION PROJECT (See Note)

Municipality / Government Dept. Halifax Regional Municipality

Intersection Street Names **Cobiquid Road @ Zinc / Freer**

Location **Sackville**

Account Type UNMETERED [x] METERED [ ]

Account # **1334298-5**

Meter # if applicable

EXISTING INCANDESCENT LIGHTS BEING REMOVED

NUMBER	DESCRIPTION	WATTAGE

NEW LED LIGHTS BEING INSTALLED

NUMBER	DESCRIPTION (Continuous/Non-Continuous, Size, Colour)	WATTAGE
8	Bi-modal Ped Heads	5w
16	12" (300mm) Red LED	10w
9	12" (300mm) Amber LED	22w
9	12" (300mm) Green LED	12w
7	8" (200mm) Amber LED	13w
7	8" (200mm) Green LED	6w
2	12" (300mm) Bi-modal Arrow	10w
Summary		
8	Continous LED	RC#531
50	Non-Continous LED	RC#530

NOTES (if required):

This intersection is under construction.
Power will be required by end of January / 2006

Date Installed TBD

Authorized Signature Of Municipality/Government

NOVA SCOTIA POWER
An Emera Company

Please return form to: Barrie Clark, NS Power, PO Box 910, Halifax, NS B3J 2W5
Fax 428-6542, barrie.clark@nspower.ca

Note: This form is to be used when replacing incandescent traffic control lights with Light Emitting Diode (LED) lights. Please note whether LED is continuous or non-continuous operation. Please contact NSPI directly if intersection wiring supplies more than traffic control signals or flashing highway lights.

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Question IR-6 Please provide a schedule for intersection conversions to LED for 2007 and 2008.

Response IR-6 At this time, all future installations of LED signals are dependent on Budget approvals. Until the 2007/08 budget is passed, which is not expected until March/April 2007, there is no schedule for future intersection installations. It would be reasonable to expect that 40-50 intersections will be converted from LED to incandescent of the remaining 200 in 2007-2008. This would be carried out as a Capital project, and NSPI would be notified of the billing changes required in a batch request, similar to the Sackville conversion process.

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Question IR-7 Please provide the number of billing staff employed by HRM.

Response IR-7 The number of HRM billing staff is not relevant to the current proceeding. If this information is being sought to provide a comparison to NSPI costs, the nature of each organization is sufficiently disparate that the answer would not provide relevant information.

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Question IR-8 Please provide the number of property tax accounts in HRM.

Response IR-8 The number of property tax accounts is not relevant to the current proceedings. Property tax payment is only one of the approximately 151 types of payments HRM collects. To the extent that this IR is related to IR-7, the number of HRM billing staff per property tax account does not provide information relevant to the current proceeding.

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To: **Nova Scotia Power Incorporated**

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Question IR-9 What is the direct costs (labour and materials only) to repair and maintain HRM owned street lights?

Response IR-9 HRM employs a higher level of streetlight maintenance than NSPI and therefore HRM maintenance costs are not relevant to this proceeding.

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Question IR-10 Who currently performs street light maintenance for HRM (internal workforce or external contractors)?

Response IR-10 A subsidiary of Emera, Cablecom, together with HRM staff perform streetlight maintenance for HRM.

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Question IR-11 If external contractors, please provide a copy of the current contract.

Response IR-11 The current contract with Cablecom is a confidential document.