Nova Scotia POWER
An Emera Company

PO Box 910 ● Halifax, Nova Scotia ● Canada ● B3J 2W5

July 8, 2025

Crystal Henwood
Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
Halifax, NS B3J 3S3

Re: M12149 – Nova Scotia Power Inc. Investigation arising from Joint Use Agreement between NS Power and Bell Aliant

Dear Ms. Henwood:

On March 21, 2025 the Nova Scotia Energy Board (NSEB, Board) wrote to advise that it was opening an investigation into the Joint Use Agreement for Utility Poles between Nova Scotia Power Inc. (NS Power) and Bell Aliant (Bell).

The rationale and scope of the investigation were provided as follows in the Board's letter:

> The investigation follows two complaints where the following issues about the Joint Use Agreement were raised [see M11835 and M11838].
>
> 1) Whether the Joint Use Agreement is unreasonable, insufficient, or unjustly discriminatory because there are different rebate schemes depending on whether an area is serviced by joint use poles owned by NS Power or Bell Aliant.
>
> 2) Whether the provision of electric service connections and the disconnection and removal of service connections are being delayed or impacted by the processes used under the Joint Use Agreement.

The NSEB initiated a paper hearing and responded to Information Requests from the Board on June 16, 2025.

As noted in the Board's letter of March 21, 2025, the 1993 Joint Use Agreement between NS Power and Bell has been entered as Exhibit N-1 in this proceeding.

On May 8, 2025 NS Power wrote to the Board and provided a copy of a Letter of Intent between NS Power and Bell dated March 3, 2025 which sets out an agreement for how new line extensions will be handled in order to improve the overall experience for customers. That Letter of Intent has been entered as Exhibit N-4 in this proceeding.

NS Power wishes to include an additional document in its evidence, as well as the information below.

On April 23, 2025 NS Power filed a letter about its updated customer processes in matters M11838, M11839 and M11845. NS Power relies on the information contained in the letter and is attaching it to this letter as an exhibit to be included in this proceeding.

Additional commentary follows below.

NS Power wishes to reiterate the actions taken by NS Power and Bell in 2024 to resolve communication, process, and delay issues for the sole benefit of their customers. As of March 2025, these actions resulted in NS Power having sole responsibility for all new line extensions, which effectively eliminates issues of long delay times and differential pricing. This also means that all new line extensions will be treated the same from a cost and rebate perspective.

To that end, the new rebate scheme for new line extensions is not unreasonable, insufficient or unjustly discriminatory as all rebates will now follow NS Power's regulated rebate scheme. Further information about this can be found in NS Power's responses to Information Requests, which are available as Exhibit N-5 in this proceeding.

Furthermore, as of March 2025, new service connections will not be delayed or impacted by the processes under the Joint Use Agreement, regardless of who owns the poles. NS Power will be responsible for all line extensions for new service connections going forward. The processes for disconnection and removal of service connections owned by NS Power on NS Power-owned poles are the same as they were before and are not impacted by the Joint Use Agreement. Disconnection and removal of NS Power-owned assets on Bell-owned poles will proceed with notification to Bell only; there is no requirement for approval from Bell in these situations. As NS Power is one of the companies that completes work on behalf of Bell, customers may further benefit by having NS Power crews remove both NS Power and Bell assets (line or poles) at the same time.

In a scenario where lines must be transferred to different poles, as was the case for Seneca Shores, re-engineering for the assets may be required. Engineering is necessary when existing assets do not meet current standards. To the greatest extent possible, the execution of the work in the field must also ensure continuous reliable supply to other existing customers. The coordination, time and processes to engineer and execute this work for both NS Power and Bell is not related to the Joint Use Agreement.

In summary, NS Power asks that the Board accept the April 23, 2025 letter and this correspondence as additional evidence in this proceeding.

Yours truly,

Blake Williams
Senior Director, Regulatory

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April 23, 2025

Lisa Wallace
Chief Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
P.O. Box 1692, Unit "M"
Halifax, NS B3J 3S3

Re: M11838, M11839, M11845 – Customer Service Processes – Compliance Filing

Dear Ms. Wallace:

In August 2024, Nova Scotia Power Inc. (NS Power, Company) received three customer complaints from Dustin Fitch, Lorne Smith and Seneca Shores Living Inc. that were all related to service connection request delays. In the same month, NS Power provided updates on the three complaints to The Nova Scotia Energy Board (Board, NSEB) and then later responded to Information Requests on November 29, 2024. The Board issued its decisions on the above-noted matters on February 13, 2025, and directed as follows:

> NS Power is […] directed to file an update by April 30, 2025, about a review of its customer service processes to improve communication with its customers on these issues and to better coordinate the work of its staff in its work management system.

Further to this direction, please see below NS Power's response.

BACKGROUND

Since the beginning of 2022 NS Power has seen its total number of customers grow by approximately 21,000 and the Company now has over 557,000 customers across all customer classes. This trend of increasing customer numbers alongside increased residential construction projects throughout the province is reflected in the number of work requests received by NS Power, which increased by approximately 30 percent from the start of 2022 through to the end of 2024.

The Company acknowledges that there have been instances where the customer experience has not been ideal, and that these instances are often driven by the changes described above. NS Power identified this trend and the need for additional support to address the increasing number of customers and the additional volume of customer-requested work, reliability work, and rural broadband make-ready work. NS Power has been working internally to determine where enhancements to the Company's processes can be made, representing an active effort to improve service for all customers and complete all work in a more timely manner.

Since the beginning of 2023, NS Power has increased internal resources and contractors and focused on refining processes and communication to deliver a better experience for customers. NS Power believes that the overall experience improved in the latter half of 2024 and 2025, and the work that was already done has reduced Building and Customer Escalations in 2024 by approximately half compared to what was experienced in prior years. However, NS Power acknowledges that there is still progress to be made and has developed a plan to address this work. This includes planned additional activities in 2025 that will further improve the experience for all customers when requesting work through NS Power. In the sections below, NS Power describes the areas identified as requiring further improvement, the steps taken to date to address these areas, and the proposed method for continuing to address those issues in 2025.

IDENTIFIED GOALS AND ACTIONS TAKEN

Resource Plan

NS Power has been actively working to increase its internal resources and contractors to match work volume demand over the past several years. To support the increase in work for its customers NS Power has hired 12 Planners, 20 Wiring Inspectors, 2 Planning Coordinators, 13 Permit Centre Employees, 53 Powerline Technicians (PLTs) and 30 PLT Apprentices since the beginning of 2023. NS Power has also increased the complement of PLTs through its Line Services Contract with Connect Atlantic Utility Services, as well as signed contracts with two additional line services contractors, K-Line and Locke's Electrical, in order to complete more work with PLT contractors.

In 2025 NS Power will continue its extensive recruitment efforts to ensure that adequate resources, such as PLTs, are in place to support customer work.

Customer Communications

A common theme in escalations is unclear communication or miscommunication with customers. NS Power identified this issue and plans to implement a comprehensive communication structure for customer-requested work. The elements of this structure are being phased in, and some aspects are already in place. Each element is described below, along with the actual implementation date for those aspects that are already in place, or the planned implementation date for those aspects that still need to be implemented:

- NS Power dedicated resources to managing complex customer files and escalated situations in late 2023, and expanded this effort in 2024, improving communications with customers who are served by this team.

- Customer Service Associate (CSA) scripting has been reviewed and will be continuously updated to ensure that customers have clearer expectations and understanding from their first call to NS Power (implemented at the start of Q1 2025).

- Customer emails are collected for all work requests (implemented in Q2 2023) to allow for increased communication with customers.

- Customers now receive letters via email at the start of a project outlining the expectations for the journey of their initiative (designed and tested throughout 2024, and implemented at start of Q1 2025).

- Customers are now sent a second letter via email after a Planner visit that confirms specifics of what is required for the projects (implemented in Q1 2025). This helps provide a clear expectation of what elements of work will be completed by NS Power, and what elements need to be completed by the customer.

- Customer timelines for completing work will be updated regularly based on current performance and forecasts, to set more realistic expectations for customers and provide customers with better insight into the timelines when they initiate a request and throughout the steps of the work. This effort is necessary as situations such as adverse weather can affect the operational timelines to complete customer work. This information will also be reviewed internally to ensure organizational awareness of the customer experience (implemented in Q1 2025).

- NS Power continues to leverage the 'one view of work' that the Work and Asset Management (WAM) project delivered in 2023, and senior leadership of NS Power's Energy Delivery Scheduling and Customer Care teams meet frequently to review the status of customer-requested work in the system.

Joint Use Agreement with Bell Aliant

The Joint Use Agreement with Bell Aliant has also been identified as a source of confusion and can lead to delays for customers. Until recently the arrangement for customers in a Bell Aliant-owned pole area (Bell Pole Area) was that NS Power completed the required work, but effectively acted as a subcontractor for Bell and required approval from Bell in order to be permitted to proceed with that work. Since Bell Aliant owns these poles, NS Power had to submit a work request to Bell Aliant and wait to receive the required approval before proceeding with line extension work or service pole work within a Bell

Pole Area. This approval process led to significant delays and inconsistencies in cost for customers requesting power connections in a Bell Pole Area.

As of March 3, 2025 this is no longer the case. Moving forward, NS Power is no longer required to submit a work request or wait for approval before proceeding with line extension or service pole work within a Bell Pole Area. The removal of this requirement for this type of work should serve to alleviate most of the delays experienced by customers in these areas. Although NS Power acknowledges that this will not capture all scenarios, and that the Joint Use Agreement with Bell Aliant may benefit from further updates, the Company believes that this is a very positive development.

Complex Customer Projects

Work requests from large developers generally represent more complex projects and work orders. With development continuing to accelerate within the province, NS Power's Customer Care and Key Accounts teams are exploring solutions to address the increased volume of complex requests in an effective and efficient manner. An initiative is underway for NS Power to review complex and large developer work requests and identify areas where improvements to this work order process and associated communications can be made. It is expected that the results of this will benefit all customers in addition to developers, as efficiency in the handling of work orders overall will be assessed.

Managing Escalations

NS Power's goal is to reduce situations where escalation of customer complaints takes place. However, the Company recognizes that escalations cannot be eliminated entirely and that some matters will inevitably end up in an escalated status. NS Power is expanding its programs to ensure that internal escalations are dealt with effectively, with the goal of reducing the incidence of additional escalations to the Dispute Resolution Officer (DRO) or Board.

NS Power's dedicated resources within Customer Care continue to be a primary resource utilized to address customer escalations. In 2024, and now into 2025, this internal team will become increasingly proactively engaged with more complex cases or cases that are flagged as being likely to escalate before they reach the point of escalation. This team will also continue to mitigate escalated files in a timely manner and will become involved in an increased number of escalated files at an earlier point in the escalation process. Initial impacts of this program were positive in 2024, and in 2025 the goal is to achieve continued reductions in escalations. To achieve this goal, these internal resources will be expanded in 2025.

Turnaround Time

The final area identified for improvement was NS Power's turnaround times, both in the Permit Centre and for inspections. In 2023, wait times in the Permit Centre averaged 21 minutes and in 2024 these times improved to 1 minute. Inspection times were also improved from an average of four-six weeks across the province in 2023 to inspections being consistently provided within a two-week window in 2024. NS Power also made priority inspections more accessible to increase the availability of inspections for those who require them immediately. This was made possible by the increased resourcing efforts described above. The two-week average window for inspections will be maintained as a goal in 2025.

NS Power has forwarded a copy of this correspondence to Mr. Fitch, Ms. Smith and Seneca Shores Living Inc.

Yours truly,

Mollie Morris
Regulatory Counsel

Encl.

c. Dustin Fitch
Lorne Smith
Seneca Shores Living Inc.