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Request IR-1:

Reference: Exhibit N-1, Joint Use Agreement

(a) Has the Joint Use Agreement (“JUA”) been amended at any time since March 31, 1993?

(b) The JUA is now over 30 years old. Has NS Power ever engaged in a review of the JUA, at any time since March 31, 1993, to determine whether the Agreement (in whole or in part) should be updated or amended in any way? If so, please provide details concerning any such reviews. If no such reviews have been conducted, please explain why not.

Response IR-1:

(a) No, the Joint Use Agreement (JUA) has not been amended since March 31, 1993. While operational practices and technologies have evolved over time, the terms of the agreement have remained unchanged.

(b) Yes, NS Power has periodically reviewed the JUA through discussions within the Joint Use Operating Committee with Bell Aliant (Bell). These discussions have primarily focused on operational coordination and customer service considerations. Throughout its duration, the JUA has continued to support joint use activities effectively, and no material issues had previously emerged that warranted formal amendments. However, recent operational challenges related to the line extension process have brought renewed attention to the agreement, highlighting areas where updates may be beneficial.

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Request IR-2:

Reference: Exhibit N-4, NS Power Letter to Board re: Letter of Intent dated May 8, 2025

NS Power's letter, and the content of the Letter of Intent, indicate that the current process changes described therein are "test changes," which may or may not be fully accepted and implemented by NS Power and Bell Aliant ("Bell").

(a) Has NS Power considered other potential alternative resolutions to address these issues other than the "test changes" as described? If so, please provide details.

(b) Please describe what information NS Power intends to gather during the test period of March 3, 2025 to December 31, 2025 to "review and evaluate the process and settlement exercise undertaken in these initial periods, and to ensure an accurate determination of the process is documented."

Response IR-2:

(a) No, alternative resolutions have not been considered. If it is determined that the new process does not provide benefits to customers as intended, NS Power and Bell will consider potential alternative resolutions.

(b) During the test period, NS Power will collect data on the number of poles placed in areas where, under previous arrangements, would have belonged to Bell. This information will be obtained using various internal systems and will be used to determine the updated pole ownership ratio and estimate the number of poles Bell may be required to purchase. NS Power will also review timelines for line extensions to determine the overall benefit to customers with this process.

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1 **Request IR-3:**

2
3 **Reference: Exhibit N-6, NS Power Evidence, Attachment 1 (NS Power Letter to Board**
4 **dated April 23, 2025), p. 4 of 5**

5
6 **NS Power acknowledges that its prior arrangement with Bell “led to**
7 **significant delays and inconsistencies in cost for customers requesting power**
8 **connections in a Bell Pole Area.” However, NS Power goes on to state: “As of**
9 **March 3, 2025 this is no longer the case. Moving forward, NS Power is no**
10 **longer required to submit a work request or wait for approval before**
11 **proceeding with line extension or service pole work within a Bell Pole Area.**
12 **The removal of this requirement for this type of work should serve to**
13 **alleviate most of the delays experienced by customers in these areas.**
14 **Although NS Power acknowledges that this will not capture all scenarios,**
15 **and that the Joint Use Agreement with Bell Aliant may benefit from further**
16 **updates, the Company believes that this is a very positive development.”**
17

18 **(a) How long has NS Power been aware of these delays and inconsistencies?**

19
20 **(b) Has NS Power collected any data that would help demonstrate the extent of these**
21 **delays and inconsistencies? If so, please provide. If not, please explain why not.**
22

23 **(c) Why did NS Power only make the required change to the Joint Use Agreement as of**
24 **March 3, 2025?**
25

26 **(d) Since March 3, 2025, has NS Power (i) tracked service times for power connections to**
27 **both NS Power and Bell poles, and (ii), if so, does the information show any**
28 **improvement for connection times?**
29

30 **(e) If the answer to (d)(i) is that NS Power has not tracked service times for power**
31 **connections to both NS Power and Bell Poles, then please explain why not.**
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1 **(f) What other “further updates” does NS Power anticipate may be beneficial to the Joint**
2 **Use Agreement?**

3
4 **(g) What efforts is NS Power currently making to pursue further updates to the Joint**
5 **Use Agreement that are beneficial to customers?**

6
7 Response IR-3:
8

9 (a) NS Power has been aware of the delays and inconsistencies associated with the previous
10 process over the past year. These challenges have come to light due to population growth
11 in Nova Scotia and a record number of customer power requests in 2024. Initially, these
12 issues were managed on a case-by-case basis. As the broader impact became evident, NS
13 Power began working with Bell to develop a more efficient process, resulting in the
14 changes implemented on March 3, 2025.

15
16 (b) Prior to the cyber incident, NS Power maintained live data tracking the duration of
17 customer installations. The previous process for Bell Aliant Work Requests often included
18 multiple steps that contributed to delays, such as a secondary site visit by a Bell
19 representative to confirm site requirements, separate payments to Bell and NS Power, and
20 delays in communication from Bell contractors to NS Power to resume installation work.
21 Unfortunately, due to the cyber incident, NS Power is currently unable to access this
22 historical data, as the application used for tracking is unavailable. Greater clarity on the
23 availability of this data may be possible by the fall.

24
25 (c) The change was implemented on March 3, 2025, following extensive discussions to
26 identify the appropriate process improvements and formal agreement from Bell on the
27 initiative. Implementation required updates to internal systems, staff training, and revisions
28 to documentation and forms, all of which contributed to the timing of the change.
29

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1 (d) Since the cyber incident, NS Power has not been able to formally create new tracking data
2 for service times for power connections as effectively as before, as the links between
3 applications used to track this information are currently unavailable.

4
5 (e) As noted in responses to part (b) and (d), NS Power had the capability to track installation
6 timelines more effectively prior to the cyber incident. However, the incident has
7 temporarily impacted the Company's ability to access and generate new tracking data for
8 service times related to both NS Power and Bell poles, as the links between applications
9 used for tracking are currently unavailable.

10
11 (f) As part of the recent process changes, NS Power and Bell have agreed to formalize the
12 updates through a signed agreement. Once finalized, both parties will assess whether
13 further revisions to the JUA are necessary. At this time, no additional updates are
14 anticipated.

15
16 (g) Please refer to part (f).

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Request IR-4:

Reference: Exhibit N-6, NS Power Evidence, Attachment 1 (NS Power Letter to Board dated April 23, 2025), p. 4 of 5

“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.”

(a) Please describe in further detail NS Power’s initiative to “review complex and large developer work requests,” and clarify when the results of this review will be known and any learnings implemented.

Response IR-4:

(a) On June 9, 2025, NS Power submitted an application to the Board for a project aimed at improving service connections for customers involved in large or complex construction projects. The initiative includes the development of a stand-alone portal and dedicated, segment-specific processes tailored to support customers with significant power requirements or unique connection needs.

The new portal and its streamlined processes will enhance customer development projects by enabling functionality for self-serve access to document exchange, status tracking, and service coordination. It will be configured to provide clarity and organization of relevant project information, improving visibility into project tasks and empowering users to plan and forecast project milestones. The portal will increase transparency, offering insights into

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1 the status of project activities and task ownership, which will help reduce the time required
2 to manage escalations and delays, ultimately improving overall performance and customer
3 satisfaction.

4
5 The portal is expected to be in service by June 2026. For more details, please refer to NSEB
6 M12318 – CI C0073777 – IT Complex Customer Projects.