

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: THE PUBLIC UTILITIES ACT

- and -

**IN THE MATTER OF: AN APPLICATION by NOVA SCOTIA POWER INC. for Approval
of CI C0061005 – POA Cell Capping 2025 – \$2,530,405**

INFORMATION REQUESTS

To: Lana Myatt, Senior Regulatory Analyst
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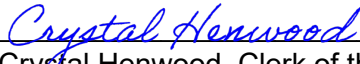
From: Board Staff
Nova Scotia Energy Board

Responses Due: Monday, August 11, 2025

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Somesh Singh, P.Eng.**
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Issued at Halifax, Nova Scotia, this 18th day of July 2025.



Crystal Henwood, Clerk of the Board

Request IR-1:

The application notes the following related CIs pursuant to Section 11.2 of the Capital Expenditure Justification Criteria (CEJC):

- 2023 C0052498 POA - Ash Cell Capping 2023 - \$3,698,493
- 2026 TBD POA Ash Cell Capping 2026 - \$2,420,000
- 2027 TBD POA Ash Cell Capping 2027 - \$TBD

a) Please provide a status of C0052498.

b) Please provide a list of all active cells that require capping within the next five years, along with their current elevation limits and the estimated elevation limits projected until the Point Aconi (PA) unit's planned retirement in 2029/2030.

Request IR-2:

Please provide a copy of the PA Generating Station's approved industrial permit issued by the NS Department of Environment and Climate Change (Department).

Request IR-3:

Page 1 of the application states: "A cell is considered to have reached capacity when it meets any of its critical design or regulatory thresholds — including maximum volume, final elevation, permitted airspace, or environmental constraints. In the context of this project, the cell capacity was determined by the elevation limit, which is approximately 41 meters above sea level."

a) Please provide a copy of the documented critical design and regulatory thresholds.

b) Please provide a copy of the documentation confirming that Cell 2 has reached an elevation of 41 meters above sea level.

c) Is Cell 2 currently at its maximum design/regulatory volume?

- i. If not, please explain why ash within Cell 2 cannot be moved around within the cell to take advantage of available volume while lowering the elevation of the cell below 41m above sea level.

Request IR-4:

Page 1 of the application states: "The capping will also reduce the volume of wastewater generated at the ash disposal site by limiting the infiltration of precipitation into the ash cells. The project scope includes construction work on the Cell 2 Interceptor Ditch to divert water not contacted by ash away from the ash management area and treatment ponds, therefore reducing the operational demands on the wastewater treatment system."

- a) Please provide an estimate of the annual operations costs savings at the wastewater treatment system as a result of completing the proposed project.
- b) Where will the Cell 2 Interceptor Ditch divert the water that is not contacted by ash and where will that water ultimately discharge?

Request IR-5:

Page 2 of the application states: "Following installation, surface runoff from the capped area will be monitored in accordance with the Department's regulatory standards. Upon verification that water quality meets the applicable discharge criteria, runoff will be directed away from the wastewater collection system, thereby reducing the hydraulic load on the site's treatment infrastructure."

- a) Please describe the work involved to verify that surface runoff water quality meets applicable discharge criteria.
- b) Please describe the work involved to direct runoff away from the wastewater collection system when it is confirmed that water quality meets applicable discharge criteria.
 - i. Is the cost of this work included in the \$2,530,405 estimate? If not, please explain.
- c) What are the consequences if the surface runoff water quality does not meet applicable discharge criteria?
 - i. What entity will be responsible for paying any costs associated with these consequences?

Request IR-6:

Page 2 of the application states: "Other cells within the Residue Management Site (RMS) remain active and continue to receive ash material throughout the construction season."

- a) Please confirm that the other cells within the RMS have sufficient available capacity to accommodate ash/residuals that is expected to be produced by the PA generating station up until its planned retirement in 2029/2030.
 - i. If not confirmed, please describe NS Power's contingency plan, and related cost estimate, to handle any excess ash/residuals produced by the station in advance of its retirement.

Request IR-7:

Page 2 of the application states: "A liner-style cap has been selected as the most cost-effective and technically suitable solution for the permanent closure of the cell."

a) Please confirm that the proposed liner will be constructed of clay.

i. If not confirmed, please describe the type of liner proposed for the project.

b) Please identify the other types of liners considered by NS Power for the project and provide the estimated capital cost for each.

Request IR-8:

With respect to cap design, Page 2 of the application states that, "this design is consistent with the approach previously accepted by the Nova Scotia Department of Environment and Climate Change for earlier cell capping projects".

a) Please confirm that the cost of obtaining all required acceptances, approvals, licenses, etc., from the Department and any other regulatory authorities for this project are included in the \$2,530,405 estimate.

i. If not, please explain.

Request IR-9:

With regard to all third-party costs on Page 3 of the application, including those in Attachment 1.

a) Please confirm whether the noted pricing is based on actual, competitive, tendered prices for the current project.

b) Please itemize and explain any third-party costs that will not be based on a competitive procurement process and how NS Power can justify these costs to ratepayers.

Request IR-10:

Please provide a table similar to that on Page 3 of the application showing the breakdown of the original budget of \$3,225,440 compared to the new estimate of \$2,530,405.

Request IR-11:

Assuming the project is approved by the Board and the full project cost is included in NS Power's rate base once placed into service, please identify the rate base dollar amount associated with the project that NS Power expects to transfer to the DDA upon retirement of the POA generating facility in 2029/30.