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Request IR-1:

Reference to Page 1 of 6, NS Power notes: “Pursuant to Section 11.2 of the CEJC, related CIs for Steam projects include “work completed on the same asset (turbine, boiler, etc.) and on the same unit (Lingan Unit #3, for example)”:

- **2023 – C0052294 POA - Boiler Refurbishment 2023 - \$943,103**
- **2023 – C0052275 POA Boiler Arrowhead Replacements 2023 - \$273,644**
- **2023 – C0052302 POA SH1 Refurbishment 2023 - \$405,836**
- **2023 – C0055601 POA Waterwall Panel Replacement - \$48,639**
- **2023 – C0056864 POA UU Left wall Tube Replacement - \$354,461**
- **2024 – C0060250 POA Boiler Refurbishment 2024 - \$1,121,251**
- **2024 – C0060246 POA Boiler Arrowhead Replacements 2024 - \$273,624**
- **2024 – C0052438 POA BA Center Drain Valve Replacements 2024 - \$118,768**
- **2024 – C0071229 POA UU RH1 Refurbishment - \$893,600**
- **2025 – C0067947 POA SH3 Refurbishment 2025 - \$659,405**
- **2025 – C0067951 POA SH1 Refurbishment 2025 - \$518,000**
- **2025 – C0068028 POA Arrowhead Refurbishment 2025**
- **2025 – C0068029 POA SUB Upgrades - \$254,321**
- **2025 – C0074768 POA UU RH1 Refurbishment - \$238,855**
- **2026 – TBD POA Boiler Refurbishment 2026 - \$TBD**
- **2026 – TBD POA Arrowhead Refurbishment 2026 - \$TBD**
- **2026 – TBD POA Boiler Refractory Replacement 2026 - \$TBD**
- **2027 – TBD POA Boiler Refractory Replacement 2027 - \$TBD”**

(a) Please clarify the rationale for separating boiler-related work into multiple projects within the same execution year.

(b) Please confirm whether above 2025 CIs are for separate work NOT included in the present application (CI C0067906).

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1
2 **(i) If the above CIs are for separate work, why were they not included for approval**
3 **in the current application?**

4
5 **(ii) Please provide the anticipated start date and completion date for each of the 2025**
6 **CIs.**

7
8 **(iii) Regardless of the response to the proceeding IR-1 b) ii., does NS Power intend to**
9 **apply to the Board for approval of the above 2025 CIs collectively, since they relate**
10 **to the same asset? If not, why not?**

11
12 **(iv) Reference to project 2025 – C0068028 POA Arrowhead Refurbishment 2025**

13
14 **(a) Please provide the cost estimate and work scope for this project.**

15
16 **(c) Please explain why the boiler refractory projects are not included in the list above**
17 **and have been separated from other boiler refurbishment projects.**

18
19 **(d) Please submit detailed project scopes for projects in the list above that clearly outline:**

20
21 **(i) The work completed for each past project;**

22 **(ii) The planned scope of work for each upcoming or future project; and**

23 **(iii) The comprehensive cost estimate or detailed expense breakdown or estimate**
24 **for each project.**

25
26 **(e) Reference to 2024 – C0060250 POA Boiler Refurbishment 2024 project - \$1,121,251**
27 **and 2023 – C0052294 POA - Boiler Refurbishment 2023 - \$943,103:**

28 **(iv) Were both refurbishment projects executed by NS Power?**

29 **(v) If the projects have been completed, please provide the final scope of work and**
30 **outcomes.**

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1 **(vi) If either project remains incomplete, please explain the reasons for the delay**
2 **or cancellation.**

3
4 Response IR-1:

5
6 (a) NS Power has consistently applied this approach in the past, separating boiler-related work
7 into distinct capital projects when different boiler components are being addressed. This
8 practice enables more accurate historical cost tracking, providing the Board and intervenors
9 with clearer visibility on how and where NS Power invests in its assets, as well as trends
10 in past investments.

11
12 This approach has been standard for Pt. Aconi and other thermal plant projects prior to the
13 new requirement to submit Pt. Aconi projects exceeding \$1M to the NSEB, as reflected in
14 prior ACE plans listing upcoming Pt. Aconi investments. Boiler refurbishment projects at
15 Pt. Aconi generally focus on selective tube replacements. When investments involve
16 different components or entire sections of the boiler (e.g., burner nests, as in C0073965
17 TRE5 Burner Nest Waterwall Tube Replacement), a separate capital project is initiated to
18 improve historical tracking.

19
20 The Point Aconi boiler, containing thousands of tubes across multiple components, each
21 with unique operating conditions and wear patterns. For example, individual components
22 include: the division wall (28 tubes per side), Superheater 1 (14 elements × 60 tubes),
23 Superheater 2 (12 elements × 35 tubes), Superheater 3 (108 platens × 12 tubes), Reheat 1
24 (108 platens × 40 tubes), Reheat 2 (108 platens × 30 tubes), and the Economizer (168
25 platens × 52 tubes). Due to this scale and variation in wear, refurbishment of individual
26 sections or components often requires separate planning, execution, and capital tracking to
27 optimize outage efficiency and ensure reliability.

28
29 (b) (i) Yes, please refer to Part (a) above.

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(ii) All the listed 2025 capital investments are planned for execution during the scheduled maintenance outage occurring between September and November 2025. While specific start and end dates for each CI will be finalized through detailed outage planning, all work is expected to occur within this defined window.

(iii) No, NS Power does not intend to seek Board approval for the 2025 capital investments as a single collective application. Please refer to Part (a) above.

(vii) Work Scope:

The Arrowhead Refurbishment project is focused on restoring the integrity and performance of the primary air system by addressing wear and damage to arrowhead nozzle assemblies. The scope includes:

- Inspect arrowhead nozzle assemblies within the primary air system for wear and damage.
- Perform a thorough cleaning of the system to enable accurate inspection and safe access.
- Identify and remove compromised arrowheads using approved procedures.
- Install new arrowhead assemblies to restore system integrity and performance.
- Ensure all work complies with NS Power's quality and safety protocols, including confined space and hot work standards.
- Engage specialized contractors for cleaning and boilermaker services, supported by NS Power's maintenance and reliability teams.

(c) Boiler refractory projects are separated from other boiler refurbishment projects because they involve a distinct scope of work compared to boiler pressure parts. At Point Aconi, pressure part refurbishment focuses on metallic tube components such as division walls, superheaters, reheats, and economizers, which are subject to thermal fatigue, corrosion, and erosion and require specialized welding and tube replacement activities. Refractory, by contrast, is a non-metallic lining material used to protect the boiler structure from high temperatures and abrasive circulating bed material, and its inspection, installation, and

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1 refurbishment processes are fundamentally different from those required for pressure part
2 work.

3
4 Refractory is installed in key areas of the Pt. Aconi CFB boiler, including the two cyclones,
5 two combustor-to-cyclone crossover ducts, two cyclone-to-back pass crossover ducts, two
6 loop seal cans, four cyclone return legs, and the lower combustor. These linings degrade
7 due to spalling, chemical attack, and abrasion. Although refractory and tube replacement
8 work are both scheduled and executed during the same planned outage, the scope of
9 refractory work is unique and requires different materials, contractors, and quality control
10 measures. Defining refractory projects as separate capital projects within the outage allows
11 NS Power to clearly track costs and service life specific to refractory systems, while
12 maintaining consistency and transparency in regulatory reporting.

13
14 (d)

- 15 (i) The following summary outlines the work completed under each project listed above
16 at the Point Aconi Generating Station during 2023 and 2024.

17
18 **2023 - C0052294 POA - Boiler Refurbishment 2023**

- 19 • Full Boiler Condition Assessment
20 • Explosive de-slagging of SH-3.
21 • Boiler pressure test conducted at 1500 psi – no leaks observed.
22 • Steam drum inspections revealed three minor indications in can supports.
23 • Pad weld overlay refurbishments completed on Main Steam Header “T”
24 reducers.
25 • Air Heater inspection identified plugged tubes.
26 • Loop Seal Can Nozzles refurbished; miscellaneous inspections completed (e.g.,
27 fan blades, blowdown tanks).

28
29 **2023 - C0052275 POA Boiler Arrowhead Replacements 2023**

- 30 • Condition assessment of 370 Arrowhead floor nozzles.

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- 270 nozzles replaced
- 4 center drains replaced with new flanges and piping.
- Refurbishments completed on center bellows in the air duct.
- Air testing confirmed leak-free performance.

2023 - C0052302 POA SH1 Refurbishment 2023

- 405 shields replaced on SH-1 Upper and Lower Omegas.
- New shield clips installed with improved weld positioning.
- 10 percent of welds inspected via Liquid Penetrant Inspection (LPI).
- Internal inspection of warped OMEGA 5
- 2 tube replacements on OMEGA 6.

2023 - C0055601 POA Waterwall Panel Replacement

- Condition Assessment - UT survey and pad welding performed on East Combustor Wall (18 pads installed).
- North, West, and South walls surveyed – no overlay required.
- Kick-out areas inspected – no refurbishments needed.

2023 - C0056864 POA UU Left wall Tube Replacement

- Emergency refurbishment work was undertaken following a tube failure in a water wall tube located on the Left Wall of the boiler.
- Visual and ultrasonic testing (UT) were conducted to assess surrounding areas.
- A single tube refurbishment was completed in the affected section.
- Post-refurbishment pressure testing confirmed no leaks, validating the integrity of the refurbishments.

2024 - C0060250 POA Boiler Refurbishment 2024

- Boiler Condition Assessment
- Conducted explosive de-slagging of SH-3 and rodding of boiler sections.

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- Replaced 4 tubes in SH-3, 3 tubes in SH-1 (OMEGAS), and 9 tubes in RH-1 Outlet.
- Installed 456 new shields on SH-1 Omegas and 186 shields in SH-3.
- Performed UT and visual inspections across combustor walls, SH, RH, and economizer sections.
- Completed RH and main boiler pressure tests (500psi and 1500psi respectively).
- Inspected and refurbished steam drum welds, air heater tubes, and miscellaneous valves.

2024 - C0060246 POA Boiler Arrowhead Replacements 2024

- Condition Assessment of 590 Arrowhead floor nozzles.
- Replaced 580 nozzles.
- Conducted air testing to confirm leak-free installation.

2024 - C0052438 POA BA Center Drain Valve Replacements 2024

- Replaced four center drain valves with new flanges and piping.
- Refurbished center bellows in the air duct.
- Air tested all center drains to ensure no leaks.

2024 - C0071229 POA UU RH1 Refurbishment

- Rodded RH-1 Outlet and Inlet sections to remove ash.
- Conducted UT and visual thickness surveys on 36 platens.
- Replaced 9 tubes in RH-1 Outlet.
- Performed RH pressure test at 500psi with no leaks.

2025 - C0074768 POA UU RH1 Refurbishment

- Isolated and accessed the Reheat 1 outlet section.
- Conducted inspection and non-destructive testing of affected tubes.

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- Removed and replaced damaged tube sections.
- Completed weld inspections and pressure testing.
- Restored insulation and re-commissioned the unit.

(ii) The following outlines the planned scope of work for each upcoming project at the Point Aconi Generating station. For the 2026 boiler-related projects, detailed scopes are not yet finalized. These will be developed following the 2025 annual outage, once updated inspection data and condition assessments are available. [we need preamble to this response here]

2025 – C0067951 POA Super Heater 1 Refurbishment 2025:

The SH1 refurbishment project involves targeted inspection and replacement of superheater components within the SH1 section of the boiler. The scope includes:

- Installation of swing staging to access SH1 components.
- Inspection of SH1 tubing and shielding using non-destructive ultrasonic thickness testing.
- Replacement of tube shielding where abrasive wear has reduced thickness below allowable limits.
- Refurbishment of tubes found to be degraded or at risk of failure before the next inspection cycle.

2025 - C0067947 POA Super Heater 3 Refurbishment 2025:

The SH3 refurbishment project focuses on SH3 in the backpass section of the boiler and includes:

- De-slugging of SH3 area to allow for thorough inspection.
- Inspection of SH3 tubing and shielding, including evaluation of wear and erosion.
- Replacement of tube shielding and tubing based on condition assessments.

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- The refurbishment is designed to extend the service life of SH3 components and maintain boiler efficiency and reliability.

2025 - C0068028 POA Arrowhead Refurbishment 2025:

The Arrowhead Refurbishment project is focused on restoring the integrity and performance of the primary air system by addressing wear and damage to arrowhead nozzle assemblies. The scope includes:

Inspect arrowhead nozzle assemblies within the steam system for wear and damage.

- Perform thorough cleaning of the system to enable accurate inspection and safe access.
- Identify and remove compromised arrowheads using approved procedures.
- Install new arrowhead assemblies to restore system integrity and performance.
- Ensure all work complies with NS Power's quality and safety protocols, including confined space and hot work standards.
- Engage specialized contractors for cleaning and boilermaker services, supported by NS Power's maintenance and reliability teams.

2025 - C0068029 POA SUB Upgrades:

The SUB Upgrades project involves the inspection and condition-based refurbishment of six original light oil start-up burners at the Point Aconi Generating Station. These burners are critical for initiating combustion during unit start-up and ensuring stable boiler operation. The scope includes:

- Inspection of burner assemblies during a planned maintenance outage to assess wear, corrosion, and operational integrity.
- Replacement of burner subcomponents (e.g., fuel nozzles, igniters, atomizers) based on condition and performance criteria.

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1 (iii) All boiler-related capital projects listed for 2025 were submitted to the Board as part
2 of NS Power's 2025 Annual Capital Expenditure (ACE) Plan. However, NS Power is
3 unable to provide comprehensive cost estimates or detailed expense breakdowns for
4 these previously submitted projects due to the cybersecurity incident that impacted
5 access to historical financial records. For the 2026 boiler-related projects, cost
6 estimates and detailed scopes are not yet finalized. These will be developed following
7 the 2025 annual outage, once updated inspection data and condition assessments are
8 available.

9
10 (e)

11 (i) Both Boiler projects were executed by third party contractors managed by NS Power
12 employees.

13
14 (ii) The Boiler refurbishment projects are a program approach and are similar year over
15 year. The typical boiler refurbishment program consists of;

- 16 • Internal Boiler Condition Assessment Boiler thorough visual and ultrasonic
17 thickness testing surveys in the combustor, SH1, SH2, SH3, RH I and II,
18 economizer and airheater.
- 19 • Boiler header inspections.
- 20 • Steam Drum and downcomer inspection.
- 21 • Lower waterwall inspection in areas susceptible to higher ash abrasion.
- 22 • SH1 inspection utilizing swing staging for access. Replacement of SH1
23 abrasion tube shields.
- 24 • SH2 inspection utilizing swing staging for access, replacement of tubes found
25 at or below minimum acceptable wall thickness.
- 26 • SH3 inspection, replacement of failed abrasion shields.
- 27 • RH inspection and replacement of worn, damaged or missing reheat tube
28 abrasion shields.
- 29

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- Economizer inspection replacement of worn, damaged or missing tube abrasion shields.
- Air Heater inspection.
- Boiler Pressure Test.

The boiler program condition assessment determines if extensive replacement or refurbishment is required in a specific area in the same year through a U&U or in a subsequent year utilizing planned projects such as the case of C0067947 POA SH3 Refurbishment 2025 and C0067951 POA SH1 Refurbishment 2025.

Outcome of C0060250 POA Boiler Refurbishment 2024 project - \$1,121,251

- Full inspection was completed.
- 456 Shields replaced on SH1 and 245 pad welds completed on think areas to allow the boiler to run to the next inspection interval for tube replacement in 2025 under C0067951 POA SH1 Refurbishment 2025.
- 186 Shields replaced in SH3 and 4 SH3 tube replacement, inspection results determined more extensive tube replacements required under C0067947 POA SH3 Refurbishment 2025.
- Inspection of RH1 found 9 boiler tubes required replacement prompting C0071229 POA UU RH1 Refurbishment.

Outcome of 2023 – C0052294 POA - Boiler Refurbishment 2023 - \$943,103:

- Full inspection completed.
- SH1 Inspection and Tube replacement completed under C0052302 POA SH1 Refurbishment 2023.
- 98 Shields and 14 tubes were replaced in SH3.
- 2 Tubes Replaced in RH1.

(iii) Both projects were completed.

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Request IR-2:

Reference to page 1 of 6, NS Power notes “The scope of work includes the refurbishment and replacement of boiler and air heater components critical to environmental compliance and the safe, reliable, and efficient operation of the system. This includes tubing, headers, casing, ducting, insulation, cladding, tube shields, and other miscellaneous components identified as deficient. The final scope of this project will be determined through the annual boiler condition data collection and analysis.”

(a) Please provide the analysis report and supporting data related to this project.

(b) Please explain whether any remedial work has been undertaken to address the identified issue.

(c) If work has been completed, please provide a detailed scope of the project, including the nature and extent of the work performed and project financial statements.

(d) If no work has been completed to date, please explain how the project budget estimate was developed. Specifically, describe the process, assumptions, and methodology used to determine the estimate, and provide an explanation for the proposed cost variances.

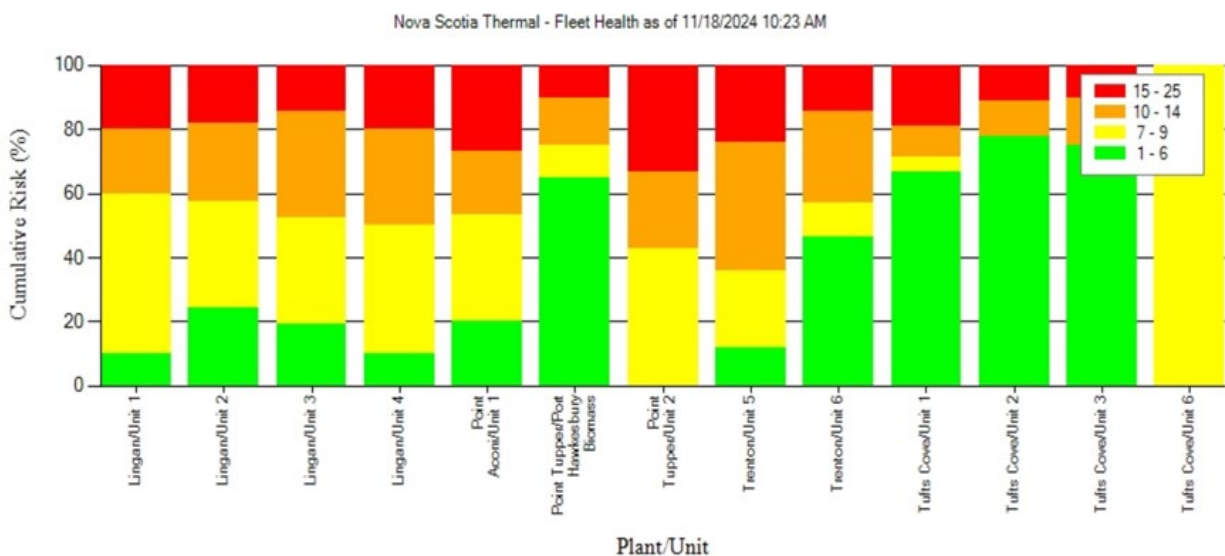
Response IR-2:

(a) The refurbishment follows a standardized program-based approach with similar activities implemented annually. The final scope is determined each year following completion of inspections and is based on NS Power’s boiler condition data collection and analysis for that inspection cycle, which includes:

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- Boiler Tube Failure Reports generated for any failure events that result in unit outages.
- Annual Boiler Inspection Reports conducted by NS Power's maintenance contractor under Boiler Asset Strategy Committee supervision.
- Header Inspection Program data, including ultrasonic thickness measurements and creep ranking calculations.
- Work Order history from NS Power's CMMS (DirectLine), used to identify recurring issues and validate maintenance effectiveness.
- Root Cause Analyses for past failures

This information is compiled and used to develop the boiler risk profiles for each site, represented below for each Unit.



- (b) No remedial work has been undertaken as part of the scope for this year's boiler refurbishment project. Work is conducted offline during planned outages, leaving limited opportunity for additional repairs. Any major replacements are handled as unforeseen capital projects or deferred to future planned projects. Routine short-term repairs are treated as operational expenses and are not capitalized.

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1 (c) Not Applicable.

2
3 (d) The budget estimate for the current boiler refurbishment at the Point Aconi Generating
4 Station was developed using historical cost data from prior annual refurbishment projects
5 at the facility, escalated for inflation to reflect current economic conditions. Project scope
6 and costing were determined using Asset Risk Profiles, informed by annual inspection
7 results that identify component conditions and prioritize work based on asset criticality.

8
9 The refurbishment scope is defined through annual inspections of pressure-retaining and
10 non-pressure-retaining components. High-wear areas in the combustor section are 100%
11 inspected, while the superheater, reheater, and economizer are fully visually inspected. Due
12 to the large number of tubes (in excess of 5,000), 10–15 percent of superheater and reheater
13 tubes are subject to ultrasonic thickness testing each year, with inspection areas rotated to
14 ensure coverage over time. Components such as tube erosion shields or tubes found below
15 minimum allowable thickness are replaced during the outage. Where large numbers of
16 tubes in a localized area are at or near limits, projects are advanced as either “Unforeseen
17 & Unbudgeted” or “ACE” initiatives to address those specific risks. This inspection-based
18 methodology ensures scope definition is both systematic and responsive to current asset
19 conditions. Below is the photo of a small section of Superheater 3 illustrating the density
20 of boiler tubes inspected annually.



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1 Key assumptions underpinning the estimate include labor and access costs aligned with the
2 planned outage schedule, component replacement requirements identified during
3 inspections, material pricing validated through vendor quotations, and labor availability
4 within the outage window.

5
6 Cost variances relative to prior estimates are primarily the result of scope refinements based
7 on inspection outcomes, including more targeted component replacements and updated
8 material specifications. As the boiler continues to age, some variances may reflect
9 increased replacement needs in localized areas. These adjustments have been carefully
10 reviewed to ensure the budget remains accurate, transparent, and compliant with regulatory
11 standards.

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Request IR-3:

When was the most recent refurbishment of the same boiler components carried out?

(a) Please provide detailed information on the scope of work completed during that refurbishment.

(b) Please include the financial details associated with the project, including total costs and any relevant breakdowns.

(c) What was the expected service life or operational lifespan of the components following the refurbishment?

Response IR-3:

(a) The most recent refurbishment of the Point Aconi boiler components was undertaken during the 2024 scheduled annual maintenance outage, in accordance with established inspection and maintenance protocols. The scope of work was comprehensive and focused on ensuring the continued safe, compliant, and efficient operation of the boiler system. It is important to note that items are replaced or refurbish on condition as found during inspection in the planned outage. The majority of boiler tubes replaced are original to the plant and are only replaced or refurbished when they meet the minimum allowable tube thickness.

Refurbishment activities commenced with the installation of working platforms in the front pass combustor to facilitate access for inspection. Condition-based assessments of the lower waterwalls were conducted, and refurbishment was performed where degradation was identified. Swing staging was deployed to access upper boiler sections, including superheaters SH1 and SH2. Due to observed wear, shielding in SH1 was replaced, and selective refurbishment of SH2 tubing was completed.

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1 Further inspections were carried out on the boiler downcomers and steam drum internals,
2 with refurbishments executed as required based on material condition. The back pass was
3 de-slagged to permit full inspection of SH3, RH2, RH1, and the economizer. Within these
4 sections, boiler tubes and shielding were either replaced or refurbished depending on the
5 extent of wear or wall loss. Boiler headers were inspected as part of the five-year rotational
6 program or as informed by risk-based assessments. It is important to note that the activities
7 described herein do not include work associated with the Arrowhead or Refractory
8 Program projects.
9

10 (b) Due to the cyber incident continuing to affect portions of NS Power's IT system, it is not
11 possible to provide a full breakdown of financial details for the 2024 POA Boiler
12 Refurbishment at this time. While the Company is unable to provide detailed expense
13 categories such as labour, materials, and contractor costs at this time, it can confirm that
14 the total project cost is \$1,121,251.
15

16 (c) Following refurbishment, the expected operational lifespan of the Point Aconi Boiler
17 components varies depending on the type and location of each component within the
18 system. The replaced boiler tubes are expected to have a service life of 20 years under
19 standard operating conditions. These tubes are typically original to the boiler and are only
20 replaced when they reach the minimum allowable thickness, ensuring long-term reliability.
21 In contrast, tube shielding components experience more frequent abrasive wear due to their
22 exposure, with an expected service life ranging from 2 to 5 years depending on their
23 location within the boiler and the severity of erosive conditions.

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Request IR-4:

What is the estimated extension in service life, expressed in operating hours, that is expected from the proposed boiler refurbishment?

Response IR-4:

The proposed boiler refurbishment is expected to extend the operational service life of critical components based on their condition and location within the system. The refurbishment strategy is condition-based, meaning that only components identified as damaged or having reached the minimum allowable thickness for safe operation are selected for replacement and not replaced based on operating hours alone. This targeted approach ensures that the project addresses only those components at risk of failure before the next scheduled inspection interval.

Boiler tubes that are replaced during this outage may have been in service for over 150,000 operating hours. Once replaced, the new tubes are expected to provide approximately 150,000 to 200,000 further operating hours, depending on operating conditions and maintenance practices. Tube shielding components, which are more susceptible to abrasive wear, typically require more frequent replacement. These components are expected to provide an extension of 7,000 to 14,000 operating hours, or approximately 2 to 5 years of service life, depending on their placement and exposure to erosive forces within the boiler. This refurbishment approach ensures continued reliability and safety while optimizing lifecycle costs.

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Request IR-5:

Reference to 2025 10-Year System Outlook (M12386), page 17 of 64 (Figure 7), NS Power notes that Point Aconi will be retired on 2029/2030.

(a) How does the proposed boiler refurbishment align with NS Power’s goal of achieving 80% renewable energy generation by 2030?

(b) Please explain NS Power’s routine maintenance plans, strategies and procedures for overall operation of the Point Aconi Generating Station.

(c) Does/did NS Power intend to adjust its maintenance strategies in light of the planned retirement?

(d) If so, please outline the revised maintenance strategies and provide a detailed plan covering the period from 2025 to 2030.

(e) If not, please explain the reasoning for maintaining the current maintenance approach.

Response IR-5:

(a) The proposed boiler refurbishment at the Point Aconi Generating Station is intended to ensure the safe and reliable operation of the unit through to its planned retirement in 2029/2030. While the facility is scheduled for retirement to support the transition toward 80 percent renewable energy generation by 2030, maintaining operational integrity in the interim is critical to system reliability. The refurbishment supports NS Power’s broader energy transition strategy by ensuring that Point Aconi remains a dependable source of generation during this transitional period.

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1 (b) NS Power conducts a planned maintenance outage at the Point Aconi Generating Station
2 each year. This outage includes inspecting critical boiler components, particularly pressure
3 parts and tube shielding, to ensure that tubing has not degraded below the minimum
4 allowable thickness. Component replacement decisions are guided by NS Power's quality
5 practice for boiler tubing replacement, including ultrasonic thickness testing and condition-
6 based assessments. This routine maintenance strategy ensures continued safe operation and
7 compliance with regulatory standards.

8
9 (c) An annual maintenance outage at the Point Aconi Generating Station is expected to be
10 required through to the unit's planned retirement in 2029/2030. These outages are essential
11 to ensure the safe and reliable operation of the boiler. During each outage, the boiler is
12 thoroughly inspected, with particular focus on identifying and replacing boiler tubes that
13 have worn to or below the minimum allowable thickness. NS Power utilizes its established
14 quality practice for boiler tubing replacement, which incorporates adjusted tube wall
15 thickness criteria for units nearing the end of their operational life. Specifically, the
16 minimum allowable tube thickness has been reduced to reflect the shortened remaining
17 service period, continuing to allow for safe operation while optimizing investment. This
18 strategic approach ensures that the boiler remains compliant with safety standards and
19 operational requirements until its scheduled retirement.

20
21 (d) From 2025 through 2029, NS Power will continue its annual maintenance strategy focused
22 on boiler inspection. However, the boiler tubing replacement criteria have been modified
23 to reflect the shortened remaining service life. Specifically, the minimum allowable tube
24 thickness for superheater sections has been reduced from 70 percent to 50 percent of the
25 original design thickness. For all other tubing within the boiler, the replacement threshold
26 remains at 50 percent of the original thickness. If inspection data and wear rate analysis
27 indicate that a tube will fall below the 50 percent threshold within the upcoming operating
28 year, it will be replaced or refurbished accordingly. This revised strategy in consultation
29 with the Nova Scotia Department of Labour and Immigration balances safety, reliability,
30 and cost-effectiveness as the unit approaches retirement.

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- 1 (e) Please refer to Part (d). While the overall maintenance strategy remains consistent, the
2 adjustment to tube thickness criteria reflects a targeted revision aligned with the unit's end-
3 of-life planning. This ensures continued safe operation without over-investment in
4 components that will not be required beyond 2030.