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July 24, 2025

VIA EMAIL

Crystal Henwood
Regulatory Affairs Officer/Clerk of the Board
Nova Scotia Energy Board
3rd Floor Summit Place
1601 Lower Water Street
Halifax NS B3J 3S3

Dear Ms. Henwood:

Re: M12376 – Review of NSPI Performance Standards

These are the comments of the Consumer Advocate concerning the Draft Terms of Reference for the forthcoming review of Nova Scotia Power's Performance Standards.

In relation to existing Standards, the review should consider the following:

A) Adverse Weather Response

- Is the threshold for the outage reports of 30,000 or more customers appropriate or would there be value in generating reports for outage events affecting fewer than 30,000 customers?

B) Reliability Metrics

- Does Nova Scotia Power's use of Reliability Metrics conform to industry standards and best practices?
- Do the Reliability Metrics employed by Nova Scotia Power appropriately measure reliability as actually experienced by the customers of the Utility?
- Are the Reliability Metrics applied consistently by the Utility?
- Do the Reliability Metrics appropriately measure the performance of the Utility over time?
- Is it appropriate to "normalize" performance indices and if so, by what means and in what circumstances is it appropriate to normalize performance data?

C) Customer Service

- Should on-time completion of new service connections and customer satisfaction survey results be added to the Performance Standards?

In relation to additional Performance Standards arising from the categories listed in Section 52A of the *Public Utilities Act*, the Review should consider whether Performance Standards should be developed for:

- a) Equity, low-income service and energy poverty; and
- b) Data handling, public availability of data and information technology?

The Consumer Advocate thanks the Board for the opportunity to provide these comments and looks forward to participating in the Review.

Yours truly,



David Roberts,
Consumer Advocate

cc. Participant List