

Nova Scotia Independent Energy System Operator (NSIESO)
Responses to Consumer Advocate (CA) Information Requests

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Request IR - 1

RE: Exhibit A-1, p.2, stating, “the NSIESO does not have historical organizational experience and operational data.”

- a) Please provide historical organizational experience and operational data provided to the NSIESO from NS Power relevant to its forecast of OM&A costs.
- b) If the NSIESO has not requested the data in part (a) from NS Power, please explain why it has not.
- c) If NS Power declined to provide the data requested in part (a), in whole or in part, please provide the NSIESO’s understanding as to any reasons NS Power may have expressed for its position.
- d) If the usefulness or applicability of the data requested in part (a) to the NSIESO are limited in any manner, please explain the limitations.

Response IR - 1

- a) NS Power has provided the initial transition information for Phase 1 and Phase 2 positions (from 2024 planning estimates) including average salaries, incentive ranges, benefits plans and policies, and pension plans, high level role profiles, organization charts, etc. In addition, they provided the 14.75% fringe load factor that covers employer costs for compensation elements such as benefits, pensions, WCB, education funds, Insurances, taxable parking, 4% vacation, Employer RRSP, etc. NS Power has been providing actual information on the employees presently filling confirmed transitioning

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- 21 roles including actual salaries, incentive eligibility level, age, years of service, benefit,
22 and pension plan participation, vacation entitlements, etc.
- 23 b) The NSIESO has requested data, as outlined in a).
- 24 c) NS Power provided the data, as outlined in a).
- 25 d) There have been no limitations.

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Request IR - 2

RE: Exhibit B-2, p. 19, stating, “Therefore, upon transfer, these costs do not reflect an incremental cost to customers because they represent a currently funded and continuing function.”

a) Will NS Power transfer funds to the NSIESO to cover the cost so that they do not reflect an incremental cost to customers? If not, please explain how these costs do not reflect an incremental cost to customers.

b) Please provide an update on the estimated 23 employees to be transitioned to the NSIESO on an assumed start date of October 1, 2025. Are these assumptions still anticipated to be reasonably accurate?

Response IR - 2

a) Please see Response to NSEB IR-15.

b) Please see Response to NSEB IR-15.

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Request IR - 3

RE: Exhibit A-1, p. 10, stating that the NSIESO anticipates future capital applications that may be “required to fulfil the NSIESO’s core functions.”

a) Does the NSIESO anticipate adopting NS Power’s accounting policies regarding, for example, the definitions of capital projects and the cost thresholds for projects that must be approved in an annual plan or application?

b) Please provide any list of such capital applications that the NSIESO anticipates at this time.

c) Does the NSIESO expect to obtain any assets as a result of capital transfers from NS Power? If so, please provide details on anticipated cost, schedule, etc. that may be available.

d) Does the NSIESO expect to rent or otherwise expense the cost of using any assets that will continue to be owned by NS Power? If so, please provide details on anticipated cost, timing, etc.

Response IR - 3

a) The NSIESO is a new organization in the start-up phase and as such has not yet had an opportunity to contemplate accounting policies. Please see Response to NSEB-IR20(c), capitalization policy.

b) The NSIESO does not anticipate any capital applications at this time, but there may be future capital applications. Please see Response to NSEB-IR19 and 20.

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- 21 c) The specific capital project requirements for the NSIESO have not yet been determined,
22 nor the timing and amount of any capital applications. Please see Response to NSEB-
23 IR19.
- 24 d) The NSIESO and NS Power have not yet determined the future ownership of the assets.
25 Please see Response to NSEB-IR22.

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Request IR - 4

Does the “Transition Committee” (Exhibit A-1, p. 8) exist?

a) If so, please identify when it first met, describe its membership, and provide any available agendas, minutes, and meeting materials.

b) If not, please explain why not and provide an estimate for when such a committee will begin operating.

Response IR – 4

a) The Joint Transition Committee has recently been formalized through formal Terms of Reference, although informal discussions began in late July. There have not yet been any formal agendas or meeting minutes. Please refer to the Response to NSEB – IR 7(b),

b) See answer a).

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Request IR - 5

RE: Exhibit A-1, p. 6, stating that the NSIESO is mandated to “develop terms of reference for and carry out an integrated resource planning exercise as required.”

Further, in NS Power’s 2025 IRP Action Plan and Roadmap Update (M12247),

i) Synapse Recommendation 1 points to the need to update the resource plan to reflect the schedule for the Reliability Tie, including the 100 MW of incremental firm import, to assess the scale of need for new CTs in Nova Scotia as discussed in Synapse Recommendation 3.

ii) Synapse Recommendation 4 points to the need to further evaluate Mersey’s economic prudence; the Mersey redevelopment project has not been evaluated since the 2020 IRP and the next decision point on the Mersey redevelopment project is expected be considered using IRP modeling data.

iii) NS Power states that it continues to advance work on the Effective Load Carrying Capacity study and Net Zero Atlantic’s hybrid peak assessment to be used as inputs to the next IRP.

iv) NS Power’s Dynamic Line Ratings Project is expected to be completed by the end of 2025 and initial evaluation results should be available in short order.

In anticipation of the transition of system planning responsibilities to the NSIESO in Q4 2025 (Exhibit A-1, p. 5),

a) Is there any reason that NS Power should not make full efforts to advance topics (i)

through (iv), including preliminary modeling, in advance of the scheduled transition?

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- b) What is the status of the required offer of employment to non-unionized NS Power employees (Exhibit A-1, p. 20, Exhibit B-2, p. 19-20) for positions related to system planning? Please provide as much detail as possible, understanding the necessity to respect personnel matters.
- c) Please describe in as much as possible the arrangements for the transfer of system planning resources, such as hardware, data access, and software (licenses, support contracts, etc.) from NS Power to the NSIESO. If any such transfers are uncertain or have been determined to be infeasible (e.g., due to contract limitations), please describe the reasons for the uncertainty or determination and itemize, to the extent feasible, the likely costs for obtaining substitute hardware, data access, or software resources.
- d) Recognizing the deadline to commence resource planning of October 24, 2025 (Exhibit B-2, p. 21), what is the NSIESO's best estimate as to when it will be able to complete and share with parties or the Board its first system planning modeling results? Please provide appropriate caveats along with the best current estimate, including any budget or personnel limitations.
- e) What NSIESO responsibilities (e.g., procurements for energy resources) will depend on the actual schedule for completing system planning modeling results?
- f) Please explain how the NSIESO will evaluate the schedule for the fast-acting generation project in light of supply chain limitations, and describe the nature and cost of any investments in this project the NSIESO anticipates committing to or endorsing during the proposed budget period.

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- g) Please describe the NSIESO's plans, schedule, and budget to evaluate the Stage 2 NS-NB Reliability Intertie Project. If the NSIESO has not developed this information, please explain when it will do so or, if it has not committed to such an evaluation, provide the reasons for such a decision.

Response IR - 5

- a) Please refer to Response to NSEB IR-17(d).
- b) Offers for employment to non-unionized NS Power transitioning employees, including those positions related to system planning have not started. Please refer to Response to NSEB IR-13 for details.
- c) The NSIESO is in the early stages of collaborative engagement around transition with Nova Scotia Power and is investigating the transfer of hardware, software and data. This is an ongoing area of discussion with the principle being to transfer where it is possible and where it makes sense. There may be pragmatic, legal or economic reasons why transferring of specific resources may not happen.
- d) Please see response to Response to NSEB IR-17(c).
- e) Please refer to Response to CA IR-6(a) and Response to SEE IR-4(a) and (b).
- f) The NSIESO has a general understanding of current SCCT supply chain limitations, which will become clear at the time of RFP bid submissions. See Response to SEE IR-4. Proponent schedules will be evaluated on their reasonableness and duration, i.e., proponents bidding realistic and shorter schedules will be scored higher. The NSIESO will only select a reputable firm with creditworthiness sufficient to provide contract

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64 security and liquidated damages if the commercial operation data extends beyond that
65 permitted by the power purchase agreement. If bid schedules suggest that fast-acting
66 capacity resources are available further into the future than needed, the NSIESO will
67 develop action plans based on the specific RFP cost and schedule submissions and
68 engage with stakeholders. The nature and costs are detailed in Responses to SEE IR-4,
69 NSEB IR-20, IG IR-7, DGT IR-25, CA IR-6 and SBA IR-6.

- 70 g) The NSIESO has yet to complete high-level and detailed planning of activities to
71 complete its first IRP. The Stage 2 NS-NB Reliability Intertie Project will be included –
72 as appropriate – in assessments of transmission, electricity supply and ancillary service
73 requirements as part of the IRP process.

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Request IR - 6

RE: Exhibit B-2, p. 25-26, discussing the fast-acting generation.

- a) Please clarify the total amount of fast-acting generation that the NSIESO anticipates procuring (300 MW, 600 MW, or some other figure).
- b) Please explain whether the NSIESO anticipates advancing the procurement for the fast-acting generation based on the referenced documents (2030 Clean Power Plan and NSPI's 2023 Evergreen IRP), or whether it intends to conduct additional modeling assessment.
- c) Does the NSIESO have the right to use procurement documents developed for the Nova Scotia Rate-Based Procurement?

Response IR - 6

- a) The NSIESO intends to immediately procure 100MW as per Response to SEE IR-4(c) and 300MW as per Response to SEE IR-4(a) and (b). The RFP results, specifically price and schedule, will be reviewed by the NSIESO procurement and planning resources (once transferred from NS Power), to determine the prudence of awarding more than 300MW.
- b) The procurement plan outlined in Response to CA IR-6(a) is congruent with the 2030 Clean Power Plan and NS Power's 2023 Evergreen IRP (see Response to SEE IR-4(b)). The NSIESO also requested planning model output and insight from the firm referenced in Response to SEE IR-4(a)(ii), who confirmed that SCCT procurement quantities are justified.

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- 22 c) The NSIESO has not made such a request because the NSIESO believes that the NB
23 Power documentation, augmented as described in Response to SEE IR-4(a), is most
24 appropriate for procuring fast-acting capacity in the current market context.