

Nova Scotia Independent Energy System Operator (NSIESO)
Responses to Industrial Group (IG) Information Requests

NON-CONFIDENTIAL

Request IR - 1

Reference: N-01, Notice of Application, page 1, lines 15-18.

The NSIESO is in the process of scaling as an organization, including building out its executive and various business units, and coordinating the transition of certain operational functions from Nova Scotia Power Inc. (“NSPI”) in a phased approach.

a) Please clarify what “business units” are being referred to and expected for the NSIESO?

b) Which “business units” are expected to be transferred directly from NSPI?

c) To date, what coordination has taken place with NSPI in relation to this transfer of business, and specifically, how often are members of the NSIESO and NSPI meeting to discuss the phased approach?

d) Have there been discussions with NSPI regarding overlapping costs with the NSIESO and/or the proposed recovery mechanism of those costs from ratepayers? Please elaborate.

e) Is the NSIESO able to confirm, or estimate, the total costs that will be transferred from NSPI to the NSIESO in each stage of the transition? Please explain how these calculations or estimates were reached.

Response IR - 1

a) (Phase 1); System Control Center Operations (Phase 2); and Administration (senior leadership and non-unionized administrative positions, which are not technical in nature).

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- 22 b) The two business units transferring from NS Power are Planning, Grid Integration 1) and
23 System Control Center Operations (Phase 2).
24 c) Please refer to Response to NSEB IR-7.
25 d) Please refer to Response to NSEB IR-15.
26 e) The transition team continues to work through the transition details therefore the NSIESO
27 is not able to confirm the total costs that will be transferred from NSPI to the NSIESO in
28 each stage of the transition at this time.

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Request IR - 2

Preamble: The NSIESO confirms the \$2.68 of public funding received from the Province of Nova Scotia, which will first be used to cover the one-time transition costs then the funds will be applied to the other O&M costs.

a) Please confirm whether there are any conditions placed on the NSIESO in using the public funding received, and if possible, provide a copy of the contract with the Province (or any other records documenting the use or any restrictions on use) with respect to these public funds.

b) In what scenario would the one-time transition costs, including the ramp up to the organizational capabilities and transition of responsibilities from NSPI, exceed the public funding received?

c) The NSIESO confirmed that if the anticipated costs exceed the public funding received, then those costs would be the subject to a prudency review. In what application or process would that prudency review be completed?

d) Does the NSIESO expect to apply for and/or receive any other grants from the government between now and full operation in 2027? Please explain.

Response IR - 2

a) The NSIESO expects that the one time transition costs may exceed the \$1.23 million of costs identified in its evidence, however the total is not known at this time as the NSIESO is still in the process of preparing its Phase 1 and Phase 2 transition plans. The Provincial grant does not limit the one time transition costs incurred by the NSIESO to \$2.68

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- 22 million, rather it is intended to offset for the NSIESO, and by extension electricity
23 customers in Nova Scotia, the costs of effecting the transition of responsibilities
24 contemplated by the More Access to Energy Act. Please see also Response to DGT IR-5
25 b) The planning for the full transition, including Phases 1 and 2, is ongoing, and the full
26 extent of one time transition costs is not known at this time.
27 c) Please refer to Response to NSEB IR-11.
28 d) Not at this time, however if government funding opportunities arise which might be
29 available to the NSIESO then these will be explored.

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Request IR - 3

Reference: N-01, Notice of Application, page 2, lines 3-7.

The NSIESO is not yet in a position to propose a mechanism for rate recovery. It is the NSIESO's proposal to defer the approval of a rate recovery mechanism until a future application. Further, as a newly constituted corporation, the NSIESO does not have historical organizational and operational data. As a result, there may be circumstances that may not be readily foreseeable that have not formed the basis of its financial forecasting.

Recognizing these explanations for why the NSIESO is currently not proposing the mechanism for recovery, does the NSIESO have an anticipated mode for recovery? Please elaborate and confirm when it is expected that this proposed mechanism for rate recovery will be ready to be filed with the Board.

Response IR - 3

Please see Response to NSEB IR-3.

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1 **Request IR - 4**

2 Is the NSIESO able to provide an order of magnitude for the anticipated impact to customer rates
3 in relation to the transition to the NSIESO, either for the next application and/or when the
4 NSIESO is fully operational in 2027?

5 **Response IR - 4**

6 The NSIESO is not in a position to provide an estimate of rate impacts.

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1 **Request IR - 5**

2 Reference: N-01(i), Application Exhibits, page 13, lines 13-16.

3 These costs are expected to be in the amount of \$1.23M during the test period and be funded in
4 full using \$2.68M of Provincial funding. The NSIESO is not expecting the Nova Scotia Energy
5 Board's approval for these expenses since these expenses are not forecasted to be funded by
6 ratepayers.

7 Is NSIESO suggesting that the transition costs that are below \$2.68 million are not subject to the
8 Board's review? If so, please explain why, with specific reference to legislative authority.

9 **Response IR - 5**

10 The NSIESO is suggesting that Energy Board approval is not required for one time transition
11 costs that are below \$2.68 million, to the extent that such costs are being funded through a grant
12 provided by the Province of Nova Scotia. These one time transition costs are included in this
13 application for transparency.

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Request IR - 6

Reference: N-01(i), Application Exhibits, page 19, lines 5-6 and 12-14.

The NSIESO is forecasting \$1.61M in expenses as part of the Transitioned Operations cost category. These expenses are the portion of NSPI operational costs that will be transitioned to NSIESO during the test period....

Given that the costs under this category are to pay for functions that are currently carried out by NSPI, these costs have already been approved by the Utility and Review Board and are recovered in NSPI's rates.

a) Does this mean that the NSIESO expects that there is \$1.61M (and only \$1.61M) in overlapping costs with NSPI in relation to the NSIESO's first year of operation? Please explain.

b) How does the NSIESO account for the fact that these costs are already embedded in existing rates, without requiring ratepayers to pay twice (i.e., in existing rates and as part of the NSIESO costs)?

c) Has the NSIESO validated with NSPI, and the employees themselves, the employees to be transitioned? If there are any changes to the numbers, or the roles from the assumptions, please elaborate on the reasons.

Response IR - 6

a) The forecast contained in the revenue requirement included the forecast employee costs as well as an estimate for consultant costs to support the Integrated Resource Planning

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- 21 project to commence before October 23, 2025. The transition planning is ongoing and
22 there may be additional areas of overlap identified.
- 23 b) Please see Response to NSEB IR-15.
- 24 c) This work is ongoing and offers of employment by the NSIESO to the employees
25 presently in the roles being transferred are expected to be made over the next several
26 weeks.

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1 **Request IR - 7**

2 Reference: N-01(i), Application Exhibits, page 25.

3 With respect to procurement costs anticipated, is the NSIESO able to provide an update on the
4 progress made with respect to competitive energy and capacity procurements, including any
5 details on anticipated projects to be capitalized in the next three years?

6 **Response IR - 7**

7 Please refer to Responses to SEE IR-4 (a)-(d), NSEB IR-20 (b), NSEB IR-21, and CA IR-6 (a) &
8 (b).

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1 **Request IR - 8**

2 Reference: N-01(i), Application Exhibits, page 28.

3 Please provide the actual, or anticipated, interest expense that will apply to the line of credit
4 sought by NSIESO for the test period and confirm whether NSIESO will be seeking the same
5 interest rate recovery in relation to its proposed Deferral and Variance Account?

6 **Response IR - 8**

7 The anticipated interest expense of \$0.03 M relates to the line of credit for the test period,
8 calculated based on Prime + 0.75%. If these expenses are actually incurred, then NSIESO will be
9 seeking recovery of the actual interest expense.