M12412

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF:	***The More Access to Energy Act***
	– and –
IN THE MATTER OF:	**An Application by the NOVA SCOTIA INDEPENDENT ENERGY SYSTEM OPERATOR for approval of its proposed expenditure and revenue requirement for the test year ending March 31, 2026**

INFORMATION REQUESTS

To:	**Jason T. Cooke, K.C.** Nova Scotia Independent Energy System Operator Burchell Wickwire Bryson LLP 1900-1801 Hollis Street Halifax, NS B3J 3N4 jcooke@bwbllp.ca
From:	The Consumer Advocate
Responses Due:	**October 7, 2025**
Copies:	1 electronic copy (PDF searchable)
Contact Person:	**David J. Roberts** Consumer Advocate Pink Larkin 1463 South Park Street Halifax, NS B3J 3S9 Tel: (902) 423-7777 Email: droberts@pinklarkin.com

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.

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?

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.

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.

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?

(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.

(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.

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?