

December 1, 2025

Crystal Henwood  
Clerk of the Board  
Nova Scotia Energy Board  
1601 Lower Water Street, 3rd Floor  
Halifax, NS B3J 3S3

**Re: M12293/M12436 – North American Electric Reliability Corporation – Quarterly Application for Approval of Reliability Standards – First and Second Quarter 2025 – Compliance Filing**

Dear Ms. Henwood:

On July 24 and October 20, 2025, Nova Scotia Power Incorporated (NS Power) submitted its comments regarding the North American Electric Reliability Corporation (NERC) first and second reliability standards applications to the Nova Scotia Energy Board (NSEB, Board). In its comments, NS Power noted the potential for project support required to comply with applicable NERC reliability standards. On October 23, 2025, the NSEB provided the following related direction:

...to address the statutory requirements, before making a final determination, the Board would ask that NS Power provide any information or estimates on the costs associated with implementing the reliability standards submitted by NERC for approval in matters M12293 and M12436 and NS Power's position on whether this range of costs is justified in the circumstances.

The Board requests a response by Monday, November 17, 2025.<sup>1</sup>

The Company requested and received from the NSEB an extension to file its response to December 1, 2025. The Company provides herein information and cost estimates associated with implementing the referenced NERC reliability standards.

---

<sup>1</sup> M12293/M12436, NSEB, Decision Letter, M12293 – North American Electric Reliability Corporation – Quarterly Application for Approval of Reliability Standards – First Quarter 2025 and M12436 – North American Electric Reliability Corporation – Quarterly Application for Approval of Reliability Standards – Second Quarter 2025, 99770, October 23, 2025, page 1.

With respect to reliability standards BAL-007-1, PRC-028-1 and PRC-030-1, NS Power provided the following in its comments of July 14, 2025:

NS Power notes that BAL-007-1, PRC-028-1 and PRC-030-1 will likely require project support as there is significant work required to develop new processes and scenarios.<sup>2</sup>

BAL-007-1 and PRC-030-1 (as well as TOP-003-7 and TPL-008-1 which were identified as requiring support after submission of NS Power's comments) will require a capital project for development and deployment of new and revised process and procedure documentation for execution of the necessary analysis, internal controls, Engineering Guideline revisions, and SCADA enhancements for disruption monitoring and generator forecasting solution enhancements. BAL-007-1 will also require technology enhancements to enable reporting/traceability. Resources from 11 different internal business units as well as a Project Manager, Business Analyst, and other potential core project execution resources are required to implement these standards. Under the first phase of the transition to IESO Nova Scotia (IESO NS), IESO NS is now responsible for all reliability standards applicable to the Planning Coordinator (PC), Transmission Planner (TP), and Resource Planner (RP) functional entities, pursuant to the Compliance Transition Agreement between IESO NS and NS Power. As an example, TPL-008-1 applies to the TP and PC functions and would therefore fall to IESO NS to implement if approved.

While NS Power can initiate certain elements of this work to support continuity - responsibility and associated costs will transition to IESO NS as the functional roles migrate. With the second phase of the transition, IESO NS will assume additional functional entity roles in 2027, at which point it will be ultimately responsible for the full scope of this work and its ongoing costs.

Meeting the requirements to achieve compliance for PRC-028-1 is proposed to be covered by a separate capital project that is currently in the initial planning stages. This specific project is planned to address a much broader need for system monitoring due to the planned high penetration of new interconnections onto the grid in the next 5 – 7 years.

With respect to reliability standard CIP-015-1, NS Power provided the following in its comments of October 20, 2025:

NS Power notes that CIP-015-1 will require capital project support as there is significant work to meet compliance such as, but not limited to,

---

<sup>2</sup> M12293, 98679, North American Electric Reliability Corporation – Quarterly Application for Approval of Reliability Standards – First Quarter 2025, NS Power, Comment Submission, July 24, 2025, page 17, lines 18-19.

implementation aspects such as traffic mirroring, network feed setup, integration with monitoring tools, documentation, and processes. A project will be submitted to the NSEB when appropriate and may include other NERC standards that require project support to be implemented.<sup>3</sup>

CIP-015-1 will require a capital project to meet compliance for the items noted in the excerpt above. Resources from 12 different internal business units as well as a Project Manager, Business Analyst, and other potential core project execution resources are required to implement this standard.

A high level capital cost estimate to implement BAL-007-1, TOP-003-7, TPL-008-1, PRC-030-1, and CIP-015-1 is approximately \$4.5M. Based on experience with compliance with reliability standards, NS Power believes this approximate cost is reasonable at this time, and necessary in order to comply with the aforementioned reliability standards on the assumption the NSEB approves them for Nova Scotia. As more detailed scoping is undertaken by NS Power as a normal course of its capital project development, the scope of the projects will be defined in greater detail and the cost estimates refined. Finally, when ready the capital projects will be submitted to the NSEB for its approval; the prudence of the investments and the reasonableness of the costs can be formally examined by the Board at that time.

Kind regards,



Mark Peachey  
Manager, Regulatory System Planning & Innovation

---

<sup>3</sup> M12436, 99716, North American Electric Reliability Corporation – Quarterly Application for Approval of Reliability Standards – Second Quarter 2025, NS Power, Comment Submission, October 20, 2025, page 10, lines 6-10.