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LAWYERS | AVOCATS

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February 6, 2026

VIA EMAIL: crystal.henwood@novascotia.ca
VIA WEB PORTAL

Crystal Henwood, Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
P.O. Box 1692, Unit "M"
Halifax, NS B3J 3S3

Dear Ms. Henwood:

Re: M12451 - Nova Scotia Power Inc. - 2026 General Rate Application (GRA)

This is the reply of the Consumer Advocate to the closing submissions in this proceeding.

The hearing of the General Rate Application ("GRA") of Nova Scotia Power provided the Board and all Interveners with a full opportunity to test the evidence submitted by Nova Scotia Power and provide their own evidence if they chose to do so.

That evidence, rather the opening or closing submissions of parties, is the basis upon which the Board should decide this Application.

The evidence before the Board shows that the GRA is supported by a Consensus Agreement between Nova Scotia Power and representatives of its ratepayer groups that is an attempt to balance the expectations that are to be met by Nova Scotia Power in the coming years with electricity rates that are fair and equitable. The Board will determine if that attempt has been successful.

The Cost of Service principles under which the costs of providing electricity services are apportioned among the different rate classes have resulted in rate increases in the GRA that are not evenly distributed among those rate classes. The Consensus Agreement recognizes that problem by providing for a review of one of the key components of the Cost of Service methodology that was applied in the GRA. The Consumer Advocate submits this review is the appropriate way to deal with the Cost of Service issue that was identified in the Consensus Agreement.

Several parties emphasized in their closing submissions the need to bring certainty to elements of the GRA that remain unresolved, particularly the proposal to securitize Nova Scotia Power's thermal assets. The Consumer Advocate shares this concern.

Securitization will remove more than $700 million dollars from the rate base of Nova Scotia Power which otherwise would put more upward pressure on rates. The evidence before the Board suggests securitization will help keep rates down. The Consumer Advocate is hopeful Nova Scotia Power and the Province will agree on a plan to implement securitization in the near future.

We thank the Board for the opportunity to make these brief, reply submissions.

Yours truly,

PINK LARKIN

David Roberts,
Consumer Advocate