2025 **M12451**

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: **THE PUBLIC UTILITIES ACT**

- and -

IN THE MATTER OF: **A GENERAL RATE APPLICATION** by **NOVA SCOTIA POWER INCORPORATED** for approval of certain revisions to its Rates, Charges and Regulations

NON-CONFIDENTIAL INFORMATION REQUESTS

To: **Blake Williams**
Senior Director, Regulatory Affairs
Nova Scotia Power Inc.
By email: blake.williams@nspower.ca

From: Synapse Energy Economics, Inc.
Board Counsel Consultant

Responses Due: **Wednesday, November 5, 2025**

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Caroline Palmer**
Synapse Energy Economics
485 Massachusetts Ave., Suite 3
Cambridge, MA 02139
Tel: +1 (617) 973-1715
Email: cpalmer@synapse-energy.com

Issued at Halifax, Nova Scotia, this 22nd day of October, 2025.

Crystal Henwood, Clerk of the Board

Request IR-1: Refer to GRA Appendix 12A, Cost of Service Study Process, section 3.1. How does the Company define customer-related costs?

Request IR-2: Refer to GRA Appendix 12A, Cost of Service Study Process, section 5.1.

a. Describe and provide all sensitivity analysis and modelling the Company has conducted to conclude that "increased granularity would not necessarily create a more precise or effective COSS."
b. Explain narratively how the results of the analyses provided in part (a) demonstrate that "increased granularity would not necessarily create a more precise or effective COSS."
c. Provide examples of inconsistencies within the COSS that may begin to arise due to increased granularity.
d. What proportion of the Company's generation assets does the proposed SLF approach classify to energy and what proportion to demand?
e. Identify the tab and cells in the Company's COSS (SR-01 Attachment 2) or other attachment that calculate the SLF. If not already provided, provide all underlying data supporting the calculation, in live, unlocked Excel file format with all links and formula intact.
f. What proportion of the Company's generation assets would the Company's current generation classification approach to classify to energy and what proportion to demand? Provide all underlying data supporting the calculation, in live, unlocked Excel file format with all links and formula intact.
g. In live, unlocked Excel file format with all links and formula intact, please provide an alternate version of the COSS (for each of 2026 and 2027) using the Company's current generation classification.

Request IR-3: Refer to GRA Appendix 12B p.24. Explain and provide examples of how the current methodology would cause "materially different rate impacts to different classes depending on when investments in those assets take place." How might the rate impacts differ across NSPI's various classes?

Request IR-4: Refer to GRA Appendix 12A, Cost of Service Study Process, section 5.3.

a. Provide the Board's Decision on the Cost of Service proceeding in 1995 (NSPI864).
b. Explain why reduced dependence on coal fired generation located in Cape Breton is making classification of transmission based on SLF less relevant over time.
c. The Company states that "Transmission costs…can be thought of as being incurred solely for the purpose of providing the required capacity on the system to respond to…demand." Explain why the Company does not think of transmission as providing energy.
d. Explain how the shift to wind generation moves the system from radial to network design. Use map(s) of the Company's system to illustrate this change.

e. If not provided in part (d), provide a map or illustration of the Company's system demonstrating how the Company's network system design intends "to connect multiple renewable generation sites."
f. Does the Company consider its wind generation to be "distant generation sites"? Why or why not?
g. Explain why system demand will increasingly be the driver of NS Power's system costs as the system changes to accommodate more renewable energy.
h. Is NSPI's transmission system designed to minimize energy losses? Explain why or why not.
i. Is NSPI's transmission system designed to function over extended hours of high loading? Explain why or why not.
j. In live, unlocked Excel file format with all links and formula intact, please provide an alternate version of the COSS (for each of 2026 and 2027) using SLF to classify transmission costs into demand and energy.

Request IR-5: Refer to GRA Appendix 12A, Cost of Service Study Process, section 5.7.

a. Could the Company classify transmission costs to demand and energy based on SLF under the OATT? Why or why not?
b. If the answer to part (a) is no, explain why the Company can propose to change other transmission approaches under the OATT but could not change classification.

Request IR-6: Refer to GRA Appendix 12A, Cost of Service Study Process, section 6.1.

a. For each distribution sub-function classified using the minimum system study, identify the portions of the sub-function determined to be customer- and demand-related.
b. What is the kW or kVA capacity of the minimum size equipment the Company used for each distribution sub-function classified using the minimum system study?
c. Has the Company included subtransmission, trunkline, upstream, or backbone primary feeders in the overhead & underground lines that it classified using the minimum system methodology?
d. Does the plant accounting data for overhead & underground lines isolate the costs of trunkline, upstream or backbone primary feeders from the rest of the plant in those accounts?
e. Identify the tab and cells in the Company's COSS (SR-01 Attachment 2) or other attachment in which the Company conducts the minimum system study. If not already provided, provide the study and all underlying data supporting the study, in live, unlocked Excel file format with all links and formula intact.
f. In live, unlocked Excel file format with all links and formula intact, please provide an alternate version of the COSS (for each of 2026 and 2027) in which poles & fixtures and overhead & underground lines are classified as 100% demand-related.

Request IR-7: Refer to GRA Appendix 12A, Cost of Service Study Process, section 6.1 and GRA Appendix 12B p.37 and 39.

a. Has the Company calculated the load carrying capability, or the "minimal demand" that can be met by its hypothetical minimum system comprised of minimum specifications? If yes, provide the calculation in live, unlocked Excel file format with all links and formula intact and narratively explain how the Company did so.
b. If the answer to part (a) is no, please explain how the Company might conduct the described calculation.

Request IR-8: Refer to the Company's COSS. Using the most granular data available, provide a summary of individual customer maximum demands for each customer class (ex: in the form of a box and whisker plot, or boxplot).

Request IR-9: Refer to GRA Direct Evidence p.86.

a. Describe the extent of AMI meter installations in the Company's territory What portion of each customer class has AMI installations? If the answer is less than 100%, explain if the Company plans to roll out advanced metering to all customers, and provide the timeline for the rollout.
b. Does the Company classify, or intend to classify, AMI meter costs as customer-related?
c. If applicable, provide the matter number and Board order approving the Company's AMI investment.

Request IR-10: Refer to GRA Direct Evidence p.81. Identify the tab and cells in the Company's COSS(s) indicating that if "customer charges were to be set directly based on changes in the customer-related costs from the 2026-2027 COSS, they would show about a 50 percent increase in 2026 followed by a minor single digit increase in 2027."

Request IR-11: Refer to GRA non-confidential PR-01.

a. Explain why the energy charges for Small General Tariff, General Tariff, Small Industrial Tariff (and any others) are lower for usage beyond the first 200 kilowatt-hours per month. Explain how rates that decrease as monthly consumption increases reflects cost causation.
b. For general and industrial rate classes, narratively explain how the Company decides how much revenue to collect via energy charges versus demand charges.
c. Identify the tab and cells in the Company's COSS that report the energy-related and demand-related revenue requirements per customer class.
d. Identify the attachments, tabs, and cells in which the Company calculates energy and demand charges based on energy- and demand-related revenue responsibilities by class. If not already provided, provide the calculation and all underlying data, in live, unlocked Excel file format with all links and formula intact.