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November 27, 2025

REDACTED

Lisa Wallace
Chief Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
Halifax, NS B3J 3S3

Re: M12554 – DRO Appeal – Ralph Doncaster

Dear Ms. Wallace:

In the Nova Scotia Energy Board's (Board, NSEB) letter dated November 13, 2025, the Board directed as follows:

By copy of this letter, the Board directs Nova Scotia Power Inc. (NS Power, the Company) to file a response with the Board to the enclosed appeal on or before **2:00 PM on Thursday, November 27, 2025**. NS Power must also provide a copy of their response to the appellant, Mr. Ralph Doncaster.

Mr. Doncaster is appealing a decision by the Dispute Resolution Officer (DRO) dated November 4, 2025. The complete DRO file as provided by the DRO pertaining to this decision is included as **Confidential Attachment 1**. Attached as **Confidential Attachment 2** are the relevant customer account and communication notes from NS Power's CIS database.

Please accept the following summary of activities and communications pertaining to November 4, 2025, DRO decision being appealed by Mr. Doncaster:

- May 9, 2025 – A tenant at the customer's rental property located at [REDACTED] (the Property) scheduled a connection. This request automatically triggered the disconnection of Mr. Doncaster's service at the Property (Account [REDACTED]).
- May 26, 2025 – A closing bill was issued for Mr. Doncaster's service at the Property. The final bill was estimated based on the average daily consumption from May 2024. Copies of Mr. Doncaster's 2025 bills are attached as **Confidential Attachment 3** (see page 5 of 6 for the closing bill).

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- October 21, 2025 – Mr. Doncaster contacted the DRO to formally dispute his bill. This is referenced on page 2 of 17 in the DRO file attached as Confidential Attachment 1.
- October 21, 2025 – The DRO responded to Mr. Doncaster, outlining his role and advising that the customer must first exhaust normal NS Power Customer Relations channels before filing a formal dispute. The DRO provided instructions for contacting NS Power and the steps required to proceed if the matter could not be resolved. This is referenced on page 1 of 17 in the DRO file attached as Confidential Attachment 1.
- October 21, 2025 – In receipt of the DRO's billing inquiry, NS Power called Mr. Doncaster and left a voicemail with contact information. This is referenced on page 2 of 6 in Confidential Attachment 2.
- October 21, 2025 – The customer returned NS Power's call and spoke with a representative regarding the May estimated bill. NS Power explained that the disconnect order was system-generated when the tenant requested a connection, which closed the account. The representative also clarified that the May bill was estimated using an average of 86.3 kWh per day from May 2024 and that the account was aggregated with a primary net metering account, which resulted in unallocated generation and a higher bill.

NS Power confirmed that a true meter read was later obtained in accordance with Regulation 5.1. The customer requested a revised bill and provided consent for the matter to be referred to the DRO. This is referenced on pages 2 to 5 of 6 in Confidential Attachment 2.

- October 21, 2025 – Mr. Doncaster emailed the DRO stating he requested a reprinted bill or confirmation that the meter was read on May 9 and that the bill was not an estimate. He noted NS Power advised this could not be provided and asked to escalate the matter to dispute resolution. This is referenced on page 3 of 17 in the DRO file attached as Confidential Attachment 1.
- October 22, 2025 – The DRO responded to the customer and NS Power. He summarized his role and asked NS Power to provide its position in the matter as well as relevant account documentation. This is referenced on page 4 of 17 in the DRO file attached as Confidential Attachment 1
- October 23, 2025 - NS Power advised the DRO that access to the subject account had been granted and provided copies of the account ledger and meter reads. NS Power confirmed it was reviewing the account and would provide its position once the review was complete. This is referenced on pages 5 to 8 of 17 in the DRO file

attached as Confidential Attachment 1.

- October 30, 2025 – NS Power provided its position to DRO, stating the following:

[...] NS Power experienced a cyber incident on April 25, 2025. While meters did continue to accurately record energy usage, we were not able to retrieve the information and apply it to the bill. The customer's service was disconnected on May 9, 2025 and NS Power estimated the closing bill based on daily average consumption from May 2024.

In May 2024 there was 5523 kWh used in 64 days. ($5523 / 64 = 86.297$). For May 2025 the billing was calculated using 86.297×52 days to estimate the 4487 kWh billed.

It is NS Power's position that the meter was not read on May 9th therefore the bill indicated it was an estimated read.

This is referenced on page 9 of 17 in the DRO file attached as Confidential Attachment 1.

- October 30, 2025 – The DRO emailed NS Power requesting confirmation of whether an actual connection reading was obtained for the new tenant and, if not, whether a meter reading had been taken since the May 9 disconnection or was scheduled. This is referenced on page 10 of 17 in the DRO file attached as Confidential Attachment 1.
- November 3, 2025 – NS Power reviewed the account and based on the true reading of 176,736 kWh obtained from the Property on September 17th and the previous true reading of 164,182 kWh on March 18, the Company recalculated Mr. Doncaster's estimated usage for May and adjusted the account accordingly. This adjustment resulted in credit being applied to Mr. Doncaster's account. This is referenced on page 11 of 17 in the DRO file attached as Confidential Attachment 1.
- November 3, 2025 – NS Power responded to the DRO stating:

[...] NS Power has reviewed the subject account again and placed an adjustment based on the true reads. There was no connection reading obtained for the following Customer. The meter has been read on September 17th and that reading was 176736. The last true read was 164182 on March 18th.

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For calculations, the customer had service for 52 days.
 $176736 - 164182 = 12554$ kWh used between March 18 and
September 17 (183 days)
 $12554 \text{ kWh} / 183 \text{ days} = 68.601$ kWh per day
 $68.601 \text{ kWh per day} \times 52 \text{ days} = 3567.257$ kWh estimated the
customer used in 52 days.

The customer was billed for 4487 kWh's and NS Power now
estimates to have only used 3567 kWh's so the difference of 920
kWh's has been credited to the customer's account.

A credit in the amount of \$179.29 has been applied on the
customer's account and should post within the next 1 to 2 days.
The customer's account balance is now \$428.51.

This is referenced on page 11 of 17 in the DRO file attached as Confidential
Attachment 1 and page 6 of Confidential Attachment 2.

- November 3, 2025 – The DRO emailed Mr. Doncaster indicating that the matter
appeared to be resolved and asked the customer to confirm agreement. The DRO
advised that if the customer did not agree, a Final Written Decision would be
issued, which could be appealed to the Board. This is referenced on page 12 of 17
in the DRO file attached as Confidential Attachment 1.
- November 4, 2025 – In a follow-up email, Mr. Doncaster stated that he does not
accept NS Power's use of estimated billing. He noted that NS Power could have
obtained a meter reading at the time of disconnection and expressed concern that
consumption patterns may differ for the new occupant of the Property. This is
referenced on page 14 of 17 in the DRO file attached as Confidential Attachment
1.
- November 4, 2025 – Mr. Doncaster emailed the DRO proposing a settlement to
resolve the dispute. He indicated that, notwithstanding his position on accurate
billing, he would accept a 30% reduction in NS Power's estimated usage of 3,567
kWh, which equals 2,497 kWh. This is referenced on page 13 of 17 in the DRO file
attached as Confidential Attachment 1.
- November 4, 2025 – The DRO issued his Final Written Decision pertaining to this
appeal, finding as follows:

N.S. Power estimated usage of 3567 kWh billed to the Customer,
after adjustments, as the basis for the Customer's 9 May 2025
closing bill, is reasonable based on circumstances and available

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data, and an 30% arbitrary/preferential reduction, as proposed by the Customer, would violate section 67 (1) of the Public Utilities Act.

This is referenced on page 16 to 17 of 17 in the DRO file attached as Confidential Attachment 1.

- November 4, 2025 – Mr. Doncaster appealed the DRO’s decision with the NSEB.

NS Power agrees with the DRO’s decision that NS Power has appropriately billed Mr. Doncaster.

Following the April 24, 2025 cyber incident, NS Power was temporarily unable to access meter data as the meters were unable to transmit information remotely via the AMI network. As a result, most bills issued prior to July 2025 were based on estimated consumption. In late June, NS Power began manual meter reading and has been reconciling accounts as actual readings became available.

In this case, a connection was requested by a new tenant at the Property on May 9, 2025, which automatically resulted in the disconnection of Mr. Doncaster’s service at the Property. However, due to the high volume of manual meter reads required after the cyber incident, NS Power was unable to obtain a final true read at that time. The May closing bill for Mr. Doncaster was therefore estimated using the customer’s historical consumption pattern from May 2024, in accordance with Regulation 5.1 of NS Power’s Regulations.¹

A true meter read was later obtained from the Property on September 17, 2025, showing 176,736 kWh compared to the previous true read of 164,182 kWh on March 18, 2025. Based on these readings, NS Power calculated usage of 12,554 kWh over 183 days (March 18 – September 17), or 68.601 kWh per day. For the 52-day period covered by the closing bill, NS Power recalculated usage at 3,567 kWh.² The customer was originally billed for 4,487 kWh; therefore, NS Power applied a credit for the difference of 920 kWh, totaling \$179.29, reducing Mr. Doncaster’s account balance to \$428.51.

NS Power’s actions were consistent with Regulation 5.1, which permits estimated billing when circumstances beyond the Company’s control prevent obtaining an actual meter reading. NS Power issued an estimated closing bill based on historical consumption and, once actual meter data became available, recalculated usage and applied an adjustment to the account as required.

¹ *Calculation for May estimate:* Average daily usage from May 2024 was 86.3 kWh/day. For 52 days of service: $86.3 \times 52 = 4,487.6$ kWh (rounded to 4,487 kWh).

² *Re-calculation for May estimate:* Average daily usage from March 18, 2025 until September 17, 2025 was 68.601 kWh per day. For 52 days of service: $68.601 \times 52 = 3,567.252$ (rounded to 3,567 kWh).

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The customer later proposed a settlement reducing NS Power's recalculated usage by 30%, lowering the billed amount to 2,497 kWh. As noted by the DRO, accepting this adjustment would violate Section 67(1) of the *Public Utilities Act*, which requires that customers be charged equally and at the same rate for the same type of service. Billing must be based on reasonable and available data, not on arbitrary reductions, to maintain fairness.

Please consider the enclosed information confidential due to the personal nature of the information that has been provided. NS Power has forwarded a copy of this correspondence to Mr. Doncaster by email.

Yours truly,



Kathleen Murray
Regulatory Counsel

Encl.

c. Mr. Ralph Doncaster

Doncaster DRO Appeal Attachment 1 has been removed due to confidentiality.

REDACTED (CONFIDENTIAL INFORMATION REMOVED)

Doncaster DRO Appeal Attachment 2 has been removed due to confidentiality.

Doncaster DRO Appeal Attachment 3 has been removed due to confidentiality.