

BEFORE THE NOVA SCOTIA ENERGYBOARD**RALPH DONCASTER****v****NOVA SCOTIA POWER INC****Appeal Reply****Introduction**

On 2025-11-27, NSPI filed a response in this matter. The Board has directed the appellant to file any reply by 2025-12-11. This reply addresses the NSPI response.

Argument

NSPI does not have the discretion to use estimated billing when it so chooses. NSPI Regulation 5.1, Meter Reading, states, "If the Company is unable to obtain a meter reading due to circumstances beyond its control, or due to the failure of the Customer to return a post card reading, then the amount of power and energy used by the Customer shall be estimated by the Company using the best available data."

NSPI has not proven that it was (and still is) unable to obtain a meter reading for the disconnection date due to circumstances beyond its control. It claims it was unable to obtain a meter reading due to the IT systems breach that it refers to as a "cyber incident". Although the Board has yet to reach any conclusions from its investigation, I think the Board will find lack of due diligence in following computer security best practices.

NSPI has claimed it did not have the resources to send someone to do a physical meter read on the disconnection date. No evidence was provided to support this assertion, so the Board should presume NSPI simply chose not to deploy the resources it had available, possibly to minimize staff overtime costs. However that claim may be false, as I believe they did have the resources, and did send someone to do a to do a physical meter read on the disconnection date

On 2025-10-21, I spoke to a NSPI customer service agent, who identified himself as, "Matthew M." He claimed that NSPI had sent someone to read the meter on the disconnect date of 2025-05-09, and the final bill wasn't really an estimate. I asked for a letter putting this in

writing, but Mathew M. refused. The new account holder told me they spoke to someone from NSPI on or about 2025-05-09 who was at the property to take a meter reading. The meter reading on the bill was clearly an estimate since it was not an integer amount. The meter LCD only displays integer values for kWh consumed. On 2025-10-23 I wrote an email to NSPI customer relations, requesting they review their recordings of my phone call with Matthew M. NSPI customer relations ignored my request, so on 2025-10-30 I emailed Peter Gregg. He has also ignored my request.

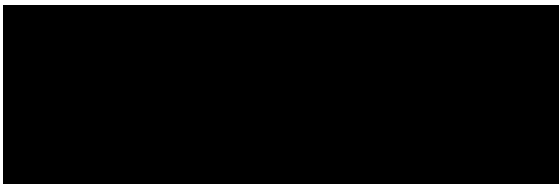
On 2025-10-30, NSPI wrote to the DRO and stated that meters, “continue to accurately record energy usage”. In my email of 2025-11-04 to the DRO, I wrote, “According to their own submissions, the smart meter (an Itron OpenWay Riva), has been storing power consumption data. Although NSPower has shut down their meter reading network following their lapse in computer security, the meters can still be read by a technician on site with the appropriate meter reading equipment.” NSPI has not refuted this, and has simply ignored this option. NSPI can also retrieve the data by turning their meter reading network back on, but refuses to do so until sometime in 2026.

Conclusion

NSPI has failed to show that they were, “unable to obtain a meter reading due to circumstances beyond its control”, and therefore they cannot rely on estimated billing. The Board can take judicial notice of the fact that many NSPI customers are dissatisfied with estimated billing. In his letter to the Board dated December 3, 2025, Premier Tim Houston questions the fairness and legality of NSP’s estimated billing methodology. If the Board sides with NSPI in this matter, NSPI will use it as a precedent for other challenges to their use of estimated billing.

Signature

Signed this 10th day of December, 2025

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Ralph Doncaster