2025 **M12558**

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: **The Public Utilities Act**

IN THE MATTER OF: **A Review of Nova Scotia Power Incorporated's Five-Year Reliability Plan 2025-2029**

INFORMATION REQUESTS

To:	Synapse Energy Economics, Inc. ("Synapse")
From:	The Industrial Group
Responses Due:	November 27, 2026
Contact Person	Nancy G. Rubin, K.C. Brianne Rudderham Stewart McKelvey Suite 600-1741 Lower Water Street P.O. Box 997 Halifax NS B3J 2X2 Telephone: (902) 420-3200 / Fax (902) 420-1417

Issued at Halifax, Nova Scotia, this 13th day of November 2026.

Request IR-1:

Reference: Synapse Final Report, October 26, 2026 (the "Report"), Appendix A, p. 70 (PDF p. 72): "Assessment of affordability, with consideration of a range of customer classes." and "Estimates of rate and bill impacts for several illustrative customer classes."

And Report, pp. 50–51 (PDF pp. 52–53): "NS Power did not present an analysis of affordability as part of its Reliability Plan".

(a) Please explain whether uncertainty about future cost-of-service allocation prevents useful indicative rate and bill impacts by customer class from being prepared for the Reliability Plan or merely affects the precision of those estimates. Identify which uncertainties, if any, prevent an estimate and explain why.

(b) Please explain the difference between an illustrative planning estimate based on stated allocation assumptions and sensitivity analysis, and a final determination of cost allocation or rates. Explain the relevance of the 2022 ACE Decision (M10366, para. 148). Identify the minimum information, assumptions and qualifications needed to prepare preliminary estimates of rate and bill impacts, including for industrial customers.

(c) Please identify the proceeding and earliest filing in which Synapse recommends that indicative class-specific rate and bill impacts be provided. Does the absence of definitive cost-of-service study results justify omitting all such estimates from reliability planning, or could ranges or scenarios provide useful information in the meantime? Please explain.

Request IR-2:

Reference: Report, p. 20 (PDF p. 22).

Annual project selection and pacing are re-assessed each year in the ACE process, applying updated risk, asset condition, and performance evaluations….

- ***The methodology for determining future budgets is not likely to be accurate and does not appropriately reflect changing system needs over time….***

The Plan does not provide a forecast of specific work or project scope for the years beyond 2025, and the investment levels for those years represent planning-level allocations rather than detailed project forecasts.

(a) Beyond the Five-Year Reliability Plan itself, please identify the capital planning documents, forecasts and information about the scope of planned work did Synapse review before reaching the conclusions at pp. 20–21 about future-year budget accuracy and the level of work-scope detail beyond 2025? For each document, identify its date, the years it covers, and whether it provides information at the program, sub-program, feeder or project level.

(b) Please specify the minimum forecasting methodology and level of work-scope detail Synapse considers sufficient for the later years of a five-year reliability plan, as distinct from the detail required for annual project approval. Identify the inputs, updating frequency and treatment of

uncertainty required to meet that standard. Explain why NSPI's approach is insufficient to meet the recommended standard

(c) Does Synapse distinguish between forecast error caused by an inadequate initial forecasting method and a justified change in work scope resulting from annual reprioritization, as asset condition and risk change? If so, explain how that distinction should be made when assessing the accuracy of the original five-year forecast. Would justified reprioritization, by itself, show that the original forecast was deficient?

Request IR-3:

Reference: Report, p. 27 (PDF p. 29): "There is no evidence that the Company considered alternative portfolios".

Report, p. 27 (PDF p. 29): "While the Company states that it considered alternatives, the Company did not provide Synapse with any alternative Plan portfolios considered by the Company."

Report, Table 6, Finding 5, p. 29 (PDF p. 31): "The Company did not provide evidence that it considered alternative portfolios to the proposed Reliability Plan and why it did not pursue them."

(a) Beyond the examples given at p. 27, please specify what minimum differences in the mix, scale or timing of investments are needed for a scenario to qualify as an alternative portfolio, rather than an assessment of alternatives for individual projects or programs.

(b) Is Synapse's finding that NSPI did not perform a portfolio-level alternatives assessment, or that the material provided did not demonstrate that it had done so? If Synapse concludes that no such assessment was performed, identify the evidence supporting that conclusion.

(c) If Synapse's concern is that NSPI has not shown that it assessed alternatives, is Synapse concluding that the proposed portfolio has not been shown to be optimal, or that the evidence shows it is not optimal? Explain the evidence supporting Synapse's conclusion.

Request IR-4:

Reference: Report, p. 25 (PDF p. 27): "NS Power's allocation between these programs is only appropriate if distribution corridor widening is much more effective at reducing vegetation-related outages compared with trimming/removal activities (at least 146 percent more effective, given the unit cost premium)."

(a) What specific findings or results would lead Synapse to revise or withdraw its concern about the allocation between distribution corridor widening and trimming/removal?

(b) In particular, would evidence of reliability benefits over the lifecycle, avoided repeat maintenance or differences in outage risk change Synapse's comparison based on unit cost per kilometre? Explain how that evidence would affect its conclusion.

(c) Identify any decision threshold Synapse proposes or explain why a fixed threshold would not be appropriate.

Request IR-5:

Reference: Report, p. 42 (PDF p. 44): "Synapse could not verify NS Power's estimates of reliability performance improvements and diminishing returns presented in its Reliability Plan…. It is therefore impossible to determine whether the forecasted reliability improvements are realistic or based on sound analysis."

(a) For each reliability improvement estimate, state whether Synapse (i) could not independently verify the estimate because supporting information was insufficient, and (ii) considers the estimate erroneous or materially overstated, or both.

(b) For each estimate in category (ii), identify the error and the evidence supporting that finding. State whether the error increases or decreases the estimate, and by how much, to the extent Synapse has determined this.

(c) For each estimate in category (i), does Synapse reach any conclusion about its accuracy beyond being unable to verify it? If so, state the conclusion and explain its basis.

Request IR-6:

Reference: Report, p. 48 (PDF p. 50): "In its responses to interrogatories, NS Power distinguished between expenditures that maintain current levels of reliability (referred to below as "maintenance of status quo") and expenditures that improve reliability from current levels… While some spending is necessary to maintain reliability, it is striking that 81 percent of the Plan's forecasted spending is intended to support status quo reliability."

(a) Did Synapse adopt NSPI's expenditure classifications without adjustment, or independently assess them using its own criteria? If Synapse assessed them independently, identify the criteria and any adjustments made.

(b) Please identify the source and level of detail of the expenditure data used. Explain how Synapse assessed the classification of expenditures serving more than one purpose and whether any expenditures were counted more than once.

(c) Did Synapse compare NSPI's mix of expenditures with that of other utilities? If so, identify each utility, the data source and period covered, and any adjustments made to ensure consistent definitions and treatment of capital and operating expenditures. If no comparison was made, please confirm.

Request IR-7:

Reference: Report, p. 10 (PDF p. 12): "However, it is unclear how the climate data in the Climate Adaptation Plan ties to the 0.26 increase in SAIDI."

Report, p. 12 (PDF p. 14): "This analysis suggests that high winds, as measured by the count of annual days with high gusts, have not significantly increased in recent years. The takeaway is that changes in wind speed cannot fully explain NS Power's missed reliability performance targets in recent years without the occurrence of a tropical storm."

(a) Please state whether Synapse's concern at pp. 10–13 is (i) insufficient evidence supporting NSPI's quantified estimate of climate-related reliability degradation, (ii) that Synapse disagrees with the existence or direction of the climate-related risks identified by NSPI, or (iii) both. Identify which conclusions fall within each category.

(b) If Synapse disagrees with the existence or direction of any identified risk, specify the risk, explain its disagreement and identify the supporting evidence.

(c) If Synapse's concern is limited to the estimated amount of deterioration or how much is attributed to climate-related factors, please confirm that Synapse is not concluding that the underlying climate-related risk is absent

Request IR-8:

Reference: Report, p. 37 (PDF p. 39): "Regarding Synapse's finding that NS Power's scoring leads to inadequate differentiation for risk prioritization, Synapse recommends a risk-unit based framework. This uses estimates of likelihood and consequence of a reliability event at the feeder level, multiplied together to calculate total risk."

Report, p. 41 (PDF p. 43): "Progression toward a more granular approach would help create a more accurate and useful feeder prioritization model while improving transparency of expected benefits and the costs to realize those benefits at the feeder or project level."

(a) Has Synapse retrospectively tested either NSPI's feeder-prioritization methodology or Synapse's proposed risk-unit methodology against actual subsequent investment and outage outcomes, as distinct from comparing the rankings generated by the two methods?

(b) If so, identify the period, feeders, outcome measures, assumptions and results, including any treatment of weather and other confounding factors.

(c) If not, please confirm and distinguish any claimed advantage supported by observed outcomes from an expected improvement based on the design of the proposed method.

Request IR-9:

Reference: Report, p. 28 (PDF p. 30): "We also include suggested timing for implementation. Near-term indicates consideration in the 2027 ACE Plan. Mid-term implies consideration in the 2028 ACE Plan. Longer-term contemplates consideration in the next Five-Year Reliability Plan."

(a) Please rank Synapse's recommendations by expected net benefit to customers. Identify the criteria used, including expected reliability improvement, customer outage costs, implementation costs and bill impacts, to the extent assessed.

(b) Identify which rankings are supported by quantified analysis and which are based on qualitative judgment. Identify any recommendations that cannot reasonably be ranked using the available evidence

(c) Explain any differences between the ranking by customer benefit and Synapse's proposed implementation priorities, including whether implementing one recommendation depends on implementing another.

Request IR-10:

Reference: Report, Table 11, Recommendation 11, p. 43 (PDF p. 45): "NS Power should provide a more detailed methodology and analysis to support its reliability improvement estimates in the Company's next Plan."

Report, Table 7, Recommendation 6, p. 36 (PDF p. 38): "NS Power's risk prioritization framework should allow for much greater differentiation in risk scores to facilitate targeting programs to the highest risk feeders."

(a) For each recommendation noted, identify whether it is based on (i) missing or unverified information, (ii) a substantive disagreement with NSPI's planning or analytical method, or (iii) both. For each, briefly explain the classification.

(b) Assuming that NSPI provides all the information Synapse considers missing and that this information verifies NSPI's existing estimates, which recommendations in its Report would Synapse maintain, and which would it reconsider? Explain why.

(c) For each recommendation Synapse would maintain, explain the basis that does not depend on the missing or unverified information.