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Request IR-1:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, page 1 of 6.

NS Power has set up a dedicated RtR Project Implementation team (the Project team) who began gathering specific requirements to serve this line of business. The project implementation work began in early 2023 and is expected to conclude late in 2026.

- (a) Please provide names of the Project team showing internal and external resources, roles, direct reporting, and accountability for scope, schedule, cost, and quality deliverables.**
- (b) Please provide any internal documentation or resources that specify the gathered “specific requirements to serve this line of business” that the Project team created, and/or relies on in completing this transition.**
- (c) Please identify the decision-making authority and escalation process for RtR project scope changes, budget variances, and schedule delays, including Renewall's role and approval rights.**

Response IR-1:

- (a) Please refer to Attachment 1 Project Resources Roles and Accountability and Attachment 2 Project Team Structure.**
- (b) Please refer to CA IR-1 Attachments 1 to 5.**
- (c) Please refer to Attachment 3 for the Change Control Process applied by the Project Team. As NS Power has obligations to comply with the applicable legislation as mandated under section 3G (now section 22) of the *Electricity Act*, it retains authority for the work**

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1 execution and scope of this project. NS Power has informed and collaborated with the LRS
2 consistently throughout the implementation project and, as referenced in the response
3 provided in REI IR-21 related to upcoming anticipated changes in scope specifically
4 initiated by the LRS, NS Power and Renewall agreed to utilizing a decision request/change
5 request (DR/CR) process for scope, schedule, or cost impacting items that had not
6 previously been included in the initial cost estimate.

Resource	Scope & Responsibilities
Senior Business Analyst	Capturing business requirements, documenting procedural and technical specifications; drafting as is & to be processes; facilitating workshops with business teams to understand business impacts of project scope to feed into initial cost/schedule estimates and resource requirements. Reporting directly to Program Manager.
Junior Business Analyst	Capturing detailed requirements, documenting procedural and technical specifications; updating processes; updating as is & to be processes; test development; training development; preparing SCADA change requests; supporting business end users; system operators and Project Manager.
Business Analyst	Lead development of RCTRA processes; develop full suite training materials; user guides; identify impacted stakeholders; inform business leads; communicate impacts; compile feedback; guide necessary approach adjustments based on feedback.
Lead Engineering Consultant	Updating system operating guidelines and procedures; providing subject matter insight and expertise in all processes, business and technical functions; guiding scope and implementation requirements and deliverables.
Project Manager	Responsible for all facets of project implementation and associated deliverables, go live, hypercare and transition to operations. All resources report to the Project Manager. Project Manager reports to the Program Manager.
MDMS Development Resources	Identification, documentation and development of enhancements required for MDMS including testing support throughout the MDMS user acceptance testing cycle in addition to solution report development
CIS Development	Develop changes in CIS according to requirements.
WebForm Developer	Develop new forms to facilitate RCTRA Process according to requirements and mock ups and support testing.
Design Engineer	Identify and design system to system interfaces with project team and Integration Specialist.
Portfolio Program Manager	Complete the initial high-level scoping of the RtR Implementation Project in 2022, completed all project estimates and execute project initiation steps to formalize the implementation project and onboard the Project Manager and all team members. Manage approvals, financial management, continued

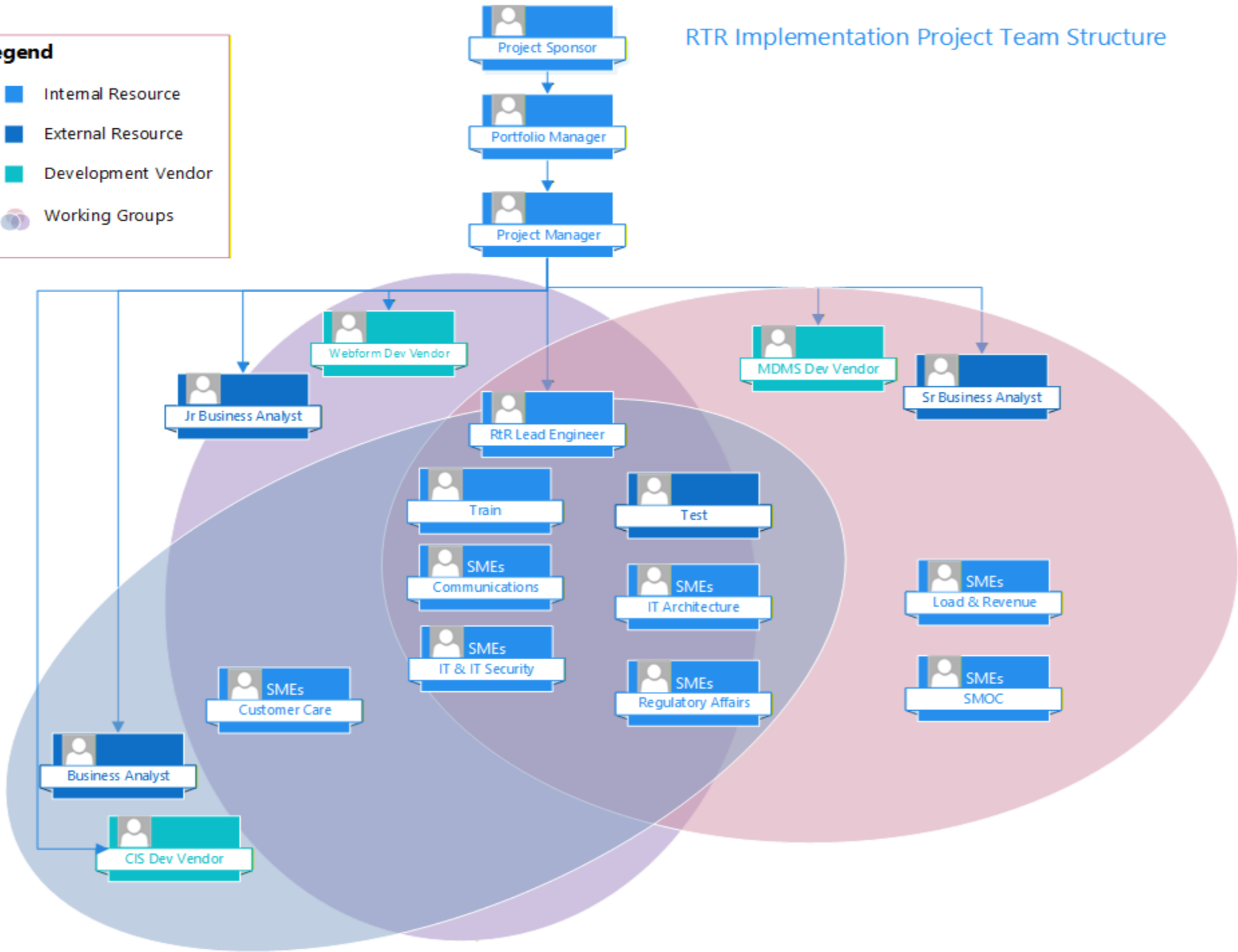
	resource acquisition, IT PMO engagement, decision and change request management, training plan approval, system and UAT test plan approvals, chair steering committee meetings and update sponsor, and business owner(s) on status etc.
SME Customer Care	Business owner and subject matter expert for Customer Care; process design decisions, end user training and testing. Guide development and process design and identify areas of impact.
SME CIS	Business owner and subject matter expert for Customer Billing; solution and design decisions, liaise with CIS Development resource, guide training, documentation and system regression testing scope.
SME SMOC	Business owner for MDMS; solution and process design decisions, system change execution approvals and user testing.
SMOC Coordinator	Monitor, maintain and resolve AMI interval data and aggregations, maintain RtR master data for batch job monitoring and processing.
Finance Business Analyst	Set up operational time recording codes for NS Power team members to enable post go live resource time tracking to confirm expected resource requirements.
Test Lead	Provide insight, direction, guidance and scope to execute CIS regression testing.
Load & Revenue Forecasting	Oversee the LRS billing process verifying individual RtR tariffs are calculated correctly and ultimately delivered to the licensed retail supplier. This includes the review of billing determinant MDMS meter interval data by both LRS generation sources and customer load.
Tariff Forecasting & Billing SME	Oversee the billing of the LRS and their customers within the CIS system and ultimately ensure bill accuracy and entrance into NSP financial records.
Solution Architect	Provide Solution and Architectural design guidance and expertise, identify system and network requirements, protocols, and approvals when and where necessary. Work with vendors to confirm system requirements and help achieve transition into NS Power Network.
Business Support Manager	Participate in requirements gathering, scoping, and initial solution design. Oversee Information Technology (IT) resource requirements to manage

	resource availability that aligns with the implementation project needs, schedule and transition to operations
Manager BI Solutions	Participate in requirements gathering, scoping, and initial reporting solution design. Oversee Business Intelligence resource requirements to manage resource availability that aligns with the implementation project needs, schedule and transition to operations.
SR. BI Architect	Participate in requirements gathering, scoping, and initial reporting solution design. Oversee Business Intelligence resource requirements to manage resource availability that aligns with the implementation project needs, schedule and transition to operations when Manager is not available.
BI Developer	Work to develop Reports and Queries within BI as designed/requested by Project Team
IT Security Analyst	Conducts IT Security, NERC and Data privacy compliance reviews to identify potential risks or vulnerabilities. Outlines risk remediation requirements and monitors risk reduction compliance.
Enterprise Risk Lead	Reviews IT Security and vendor risk evaluations to provide remediation guidance and approvals.
Integration Specialist	Updates existing integrations (interfaces) between systems and create new interfaces or confirm none required.

Legend

- Internal Resource
- External Resource
- Development Vendor
- Working Groups

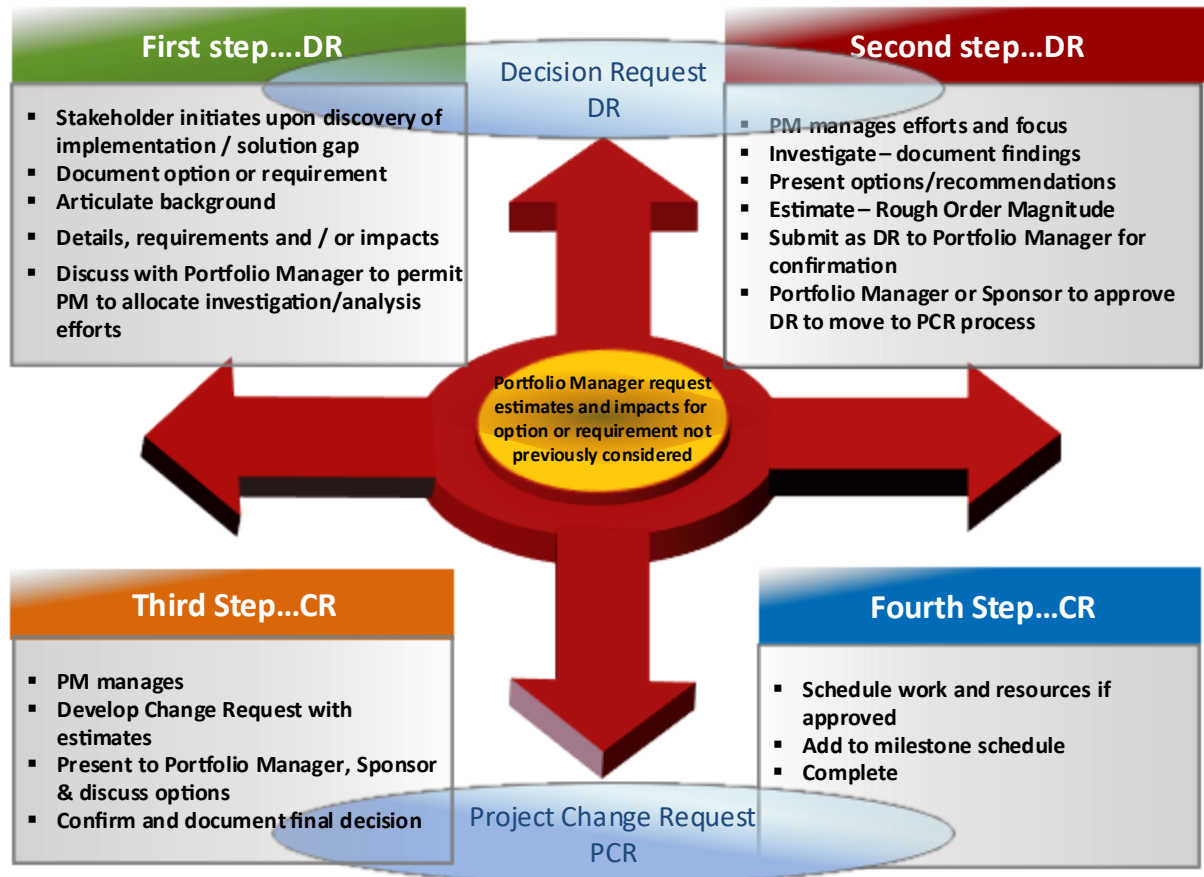
RTR Implementation Project Team Structure



Change request management is the process to formally recognize, manage, assess, control, and approve requested changes or decisions related to portfolio or project scope, definition, schedule, or budget during the delivery of a project. These changes are typically requested for the project to be successful. Below outlines the process to be followed:

CHANGE REQUEST PROCESS

The following diagram outlines the typical process for managing decision / change requests.



The following steps describe the typical change request process:

1. Decision / Change requests can be identified by anyone on the Portfolio/ Project Team (s). When the need for a change request is identified, it is to be documented using the change request template and brought to the attention of the responsible Project Manager.
2. The Portfolio Manager or Portfolio Sponsor(s) will review the change request and confirm that it is in fact required for the project to be completed successfully. The Project Manager is responsible for ensuring the change request form is properly documented.
3. All information outlined in the change request template should be completed to ensure sufficient detail is included to fully evaluate the requested change, identify rationale, and specify benefits of the

change requested. Specifically, items such as “description of change”, “purpose and benefit of the change”, and “impact of inaction” should be thoroughly detailed. This information is critical in the evaluation and subsequent approval or rejection of the requested change.

4. When the Project Manager has completed documenting the change request, he/she is then responsible for updating the project’s change request log and ensuring it is maintained and updated on a regular basis.

5. Once complete, the Project Manager will then forward the change request to the Portfolio Manager who will meet with the Sponsor(s), for review and approval.

6. The Project Sponsor will review the requested change for impact to the critical path of activities, scope, and budget, and if it is in his/her resolution capacity, the change will be approved/denied.

7. For changes outside of the Project Sponsor’s resolution capability, for changes with larger implications to the scope, schedule, or budget, or in the absence of a Project Sponsor, the change request will be escalated for review and decision.

8. Change requests escalated to the Project Sponsor will retain the file naming of the originating project. When a change request is escalated, the Project Sponsor is filling the role of an action owner. This change request is still the responsibility of the Project Manager. All information about the escalated change request will be maintained in the project’s records by the Project Manager. Additionally, the change request status will continue to be reflected in the project’s change request log until a decision is reached.

If the change request is rejected, the Project Manager will be notified. The Project Manager will then update the change request form and the change request log accordingly. Adjustments to the change request and resubmission may be required, at which time the Project Manager would re-initiate the process. If the change request is approved, the Project Manager will be notified. The Project Manager will then update the change request documentation as required, as well as make the required changes to the project plan, schedule, and budget.

Decision Request and Change Request templates are available on the ECC Renewables & Decarbonization Portfolio SharePoint site.

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Request IR-2:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, page 1 of 6.

NS Power has conducted detailed requirements gathering and scoping based on areas of impact and mechanisms that will need to be in place to facilitate the transition of customers and the onboarding of the first LRS in the RtR Market.

(a) Please provide the documentation described, that outlines the detailed requirements for gathering and scoping, along with the corresponding areas of impact and mechanisms that will need to be in place.

(b) Please provide detailed specifications for the customer transition mechanisms, including the following (as available):

(i) Customer onboarding process flows (bundled-to-unbundled transition);

(ii) Customer offboarding process flows (unbundled-to-bundled return);

(iii) System changes, webforms, data flows, and validation rules supporting each transition; and

(iv) Customer communication and notification protocols.

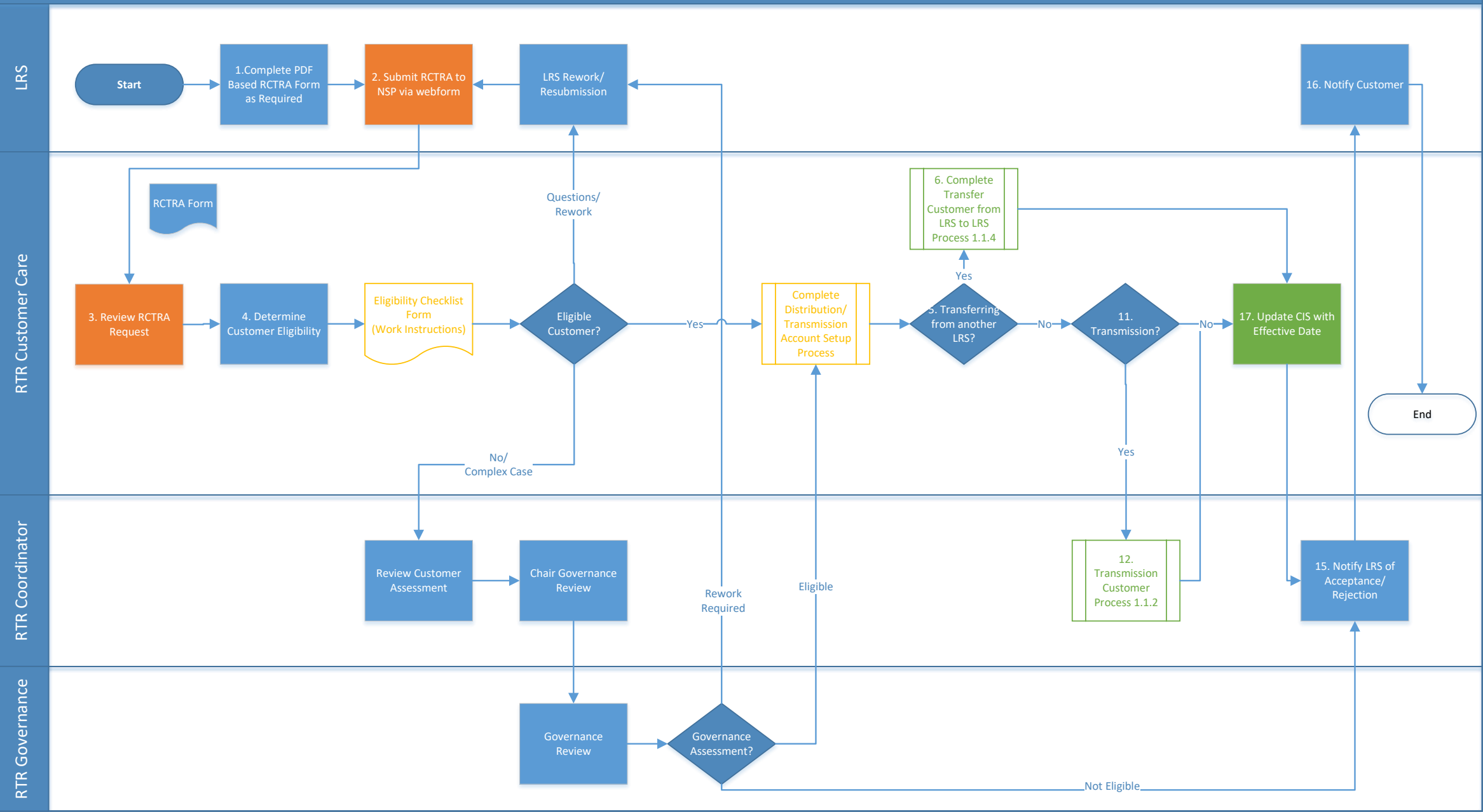
Response IR-2:

(a) Please refer to CA IR-1 Attachments 1 and 2.

(b) (i-iv) Please refer to Attachments 1 to 5.

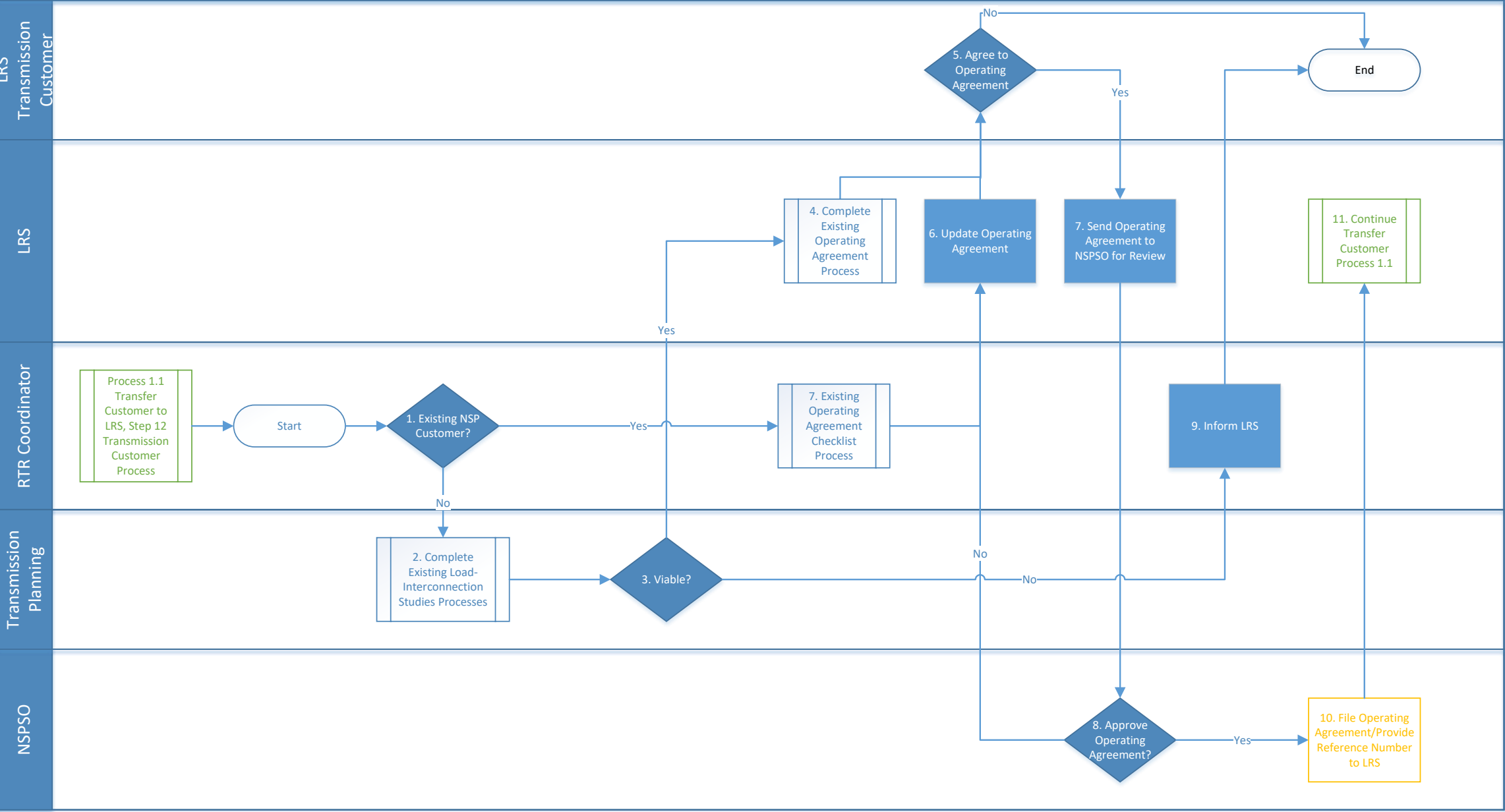
1.1 Transfer Customer to LRS

This diagram outlines the process completed to onboard a customer to a specific Licensed Retail Supplier (LRS) within the 14 Day SLA



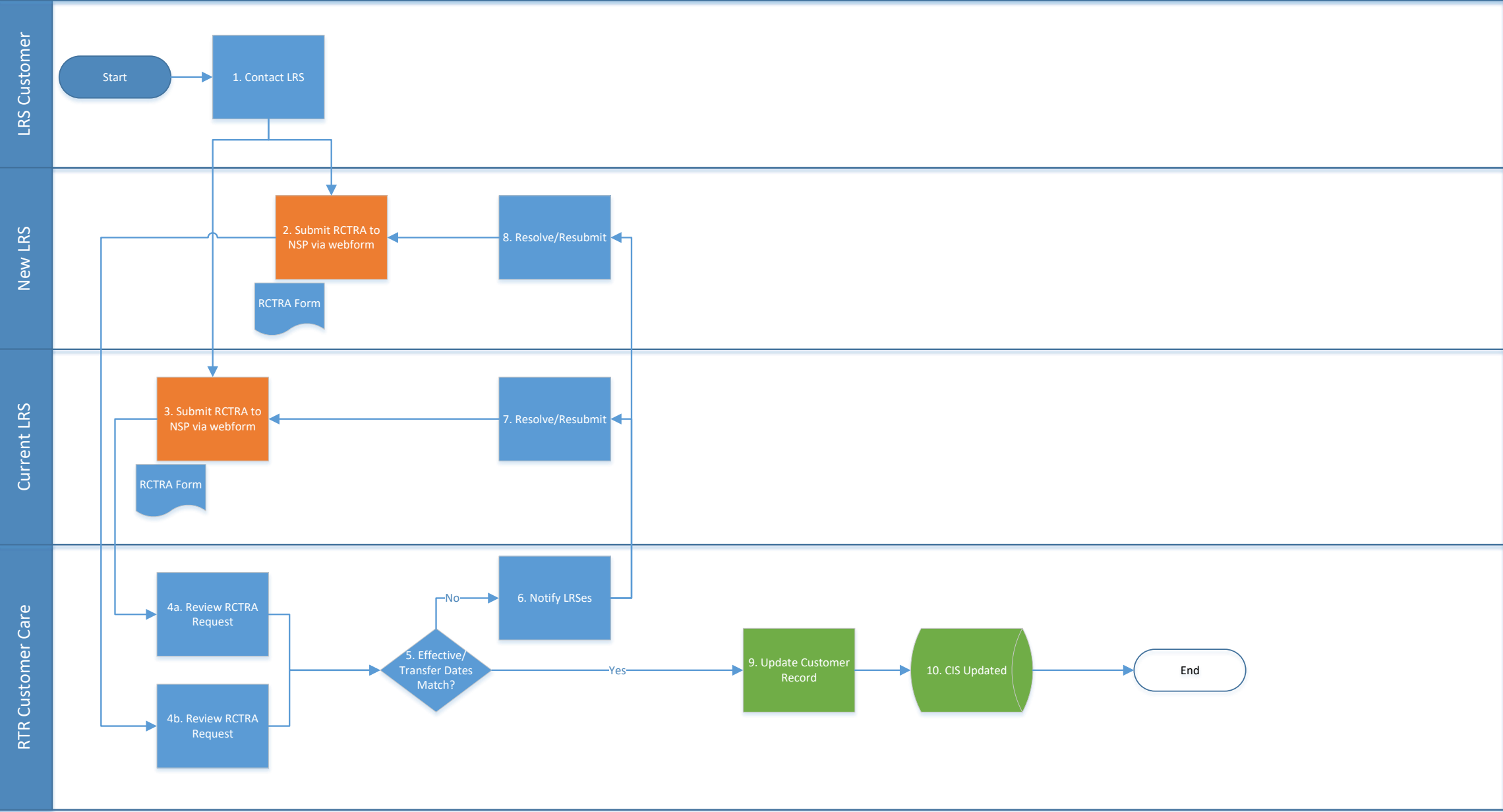
1.1.2 Transmission Connected LRS Customer Onboarding

This diagram outlines the process of a LRS completing the Operating Agreement Process for a Transmission Connected Customer



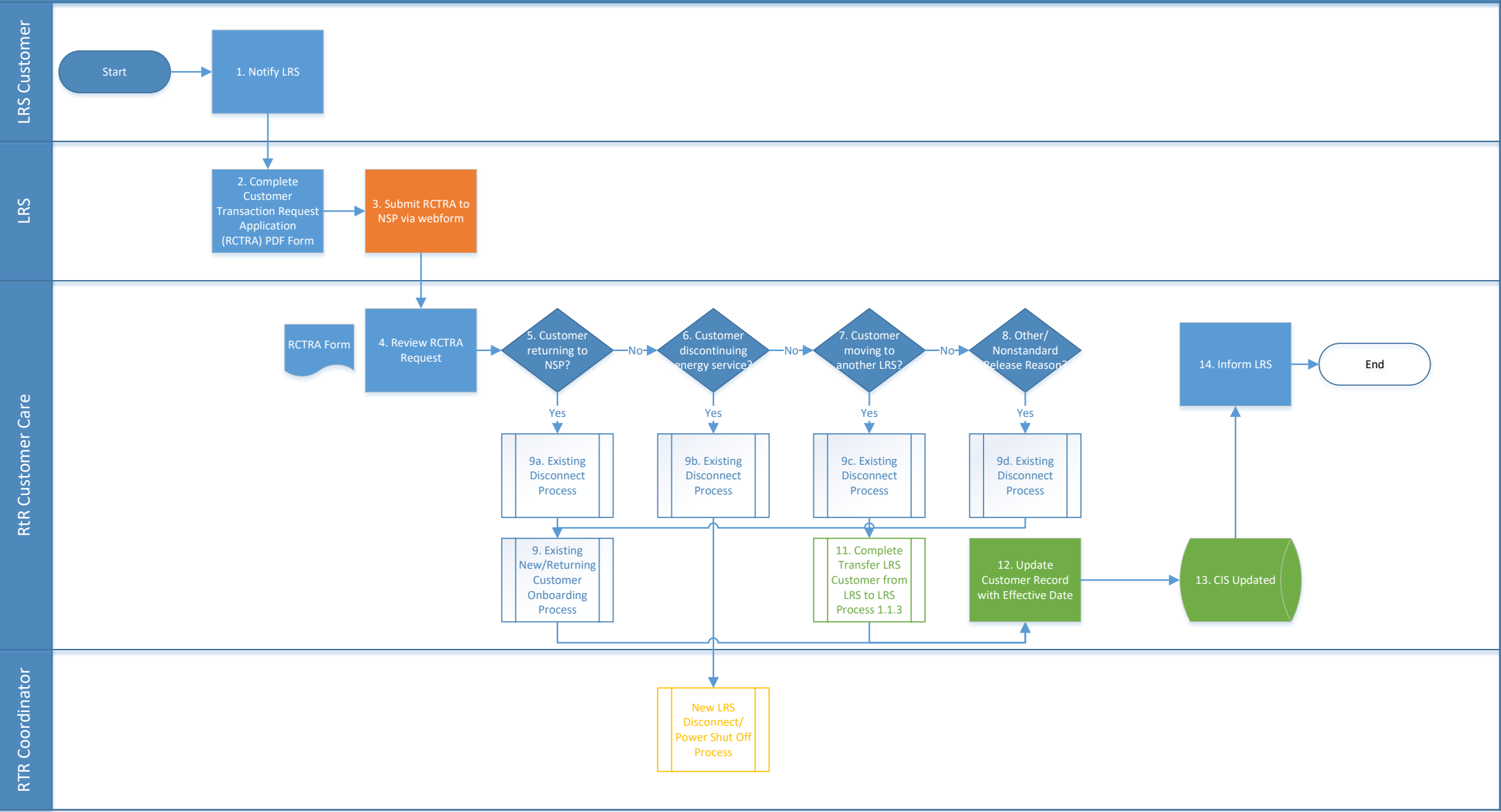
1.1.3 Transfer LRS Customer from One LRS to Another

This diagram outlines the process transferring a current LRS Customer from their current LRS to another LRS



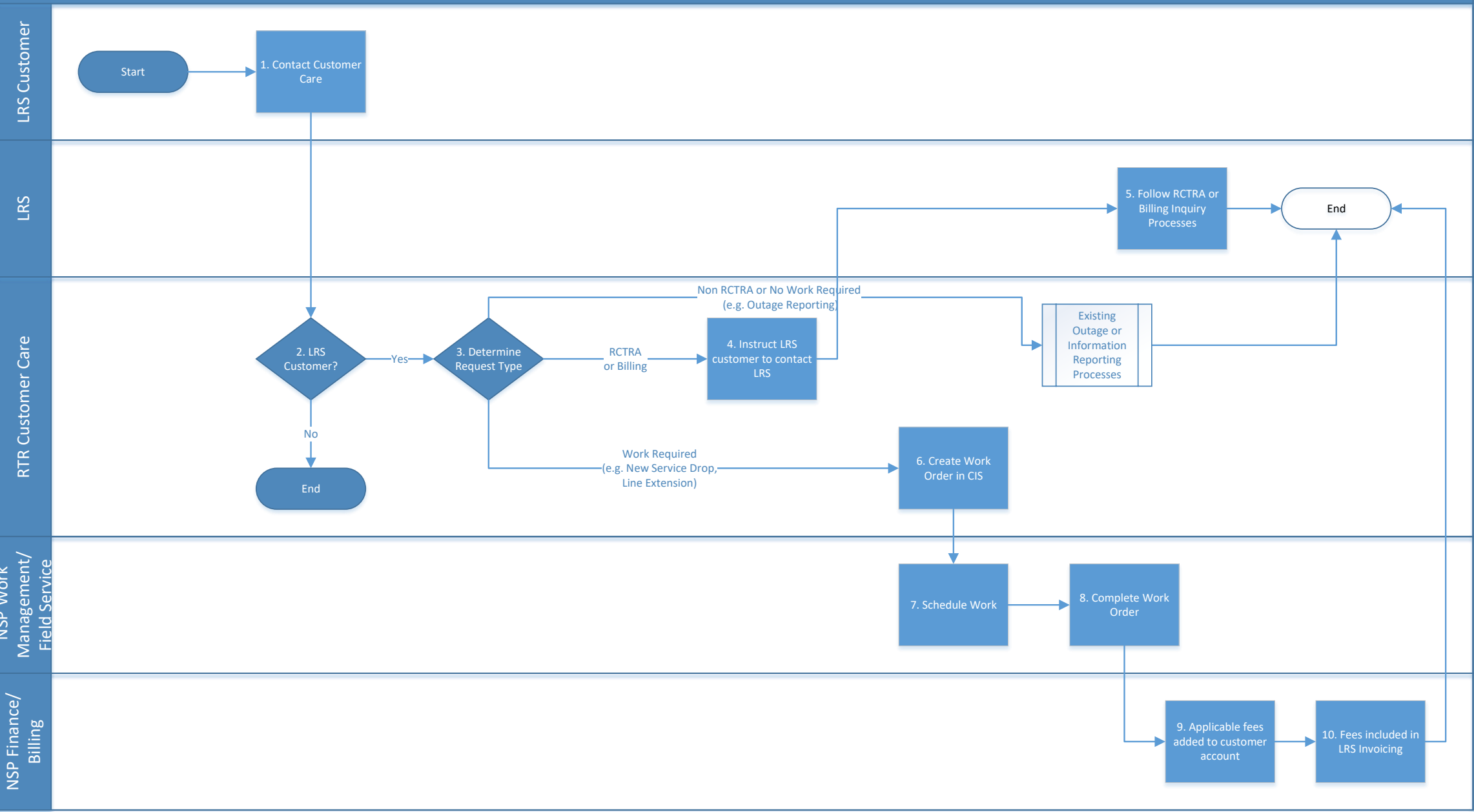
1.2 Release Customer from LRS

This diagram outlines the process for an LRS releasing an RTR customer



2. Existing LRS Customer Contacts NS Power Customer Care

This diagram outlines the process for NSP managing LRS Customer requests for Customer Service



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Request IR-3:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, page 1 of 6.

Cost recovery for capital expenditures and operating costs associated with the initial setup and ongoing operation will be recovered from LRSs through the applicable RtR tariffs. Accordingly, costs associated with the previous establishment of tariffs to facilitate the RTR market, leading up to the Board's 2016 decision will be included in and considered through a future Annually Adjusted Rates (the AAR) process starting in 2026 and continuing until full cost recovery has been achieved.

- (a) Please confirm whether NSPI intends to recover all the RtR Implementation Project costs incurred under capital application C0053699 through the AAR process.**
- (b) If any portion of the costs will not be recovered through the AAR, please identify and explain the alternative recovery treatment.**
- (c) Please provide the specific cost recovery framework and the allocation methodology for assigning costs to LRSs, now and in the future.**
- (d) Please identify any legacy RtR-related costs incurred prior to the Board's 2016 decision, including:**
 - (i) a description of each cost category;**
 - (ii) the original incurrence period; and**
 - (iii) the accounting treatment applied to date.**

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1 **(e) Please identify the exact timing for the first AAR filing (target filing date, test period,**
2 **and effective date) and confirm what RtR implementation cost data will be included**
3 **in that initial filing.**

4
5 **(f) Please confirm whether the 2026 AAR filing will set the initial RtR tariffs based on**
6 **the amount approved in this application? If not, explain how it will be set.**

7
8 **(g) If so, does NSPI intend to account for variances between the approved amount and**
9 **actual amounts incurred? Please explain.**

10
11 Response IR-3:

12
13 (a-b) There remains uncertainty regarding the appropriate cost recovery mechanism for the RtR
14 Implementation Project costs, particularly in light of the ongoing development of the
15 Independent Energy System Operator Nova Scotia (IESO-NS). One scenario is that NS
16 Power recovers the costs of the capital project through the RtR Tariffs that are approved
17 through the AAR process. An alternative would be that the asset is transferred to the IESO-
18 NS which in turn provides compensation to NS Power and the IESO-NS recovers the cost
19 from the LRS.

20
21 (c) With only one current LRS it is anticipated the full cost would be assigned to the LRS as
22 these incremental costs have been created as a direct result of that LRS. The specific cost
23 recovery framework and the allocation methodology for assigning costs to further LRSs,
24 should that be required, is yet to be determined.

25
26 (d) The RtR Tariffs were first developed and approved as part of M06214. In the NSEB's
27 decision, the Board approved the deferral and amortization of the RtR Market
28 Implementation Costs. NS Power's compliance filing in that matter, reproduced below,
29 outlined the various cost categories of the deferral:

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To date, implementation costs have been approximately \$800,000. As provided by the Company in its response to UARB IR-5, total implementation costs will include the following:

- NS Power external consultant costs;
- RtR market process and procedure development costs;
- Stakeholder engagement costs;
- Billing system development costs;
- UARB consulting costs and counsel costs;
- Small Business Advocate and Consumer Advocate RtR proceeding engagement costs; and
- Financing costs associated with these expenditures¹

As outlined in M11874 Board IR-1,² NS Power has continued to defer these costs, and will continue to incur financing costs on the deferral until those costs have been recovered (please refer to part (a-b) above). A full accounting treatment of the costs to the date of that IR submission was provided as M11874 Board IR-1 Attachment 2; this document has been appended as Attachment 1 for ease of reference.

(e) The AAR application has a Board directive to file by November 7th of each year for the following year. For the 2027 test year, the AAR application would be anticipated to be filed with the NSEB by November 7, 2026. The RtR market implementation costs that are anticipated to be included are not known at this time. As discussed above, there is uncertainty related to the development of the IESO-NS and actual implementation costs remain unknown.

(f) Not confirmed. The 2026 AAR filing was made on November 7, 2025 and does not include proposed recovery of the amounts included in this application. Details of the 2026 RtR tariffs are provided in NS Power's 2026 AAR Application and do not include any

¹ M06214, Renewable to Retail, NS Power Compliance Filing, April 25, 2016, page 25.

² M11874, Renewable to Retail Implementation Costs, NSPI (NSUARB) RIR-1, October 18, 2024.

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1 collection for amounts related to the historical deferral from M06214 or collection for the
2 capital and financing costs for C0053699.

3
4 (g) As prescribed in Section 22 (2)(b) of the Electricity Act:

5
6 retail suppliers and their customers are to be responsible for all costs related
7 to the provision of service by retail suppliers to their customers that would
8 otherwise be the responsibility of Nova Scotia Power Incorporated and its
9 customers.

10
11 Given this requirement, NS Power and/or the IESO-NS would need to ensure the actual
12 amount of these costs are captured and ultimately collected from the retail supplier versus
13 the forecast costs included in the capital application. As outlined in part (a-b), the process
14 to ensure actual costs are charged has not yet been determined.

Nova Scotia Power Inc.
Renewable to Retail Regulatory Asset

Renewable to Retail Implementation Costs NSUARB IR-1 Attachment 2 Page 1 of 5

	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Interest to be compounded Jan-19	Feb-19	Mar-19	Apr-19
Beginning Balance	761,122	760,105	759,967	759,967	766,938	768,077	761,106	761,106	763,103	754,962	777,895	780,437	780,437	784,618	784,618	784,759	784,759	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053
Additional costs deferred (001.180450.000.0000.000.0000.000)	(1,017)	(138)	-	6,971	1,140	(6,971)	-	1,997	(8,140)	22,932	2,542	-	4,181	-	141	-	1,294	-	-	-	-	-	-	-	-	-	-	-
Ending Balance - prior to interest recovery	760,105	759,967	759,967	766,938	768,077	761,106	761,106	763,103	754,962	777,895	780,437	780,437	784,618	784,618	784,759	784,759	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053
Compounded Interest	61,501	61,501	61,501	61,501	61,501	61,501	88,434	88,434	88,434	88,434	88,434	88,434	118,551	118,551	118,551	118,551	118,551	118,551	149,683	149,683	149,683	149,683	149,683	149,683	149,683	181,919	181,919	181,919
Total including compounded interest	821,606	821,468	821,468	828,439	829,578	822,607	849,540	851,536	843,396	866,328	868,870	868,870	903,169	903,169	903,310	903,310	904,604	904,604	935,736	935,736	935,736	935,736	935,736	935,736	935,736	967,972	967,972	967,972
Interest recovery:																												
Annual WACC	7.01%	6.96%	6.96%	6.96%	6.96%	6.96%	6.96%	6.96%	6.96%	6.96%	6.96%	6.96%	6.89%	6.89%	6.89%	6.89%	6.89%	6.89%	6.89%	6.89%	6.89%	6.89%	6.89%	6.89%	6.84%	6.84%	6.84%	6.84%
Interest True Up																												
Interest recovery for the month	4,800	4,408	4,408	4,448	4,455	4,414	4,927	4,939	4,892	5,025	-	10,335	5,186	5,186	5,187	5,187	5,194	5,194	5,373	5,373	5,373	5,373	5,373	5,373	5,517	5,517	5,517	5,517
Interest recovery, cumulative	66,301	70,708	75,116	79,564	84,019	88,434	93,361	98,300	103,192	108,216	108,216	118,551	123,736	128,922	134,109	139,295	144,489	149,683	155,056	160,428	165,801	171,174	176,546	181,919	187,437	192,954	198,471	203,989
Total Renewable to Retail Regulatory Asset (including interest recovery)	826,405	830,675	835,083	846,502	852,097	849,540	854,467	861,403	858,154	886,111	888,653	898,987	908,354	913,540	918,868	924,054	930,542	935,736	941,109	946,481	951,854	957,227	962,599	967,972	973,489	979,007	984,524	990,042

Nova Scotia Power Inc.
Renewable to Retail Regulatory Asset

Renewable to Retail Implementation Costs NSUARB IR-1 Attachment 2 Page 2 of 5

	Interest to be compounded																				
	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21
Beginning Balance	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053
Additional costs deferred (001.180450.000.0000.000.000.0000.000)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ending Balance - prior to interest recovery	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053
Compounded Interest	181,919	181,919	215,024	215,024	215,024	215,024	215,024	215,024	249,261	249,261	249,261	249,261	249,261	249,261	283,529	283,529	283,529	283,529	283,529	283,529	318,933
Total including compounded interest	967,972	967,972	1,001,077	1,001,077	1,001,077	1,001,077	1,001,077	1,001,077	1,035,314	1,035,314	1,035,314	1,035,314	1,035,314	1,035,314	1,069,582	1,069,582	1,069,582	1,069,582	1,069,582	1,069,582	1,104,986
Interest recovery:																					
Annual WACC	6.84%	6.84%	6.84%	6.84%	6.84%	6.84%	6.84%	6.84%	6.62%	6.62%	6.62%	6.62%	6.62%	6.62%	6.62%	6.62%	6.62%	6.62%	6.62%	6.62%	6.47%
Interest True Up																					
Interest recovery for the month	5,517	5,517	5,706	5,706	5,706	5,706	5,706	5,706	5,711	5,711	5,711	5,711	5,711	5,711	5,901	5,901	5,901	5,901	5,901	5,901	5,958
Interest recovery, cumulative	209,506	215,024	220,730	226,436	232,142	237,848	243,554	249,261	254,972	260,684	266,395	272,107	277,818	283,529	289,430	295,331	301,231	307,132	313,032	318,933	324,890
Total Renewable to Retail Regulatory Asset (including interest recovery)	995,559	1,001,077	1,006,783	1,012,489	1,018,195	1,023,901	1,029,607	1,035,314	1,041,025	1,046,736	1,052,448	1,058,159	1,063,871	1,069,582	1,075,483	1,081,383	1,087,284	1,093,185	1,099,085	1,104,986	1,110,943

Nova Scotia Power Inc.
Renewable to Retail Regulatory Asset

Renewable to Retail Implementation Costs NSUARB IR-1 Attachment 2 Page 3 of 5

	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22
Beginning Balance	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053 (185.50)	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867
Additional costs deferred (001.180450.000.0000.000.000.0000.000)																				
Ending Balance - prior to interest recovery	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	786,053	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867
Compounded Interest	318,933	318,933	318,933	318,933	318,933	354,679	354,679	354,679	354,679	354,679	354,679	391,582	391,582	391,582	391,582	391,582	391,582	428,848	428,848	428,848
Total including compounded interest	1,104,986	1,104,986	1,104,986	1,104,986	1,104,986	1,140,732	1,140,732	1,140,732	1,140,732	1,140,732	1,140,732	1,177,449	1,177,449	1,177,449	1,177,449	1,177,449	1,177,449	1,214,715	1,214,715	1,214,715
Interest recovery:																				
Annual WACC	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%
Interest True Up																				
Interest recovery for the month	5,958	5,958	5,958	5,958	5,958	6,150	6,150	6,150	6,150	6,150	6,150	6,211	6,211	6,211	6,211	6,211	6,211	6,408	6,408	6,408
Interest recovery, cumulative	330,848	336,806	342,764	348,721	354,679	360,829	366,980	373,130	379,281	385,431	391,582	397,793	404,004	410,215	416,426	422,637	428,848	435,255	441,663	448,071
Total Renewable to Retail Regulatory Asset (including interest recovery)	1,116,901	1,122,859	1,128,816	1,134,774	1,140,732	1,146,882	1,153,033	1,159,183	1,165,334	1,171,484	1,177,635	1,183,660	1,189,871	1,196,082	1,202,293	1,208,504	1,214,715	1,221,123	1,227,531	1,233,938

Nova Scotia Power Inc.
Renewable to Retail Regulatory Asset

Renewable to Retail Implementation Costs NSUARB IR-1 Attachment 2 Page 4 of 5

	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24
Beginning Balance	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867
Additional costs deferred (001.180450.000.0000.000.000.0000.000)																			
Ending Balance - prior to interest recovery	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867	785,867
Compounded Interest	428,848	428,848	428,848	467,294	467,294	467,294	467,294	467,294	467,294	507,833	507,833	507,833	507,833	507,833	507,833	549,685	549,685	549,685	549,685
Total including compounded interest	1,214,715	1,214,715	1,214,715	1,253,161	1,253,161	1,253,161	1,253,161	1,253,161	1,253,161	1,293,701	1,293,701	1,293,701	1,293,701	1,293,701	1,293,701	1,335,552	1,335,552	1,335,552	1,335,552
Interest recovery:																			
Annual WACC	6.33%	6.33%	6.33%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.48%	6.48%	6.48%	6.72%
Interest True Up																			
Interest recovery for the month	6,408	6,408	6,408	6,757	6,757	6,757	6,757	6,757	6,756.63	6,975.20	6,975.20	6,975.20	6,975.20	6,975.20	6,975.20	7,211.98	7,211.98	7,211.98	7,479.09
Interest recovery, cumulative	454,478	460,886	467,294	474,050	480,807	487,563	494,320	501,077	507,833	514,809	521,784	528,759	535,734	542,709	549,685	556,897	564,109	571,321	578,800
Total Renewable to Retail Regulatory Asset (including interest recovery)	1,240,346	1,246,753	1,253,161	1,259,918	1,266,674	1,273,431	1,280,188	1,286,944	1,293,701	1,300,676	1,307,651	1,314,626	1,321,602	1,328,577	1,335,552	1,342,764	1,349,976	1,357,188	1,364,667

Nova Scotia Power Inc.
Renewable to Retail Regulatory Asset

	May-24	Jun-24	Jul-24	Aug-24	Sep-24
Beginning Balance	785,867	785,867	785,867	785,867	785,867
Additional costs deferred (001.180450.000.0000.000.000.0000.000)					
Ending Balance - prior to interest recovery	785,867	785,867	785,867	785,867	785,867
Compounded Interest	549,685	549,685	593,758	593,758	593,758
Total including compounded interest	1,335,552	1,335,552	1,379,625	1,379,625	1,379,625
Interest recovery:					
Annual WACC	6.72%	6.72%	6.72%	6.72%	6.72%
Interest True Up					
Interest recovery for the month	7,479.09	7,479.09	7,725.90	7,725.90	7,725.90
Interest recovery, cumulative	586,279	593,758	601,484	609,210	616,936
Total Renewable to Retail Regulatory Asset (including interest recovery)	1,372,146	1,379,625	1,387,351	1,395,077	1,402,803

Renewable to Retail Implementation Costs NSUARB IR-1 Attachment 2 Page 5 of 5

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Request IR-4:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, page 1 of 6.

**LRSs and their customers are responsible for all setup and operational costs...
Cost recovery... will be recovered from LRSs...**

**(a) What specific controls and accounting rules did NSPI implement to ensure only
RtR-incremental capital costs are included here, and that no general CIS/MDMS
modernization or “business as usual” IT spend is being shifted to the LRS?**

**(b) If these software enhancements deliver broader benefits to NSPI (e.g., digital forms
capability generally), what allocation method was applied so the LRS does not fund a
capability that will be used outside RtR?**

Response IR-4:

**(a) NS Power has set up a capital work order against which costs associated solely with this
implementation are allocated. Costs allocated to this capital work order are managed by
one person, the Program Manager, responsible for this project and actual costs against this
capital work order are reviewed in detail for errors or omissions.**

**(b) As described in NSEB IR-5 and NSEB IR-7 (a-c), the new software systems and
enhancements to existing software described were implemented solely to support the RtR
market. No benefits accrue to other NS Power customers.**

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Request IR-5:

For each functional area listed on page 1 (billing, reporting, settlement, reconciliation, etc.), identify what portion of spend is new/incremental for RtR versus enhancements that would have been undertaken for NSPI's broader operations in any event.

Response IR-5:

All spend for this project is new and/or incremental and is solely for the purpose of serving and supporting the Renewable to Retail market.

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Request IR-6:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, page 1 of 6.

These system and business changes will be made scalable to accommodate potential future growth in the RtR market, including the addition of other LRS as necessary.

(a) In relation to this scalability, please outline the:

(i) Design assumptions and technical specifications showing how RtR systems are sized and configured to support multiple LRS;

(ii) Scalability testing plans and results;

(iii) An estimate of incremental work scope and cost that would be triggered if a second LRS enters the market; and

(iv) An explanation of how scalability investments in the current project will reduce future onboarding costs for additional LRS.

(b) Has NSPI estimated the scalability incremental costs within the RtR Implementation project? If so, please explain. If not, how are these costs considered?

(c) What portion of the estimate relates to scalability for future LRSs?

(d) Why is it prudent and necessary to have the first LRS fund future market growth capabilities now?

(e) What is the minimum viable set of system changes required to enable the first LRS to transact at COD, and which components in this CI go beyond minimum viability?

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1 Response IR-6:

2
3 The statement referenced above was intended to provide confidence that NS Power has worked to
4 ensure both the overall solution design and required system changes were not customized to suit a
5 single Licensed Retail Supplier (LRS) and also to subsequently mitigate the potential to become
6 costly from both an implementation and operational support perspective for all parties. As an
7 example, NS Power worked to eliminate unique or one-of approaches to differentiate LRS
8 customers in the Customer Information System (CIS). These were guiding principles in discussing
9 solution options and did not impact configuration or development efforts.

10
11 (a)

12 (i) Please refer to NSEB IR-9.

13
14 (ii) One set of test plans has been developed for solution testing, including the aspects
15 of design related to scalability, which are small and considered immaterial.

16
17 (iii) If a second LRS were to enter the RtR market, it is anticipated that, because of NS
18 Power's efforts at this stage, minimal work would be required to set up and
19 configure the new LRS in the software systems described in NSEB IR-7 (a-c).

20
21 (iv) Please refer to NSEB IR-9.

22
23 (b) Please refer to NSEB IR-9.

24
25 (c) The cost estimate for CI C0053699 Renewable to Retail Implementation does not include
26 costs for scalability for future LRSs. As described in NSEB IR-9, the current MDMS was
27 tested and determined to have sufficient computational capability to support the current
28 LRS. Also, incorporating any further scalability into software solution designs under this
29 project, to support future LRSs as necessary, was determined to have an immaterial impact
30 on project costs.

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1
2 (d) NS Power clarifies that the first LRS is not funding capabilities to enable future market
3 growth. As described in NSEB IR-9 and part (c) above, the current MDMS was tested and
4 determined to have sufficient computational capability to support the current LRS and
5 incorporating any further scalability, to support future LRSs as necessary, into software
6 solution designs under this project was determined to have an immaterial impact on project
7 costs.

8
9 (e) The entire scope of system changes for CI C0053699 Renewable to Retail Implementation
10 Project as described in NSEB IR-9 (a-c) is required to enable the first LRS to transact at
11 forecasted customer volumes at the Commercial Operation Date. The entire scope of
12 project work must be implemented at the beginning of retail operations to ensure that the
13 systems and business processes are in place to meet the requirements of the Licensed Retail
14 Supplier Terms and Conditions along with the requirement to calculate settlement and
15 billing for the RtR suite of tariffs. No components of the solution go beyond minimum
16 viability to meet the LRS' expected customer volumes.

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Request IR-7:

(a) Why are bespoke online forms and Customer Information System (CIS) modifications necessary at this stage rather than using existing customer change workflows with incremental manual validation, at least for the first LRS and anticipated volumes?

(b) Please elaborate on what specific Business Intelligence reports are being built, who requires each report, and why existing standard reports (or simple exports) do not meet those requirements?

Response IR-7:

(a) Due to the unique relationship amongst customer, Licensed Retail Supplier (LRS), and NS Power, and the complexities of calculating settlement and billing for the RtR suite of tariffs, an enterprise business solution is necessary to handle the anticipated volume of retail customers, which, according to forecasts provided by the LRS, could number in the thousands (depending on customer size), and meter interval data required to calculate billing for the LRS. The forms developed for the purpose of processing information requests from the LRS regarding a specific customer's information and account history require specific consent; attestations and confirmations that express permission has been granted by the customer. The process must also respect the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) and/or any successor legislation, and as such, these forms required a specific approach to design and development. The development platform leveraged to produce these forms is the same as that which is used for NS Power's customer onboarding processing.

CIS system modifications are necessary to identify and differentiate customer transactions between NS Power and the LRS.

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1 The amount of effort to sustain these business processes manually would be significant,
2 unsustainable, and prone to error, given the large volume of meter data involved. An
3 estimated 720 internal meter readings per customer/generator per billing month for 1,000
4 customers would total 720,000-meter readings per billing month to manage.

5
6 (b) Please refer to NSEB IR-13 for details related to the reports being developed specifically
7 to accommodate RtR.

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Request IR-8:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, page 1 of 6.

The requirements of this project will impact several teams across NS Power and necessitate enhancements to technology solutions such as the Customer Information System (CIS) and Meter Data Management System (MDMS).

And: N-1, C0053699 Renewable to Retail Implementation Project, page 2 of 6.

The project involves modifying the CIS as well as developing online forms for onboarding and offboarding customers to incorporate the changes anticipated with the activation of the RtR market.

(a) Please confirm NSPI's current plan and timeline for the CIS Replacement capital project including project direction, scope, timeline, or cost.

(b) Given that the RtR implementation includes changes to the CIS for billing, customer information management, tariff maintenance, and onboarding/offboarding processes, please explain:

(i) What specific CIS functions are being enhanced (tariff determinants, settlement billing logic, customer choice flags, etc.), and how did NSP validate that each enhancement is strictly RtR-specific and not general platform improvement?

(ii) What assumptions about CIS system capabilities, timeline, and technical specifications were used in developing the RtR implementation scope and cost estimate;

(iii) Whether and how those assumptions have changed as a result of the cybersecurity incident or any re-scoping of the CIS Replacement project;

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1 **(iv) Whether any RtR work scope, integration approach, or cost has changed due**
2 **to revised CIS assumptions; and**

3
4 **(v) Whether any RtR deliverables or costs could be duplicated, stranded, or**
5 **rendered obsolete by the CIS Replacement project.**

6
7 **(c) Please provide documentation showing how NSPI has coordinated RtR**
8 **implementation planning with CIS Replacement planning, including integrated**
9 **project schedules, dependency analyses, risk registers, and scope/interface**
10 **management protocols, particularly following the cybersecurity incident.**

11
12 Response IR-8:

13
14 (a) The CIS Replacement Project is included in the 2026 ACE Plan (M12619) as a project for
15 subsequent submission and is currently planned for submission in Q3 of 2026.

16
17 (b)

18 (i) Please refer to NSEB IR-7 (a) (ii) for details related to changes to the Customer
19 Information System (CIS).

20
21 (ii) Please refer to NSEB IR-4 (b) .

22
23 (iii) This assumption has not changed as a result of the cybersecurity incident or the
24 future CIS Replacement Project.

25
26 (iv) No RtR work scope has changed with respect to the CIS.

27
28 (v) No RtR deliverables or costs are expected to be duplicated, stranded, or rendered
29 obsolete by the CIS Replacement Project.

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- 1 (c) There has not been a need to coordinate the RtR implementation project scope with the CIS
2 Replacement Project. The changes made by the RtR implementation project will not
3 impact the future scope of the CIS Replacement Project beyond other existing functionality
4 in CIS.

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Request IR-9:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, page 2 of 6.

Implementation began in 2023... based on... COD of Q3 2024... COD... revised... estimated... Q3 of 2026”

(a) Identify all workstreams started for the originally stated COD that were later paused, reworked, or extended due to the COD change—and quantify the costs of that rework/extension included in this CI.

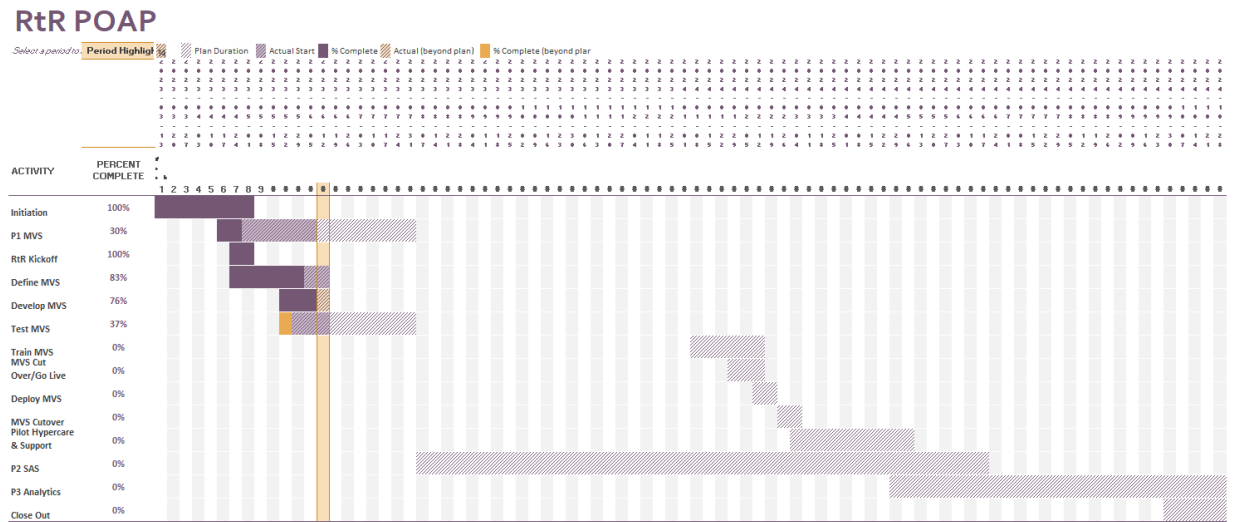
(b) Please provide details of the analysis and decision-making to demonstrate that NSPI actively re baselined scope and spend following the COD delay, to minimize the costs to be recovered from the LRS.

Response IR-9:

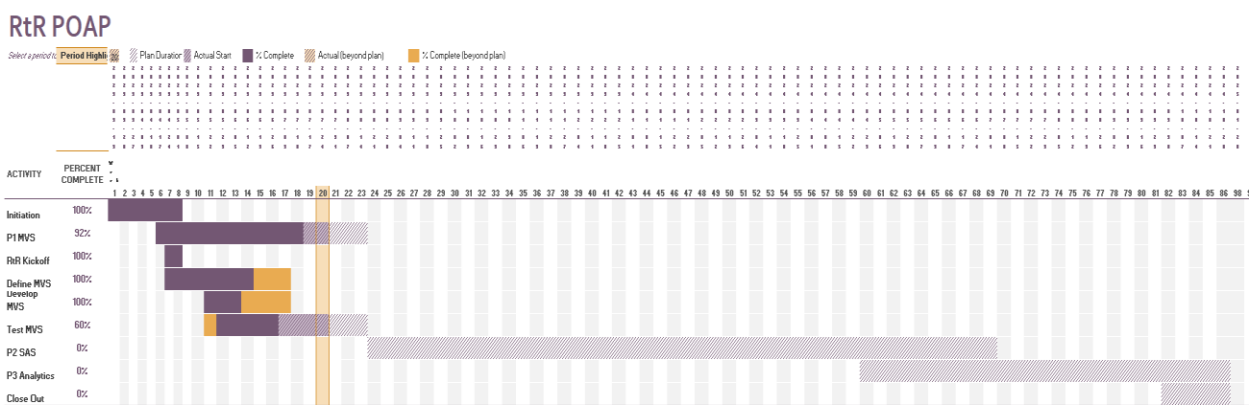
(a) Please refer to Attachment 1 which provides the plan revision summary and the associated Plan-On-A-Page (POAP) versions which depict the schedule changes associated with COD changes for the various workstreams. In May of 2024, NS Power met with Renewall Energy Inc. (REI) to discuss project costs and to share drivers for estimate changes up to that point. At that time, the estimated cost impact associated with the change in COD was approximately \$460,000. Since that time, the estimated costs associated with further COD extensions are estimated at approximately \$500,000.

(b) Please refer to Attachment 1 which outlines the project re-baselining events. Please also refer to REI IR-12 which outlines measures NS Power have taken to minimize the costs to be recovered from the Licensed Retail Supplier (LRS).

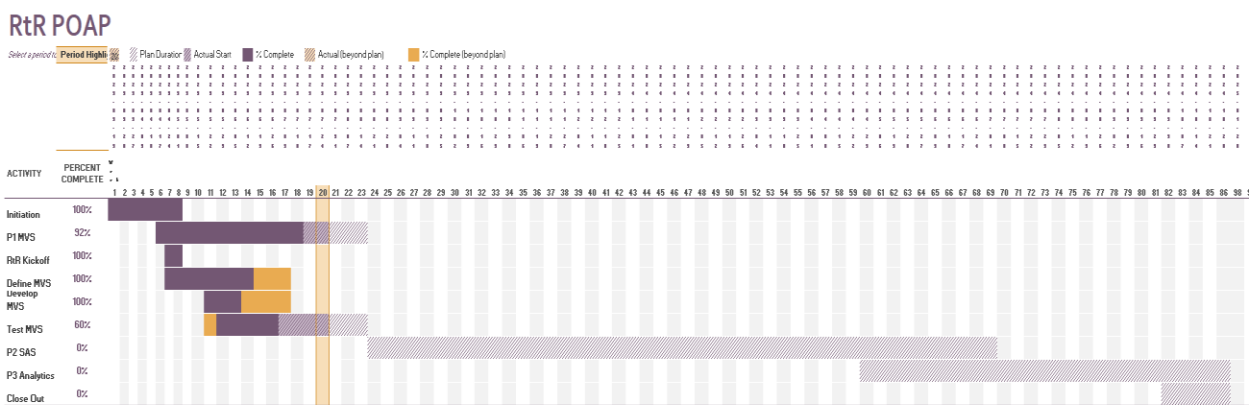
Plan 2 (GL October 2024)



Plan 3 (GL October 2024)

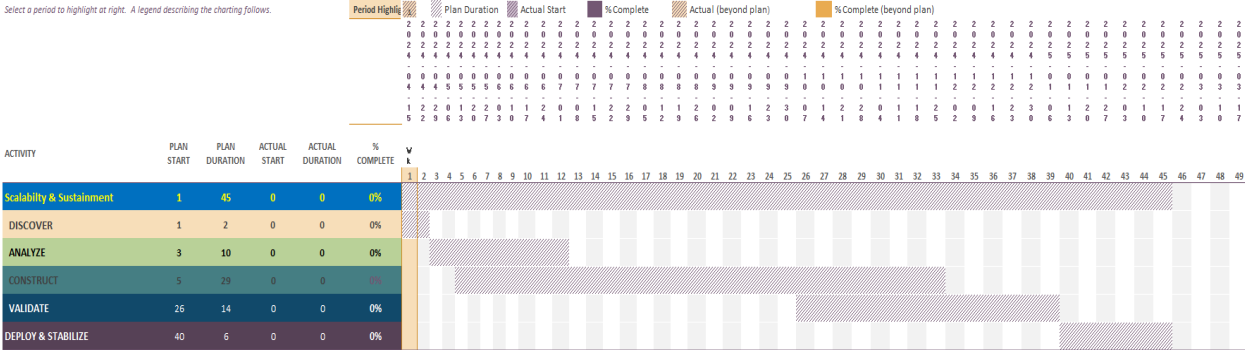


Plan 4 (GL November 2024)



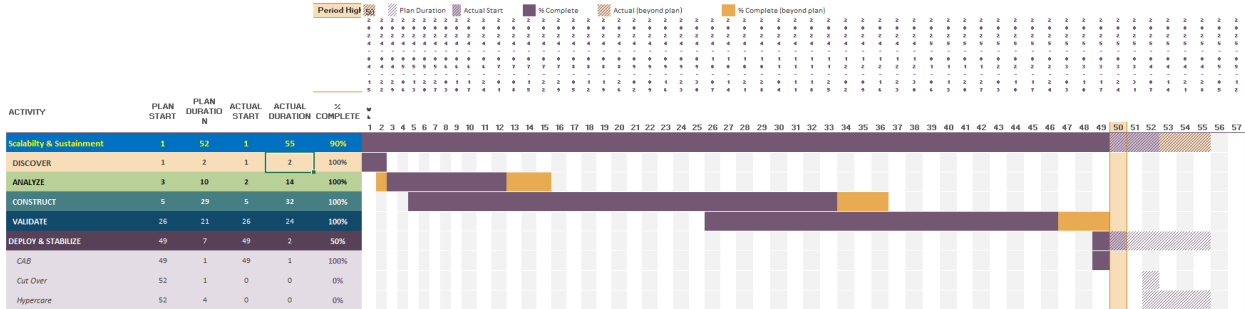
Plan 5 (GL February 2025)

RtR POAP



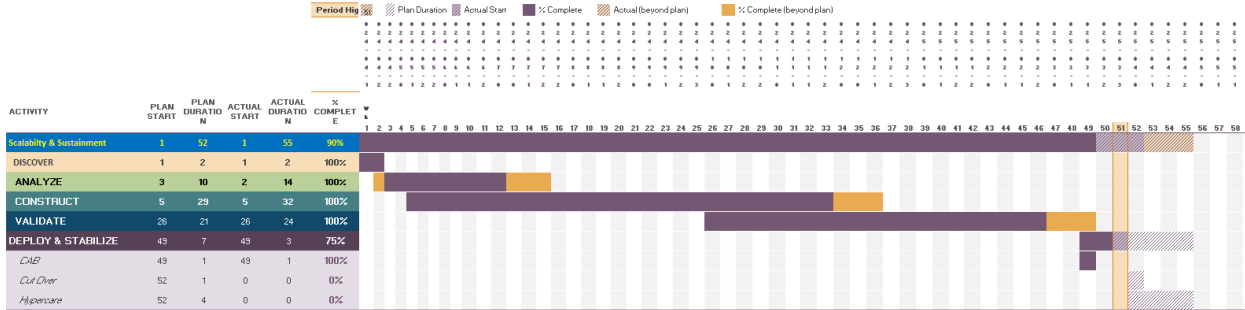
Plan 6 (GL April 2025)

RtR POAP



Plan 7 (GL TBD)

RtR POAP



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Request IR-10:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, pages 2-3 of 6.

The increase of the estimated \$581,816 from the 2025 ACE Plan subsequent submittal estimate of \$5,062,652 is primarily due to increased Administrative Overheads and the requirement to ramp up resources a second time to accommodate extended project timelines to align with the LRS' revised COD dates and to a lesser extent, an increase in technical requirements for data integration of forecasted generation data as well as additional testing complexity that was previously not considered.

- (a) Please identify whether any of these cost increases were caused or influenced by the cybersecurity incident, and provide supporting documentation (incident impact assessments, vendor change orders, resource requirement analyses) for each affected cost category.**
- (b) In relation to the second ramp-up costs noted, please explain whether NSPI has considered the impact of the cybersecurity breach and any resulting limitations on system access and customer data availability when attributing costs to the extended project timeline. And if so, how?**
- (c) Please describe the cost tracking methodology used to distinguish costs related to the 2025 cybersecurity incident from RtR project costs.**
- (d) Please provide any cybersecurity incident investigation reports, findings, or impact assessments relevant to the RtR implementation project, including any identified changes to functional requirements, technical specifications, security controls, integration protocols, or testing requirements that may have affected project scope or cost.**

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1 **(e) Please explain whether the referenced "increase in technical requirements for**
2 **forecasted generation data integration" were driven in whole or in part by**
3 **cybersecurity incident remediation needs and provide supporting documentation**
4 **showing the technical requirement changes and their cost impacts.**

5
6 Response IR-10:

7
8 (a) None of these cost increases were a result of or influenced by the cybersecurity incident.

9
10 (b) The second ramp-up costs noted do not include consideration of potential impacts from the
11 cybersecurity incident.

12
13 (c) A project code has been established for allocating costs specifically related to this RtR
14 implementation. Prior to the cybersecurity incident, all computer code changes related to
15 this project were moved into their respective operational systems and, as such, any recovery
16 work for those specific operational systems will be allocated to the cybersecurity incident
17 and not to this project. It is standard practice to review and verify financial transactions
18 related to each project in the NS Power accounting system to ensure accuracy. This
19 standard practice will continue for the duration of this project.

20
21 (d) Work on this project was paused just prior to the cyber incident as the project team had
22 completed all business process and technical set up work that could be finalized prior to
23 the conclusion phase of the project, closer to the COD of the Licensed Retail Supplier
24 (LRS). This approach was suggested by NS Power and agreed to by the LRS as a cost
25 avoidance measure for the LRS. This approach has resulted in a break between pausing
26 work on this project and the cybersecurity incident. At this time, there are no cybersecurity
27 incident investigation reports, findings, or impact assessments relevant to the RtR
28 implementation project that will affect this project's scope or cost.

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1 (e) The referenced statement “increase in technical requirements for forecasted generation data
2 integration” was not driven by cybersecurity incident remediation needs. This item is
3 related to a known, not new, requirement for the LRS to provide confirmation of contract
4 of forecast services who will provide generation forecast services to the LRS. Once
5 confirmed, NS Power will work to complete the integration for daily forecasts from the
6 LRS into NS Power systems.

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Request IR-11:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, pages 2-3 of 6.

- (a) Please reconcile the total Administrative Overhead amounts (total estimate of \$275,362) with the referenced "~\$500K increase" primarily caused by Administrative Overhead?
- (b) Please provide a detailed variance bridge showing the prior estimate's Administrative Overhead amount versus the current estimate's amount and explain the drivers of the increase.
- (c) Please confirm whether Administrative Overhead rates or allocation bases changed between the prior estimate and the current estimate, and if so, explain the reason for the change and quantify the cost impact on the RtR project.

Response IR-11:

- (a) Please refer to SBA IR-1.
- (b) Due to the cyber incident, NS Power does not have access to the original estimate details to provide a comparison table, and does not expect to recover this data. Please refer to the tables below for the calculation of the overheads for the current estimate.

Labour Overhead Calculation					
Charge Type	2023 Cost (\$)	2024 Cost (\$)	2025 Cost (\$)	2026 Cost (\$)	Total (\$)
Regular Labour	22,393	37,306	44,092	179,859	283,650
Overtime Labour	988	2,197	2,115	(56)	5,244
Term Labour	80,333	49,040	4,446	(291)	133,527
Term Labour Overtime	18,302	5,854	1,116	-	25,271

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Year	Labour AO (%)
2023	82.32%
2024	57.79%
2025	56.63%
2026	56.63%

Charge Type	2023 Labour AO Cost (\$)	2024 Labour AO Cost (\$)	2025 Labour AO Cost (\$)	2026 Labour AO Cost (\$)	Total Labour AO (\$)
Regular Labour	18,434	21,557	24,967	101,847	166,805
Overtime Labour	407	635	599	(16)	1,624
Term Labour	66,128	28,338	2,518	(165)	96,819
Term Labour Overtime	7,533	1,691	316	-	9,540
					274,789

- (c) NS Power Administrative Overhead rates are updated yearly and therefore, due to the timing of the project, the overhead rate varies from the original estimate to current estimate. As mentioned in part (b), NS Power does not have access to the original estimate details.

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Request IR-12:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, pages 2-3 of 6.

(a) Please break down the \$581,816 variance into dollar amounts for (i) Administrative Overhead, (ii) second ramp up, (iii) data integration requirements, and (iv) added testing complexity—and identify which items reflect scope change versus underestimation versus inefficiency (or any other reason).

(b) How much of the variance is attributable purely to schedule extension (time-related costs), and what steps did NSP take to minimize time-related cost accumulation once it became clear COD had moved?

Response IR-12:

(a) Please refer to SBA IR-1 (a).

(b) Please refer to SBA IR-1 (b).

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Request IR-13:

(a) Please identify all software systems that the RtR implementation depends on (including CIS, MDMS/MDM, integration middleware, webform platforms, and reporting/BI tools), and for each system, confirm:

(i) whether cybersecurity incident remediation required version upgrades, patches, or configuration changes;

(ii) whether those changes increased RtR integration complexity or cost; and

(iii) the quantified cost impact on the RtR project.

(b) Given that the RtR implementation includes metering and interval data collection/aggregation functionality dependent on MDMS/MDM systems, please provide:

(i) The current meter reading onboarding timeline and operational capability date for interval data collection, aggregation, and delivery to downstream systems; and

(ii) An explanation of whether any delays in AMI deployment, smart meter communication enablement, or meter reading onboarding have affected or could affect the RtR implementation schedule or the ability to support Renewall's Q4 2026 COD.

(c) Please confirm that all required metering, data collection, and settlement infrastructure is anticipated to be fully operational and tested in time to support Renewall's COD and provide justification for this anticipated readiness.

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1 Response IR-13:

2
3 (a) This implementation is impacting the following software systems:

- 4
- 5 • Oracle Meter Data Management System (MDMS)
 - 6 • Itron MV90
 - 7 • Orcom Customer Information System (CIS)
 - 8 • Salesforce Customer Relationship Management (CRM)
 - 9 • UL Solutions (wind forecasting service)
 - 10 • Oracle Fusion Middleware
 - 11 • Tableau Data Visualization
- 12

13 (i) Cybersecurity incident remediation has been a like-for-like restoration of
14 capabilities. There are cases where a system has been restored to a newer release if
15 one was available and it did not materially affect the scope of the rebuild effort.

16
17 (ii) There is no cost impact or additional integration complexity related to the cyber
18 incident.

19
20 (iii) N/A.

21
22 (b) (i) Smart meter reading is forecast to be restored to NS Power systems by March 31,
23 2026. The operational capability date for interval data collection, aggregation, and
24 delivery to downstream systems is Q3 2026.

25
26 (ii) The current plan for enabling AMI requirements for the RtR implementation
27 supports Renewall's Q4 2026 COD. Delays in AMI deployment, smart meter
28 communication enablement, or meter reading onboarding that affect the RtR
29 implementation schedule will be communicated to Renewall.

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1 (c) Confirmed.

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1 **Request IR-14:**

2
3 **Please elaborate on what existing MDMS capabilities were evaluated and found insufficient**
4 **for RtR settlement and billing and explain why.**

5
6 Response IR-14:

7
8 The Meter Data Management System (MDMS) capabilities were evaluated and found sufficient
9 for calculating RtR market tariffs. The MDMS required configuration changes (as described in
10 NSEB IR-7) to calculate tariff billing determinants specific to the RtR market, that will be later
11 input to the Customer Information System for billing and financial accounting purposes.

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Request IR-15:

Reference: N-1, C0053699 Renewable to Retail Implementation Project, pages 4-5 of 6, Capital Project Detailed Estimate.

(a) Please provide procurement documentation for all major external costs in the Project Estimate, including:

(i) MDMS Module Updates (\$1,432,500);

(ii) MDMS Extended Functional Support (\$359,515);

(iii) CIS Development/enhancements (\$59,000);

(iv) WebForm Development (\$57,000); and

(v) All consulting resources (Business Analysts, Technical/IT, Project Management).

(b) For each major external cost identified, please confirm whether competitive procurement practices were used, and if not, please explain the rationale.

(c) For each of the major external consulting costs, please explain how NSPI determined that the external work was required for the completion of the RtR Implementation project and that external consulting was a cost-effective approach.

(d) For each consulting resource category (Sr Business Analyst, Jr Business Analyst, Business Analyst, Lead Engineer, Project Manager), identify the vendor(s) or consulting firm(s) (if available).

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1 **(e) Why is labour overtime required at all given the COD was extended?**

2
3 Response IR-15:
4

5 (a) (i-v) Please refer to NSEB IR-14. NS Power leverages existing Master Services
6 Agreements for all resources and services noted above with the exception of the
7 RFP process that was completed in 2024 for the Meter Data Management System
8 (MDMS) configuration work.
9

10 (b) Confirmed. Competitive procurement practices are used in the establishment of Master
11 Services Agreements (MSA) and in RFPs.
12

13 (c) The work completed to understand the full scope of this implementation and establishment
14 of the Requirements Traceability Matrices as shared in CA IR-1 Attachments 2 and 3
15 enabled NS Power to identify resource and technical expertise requirements. Once these
16 requirements were understood, NS Power could evaluate both internal capability as well
17 as resource capacity and availability to help identify where external resources and vendors
18 would be needed for the completion of the RtR Implementation Project. As a result of this
19 effort, it was determined that external support was required for this project.
20

21 (d) As noted in part (a), two consulting firms with existing MSAs in place with NS Power were
22 leveraged to fulfill these roles.
23

24 (e) Regardless of COD date changes, overtime labour is occasionally required to meet the
25 project schedule that is followed until any COD changes have been shared with NS Power
26 and subsequent project schedule adjustments are made. Adhering to an agreed project
27 schedule helps to avoid impact on the Licensed Retail Supplier (LRS) with respect to NS
28 Power's readiness to provide this service to the LRS.

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Request IR-16:

- (a) Please provide a complete RtR project deliverable list, including for each deliverable:**
- (i) description and acceptance criteria;**
 - (ii) responsible party;**
 - (iii) delivery date;**
 - (iv) Renewall review/approval role; and**
 - (v) cost allocation.**
- (b) Please confirm whether the RtR implementation will deliver any new standalone systems or software applications, or whether all changes are enhancements/configurations to existing NSPI systems (CIS, MDMS, webforms, reporting tools).**
- (c) Please provide clarification on what system outputs, reports, or data files will be delivered to Renewall, along with the anticipated file formats, data, and delivery frequency to LRSs.**

Response IR-16:

- (a) (i-iii) Please refer to Attachment 1 Deliverables Listing.**
- (iv) As NS Power has obligations to comply with the applicable legislation as mandated under section 3G (now section 22) of the *Electricity Act*, it retains authority for the work execution and scope of this project. NS Power has informed and collaborated**

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1 with the Licensed Retail Supplier (LRS) consistently throughout the
2 implementation project thus far and as referenced in REI IR-21 related to upcoming
3 anticipated changes in scope specifically initiated by the LRS, NS Power and
4 Renewall Energy Inc. (REI) agreed to a decision request/change request (DR/CR)
5 process for scope, schedule, or cost impacting items related to those areas that had
6 not previously been factored into the cost estimate. REI has been involved with
7 this project through attendance of biweekly meetings with the project team which
8 commenced on May 16, 2023. These meetings were established to communicate
9 project status and work to align project delivery and REI set up approaches. In April
10 of 2025, REI and NS Power agreed that because the project team had completed all
11 business process and technical set up work possible ahead of final commissioning
12 and COD, and in the interest of avoiding additional costs to be incurred, the project
13 team would not continue work on this specific initiative until seven months prior to
14 the first retail sales are confirmed.

15
16 (v) Costs are not broken down by deliverable; rather, they are broken down by resource
17 across the entire project. Please refer to NSEB IR-1(b-c) for a table that shows the
18 costs and estimates for each year.

19
20 (b) All changes are enhancements and/or configurations to existing systems, tools, and
21 processes.

22
23 (c) As discussed with the LRS during regular project update meetings, the LRS will receive
24 four encrypted files monthly via a secure NS Power SFTP server, as follows:

- 25
26 • CIS generated summary invoice for payment to NS Power (PDF);
27 • Detailed invoice with breakdown of charges by associated RtR tariff (Excel/.csv);
28 • Breakdown of individual customer distribution, miscellaneous, and/or service
29 charges for those enrolled with the LRS (Excel/.csv); and

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- 1 • Hourly interval data for the LRS generator(s) and load sources as measured by NS
2 Power metering (Excel/.csv).

Renewable to Retail (RtR) Project			Deliverables Listing			
# Deliverables		Status Complete	Remaining			
32		13	19			
Deliverable	Name	Description	Deliverable Status	Business Owner(s) / Approver(s)	% Complete	Deliverable Acceptance Date
D.1	ECC RD Portfolio Management Plan	The Portfolio Management Plan speaks specifically to the overarching management, governance structure, communications, financial management, etc., as well as approaches to managing each ECC RD project through to operations transition and portfolio close out.	Completed	Program Sponsor	100%	13-Mar-23
D.2	Project Justification/Charter	A document to outline the purpose and need for beginning a new project. Provides high level scope, approach, and objectives of a project. Once approved in ACE, authorizes project approach, resources, and funding.	Completed	Program Sponsor	100%	1-Oct-22
D.3	Project Plan	Detailed breakdown and organization of project tasks and milestones. The project plan includes resource information, duration estimates, sequencing, and linkage of project tasks.	Completed	Program Manager	100%	28-Apr-23
D.4	Business & System Requirement documents	Business design documents that depict system changes integrated with key business area/process changes.	In Progress	Program Manager	90%	
D.5	Stakeholder Register	Stakeholder Register that details the project stakeholders in a RACI format. Also contains impact evaluation and relevant notes for Organizational Change Management. Working document.	Completed	Program Manager	100%	25-Apr-25
D.6	T616 Solution Design / System Architecture Document(s)	Solution and system technical documentation which inform and incorporate the current NS Power technical and architectural requirements. Documentation outlining the as is and the to be solution architecture to identify areas of impact and areas requiring alignment/approvals.	In Progress	Program Manager, Customer Care, SMOC, Load & Revenue	90%	
D.7	Risk Register	Initial outline of Risks identified and reviewed with the Sponsor and Steering Committee. Mitigation approach notes included in the Risk Register which will be monitored and tracked throughout the project.	In Progress	Program Manager	90%	
D.8	Kick Off presentation(s)	Project Kick Off presentation developed for Sponsor delivery prior to project execution.	Completed	Program Manager	100%	28-Aug-23
D.9	Test Plan & Test Scenerio Results	This document will outline approach to testing and creation of test scenarios as well as outlining test execution and results requirements.	In Progress	Program Manager, Customer Care, SMOC, Load & Revenue	90%	
D.10	Training Plan	This document will outline approach to training and creation of training materials as well as outlining training delivery requirements and plans.	In Progress	Program Manager, Customer Care, SMOC, Load & Revenue	90%	
D.11	Communications Plan	This document will identify key communication activities and audiences which will be delivered throughout various project intervals.	Completed	Program Manager	100%	25-Apr-25
D.12	Disaster Recovery Plans	This deliverable may come in the form of an update to NSPI's current DRP's or may be delivered as a part of the pre existing system plans.	Completed	Program Manager, IT PMO, Program Sponsor	100%	25-Apr-25
D.13	Business Continuity Plans	This deliverable may come in the form of an update to NSPI's current BCP's or may be delivered as a part of the pre existing system plans.	In Progress	Program Manager, Customer Care, SMOC, Load & Revenue, Program Sponsor	90%	
D.14	Requirements Traceability Matrix	This document consists of a listing of all business requirements as derived through stakeholder meetings, from previous documents, and via information sessions with specific vendors. Each requirement will be traced for completion and final delivery status throughout the project to its conclusion. A final disposition of each requirement will be noted in the document at project close.	In Progress	Program Manager, Program Sponsor, Customer Care, SMOC, Load & Revenue	90%	

Deliverable	Name	Description	Deliverable Status	Business Owner(s) / Approver(s)	% Complete	Deliverable Acceptance Date
D.15	Cut Over/Go Live Plans	These documents will be created and presented for final approval to the Sponsor / Business Owner. It will be reviewed and shared/coordinated with other pertinent stakeholders to prepare for the final go live of the project (s).	In Progress	Program Manager, Program Sponsor	75%	
D.16	T 606 Operational Support Plans	This document will outline the decisions, processes, and approach to supporting the specific solution of tools post go live.	In Progress	Program Manager, Customer Care, SMOC, Load & Revenue, Program Sponsor	90%	
D.17	Decommissioning Plans	This document will identify systems, spreadsheets, and other software tools utilized in the business area, that have been earmarked for decommissioning based on their replacement/redundancy because of the project implementation. It will capture decisions, timelines, and final decommissioning plans.	Not Started	Program Sponsor, Program Manager, Project Manager	0%	
D.18	Project Closeout Activities and Report	Project closeout report, activities, feedback, off-boarding staff and consultants, and project celebration.	In Progress	Program Sponsor, Program Manager, Project Manager	50%	
D.19	Lessons Learned	Lessons Learned Document	Not Started	Program Sponsor, Program Manager, Project Manager	0%	
D.20	Final closeout review and presentation	Final closeout review and presentation to the project stakeholders.	In Progress	Program Sponsor, Program Manager, Project Manager	50%	
D.21	Administrative Closure	Financial closure of the project.	In Progress	Program Sponsor, Program Manager, Project Manager	50%	
D.22	RtR Process Flows	Detailed process flow documents details the stakeholders and tasks associated with executing new process introduced by RtR	Completed	Program Manager, Customer Care, SMOC, Load & Revenue	100%	25-Apr-25
D.23	RtR Change Management Plan	This document identifies the impacted stakeholders, processes and degree of impact associated with the implementation of the RtR project. This combined with the communications plan will ensure a smooth transition to implementation	Completed	Program Manager	100%	25-Apr-25
D.24	RCTRA Forms	Forms developed to facilitate intake of information requests associated with the transition of customers into and out of the RtR market	Completed	Program Manager, Customer Care, SMOC, Load & Revenue	100%	25-Apr-25
D.25	Technical Solution Development Complete	Salesforce deployed REI utilizing for RCTRA CIS SFTP deployed for RCTRA CIS ServiceNow requests for RCTRA CIS developed PI Curtailment Report deployed MV-90 Adapter development complete UAT completed ready for Technical Code Deployment C2M (MDMS) development complete. Final UAT Complete. Solution accepted - ready for Technical Code Deployment Tableau development complete. UAT Complete. Solution Accepted ready for Technical Code Deployment ORCOM CIS Billing Development Complete. UAT Complete Accepted ready for Technical Code Deployment Final Technical Solution UAT Complete and approved.	Completed	Program Manager, Customer Care, SMOC, Load & Revenue	100%	25-Apr-25
D.26	Technical Solution Code Deployment to Production - Inactive dormant state.	Approved and moved. This will preserve the code and ensure it is integrated with any system changes prior to final go live in 2026	Completed	Program Manager, Customer Care, SMOC, Load & Revenue	100%	25-Apr-25

Deliverable	Name	Description	Deliverable Status	Business Owner(s) / Approver(s)	% Complete	Deliverable Acceptance Date
D.27	Business Process & Procedure Development	Team has finalized process and procedure documentation from a Role Based perspective. Business Leads have all signed off and approved. Once technology changes have been completed, tested and trained Procedures will be further developed, updated and completed. Final completion to resume prior to final go live in 2026	Completed	Program Manager, Customer Care, SMOC, Load & Revenue	100%	25-Apr-25
D.28	Final Technical Development and Integration	Re engage relevant resources to update code, perform final integration connections and update final documentation.	Not Started	Program Manager, Customer Care, SMOC, Load & Revenue	0%	
D.29	Final UAT	Update test scenarios/scripts and engage resources to execute final System Integration and User Acceptance Testing	Not Started	Program Manager, Customer Care, SMOC, Load & Revenue	0%	
D.30	Final Process & Procedure documentation	Update any processes & procedures based final testing results.	Not Started	Program Manager, Customer Care, SMOC, Load & Revenue	0%	
D.31	Final Operational Resource Onboarding, Readiness & Training.	Complete position approvals, post positions, hire, train and onboard for final go live.	Not Started	Program Manager, Customer Care, SMOC, Load & Revenue	0%	
D.32	Final Report Development and Integration	Develop remaining reports, test, train and integrate.	Not Started	Program Manager, Customer Care, SMOC, Load & Revenue	0%	

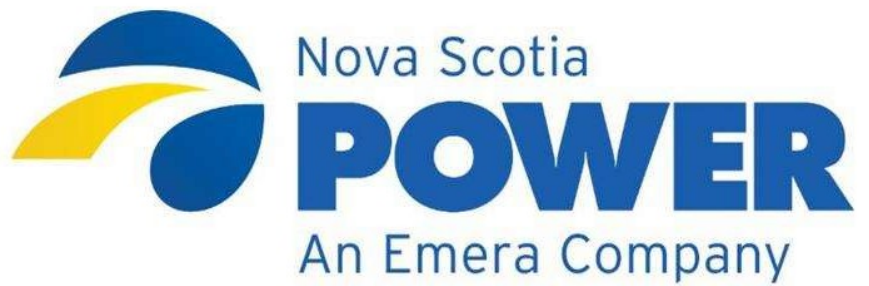
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1 **Request IR-17:**

2
3 **Please provide the detailed specifications of the webforms to be developed.**

4
5 Response IR-17:

6
7 Please refer to Attachment 1 RCTRA Webform Definition.



RCTRA Form Definition – Renewable to Retail

RCTRA Form Definition

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1. Introduction

1.1 Project Overview

Renewable to Retail (RtR) is a new electricity market in Nova Scotia. It was created through the Electricity Reform Act (2013) to enable independent licensed retailers, who are licensed by the Utility and Review Board (UARB, Board), to sell renewable low-impact electricity, generated in Nova Scotia, directly to NS Power's retail customers.

The Nova Scotia government introduced the Electricity Reform Act (2013) to permit greater competition and choice for electricity ratepayers. The government's intent in introducing the legislation was to begin opening the electricity market to renewable energy producers and create local investment opportunities for renewable electricity providers.

The Act directed NS Power to develop, in consultation with stakeholders, and file with the Board for approval any new or amended tariffs, procedures, and standards of conduct that are necessary to facilitate this market. NS Power submitted these elements to the Board for review and the Board's Decision followed in March of 2016.

The purpose of this document is to define a web form solution to be implemented in response to the above legislation. This development will enable NSP to collect requests and customer updates from the LRS while ensuring customer privacy and consent.

1.1.1 Customer Transaction Requests

To initiate Customer transfers, obtain or provide Customer information, the LRS must complete and submit to NS Power an application form (RtR Customer Transaction Request Application) signed by both the LRS and the Retail Customer.

The RtR Customer Transaction Request Application is required for the following Customer transactions:

- **TC** – Transfer Customer to RtR LRS
- **RC** – Release Customer from RtR LRS
- **CIR** - Customer Information Request from NS Power by an LRS
- **CIU** - RtR Customer Information Update to NS Power by an LRS

2. Requirements Approach

In order to best fit an approach to collecting the RCTRA information, requirements were collected with the following tenets in mind:

2.1 Business Priorities & Objectives

1. **Staff Impact** - To facilitate the completion of these Customer Information Requests with as small an impact as possible on the Customer Care group and other NSP teams required to fulfill the requests.
2. **Development Impact** - To minimize development and/or customization in the Information Systems required to process these requests, both to control the timelines and the cost to the LRS, as well as maintain standard configuration for the systems.
3. **Implementation Guide** – To follow the implementation guide as closely as possible to minimize additional regulatory input on changes or interpretations.
4. **Terms & Conditions** - To meet the requirements laid out in the Terms and Conditions in fulfilling these requests.
5. **Privacy & Consent** - To comply with Nova Scotian and Canadian privacy regulations and guidelines.
6. **Analytics & Reporting** – There may be a desire to report on the various aspects of RCTRA submissions.

2.2 Assumptions & Constraints

1. The project will **leverage existing solutions** already in place at NSP.
2. Both the input of the request and the output of the customer data to the LRS **must be secure**.
3. The **customer must consent** to the sharing of data with the LRS, and NSP must have the **appropriate level of assurance** that that consent has been obtained.
4. In all options, the collected customer data will be supplied to the LRS in flat file format **via secure FTP**.

2.3 Options Review Outcome

Based on the options available and reviewed by the business stakeholders, it was agreed that a **Salesforce web form solution was the most viable approach** to collecting RCTRA data from the LRS with the least development while also providing auditability. This will also offer future opportunities for reporting and analytics. Salesforce presents the best option for ensuring customers have consented to sharing their data with the LRS.

3. Solution Details

3.1 RCTRA Process Flows

3.2 RCTRA Information Options

The RtR Customer Transaction Request Application is required for the following Customer transactions:

- **TC** – Transfer Customer to RtR LRS
- **RC** – Release Customer from RtR LRS
- **CIR** - Customer Information Request from NS Power by an LRS
- **CIU** - RtR Customer Information Update to NS Power by an LRS

All form options will be required for go-live with the LRS; the Customer Information Request (CIR) will be required before the LRS is operational and is needed to facilitate consent to data sharing for prospective LRS customers.

3.3 Output

All forms will **output to an email format** that can be processed by the Customer Care team at NSP, through their normal request management processes. This information will also be stored in Salesforce for reporting purposes.

3.4 Storage

The solution will utilize the cloud-based storage solution within the NSP Salesforce Instance, titled “Customer Solutions.”

3.5 Processing

For processing and reporting purposes, each form entry in the Salesforce system shall have the following editable fields that can be set and updated by NSP staff, as the request works its way through the (manual) fulfillment business process.

Field Name	Type	Values
Status	Dropdown	• New • In Progress • Rejected • Canceled • Complete
Actioned By	Username	• Salesforce Username
Notes	Text Box	• Free Text

3.6 Reporting

Future reporting details will be outlined. Salesforce reporting not included in this development.

3.7 Security

No data will be returned to the LRS via Salesforce or the form. Data will only be supplied to the LRS via SFTP and encryption key, with the previously provided site and account(s).

4. Form Design Details

All the forms will have several sections in common, which will be identical in content. These sections will be:

1. Hidden Fields
2. Licensed Retail Supplier Information
3. Legal Details & Consent
4. PDF attachment

Other sections will vary as below for each form.

4.1 CIR - Customer Information Request

The purpose of the Customer Information Request (CIR) form is to allow the LRS to request billing and usage data for prospective customers, with their express permission.

The CIR will include the common sections, above, as well as the following sections.

4.1.1 CIR – Customer Information

#	Section	Name	Description	Data Type	Format	Example	Required
Section Header: Customer and/or Business Name							
		Customer is a business	This customer is a business	Radio Buttons	Yes/No	Yes/No	Yes
		Business Name	Business Name	Text	[Business Name]	ABC Motors	No
		Customer First Name	Customer's first name	Text	[First Name]	Johnathan	Yes
		Customer Last Name	Customer's last name	Text	[Last Name]	Robinson	Yes
Section Header: Customer Contact							
		Customer Phone	Customer phone number	Text	###-###-####	902-532-1234	Yes
		Email Address	Customer email address	Email	jname@customer.ca	jname@customer.ca	Yes
Section Header: Customer Service Address							
		Street	Street number and name	Text	123 Main St	123 Main St	Yes
		Town/City	Town or City name	Text	Kentville	Kentville	Yes
		Postal Code	Postal Code	Text	A#A #A#	B1B 1B1	Yes

Section Header: Customer Account Information							
		NSP Account #	NSP Account Number	Text	[example]	[example]	Yes
		NSP Meter #	NSP Meter Number	Text	[example]	[example]	Yes
Section Header: Other Relevant Information							
		Other Relevant Info	Other Relevant Information	Large/ Long Text	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	No

4.1.2 Requested Information

#	Section	Name	Description	Data Type	Format	Example	Required
Section Header: Standard Information Requests							
		Customer's Last Bill	Customer's Last Bill (in PDF format)	Check box	Checkbox	☐	No
		Customer's last 36 months of interval data	Customer's (up to) last 36 months of interval data	Check box	Checkbox	☐	No
Section Header: Other Information Requests							
		Other Information Requests	Other Information Requests	Large/ Long Text	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	No
Section Header: Information Time Period							
		Start of Customer Time Period	Start Date	Date	YYYY-MM-DD	2021-02-12	Yes
		End of Customer Time Period	End Date	Date	YYYY-MM-DD	2024-02-12	Yes
		Attestation	Wording that customer was	Check box	Checkbox	☐	Yes

			ratepayer for the service location for the time period				
--	--	--	--	--	--	--	--

4.1.3 Authorizing Statements

#	Section	Name	Description	Data Type	Format	Example	Required
		Attestation that LRS authorizes	Attestation that LRS authorizes NSP to action the request	Check box	Checkbox	☐	Yes
		Attestation that LRS has obtained customer consent	Attestation that LRS has obtained customer consent	Check box	Checkbox	☐	Yes

4.3 TC – Transfer Customer to RTR LRS

The purpose of the Transfer Customer to RTR LRS (TC) form is to allow the LRS to request that a customer be transferred to them as a customer, on a specific date, with the express permission of the customer.

The TC will include the common sections, above, as well as the following sections.

4.3.1 Customer Information

#	Section	Name	Description	Data Type	Format	Example	Required
Section Header: Customer and/or Business Name							
		Customer is a business	This customer is a business	Radio Buttons	Yes/No	Yes/No	Yes
		Business Name	Business Name	Text	[Business Name]	ABC Motors	No
		Customer First Name	Customer's first name	Text	[First Name]	Johnathan	Yes
		Customer Last Name	Customer's last name	Text	[Last Name]	Robinson	Yes
Section Header: Customer Contact							
		Customer Phone	Customer phone number	Text	###-###-####	902-532-1234	Yes

		Email Address	Customer email address	Email	jname@customer.ca	jname@customer.ca	Yes
Section Header: Customer Service Address							
		Street	Street number and name	Text	123 Main St	123 Main St	Yes
		Town/City	Town or City name	Text	Kentville	Kentville	Yes
		Postal Code	Postal Code	Text	A#A #A#	B1B 1B1	Yes
Section Header: Customer Account Information							
		Customer is 100% new to NS Energy Market	Customer is 100% new to the NS Energy Market	Radio Buttons	Yes/No	Yes/No	Yes
		NSP Account #	NSP Account Number	Text	[example]	[example]	Yes
		NSP Meter #	NSP Meter Number	Text	[example]	[example]	Yes
		Customer is transferring from another LRS	Customer is transferring from another LRS	Radio Buttons	Yes/No	Yes/No	Yes
		LRS Name	LRS Name	Text	[LRS Name]	ABC Energy Inc	No
Section Header: Other Relevant Information							
		Other Relevant Info	Other Relevant Information	Large/Long Text	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	No

4.3.2 Requested Transfer Date

#	Section	Name	Description	Data Type	Format	Example	Required
Requested Transfer Date (Min 14 days from application)							
		Effective Date	Effective Date for Transfer	Date	YYYY-MM-DD	2024-02-12	Yes

4.3.3 Authorizing Statements

#	Section	Name	Description	Data Type	Format	Example	Required
		Attestation that LRS authorizes	Attestation that LRS authorizes NSP	Check box	Checkbox	☐	Yes

			to action the request				
		Attestation that LRS has obtained customer consent	Attestation that LRS has obtained customer consent	Check box	Checkbox	☐	Yes
		Attestation re Retail Electricity Contracts Disclosure Statement	Attestation that LRS has obtained customer acknowledgement of Retail Electricity Contracts Disclosure Statement	Check box	Checkbox	☐	Yes
		Attestation re Electricity Rate Comparison Information	Attestation that LRS has obtained customer acknowledgement of Electricity Rate Comparison Information	Check box	Checkbox	☐	Yes

4.4 RC – Release RTR LRS Customer to NSP

The purpose of the Release RTR LRS Customer (RC) form is to allow the LRS to request a customer be released, on a specific date, with the express permission of the customer.

The RC will include the common sections, above, as well as the following sections.

4.4.1 Customer Information

This section is identical to 4.1.1 Customer Information on the CIR form.

#	Section	Name	Description	Data Type	Format	Example	Required
Section Header: Customer and/or Business Name							
		Customer is a business	This customer is a business	Radio Buttons	Yes/No	Yes/No	Yes
		Business Name	Business Name	Text	[Business Name]	ABC Motors	No
		Customer First Name	Customer's first name	Text	[First Name]	Johnathan	Yes

		Customer Last Name	Customer's last name	Text	[Last Name]	robinson	Yes
Section Header: Customer Contact							
		Customer Phone	Customer phone number	Text	###-###-####	902-532-1234	Yes
		Email Address	Customer email address	Email	jname@customer.ca	jname@customer.ca	Yes
Section Header: Customer Service Address							
		Street	Street number and name	Text	123 Main St	123 Main St	Yes
		Town/City	Town or City name	Text	Kentville	Kentville	Yes
		Postal Code	Postal Code	Text	A#A #A#	B1B 1B1	Yes
Section Header: Customer Account Information							
		NSP Account #	NSP Account Number	Text	[example]	[example]	Yes
		NSP Meter #	NSP Meter Number	Text	[example]	[example]	Yes
Section Header: Other Relevant Information							
		Other Relevant Info	Other Relevant Information	Large/Long Text	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	No

4.4.2 Service Change Information

#	Section	Name	Description	Data Type	Format	Example	Required
		Reason for Change	Reason for Change	Radio Buttons	Four (4) Options	LRS contract complete/not renewed, customer returning to NSP LRS contract complete/not renewed, customer not continuing energy service LRS contract complete/not renewed, customer	Yes

						moving to another LRS Other, please provide information below	
Section Header: Other Change Information							
		Other Info	Other Information	Large/ Long Text	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.	No

4.4.3 Requested Transfer Date

This section is identical to 4.2.2 Requested Transfer Date on the TC form.

#	Section	Name	Description	Data Type	Format	Example	Required
Requested Transfer Date (Min 14 days from application)							
		Effective Date	Effective Date for Transfer	Date	YYYY-MM-DD	2024-02-12	Yes

4.4.4 Attestations

#	Section	Name	Description	Data Type	Format	Example	Required
		Attestation that LRS authorizes	Attestation that LRS authorizes NSP to action the request	Check box	Checkbox	☐	Yes
		Attestation that LRS has obtained customer consent	Attestation that LRS has obtained customer consent	Check box	Checkbox	☐	Yes
		Attestation informing customer of contact	Attestation informing customer of contact from NSP	Check box	Checkbox	☐	Yes

4.5 CIU – Customer Information Update

The purpose of the Customer Information Update (CIU) form is to allow the LRS to request a customer's information be updated in NSP's records, with the express permission of the customer.

The CIU will include the common sections, above, as well as the following sections.

4.5.1 Customer Update Details

#	Section	Name	Description	Data Type	Format	Example	Required
		Customer/ Business Name	Customer/ Business Name	Check box	Checkbox	☐	No
		Customer Contact Name	Customer Contact Name	Check box	Checkbox	☐	No
		Customer Contact Info	Customer Contact Info	Check box	Checkbox	☐	No
		Other, Please Specify Below	Other, Please Specify Below	Check box	Checkbox	☐	No

4.5.2 Attestations

#	Section	Name	Description	Data Type	Format	Example	Required
		Attestation that LRS authorizes	Attestation that LRS authorizes NSP to action the request	Check box	Checkbox	☐	Yes
		Attestation that LRS has obtained customer consent	Attestation that LRS has obtained customer consent	Check box	Checkbox	☐	Yes

5. Shared Section Details

Below are the field details for each section used identically in all the forms above.

5.1 Hidden

#	Section	Name	Description	Data Type	Format	Example	Required
	Hidden						
		Date Stamp	Each form shall have a date and time stamp to indicate when it was submitted. This should be generated by the system on input.	Date	YYYY-MM-DD-HHMMSS	2024-02-12-134516	Yes

5.2 Licensed Retail Supplier Information

#	Section	Name	Description	Data Type	Format	Example	Required
	Licensed Retail Supplier Information						
		License Number	LRS's license number	Text	[example]	[example]	Yes
		Name	Business Name of LRS	Text	[example]	[example]	Yes
		Email	Email Address	Email	[example]	[example]	Yes
		Phone Number	LRS's phone number	Text	###-###-####	902-532-1234	Yes

5.3 Legal Details & Consent

#	Section	Name	Description	Data Type	Format	Example	Required
	Legal Details & Consent						
		Legal Boilerplate	Static block of text outlining the legal information surrounding the consent to disclose information	Static Text	n/a	n/a	Yes

5.4 PDF Attachment

#	Section	Name	Description	Data Type	Format	Example	Required
	PDF Attachment						
		PDF Copy of Form	Copy of the signed PDF with the customer action request	Document Upload	PDF only	PDF only	Yes

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1 **Request IR-18:**

2
3 **Please confirm whether NSPI is seeking recovery of its own regulatory hearing costs (internal**
4 **and external legal, consulting, expert witness costs) associated with this RtR capital**
5 **application and other RtR applications?**

6
7 Response IR-18:

8
9 NS Power's practice to date has been to seek recovery of regulatory hearing costs on an
10 incremental basis. As the RtR framework continues to evolve, this approach may warrant
11 reconsideration.

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Request IR-19:

Reference: M11875, N-5, NSPI (REI) IR 4 (e).

NS Power does not believe the vintage of the Customer Information System has a bearing on the cost effectiveness of the overall approach to technology enhancements required to serve the RtR Market. Minimal change has been required to the Customer Information System for this purpose.

Reference: M12619, N-1, page 133, lines 12-20.

Over the last 28 years, the CIS has been customized to meet many customer, compliance, and operational requirements. This approach provided customers with a low-cost solution, and it continues to enable its supported functions in a secure and low cost manner.

The CIS application is no longer under vendor support and has undergone significant changes and customizations over its lifespan. While investments have been made to remain on supported server infrastructure, operating system, and database technologies, the technology risk profile of this solution remains high.

(a) Please explain how these statements are consistent with one another.

(b) Please explain how these statements relate to the references to technical integration complexity and software update needs, and please provide the rationale for allocating those expenses to LRS customers.

(c) Please advise whether NSPI has conducted any analysis estimating what portion of the \$5.6M project cost might be avoided or reduced if NSPI had a modern, cloud-native CIS platform, and if so, please provide that analysis.

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1 Response IR-19:

2
3 (a) M12619, N-1, page 133, lines 12-20 stands alone as a factual statement. The changes to
4 the Customer Information System (CIS) to support the RtR implementation are of low
5 complexity and do not change the overall risk profile of the asset.
6

7 (b) The statement as taken from M11874 NSPI (REI) IR-4 part (e) does not relate to the
8 reference from this capital submission C0053699 (on page 3 of 6) under the Reason for
9 Variance paragraph. The reference to technical integration complexity and software update
10 needs is related to system integration testing across multiple systems.
11

12 (c) As noted in the Company's response to NSEB IR-2 in M11874, the approximate costs of
13 \$60,000 associated with the CIS system changes would have been required in order to
14 achieve the noted technical requirements in either the existing or a new CIS system.

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1 **Request IR-20:**

2
3 **Reference: M11874, N-4, NSPI (NSUARB) IR 1 Attachment 1, page 4;**

4
5 **And Reference: N-1, C0053699 Renewable to Retail Implementation Project, page 4.**

6
7 **Preamble: In the prior letter of credit proceeding, M11874, NSPI reported AFUDC of**
8 **\$96,024 through September 2024, whereas in this proceeding, the AFUDC is calculated at**
9 **\$653,657 total.**

10
11 **(a) Please explain the increase in AFUDC since that proceeding and confirm whether**
12 **there have been any changes in the methodology used to calculate AFUDC. If so,**
13 **please explain.**

14
15 **(b) What AO rate(s) were applied, to what cost base(s)?**

16
17 **(c) Are those AO charges incremental and not already embedded in contractor billings?**
18 **Please explain.**

19
20 **(d) How did NSPI ensure AO is not double counted with “fringe” already included in the**
21 **averaged labour rates used for budgeting?**

22
23 **Response IR-20:**

24
25 **(a) AFUDC is calculated by applying NS Power’s Board-approved Weighted Average Cost of**
26 **Capital (WACC) to the balance of capital projects prior to the project going in-service in**
27 **accordance with NSEB-approved Accounting Policy 6240 – Allowance for Funds Used**
28 **During Construction. AFUDC will vary with changes to the timing or amount of the**
29 **project spend and in-service date. There have been no changes to the methodology to**
30 **calculate AFUDC. The Board-approved WACC rate is updated annually.**

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1
2 (b) In accordance with NSEB-approved Accounting Policies 6230 and 6235, NS Power applies
3 administrative overhead rates to capital project labour and contracted external labour
4 charges. Please refer to REI IR-11 for the details of the administrative overhead rates
5 applied in this project.

6
7 (c) Administrative Overhead costs are NS Power support costs necessary to support the
8 Company's capital program but not directly charged to a specific capital project. The
9 administrative overhead costs are calculated in accordance with NS Power's Board-
10 approved Accounting Policy 6230 – Application of Administrative and Vehicle Overhead
11 (Self-Constructed Assets). As this is an allocation of NS Power's costs between capital and
12 operating activities, these costs are not embedded in contractor billings.

13
14 (d) Budgeted labour rates and costs (including fringe) are based on NS Power employees who
15 directly contribute to this project. This is separate from the costs that make up
16 administrative overhead. NS Power's administrative overhead allocates costs that support
17 capital and operating activities between OM&G and capital projects. These costs include
18 administrative support labour, project support costs, procurement, IT support, and other
19 administrative expenses.

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Request IR-21:

(a) Is the “agreed-upon change request process” in writing? If so, please provide a copy. If not, please describe and confirm that this description has been signed off by the LRS.

(b) What is the agreed-upon scope, beyond which a change is merited?

(c) Is there a dispute resolution process if there’s no agreement?

Response IR-21:

(a) In May of 2024, NS Power and Renewall Energy Inc. (REI) met and reviewed project status, cost estimates and to discuss items related to this implementation. During that meeting, NS Power and REI agreed to a decision request/change request (DR/CR) process going forward for scope, schedule, or cost impacting items related to the following anticipated future scope areas that had not been factored into the cost estimates at that time. Please see REI IR 01 for reference to the process. While there is no written agreement, the process as described has been acknowledged and accepted by NS Power and REI.

(b) Examples of scope-change drivers include but are not limited to the following:

- Outcomes of the Large Industrial Interruptible Rider (LIIR) Pilot;
- Fuel Adjustment Mechanism balance reconciliations for customers joining the RtR Market;
- Activities related to identifying RtR customers for EfficiencyOne and associated work to establish billing systems;
- Additions/Updates to RCTRA forms (e.g. Billing inquiry);
- Force Majeure support for an LRS; and

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- 1 • LRS Behind the Meter Generation and LRS Net Billing customers (as directed in
2 M12339).
3
4 (c) There is no project-specific dispute resolution process in place.

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Request IR-22:

Reference: M12339 Board Order, November 19, 2025.

1. NS Power must engage with interested parties, as contemplated under s. 22(1) of the Electricity Act, to develop or amend any tariffs, procedures or standards of conduct necessary to enable distribution-connected generation and net billing, while adhering to the requirements of s. 22(2).

2. The Board directs NS Power to file an application for the approval of the necessary tariffs, procedures or standards of conduct by April 1, 2026.

(a) Please outline what specific steps have been taken by NSPI to advance the Board's directions in M12339.

(b) What, if any, costs are forecasted by NSPI to fulfil the Board's Order?

(c) Please confirm that any costs which NSPI seeks to recover from the LRS in relation to M12339 are included in the scope of this Application. If not, please provide a budget estimate in as much detail as possible, by cost category, and explain when and how NSPI proposes to recover them.

Response IR-22:

(a) With the consent of Renewall Energy Incorporated (REI), NS Power is in the process of retaining Power Advisory to lead this work and facilitate stakeholder consultation as directed. Power Advisory is currently reviewing the scope of work and will advise whether the April 1, 2026 deadline is feasible.

(b) A cost estimate cannot be provided until Power Advisory completes its assessment of the required scope of work. NS Power will keep REI apprised and involved as the scope and

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1 related costs are determined. Once the potential option(s) are identified, NS Power will
2 need to evaluate the implications for work already completed outside of this scope in order
3 to assess any additional costs that may be required to complete implementation.

4
5 (c) Cost recovery from the LRS in relation to M12339 is not included in this application. Once
6 known, to the extent this work affects the current capital application, NS Power will follow
7 the Change Request Process noted in REI IR-21 to incorporate into the overall project
8 implementation and costs.