M12588

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: *The Public Utilities Act,* R.S.N.S. 1989, c.380, as amended

IN THE MATTER OF: **An application by NOVA SCOTIA POWER INCORPORATED for approval of CI C0053699 Renewable to Retail Implementation $5,644,468**

INFORMATION REQUESTS (NON-CONFIDENTIAL)

To: **Michael Willett**
Director, Regulatory Finance
Nova Scotia Power, Inc. (NS Power)

From: Small Business Advocate

Responses Due: February 17, 2026

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Melissa P. MacAdam**
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Issued at Bedford, Nova Scotia on this 26th day of January, 2026

Request IR-1:

Refer to M12588, Exhibit N-1, the Renewable to Retail (RtR) Implementation Project submitted by NS Power (the "Application"). Regarding the variance between the previously filed cost estimates and those updated, please answer the following questions:

a) Please provide a breakdown of the $581,816 variance by major cost category, as outlined on page 4 of 6, – Regular Labour, OT Labour, Term Labour, OT Term Labour, Software, Contracts, Consulting, Other Goods and Services, Interest Capitalized, and Administrative Overhead.
b) Please describe which cost categories experienced higher costs due to Commercial Operation Date (COD) delays?
c) Please describe the rationale for cost increases due to administrative overhead.
d) Please describe the additional testing complexity not foreseen or considered in the original estimate.
e) What steps did NS Power perform to mitigate cost increases?

Request IR-2:

Referring to M12588, Exhibit N-1, Page 4 of 6, the Capital Project Detailed Estimate, please answer the following questions:

a) Program Manager appears across multiple categories. Please explain:
   i. The duration of each role (ongoing or complete);
   ii. The rationale for the level of program management costs relative to overall project cost; and
   iii. The role the delay in COD played in increasing these costs.
b) Please explain the derivation of administrative overhead costs.

Request IR-3:

Refer to M12588, Exhibit N-1, Page 1 of 6, regarding the recovery of RtR costs over time, please answer the following questions:

a) Will the recovery period align with the 10-year depreciation life? If not, please explain why.
b) Considering the prospect for future growth in the RtR market and the potential for additional Licensed Retail Suppliers (LRSs), how is the cost structure anticipated to ensure incremental RTR costs are appropriately covered by future LRSs?
c) Given the contract between customer and their LRS lies outside of NS Power's control, how does NS Power anticipate mitigating risk of customers terminating participation before full capital recovery?