

NON-CONFIDENTIAL

Request IR-1:

In response to the Board's IR-13 and IR-14 (Exhibit N-4), the utility provided the following response:

(d) ...When NS Power lost the ability to communicate with that network through the cyber incident, the estimation logic reverted to a contingency CIS subroutine which uses seasonal logic. When a bill read is missing, CIS estimates a reading using the average usage per day at the specific property on bills in the last 12 months that are considered in the same season.

(e) ...While using average seasonal usage can protect customers from volatility in billing within a season, months on either side of the CIS seasonal change-over (April to May, October to 4 November) can be susceptible to larger swings and variances to true usage since the bill date determines the season used for the calculation. Year-over-year changes in temperature can further exacerbate or mitigate these shoulder-season variances.

NS Power has access to historical billing data, including the true meter reads used for those 16 bills. The CIS system uses this data to inform the estimation subroutine described above.

(a) While removing all confidential information, please provide energy bills issued for two randomly selected customers during the CIS seasonal change over periods (April to May and October to November) that were generated using the CIS subroutine during the cybersecurity incident. Along with the issued bills, please include all input data with timestamps that were used, as well as the CIS routine output, in an Excel sheet with all formulas intact. In addition, please provide an explanation of how the two customers were selected.

(b) Please provide the energy bills based on actual meter readings for the same location and the same billing period from one year earlier.

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1 **(c) Is the CIS subroutine developed internally, or is it owned by a third party service**
2 **provider?**

3
4 **(i) If it is owned by a third party service provider, what is the estimated annual**
5 **cost to use it?**

6
7 **(d) How was the CIS subroutine model trained, and how many predictor inputs**
8 **(independent variables) were used for training (e.g., weather, holidays, etc.)?**

9
10 **(i) Please provide the list of predictor inputs, if applicable.**

11
12 **(e) Was this routine validated or tested before it was approved for use?**

13
14 **(i) If yes, please provide a copy of the validation report.**

15
16 **(ii) If not, why was it not qualified before being approved for usage?**

17
18 **(f) Since the utility determined that the routine was producing higher bill estimates, has**
19 **the utility back tested the model on billing periods using actual meter reads and**
20 **tracked metrics such as mean error, mean absolute error, and any systematic over or**
21 **under estimation?**

22
23 **(i) If not, please explain why.**

24
25 **(ii) If yes, please provide the analysis report.**
26

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1 Response IR-1:

2
3 (a) The requested bill samples are shown below. The data inputs and calculations for each bill
4 sample are included.

5
6 The samples were selected by using a random number generator to identify account
7 numbers. The accounts were to have billed on different bill cycles. The accounts were to
8 have had bills in the period of April 2025 to May 2025 as well as October 2025 to
9 November 2025. To facilitate the response to IR-1(b), the accounts were also to have had
10 bills in the same periods in 2024.

11
12 The data inputs to the estimation subroutine are limited to two data points on specific
13 historical bills: total usage (kWhs) within the bill period and days of the period. When a
14 bill read is missing, the Customer Information System (CIS) estimates a reading using the
15 average usage per day at the specific property on bills in the last 12 months that are
16 considered in the same season. The legacy CIS does not use a trainable model and is not
17 capable of machine learning.

Minister of Energy – Accountability for Nova Scotia Power (NSEB M12600)
NSPI Responses to NSEB Information Requests

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CUSTOMER "A" / BILL "A" (May 2025)

Account Number [REDACTED]		Amount due Jul 17		\$794.39	
Service address		Domestic			
[REDACTED]		Service from Mar 11 to May 13, 2025			
SPRINGHILL, NS					
Meter number	Rate code	No. of days	New meter read	Last meter read	kWh used
[REDACTED] 31786	02B	63	93125.44	90770.44	2355

Your bill was estimated for this period
Billing date May 13 Includes payments received by May 13

Amount owing from last bill	1,112.25
Payment received Mar 31 - Thank you	-600.00
Payment received Apr 14 - Thank you	-512.25
Balance owing after last payment	\$.00

Energy charges:

Base Charge \$19.17/month	38.34
Energy 2355 kWh x \$0.18561	437.11
Total energy charges	475.45

Other charges

Heat Pump (Ductless) Leasing	258.92
Tax: HST (11931 4938 RT)	102.81
Provincial Rebate	-42.79
Total other charges	318.94

Total amount due **\$794.39**
Amount due Jul 17, 2025 **\$794.39**

Interest on overdue amounts is calculated at 1.5 % per month or part thereof (19.56%) per annum).

Past electric use:

Bill date	Energy used	No. of days	kWh per day
May 25	2355	63	37.4
Mar 25	4035	57	70.8
Jan 25	3576	63	56.8
Nov 24	1994	61	32.7
Sep 24	2314	64	36.2
Jul 24	1963	60	32.7
May 24	2603	60	43.4

Cyber incident update: visit nspower.ca

HISTORICAL DATA INPUTS

Bill Date	kWhs	Days	kWh/day
Sep-24	2314	64	36.2
Jul-24	1963	60	32.7
May-24	2603	60	43.4
Total	6880	/ 184	= 37.4

ESTIMATION CALCULATION

Bill Date	kWh/day	Days	kWhs
May-25	37.4	x 63	= 2355.7

Bills issued at property in same CIS season ('warm') in 12 months preceding this bill

Minister of Energy – Accountability for Nova Scotia Power (NSEB M12600)
NSPI Responses to NSEB Information Requests

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CUSTOMER "A" / BILL "B" (November 2025)

Account Number [REDACTED]		Amount due Dec 15		\$997.27	
[REDACTED]		Domestic			
Service address		Service from Sep 10 to Nov 13, 2025			
[REDACTED]					
SPRINGHILL, NS					
Meter number	Rate code	No. of days	New meter read	Last meter read	kWh used
[REDACTED] 31786	02B	64	100958.00	97562.00	3396
Your bill was estimated for this period					
Billing date Nov 13 Includes payments received by Nov 13					
Amount owing from last bill		701.53			
Payment received Sep 29 - Thank you		-351.53			
Payment received Oct 14 - Thank you		-350.00			
Balance owing after last payment		\$.00			
Energy charges:					
Base Charge \$19.17/month		38.34			
Energy 3396 kWh x \$0.18561		630.33			
Total energy charges		668.67			
Other charges					
Heat Pump (Ductless) Leasing		258.92			
Tax: HST (11931 4938 RT)		129.86			
Provincial Rebate		-60.18			
Total other charges		328.60			
Total amount due		\$997.27			
Amount due Dec 15, 2025		\$997.27			
Interest on overdue amounts is calculated at 1.5 % per month or part thereof (19.56%) per annum).					

Billing process update:
nspower.ca/billing

Your average cost of electricity during this period was \$10.45 per day before taxes.

Past electric use:

Bill date	Energy used	No. of days	kWh per day
Nov 25	3396	64	53.1
Sep 25	2299	183	12.6
Jul 25	2138	62	34.5
May 25	2355	63	37.4
Mar 25	4035	57	70.8
Jan 25	3576	63	56.8
Nov 24	1994	61	32.7

HISTORICAL DATA INPUTS

Bill Date	kWhs	Days	kWh/day
Mar-25	4035	57	70.8
Jan-25	3576	63	56.8
Nov-24	1994	61	32.7
Total	9605	/ 181	= 53.1

ESTIMATION CALCULATION

Bill Date	kWh/day	Days	kWhs
Nov-25	53.1	x 64	= 3396.2

Bills issued at property in same CIS season ('cold') in 12 months preceding this bill

1
2
3

Minister of Energy – Accountability for Nova Scotia Power (NSEB M12600)
NSPI Responses to NSEB Information Requests

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CUSTOMER "B" / BILL "A" (May 2025)

Account Number [REDACTED]		Amount due Jul 15		\$290.52	
Service address [REDACTED]		Domestic Service from Mar 04 to May 06, 2025			
COLE HARBOUR, NS					
Meter number	Rate code	No. of days	New meter read	Last meter read	kWh used
[REDACTED] 2597	03B	63	63314.32	61515.32	1799
Your bill was estimated for this period					
Billing date May 06		Includes payments received by May 06			
Amount owing from last bill		790.79			
Payment received Apr 02 - Thank you		-100.00			
Payment received Apr 07 - Thank you		-200.00			
Payment received Apr 17 - Thank you		-150.00			
Payment received Apr 22 - Thank you		-300.00			
Payment received May 02 - Thank you		-150.00			
Interest on overdue amounts		8.86			
Balance owing after last payment		-\$100.35			
Energy charges:					
Base Charge \$19.17/month		38.34			
Energy 1799 kWh x \$0.18561		333.91			
Total energy charges		372.25			
Other charges					
Tax: HST (11931 4938 RT)		52.12			
Provincial Rebate		-33.50			
Total other charges		18.62			
Total amount due		\$290.52			
Amount due Jul 15, 2025		\$290.52			

Interest on overdue amounts is calculated at 1.5 % per month

Cyber incident update:
visit nspower.ca

Your average cost of electricity during this period was \$5.91 per day before taxes.

Past electric use:

Bill date	Energy used	No. of days	kWh per day
May 25	1799	63	28.6
Mar 25	4617	60	77.0
Jan 25	2823	60	47.1
Nov 24	1325	61	21.7
Sep 24	1533	63	24.3
Jul 24	1257	62	20.3
May 24	2466	59	41.8

HISTORICAL DATA INPUTS

Bill Date	kWhs	Days	kWh/day
Sep-24	1533	63	24.3
Jul-24	1257	62	20.3
May-24	2466	59	41.8
Total	5256	/ 184	= 28.6

ESTIMATION CALCULATION

Bill Date	kWh/day	Days	kWhs
May-25	28.6	x 63	= 1799.6

Bills issued at property in same CIS season ('warm') in 12 months preceding this bill

Minister of Energy – Accountability for Nova Scotia Power (NSEB M12600)
NSPI Responses to NSEB Information Requests

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CUSTOMER "B" / BILL "B" (November 2025)

Account Number [REDACTED] **Amount due Dec 05** \$742.11

Service address [REDACTED] **Domestic**
Service from Aug 28 to Nov 05, 2025

COLE HARBOUR, NS

Meter number	Rate code	No. of days	New meter read	Last meter read	Multiplier	kWh used
[REDACTED] 2597	03B	69	69835.00	66494.00	1	3341

Your bill was estimated for this period
Billing date Nov 05 Includes payments received by Nov 05

Amount owing from last bill	305.73
Payment received Sep 10 - Thank you	-80.00
Payment received Oct 06 - Thank you	-100.00
Payment received Oct 14 - Thank you	-75.00
Balance owing after last payment	\$50.73

Energy charges:

Base Charge \$19.17/month	38.34
Energy 3341 kWh x \$0.18561	620.12
Total energy charges	658.46

Other charges

Tax: HST (11931 4938 RT)	92.18
Provincial Rebate	-59.26
Total other charges	32.92

Total amount due \$742.11

Amount due Dec 05, 2025 \$742.11

Interest on overdue amounts is calculated at 1.5 % per month or part thereof (19.56%) per annum).

Billing process update:
nspower.ca/billing

Your average cost of electricity during this period was \$9.54 per day before taxes.

Past electric use:

Bill date	Energy used	No. of days	kWh per day
Nov 25	3341	69	48.4
Sep 25	1797	177	10.2
Jul 25	1383	62	22.3
May 25	1799	63	28.6
Mar 25	4617	60	77.0
Jan 25	2823	60	47.1
Nov 24	1325	61	21.7

HISTORICAL DATA INPUTS

Bill Date	kWhs	Days	kWh/day
Mar-25	4617	60	77.0
Jan-25	2823	60	47.1
Nov-24	1325	61	21.7
Total	8765	/ 181	= 48.4

ESTIMATION CALCULATION

Bill Date	kWh/day	Days	kWhs
Nov-25	48.4	x 69	= 3341.4

Bills issued at property in same CIS season ('cold') in 12 months preceding this bill

- 1
- 2
- 3 (b) Below are the samples requested for the same customer accounts in response IR-1(a),
- 4 for the same bill periods in 2024.

Minister of Energy – Accountability for Nova Scotia Power (NSEB M12600)
NSPI Responses to NSEB Information Requests

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CUSTOMER "A" / BILL "A" (May 2024)

Account Number [REDACTED]		Amount due Jun 13		\$819.31			
Service address		Domestic					
[REDACTED]		Service from Mar 11 to May 10, 2024					
[REDACTED]		SPRINGHILL, NS					
Meter number	Rate code	No. of days	New meter read	Last meter read	Multiplier	kWh used	
31786	02B	60	76888.35	74285.43	1	2603	

Your meter was read on May 10, 2024
Billing date May 14 Includes payments received by May 14

Amount owing from last bill	1,055.46
Payment received Mar 19 - Thank you	-527.73
Payment received Apr 02 - Thank you	-527.73
Balance owing after last payment	\$.00

Energy charges:

Base Charge \$19.17/month	23.00
Base Charge \$19.17/month	15.34
Energy @ \$0.17547/kWh	274.08
Energy @ \$0.17703/kWh	184.29
Total energy charges	496.71

Other charges

Heat Pump (Ductless) Leasing	258.92
Tax: HST (11931 4938 RT)	113.35
Provincial Rebate	-49.67
Total other charges	322.60
Total amount due	\$819.31
Amount due Jun 13, 2024	\$819.31

Interest on overdue amounts is calculated at 1.5 % per month or part thereof (19.56% per annum).

*Rates changed April 17, 2024
nspower.ca/
rates*

Your average cost of electricity during this period was \$8.28 per day before taxes.

Past electric use:

Bill date	Energy used	No. of days	kWh per day
May 24	2603	60	43.4
Mar 24	3894	61	63.8
Jan 24	3367	62	54.3
Nov 23	1875	58	32.3
Sep 23	2211	62	35.7
Jul 23	2100	63	33.3
May 23	2981	61	48.9

1

CUSTOMER "A" / BILL "B" (November 2024)

Account Number [REDACTED]		Amount due Dec 16		\$708.67			
Service address		Domestic					
[REDACTED]		Service from Sep 11 to Nov 11, 2024					
[REDACTED]		SPRINGHILL, NS					
Meter number	Rate code	No. of days	New meter read	Last meter read	Multiplier	kWh used	
31786	02B	61	83159.08	81165.13	1	1994	

Your meter was read on Nov 11, 2024
Billing date Nov 14 Includes payments received by Nov 14

Amount owing from last bill	768.15
Payment received Oct 01 - Thank you	-768.15
Balance owing after last payment	\$.00

Energy charges:

Base Charge \$19.17/month	38.34
Energy 1994 kWh x \$0.17703	353.00
Total energy charges	391.34

Other charges

Heat Pump (Ductless) Leasing	258.92
Tax: HST (11931 4938 RT)	97.54
Provincial Rebate	-39.13
Total other charges	317.33
Total amount due	\$708.67
Amount due Dec 16, 2024	\$708.67

Interest on overdue amounts is calculated at 1.5 % per month or part thereof (19.56% per annum).

*Sign up for paperless billing at
nspower.ca/
paperless*

Your average cost of electricity during this period was \$6.42 per day before taxes.

Past electric use:

Bill date	Energy used	No. of days	kWh per day
Nov 24	1994	61	32.7
Sep 24	2314	64	36.2
Jul 24	1963	60	32.7
May 24	2603	60	43.4
Mar 24	3894	61	63.8
Jan 24	3367	62	54.3
Nov 23	1875	58	32.3

2

Minister of Energy – Accountability for Nova Scotia Power (NSEB M12600)
NSPI Responses to NSEB Information Requests

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1

CUSTOMER "B" / BILL "A" (May 2024)

Account Number	Amount due Jun 05	\$400.24
Domestic		
Service address	Service from Mar 04 to May 02, 2024	
COLE HARBOUR, NS		
Meter number	Rate code	No. of days
2597	03B	59
New meter read	Last meter read	Multiplier
49959.59	47493.30	1
kWh used	2466	

Your meter was read on May 02, 2024
Billing date May 06 Includes payments received by May 06

Amount owing from last bill	802.46
Payment received Mar 14 - Thank you	-100.00
Payment received Apr 05 - Thank you	-200.00
Payment received Apr 08 - Thank you	-200.00
Payment received Apr 18 - Thank you	-200.00
Payment received Apr 22 - Thank you	-202.46
Interest on overdue amounts	4.54
Balance owing after last payment	-\$95.46

Energy charges:

Base Charge \$19.17/month	27.94
Base Charge \$19.17/month	10.40
Energy @ \$0.17547/kWh	315.32
Energy @ \$0.17703/kWh	118.43
Total energy charges	472.09

Other charges

Tax: HST (11931 4938 RT)	70.82
Provincial Rebate	-47.21
Total other charges	23.61

Total amount due \$400.24
Amount due Jun 05, 2024 \$400.24

Rates changed April 17, 2024
nspower.ca/rates

Your average cost of electricity during this period was \$8.00 per day before taxes.

Past electric use:

Bill date	Energy used	No. of days	kWh per day
May 24	2466	59	41.8
Mar 24	4155	61	68.1
Jan 24	2838	62	45.8
Nov 23	1399	58	24.1
Sep 23	1812	62	29.2
Jul 23	1453	64	22.7
May 23	2749	61	45.1

2

CUSTOMER "B" / BILL "B" (November 2024)

Account Number	Amount due Dec 06	\$362.04
Domestic		
Service address	Service from Sep 04 to Nov 04, 2024	
COLE HARBOUR, NS		
Meter number	Rate code	No. of days
2597	03B	61
New meter read	Last meter read	Multiplier
54074.60	52749.42	1
kWh used	1325	

Your meter was read on Nov 04, 2024
Billing date Nov 06 Includes payments received by Nov 06

Amount owing from last bill	324.37
Payment received Oct 07 - Thank you	-250.00
Interest on overdue amounts	1.12
Balance owing after last payment	\$75.49

Energy charges:

Base Charge \$19.17/month	38.34
Energy 1325 kWh x \$0.17703	234.56
Total energy charges	272.90

Other charges

Tax: HST (11931 4938 RT)	40.94
Provincial Rebate	-27.29
Total other charges	13.65

Total amount due \$362.04
Amount due Dec 06, 2024 \$362.04

Sign up for paperless billing at nspower.ca/paperless

Your average cost of electricity during this period was \$4.47 per day before taxes.

Past electric use:

Bill date	Energy used	No. of days	kWh per day
Nov 24	1325	61	21.7
Sep 24	1533	63	24.3
Jul 24	1257	62	20.3
May 24	2466	59	41.8
Mar 24	4155	61	68.1
Jan 24	2838	62	45.8
Nov 23	1399	58	24.1

Interest on overdue amounts is calculated at 1.5 % per month or part thereof (19.56%) per annum).

3

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- 1
- 2 (c) The CIS estimation subroutine was part of the original product implementation in 1997.
- 3 Any changes require custom development by a third-party contractor.
- 4
- 5 (d) The CIS estimation subroutine is not trainable. The legacy CIS was implemented in
- 6 1997. It is not capable of machine learning.
- 7
- 8 (e) The CIS estimation subroutine has been functioning since 1997. Prior to the
- 9 implementation of AMI, it was the primary method of estimating bills when meter
- 10 readings could not be physically obtained. Since the implementation of AMI, and pre-
- 11 cyber incident, it has functioned on occasions when meter readings could not be
- 12 obtained for legacy (non-AMI) meters or opt-out customers.
- 13
- 14 (f) There is no machine learning model in the legacy CIS. It is not software that is capable
- 15 of learned functions or trained algorithms. The CIS estimation subroutine worked as
- 16 designed. It looks at defined historical bill data and uses a static calculation. The
- 17 legacy CIS estimates a reading using the average usage per day at the specific property
- 18 on bills in the last 12 months that are considered in the same season.

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Request IR-2:

- (a) How does the CIS subroutine work for a customer with net-metering?**
- (b) Why did the utility not consider providing estimated credits for customers with net metering?**
- (c) How many net metering customers does the utility currently have?**
- (d) For all net metering customers, when did the utility stop providing credits, and when did it resume issuing them?**
- (e) Please provide the monthly number of net metering customers, to date, who have and have not received any credits since the cybersecurity incident was discovered in April 2025.**
- (f) Are net metering customer bills reconciled with interest if the credits are held longer than expected?**
- (g) What steps has the utility currently taken to provide estimated credits in cases where it is issuing estimated energy bills?**
- (h) Were there active net metering customers in 2025 receiving estimated bills?**
- (i) Did the net metering customer bills include estimated or actual readings from their solar panel/wind/hydro/other resources?**
- (ii) Are net metering customers able to validate NS Power's kWh for 2025 on NS Power's customer information system?**

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1 Response IR-2:

2
3 (a) For net metering accounts, the CIS estimation routine estimates the consumption only.
4 Generation is set to zero when a net metering account is estimated.

5
6 (b) There is/was no CIS estimation routine for generation. Developing and deploying a new
7 estimation routine was not considered at the time of the cybersecurity incident. NS Power
8 hired meter readers to obtain generation information from customers as illustrated in the
9 response to (e). Developing estimation logic for generation would have too many factors
10 for NS Power to control, such as weather (i.e., sunny vs. cloudy weather which can vastly
11 vary by customer).

12
13 (c) As of 31 December 2025, there are 13,152 customers participating in a net metering
14 program.

15
16 (d) There was no specific date when credits were stopped or started. NS Power began
17 manually meter reading net metering customers in early July 2025 with the number of
18 estimations for this customer group at 27 percent. Going forward estimation rates for net
19 metering customers declined to 1 percent and stayed there until the MDM reads were
20 restored.

21
22 (e)
23

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Net Metering Bill Counts by Bill Month

Bill Month	Total # of Bill	True Read Bill	Estimated Bills	% Estimated bills
202505	1296	650	646	49.8%
202506	4228	3453	775	18.3%
202507	5356	3919	1437	26.8%
202508	7570	7162	408	5.4%
202509	5421	5316	105	1.9%
202510	6085	6022	63	1.0%
202511	6229	6155	74	1.2%
202512	6208	6143	65	1.0%
202601	6342	6301	41	0.6%
202602	6738	6725	13	0.2%
202603	6783	6783	0	0.0%
202604	3573	3571	2	0.1%

Notes:

- 1** Bill Month 202604 has data included up to the 20th of April 2026
- 2** Estimated bills were for consumption only, generation was zero

1
2 (f) NS Power does not provide estimated credits for generation on net metering invoices.
3 There is a true up mechanism that happens when a actual read for generation is obtained
4 and the customers receive full credit for generation at that time. No. If credits are held
5 longer than expected, customer bills are not reconciled with interest.

6
7 (g) Yes, some net meter customers received estimated bills for consumption and zero kwh for
8 generation.

9
10 (i) When net metering customers received an estimated bill it was only estimated for
11 the consumption portion of the bill. The generation was assumed to be zero at the
12 time of the estimated bill. Once a true read was obtained from the meter, both the
13 consumption and generation were trued up.

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- 1 (ii) Customers can call into NS Power and receive information on both their
2 consumption and generation on their meter from the end of December 2025 when
3 communication with the meters was established.

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Request IR-3:

Please refer to the Net Metering 2025 Annual Report (Matter M12783)

At pages 7-8, the Report states:

Please note that, due to the cyber incident, NS Power is still in the process of recovering information on changes (e.g. system retirements, capacity changes, program migrations) that have occurred to active participants (those customers participating in net metering prior to January 1, 26 2025). Upon recovery of this data and confirmation of any changes, the information provided within ‘Total Active Customers’ is subject to change in the 2026 Report. If changes have occurred during the reporting period, NS Power will clearly identify these changes in the 2026 Report.

The 2025 report includes Table 1 (Summary of Net Metering Results for the Period ending December 31, 2025) and Table 2 (Annual Average Nameplate Capacity for the Past Five Years)

Appendix A provides the source, size, location, feeder, and application of aggregation for each customer, as well as additional analysis and discussion with respect to the number of installations by resource, locational clustering, amount of sales reductions, amounts paid to customers, and trends.

In response to a directive in the Board’s decision letter from the 2024 Annual Report, NS Power filed Appendices B, C and D, described at page 6 of the 2025 Annual Report:

In response to NSEB IR-3 part (a), Appendix B contains the source data for payouts for the reporting years 2011-2019 and 2025. As a result of the cyber incident, NS Power was unable to recover the source data for the payout tables for 2020-2024.

In response to NSEB IR-3 part (b), Appendix C provides the Board with the payout amounts to all customers expressed on a \$/kWh basis

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1 relative to estimated annual generation for all active customers
2 between 2015 and 2024.

3
4 The Company has also included, as Appendix D, a Legacy Net Metering
5 payout analysis report that examines the change in excess banked
6 energy payouts between 2023 and 2024, along with the key drivers
7 behind that change.
8

9 (a) Please confirm whether the data set out in Table 1 and Table 2 of the 2025 Annual
10 Report, and Appendix A, is actual data or estimated data. If some of the data is
11 estimated, please confirm which data.
12

13 (b) If confirmed that some of the data referenced in subsection a) for 2025 is estimated,
14 please explain how the estimates were carried out and whether the actual source data
15 will be recovered in the future. If so, when?
16

17 (c) Please confirm whether the data set out in Appendix B is actual data or estimated
18 data.
19

20 (d) If confirmed that some of the data referenced in Appendix B is estimated, please
21 explain how the estimates were carried out and whether the actual source data will
22 be recovered in the future. If so, when?
23

24 (e) If the cyber incident occurred in 2025, why is the data from 2020-2024 unavailable
25 but the data prior to that is available?
26

27 (f) While the directive and NS Power's response in subsection c) and d) related to the
28 2024 Annual Report, is the 2025 data available? If not, will it be recoverable in the
29 future? If so, when?
30

31 (g) Please confirm whether the data set out in Appendix C is actual data or estimated
32 data.

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1 **(h) If confirmed that some of the data referenced in Appendix C is estimated, please**
2 **explain how the estimates were carried out and whether the actual source data will**
3 **be recovered in the future. If so, when?**

4
5 **(i) While the directive and NS Power’s response in subsection g) and h) related to the**
6 **2024 Annual Report, is the 2025 data available? If not, will it be recoverable in the**
7 **future? If so, when?**

8
9 Response IR-3:
10

11 (a) The data set out in Table 1, Table 2, and Appendix A are reflective of actuals. Table 1
12 summarizes the results between 2024 and 2025 reporting years. The values included under
13 column “Totals” for rows labeled “Legacy net metering and self-generating customers,”
14 “Net metering customers applying aggregation,” and “Total rated generation capacity
15 installed (kWac),” are actuals as of December 31, 2025; however, this does not consider
16 any changes (e.g. system retirements, capacity changes, program migrations) that may have
17 occurred in 2025 for existing participants.¹ The \$2,565,838 figure included under column
18 “Totals” and row labeled “Payout for excess banked generation to customers on
19 anniversary date” is reflective of actuals.
20

21 The data set out in Appendix A details 2025 and program to-date results; however, and
22 similar to the figures in Table 1, the “Total Active Customers” does not consider any
23 changes (e.g. system retirements, capacity changes, program migrations) that may have
24 occurred in 2025 for existing participants (i.e. those participating prior to January 1, 2025).
25

26 (b) Not applicable.
27

¹ As reported on page 7, changes (e.g. system retirements, capacity changes, program migrations) that may have occurred for “active customers” (i.e. those participating prior to January 1, 2025) in the reporting period may not be reflected in Table 1 or Appendix A. Figures for new participants during the reporting period are incorporated in Table 1 and Appendix A.

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- 1 (c) The data set out in Appendix B is reflective of actuals and has not been estimated with
2 exception to the previously established method of estimating generation based on
3 nameplate capacity and average capacity factor which is also used to estimate the annual
4 energy displaced by net metering customers
5
- 6 (d) Not applicable.
7
- 8 (e) The data from 2020-2024 is unavailable as the structure of NS Power's internal reporting
9 process was changed in 2020 to allow this information to be obtained through an ad-hoc
10 report (snapshot in time) from the Company's Customer Information System. As a result,
11 these reports were run and then summarized for inclusion in the Net Metering Reports for
12 those respective years. NS Power was unable to recover the original detailed reports for the
13 2020-2024 reporting years and, based on the ad-hoc/snapshot in time reporting structure,
14 cannot recreate these reports.
15
- 16 (f) The source data for payouts for the 2025 reporting year was provided in Appendix B of the
17 2025 Annual Report.
18
- 19 (g) The data set out in Appendix C is reflective of actuals and has not been estimated.
20
- 21 (h) Not applicable.
22
- 23 (i) As the directive related to the 2024 Annual Report, NS Power did not include this
24 information in its 2025 Annual Report. The figure below provides the payout amounts to
25 all customers expressed on a \$/kWh basis relative to estimated annual generation for all
26 active customers, updated to include 2025.

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Year	Energy (kWh)	Payout (\$\$)	Total Est. Annual Generation (kWh)	\$/kWh/Est. Annual kWh
2025	3,473,757	\$ 646,146.43	128,054,257	0.005045880
2024	2,881,875	\$ 508,721.59	107,690,385	0.004723928
2023	3,456,969	\$ 569,245.34	80,596,803	0.007062877
2022	2,273,821	\$ 374,970.97	58,351,126	0.006426114
2021	1,523,140	\$ 243,232.61	38,350,692	0.006342326
2020	642,490	\$ 101,109.16	23,208,095	0.004356633
2019	332,406	\$ 50,187.92	13,673,648	0.003670412
2018	212,972	\$ 32,513.44	7,373,103	0.004409736
2017	104,705	\$ 15,750.96	729,543	0.021590188
2016	62,722	\$ 9,059.53	N/A	N/A
2015	34,870	\$ 5,162.42	N/A	N/A

1

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Request IR-4:

Please refer to the Net Metering 2025 Annual Report (Matter M12783) - Table 1 (Summary of Net Metering Results for the Period ending December 31, 2025).

(a) Table 1 includes data relating to “Payout for excess banked generation to customers on anniversary date”. If any of the data in Table 1 is estimated and actual data subsequently changes the amount owing to, or from, customers, how does NS Power intend to deal with such variances?

Response IR-4:

(a) The values included in Table 1 labeled “Payout for excess banked generation to customers on anniversary date” have not been estimated and are based on actuals.

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Request IR-5:

(a) Is the source data to be complied for the Net Metering 2026 Annual Report able to be accurately measured or collected, or must the data still be estimated?

(b) If the data for the 2026 Annual Report is still being estimated, please confirm whether the actual source data will be recovered in the future. If so, when?

Response IR-5:

(a-b) The source data to be complied for the 2026 Net Metering Annual Report is accurately being measured and collected.

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Request IR-6:

Please refer to the Commercial Net Metering Program (CNMP) 2025 Annual Report, including Appendix A (Matter M12782)

(a) Please confirm that the data contained in the report (including in Appendix A) is actual data and it is not estimated.

(b) If confirmed that some of the 2025 data is estimated, please explain how the estimates were carried out and whether the actual source data will be recovered in the future. If so, when?

(c) If any of the data in the CNMP 2025 Annual Report is estimated and actual data subsequently changes the amount owing to, or from, customers, how does NS Power intend to deal with such variances?

Response IR-6:

(a) The data provided within the 2025 Commercial Net Metering Program Annual report and included Appendix A are based on actuals and have not been estimated.

(b) N/A

(c) N/A

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Request IR-7:

On page 2 of Monthly Update #7, it is noted that the number of customer bills requiring estimation has returned to normal levels, at around 2% percent or less. In response to IR 14(c), the utility provided a table indicating that the pre cyber incident percentage of estimated bills was 0.54%.

(a) When does the utility expect to return to the pre cyber incident percentage level for bill estimating?

(b) How many bills were issued after the utility determined that meter connections to its billing system have been restored to date. Please provide a breakdown of the Bills issued based on customer class, number of bills that were based on actual reads and number of bills that were estimated.

Response IR-7:

(a) With normal levels of estimated bills being 2% or less, NS Power will see a return to that level in April with 1.44% of bills estimated.

(b) Below, is the breakdown of bills issued since meter connections to the billing system were restored as of March 31, 2026.

Customer Class	Bills	Estimates	%
Domestic	303,354	4,246	1.40%
Commercial	30,492	687	2.25%
Industrial	1,870	43	2.30%
Other	9,076	2	0.02%
April Total	344,792	4,978	1.44%

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Request IR-8:

On page 2 of Attachment 3, the utility provides a restoration roadmap. Under the Customer section, please provide a work breakdown structure of each task, along with any identified risks.

Response IR-8:

The Work Breakdown for each restoration workstream is below.

Project: MyAccount Restoration

Task Name	Duration	Start	Finish	% Complete
My Account Restoration	340 days	Thu 5/1/25	Wed 8/19/26	77%
Initiation	5 days	Thu 5/1/25	Wed 5/7/25	100%
Release 1 - MOC - Online Customer Bill Presentment and Payment Access Enabled	35 days	Thu 5/8/25	Wed 6/25/25	100%
Release 1 - Planning & Design	10 days	Thu 5/8/25	Wed 5/21/25	100%
Release 1 - Execution & Build	25 days	Thu 5/22/25	Wed 6/25/25	100%
Release 2 - NSP Customer & Customer Care Capabilities Restored	210 days	Thu 6/26/25	Wed 4/15/26	100%
Release 2 - Planning & Design	60 days	Thu 6/26/25	Wed 9/17/25	100%
Release 2 - Execution & Build	150 days	Thu 9/18/25	Wed 4/15/26	100%
Release 3 - Customer Self-Service Online Form Capabilities Restored	80 days	Thu 4/16/26	Wed 8/5/26	11%
Release 3 - Planning & Design	20 days	Thu 4/16/26	Wed 5/13/26	50%
Release 3 - Execution & Build	60 days	Thu 5/14/26	Wed 8/5/26	0%
Project Closure	10 days	Thu 8/6/26	Wed 8/19/26	0%
Final Transition to Operations	10 days	Thu 8/6/26	Wed 8/19/26	0%
Financial Close-out	10 days	Thu 8/6/26	Wed 8/19/26	0%

Project: AMI Headend System (HES) Restoration

Task Name	Duration	Start	Finish	% Complete
AMI Headend System Restoration	239 days	Thu 5/1/25	Tue 3/31/26	100%
Initiation	5 days	Thu 5/1/25	Wed 5/7/25	100%
Release 1 - Rebuild AMI Technology Platform (Production)	150 days	Thu 5/8/25	Wed 12/3/25	100%
Release 1 - Planning & Design	60 days	Thu 5/8/25	Wed 7/30/25	100%
Release 1 - Execution & Build	90 days	Thu 7/31/25	Wed 12/3/25	100%
Release 2 - Reconnect Field Network Equipment & Meters	84 days	Thu 12/4/25	Tue 3/31/26	100%
Release 2 - Execute & Build	84 days	Thu 12/4/25	Tue 3/31/26	100%

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Project: ADMS Resiliency Restoration

Task Name	Duration	Start	Finish	% Complete
▾ ADMS Redundancy	260 days	Thu 5/1/25	Wed 4/29/26	96%
▸ Initiation	5 days	Thu 5/1/25	Wed 5/7/25	100%
▾ Release 1 - ADMS Redundancy Restored	255 days	Thu 5/8/25	Wed 4/29/26	96%
▸ Release 1 - Planning & Design	75 days	Thu 5/8/25	Wed 8/20/25	100%
▸ Release 1 - Execution & Build	180 days	Thu 8/21/25	Wed 4/29/26	95%

Project: MV90 Restoration

Task Name	Duration	Start	Finish	% Complete
▾ MV90 Restoration	380 days	Thu 5/1/25	Wed 10/14/26	67%
▸ Initiation	5 days	Thu 5/1/25	Wed 5/7/25	100%
▾ Release 1 - MOC - MV90 for analog meter data retrieval	105 days	Thu 5/8/25	Wed 10/1/25	100%
▸ Release 1 - Planning & Design	15 days	Thu 5/8/25	Wed 5/28/25	100%
▸ Release 1 - Execution & Build	90 days	Thu 5/29/25	Wed 10/1/25	100%
▾ Release 2 - MV90 Integration to CIS	200 days	Thu 10/2/25	Wed 7/8/26	69%
▸ Release 2 - Planning & Design	60 days	Thu 10/2/25	Wed 12/24/25	100%
▸ Release 2 - Execution & Build	140 days	Thu 12/25/25	Wed 7/8/26	58%

Project: Grid Model Management Restoration

Task Name	Duration	Start	Finish	% Complete
▾ Grid Model Management Restoration	175 days	Mon 11/3/25	Fri 7/3/26	88%
▸ Initiation	5 days	Mon 11/3/25	Fri 11/7/25	100%
▸ Planning & Design	60 days	Mon 11/10/25	Fri 1/30/26	100%
▸ Release 1 - Execution & Build (ArcGIS)	110 days	Mon 2/2/26	Fri 7/3/26	75%
▸ Release 2 - Execution & Build (ArcFM Designer)	110 days	Mon 2/2/26	Fri 7/3/26	75%

Project: OpenView / ActiVu Restoration

Task Name	Duration	Start	Finish	% Complete
▾ OpenView / ActiVu Restoration	145 days	Mon 11/3/25	Fri 5/22/26	92%
▸ Initiation	5 days	Mon 11/3/25	Fri 11/7/25	100%
▸ Planning & Design	20 days	Mon 11/10/25	Fri 12/5/25	100%
▸ Release 1 - Execution & Build (OpenView)	90 days	Mon 12/8/25	Fri 4/10/26	100%
▸ Release 2 - Execution & Build (ActiVu)	120 days	Mon 12/8/25	Fri 5/22/26	80%

The identified risks are similar across all workstreams:

- Risk of external vendors and service providers to meet target dates.
- Risk of a critical issue with enabling technical infrastructure that affects overall restoration timeline.

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- 1 • Risk of a critical operational priority that requires restoration work to pause if key resources
2 are temporarily reallocated.

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Request IR-9:

Please provide specific and detailed information addressing whether all or any part of the information about current NS Power customers was available in NS Power's systems to be stolen in the cyber attack in circumstances when:

(a) That information should not have been collected in the first place based on NS Power's data collection and retention policies.

(b) That information should have been destroyed based on NS Power's data collection and retention policies.

(c) That information was collected contrary to any provincial or federal statute or regulation.

(d) That information had not been destroyed, contrary to any provincial or federal statute or regulation.

Response IR-9:

(a) As set out in Section 5 of the Incident Report filed with the NSEB on December 22, 2025 (Incident Report), at the time of the Incident, NS Power had formally documented its approach to privacy compliance through an established and robust suite of written privacy policies, procedures, and related documentation. That framework was designed to align with the company's obligations under the federal Personal Information Protection and Electronic Documents Act (PIPEDA), which governs NS Power's collection, use, and disclosure of customer information, as well as evolving regulatory expectations and industry standards relating to the processing of personal information. A copy of the key policies, standards, and guidelines under this framework at the time of the Incident have been provided as listed in the table below:

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Relevant Privacy Policies, Procedures and Standards Adopted by NS Power:

Attachment	Policy/Procedure/Guidelines
1- CONF	NSPI Privacy and Personal Information Protection Policy
2-CONF	Collection of Personal Information Procedures
3-CONF	NSPI Procedure for Addressing Privacy Complaints
4- CONF	NSPI Access to Personal Information Procedure
5-CONF	NSPI Procedures for Sharing Personal Information by Email
6-CONF	NSPI Privacy Breach Response Procedures
7-CONF	NSPI Privacy Incident Reporting Procedures
8-BCONF	NSPI Cyber Incident Readiness and Response Protocol (Board Confidential)
9-CONF	Information Management Policy
10-CONF	Records Management Standard
11-CONF	Privacy Impact Assessments Template/Questionnaire
12-CONF	NSPI Privacy Training Guideline
13-NONCONF	NSPI Customer Privacy Policy

To its knowledge, and based on reasonable inquiry, NS Power collected the personal information of its current and former customers in compliance with all applicable privacy legislation, including PIPEDA, and all other applicable law. Information about customers (both former and current) is collected in accordance with NS Power's public customer Privacy Policy (attached as Attachment 13), which sets out its practices in relation to the processing of personal information and which was made (and remains) readily available to customers and reflects the substance of NS Power's obligations under Schedule 1 of PIPEDA.

NS Power also engages in regular training for those employees who process personal information of customers and employees as part of their roles, in line with the guidelines

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1 set out as Confidential Attachment 12. A sample of those materials have been provided as
2 Confidential Attachments 14-18.

3
4 **Sample Privacy Training Materials:**

5 Attachment	6 Policy/Procedure/Guidelines
7 14-CONF	2024 NSP Privacy and Data Protection Essentials
8 15-CONF	Canadian Private Sector Privacy Training
9 16-CONF	NSP Maintaining Privacy When Handling Employee Files
10 17-CONF	NSP Privacy in the Call Centre
11 18-CONF	2024 NSP Canadian PIPEDA Privacy Training Screenshots

12
13
14 As noted in Section 5 of the Incident Report, in the wake of the Incident, NS Power is
15 working to enhance its overall privacy governance framework and build on its existing
16 privacy program (policy, procedures and standards). In addition to the enhancements
17 outlined in the Incident Report, NS Power has also implemented an enhanced privacy
18 governance program designed to ensure appropriate operationalization of its privacy
19 program, and alignment with both its internal privacy policies, and applicable privacy laws
20 and regulations. This framework is informed by the AICPA's Privacy Management
21 Framework (PMF), which is designed to provide a foundation in establishing and
22 operating a comprehensive and effective information privacy program to address privacy
23 obligations and risks, and ensure monitoring and enforcement of the existing privacy programs.

- 24
25 (b) NS Power's Privacy Policy informs customers that "[t]he length of time we keep your
26 information varies depending on the product or service in question and the nature of the
27 information. We have retention standards that allow us to meet customer service, legal and
28 regulatory needs. As a result, it may be necessary for us to keep some of your information
29 on record even after the end of your relationship with us."

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1 More specifically, NS Power maintains internal records-management retention standards
2 (see Confidential Attachments 9 and 10), which establish the length of time records
3 are retained to meet customer service, operational, legal, and regulatory requirements.
4 Information kept within NS Power's internal customer record system, CIS, is retained to
5 fulfill these obligations, including account management, billing, collections, audit
6 requirements, and addressing customer inquiries or complaints.

7
8 For example, a customer's account information is maintained within CIS after the closure
9 of their service account to support account management functions, including: (i) managing
10 any unpaid balances and related collection activity; (ii) addressing customer inquiries or
11 complaints; (iii) preserving the customer number and historical records to facilitate account
12 setup if a customer returns; (iv) providing utility credit reference letters upon request of the
13 customer; and (v) maintaining accurate audit trails and transaction history.

14
15 Certain customer data was retained beyond the time frames contemplated by the
16 Company's internal record retention standards. With respect to the retention of SINs,
17 please see Section 8.5 of the Incident Report.

18
19 As noted above, in the wake of the Incident, NS Power is working to enhance its overall
20 privacy governance framework and build on its existing privacy program, including its
21 retention policies and procedures.

22
23 (c) Please see response to (a) above

24
25 (d) Please see response to (b) above.

**Cybersecurity Accountability NSEB IR-9 Attachment 1 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 2 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 3 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 4 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 5 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 6 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 7 has
been removed due to confidentiality.**

REDACTED (CONFIDENTIAL INFORMATION REMOVED)

**Cybersecurity Accountability Board Confidential
NSEB IR-9 Attachment 8 has been removed due to
confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 9 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 10 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 11 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 12 has
been removed due to confidentiality.**

Customer Privacy Policy

Nova Scotia Power Incorporated (NSPI) recognizes the importance of protecting our customers' privacy. The federal Personal Information Protection and Electronic Documents Act (PIPEDA) governs how we collect, use and disclose our customers' personal information. By using our website or applying for our services, you accept the terms set out in this policy. This Privacy Policy applies to information about identifiable individuals. It does not apply to information about organizations and businesses.

What is Personal Information?

Personal information is any information about an identifiable individual, such as a person's name, address, energy consumption history, or credit card information. It does not include the name, title, business address or telephone number of an organization or an employee of an organization. It also does not include information that has been aggregated or de-personalized, such that an individual's information cannot be identified.

What we collect and why:

The type of personal information which we collect and maintain includes:

- Name
- Premise Address and Mailing Address
- Email address
- Telephone number
- Identifying information such as your date of birth and information from government issued identification, such as your driver's license number
- Banking information and/or credit card information if you pay by credit card
- Credit history
- Transaction history, which includes a history of your power consumption and service requests
- Demographic and household information, such as the number of individuals per household and your household heat source
- Participation in Nova Scotia Power programs

We collect additional consumption information from customers who have smart meters. This information includes the amount of electricity used over specific intervals of time, as well as usage patterns. This information allows us to improve how we provide services and allows us to provide you with relevant energy related insights regarding your electricity consumption.

When you correspond with us by email, we collect your email address, internet IP address, as well as the message included in your email in order to respond to your enquiry. If you visit our website, our servers collect information which allows us to maintain the security of our website and allows them to operate.

We ensure that the purposes for collection, use and disclosure are limited to purposes that a reasonable person would consider appropriate in the circumstances. Some of these purposes are:

- To provide products and services to our customers;
- To manage our business and operations;
- To create and maintain effective business relationships with our customers;
- To facilitate account, billing, credit, collections, and customer services;
- To contact you and respond to your inquiries and requests and/or to monitor and assess quality of service, which may include recording telephone calls with customer care agents for quality assurance and training purposes;
- To establish customer identity;
- To assess credit history to determine if a security deposit is required from a customer or to assess an application to receive certain products and services or participate in certain programs, which includes periodically exchanging information with credit bureaus in order to maintain the integrity of the credit reporting system;
- To collect and process past due accounts;
- To avoid and investigate fraud and/or identity theft;
- To address and respond to issues related to the usage of critical power dependent medical equipment during an outage;
- To offer personalized energy management and enhanced customer energy consumption feedback, enabled through the collection of hourly consumption data;
- To reduce energy and revenue theft which may include the collection of outage, voltage, load profile and consumption information;
- To further develop, enhance and market products and services we offer, which may include contacting our customers to offer them participation in pilots, rebates or other programs;
- To understand customer needs and preferences, which may include contacting our customers to ask them to participate in surveys regarding our products and services; and
- To meet legal and regulatory requirements.

If you visit the Site, our servers collect information which allows us to maintain the security of the Site and allows them to operate. NSPI or a third party may use cookies to collect personal information on our websites and mobile applications. These cookies are used to remember your location preferences, to provide social media features, to authenticate your identity, and to analyze

traffic to and maintain the Site. For more information on our use of cookies please see our [Cookie Policy](#).

Safeguarding your information

We use security safeguards appropriate to the sensitivity of the information. These safeguards include organizational, technological, physical and contractual measures. We audit our procedures and security measures on a regular basis to ensure that they are appropriate and are being administered properly

Sharing your information

We do not sell or rent our customers' personal information. We do, however, disclose personal information to certain third parties in accordance with the purposes listed above. These third parties may provide us with services that enable us to provide our products and services to our customers, for example to facilitate billings and collection of payments and to process and store data on our behalf, and to provide research services to allow us to understand customer needs and preferences. In other cases, we may disclose personal information to third parties who provide services to our customers on our behalf, for example efficiency and demand side management services. These third parties are given only the information that is necessary for them to perform the services that we have contracted them to provide.

In certain circumstances information that we share with third parties may be processed in a foreign country and may be accessible to law enforcement and national security authorities in that foreign country.

Our website contains links to other websites. The privacy policies of those websites differ from ours, and we are in no way responsible for the content contained on those websites, or for your privacy should you click through to them.

Correcting and retaining your information

Please feel free to contact us at any time to update your personal information.

The length of time we keep your information varies depending on the product or service in question and the nature of the information. We have retention standards that allow us to meet customer service, legal and regulatory needs. As a result, it may be necessary for us to keep some of your information on record even after the end of your relationship with us. When the information is no longer required, it is destroyed or anonymized.

Your Privacy Choices

Subject to certain legal and contractual restrictions and reasonable notice, you can choose to refuse or withdraw your consent to the collection, use or disclosure of your personal information at any time. For example, you may choose to withdraw your consent to receive emails regarding new products or services, pilots, or surveys. You may also choose to opt out of having a smart meter. The withdrawal of consent in some circumstances may prevent us from providing you with certain products or services for which your personal information is necessary. We will explain your

options and any consequences of refusing or withdrawing your consent and we will record and respect your choices.

Contact Us

If you have any questions about how we handle your personal information, please contact us at:

privacy.officer@nspower.ca

PO Box 910

Halifax, NS

B3J 2W5

Fax No.: (902) 428-6176

Changes to this Privacy Policy

This policy may be amended from time to time since NSPI regularly reviews and updates in policies and procedures.

Cookie Policy

What Are Cookies and Why Are They Used?

Cookies are small text files that are placed onto your computer by websites and/or mobile applications that you visit. They contain unique identification numbers which can be used to identify a user's browser, but not the user. Cookies allow information to be saved between visits to websites or mobile applications so that information can be saved between visits, such as login credentials or language preferences. Cookies may also be used to customize content, offer interest-based advertising, and to gain insights into users' needs and preferences.

What Kinds of Cookies Do We Use?

As with most websites, NSPI uses cookies to automatically collect data about how you use the Site and mobile applications, including the MyAccount portal (collectively, "the Site"). The information we collect from cookies allows us to tailor the Site, provide advertising, and to analyze traffic to the Site. We do not use cookies to identify you personally, except as described in this policy. We use the following kinds of cookies on the Site:

1. Necessary Cookies - necessary cookies enable you to use the Site and all their features, such as enabling access to secure areas of the Site. Without these cookies you may not be able to use all the features of the Site. These cookies do not identify a user personally.

2. Performance Cookies - performance cookies, also referred to as behavioural or web analytics software, collect information about how you use the Site so we can analyze how the Site is used and improve it. For example, performance cookies may collect information on which pages you visit most often and any error messages you may get.

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Hotjar respects any "do not track" setting that you might have set on your browser and users may opt out of Hotjar data collection. For more information, please see Hotjar's [privacy policy](#).

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You can delete or disable cookies in your browser's options at any time. However, if you do so you may not get the best experience when visiting the Site or you may not be able to use some features and services.

Privacy Statement

Protecting the privacy and security of customer information has always been a part of how Nova Scotia Power serves its customers. Today, our Privacy Policy and procedures are consistent with the Federal requirements set out in the Personal Information Protection and Electronic Documents Act, known as PIPEDA. As always, our employees will continue to collect, use, share and store personal information with your privacy and security in mind.

Privacy Officer

Nova Scotia Power's Privacy Officer oversees our Privacy Policy and Procedures and may be contacted as follows:

E-mail: privacy.officer@nspower.ca

PO Box 910

Halifax, NS

B3J 2W5

Fax: (902) 428-4006

Reporting a customer privacy concern

Safeguarding your customer information is a priority. If you have a privacy concern relating to one of the following situations, please report to us using this form.

- personal information has been wrongly collected, used, disclosed, or retained;
- refused access to your personal information; or
- unreasonable delay in accessing your personal information.

1. Complainant information

First Name*

Last Name*

Account Number*

Ex: 1234567-8

Mailing address*

City*

Province*

Postal Code*

Country (if outside of Canada)

Daytime telephone Number*

Alternative Telephone Number

Email Address

Does your complaint involve Personal Information belonging to a third party? If so please provide their names

* Required fields

2. Details of Complaint

Please describe the events or circumstances that led to your complaint. Include details such as the names or positions of people involved in the incident, the location(s) where the incident occurred, date and time of incident, type of information involved, and any other information that you consider relevant.

**Cybersecurity Accountability NSEB IR-9 Attachment 14 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 15 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 16 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 17 has
been removed due to confidentiality.**

**Cybersecurity Accountability NSEB IR-9 Attachment 18 has
been removed due to confidentiality.**

NON-CONFIDENTIAL

1 **Request IR-10:**

2
3 **Please provide specific and detailed information addressing whether all or any part of the**
4 **information about former NS Power customers was available in NS Power’s systems to be**
5 **stolen in the cyber attack in circumstances when:**

6
7 **(a) That information should not have been collected in the first place based on NS**
8 **Power’s data collection and retention policies.**

9
10 **(b) That information should have been destroyed based on NS Power’s data collection**
11 **and retention policies.**

12
13 **(c) That information was collected contrary to any provincial or federal statute or**
14 **regulation.**

15
16 **(d) That information had not been destroyed, contrary to any provincial or federal**
17 **statute or regulation.**

18
19 **Response IR-10:**

20
21 **Please refer to NSEB IR-9.**

NON-CONFIDENTIAL

1 **Request IR-11:**

2
3 **Please confirm that, at all material times relating to the cyber attack, NS Power was fully**
4 **compliant with all applicable statutes and regulations relating to the collection and retention**
5 **of personal information of customers.**

6
7 **(a) If not confirmed, please identify each statute or regulation that NS Power had not**
8 **complied with, the reason for its non-compliance, and the steps that have, are or will**
9 **be taken to ensure compliance in the future.**

10
11 **Response IR-11:**

12
13 **Please refer to NSEB IR-9**

NON-CONFIDENTIAL

1 **Request IR-12:**

2
3 **Please confirm that, at all material times relating to the cyber attack, NS Power was fully**
4 **compliant with all its internal policies relating to the collection and retention of personal**
5 **information of customers.**

6
7 **(a) If not confirmed, please identify each policy that NS Power had not complied with,**
8 **the reason for its non-compliance, and the steps that have, are or will be taken to**
9 **ensure compliance in the future.**

10
11 **Response IR-12:**

12
13 **Please refer to NSEB IR-9.**

NON-CONFIDENTIAL

Request IR-13:

Please provide any memos, assessments, reports or email messages prepared on or after April 25, 2025, discussing how customers would be advised about the cybersecurity breach and the theft of their personal information, and what information would be provided to them.

Response IR-13:

To the extent potentially responsive documents exist, these are subject to privilege.

Without waiving privilege, however, NS Power can confirm that the general information requested is summarized in documents that NS Power has already provided. More specifically, see Section 4.2-4.3 and Section 8.4 of the Incident Report for a description of the considerations taken in notifying customers of the Incident, and the response to NSEB IR-01 filed with the Board on September 5, 2025 for copies of the information provided to customers relating to the incident. As noted in NS Power’s “Cyber Incident Communication Playbook” (provided to the Board as Board Confidential Attachment 1 to IR-9 filed with the Board on September 5, 2025), NS Power’s approach to communications throughout the incident has been underpinned by a commitment to transparency, timely communication, and a customer-centric focus, while ensuring that the Company appropriately meets its applicable regulatory obligations. The approach to communications was designed to ensure that customers were provided with a “single source of truth” webpage for timely information that could be confirmed at the time, given the evolving investigation. Customers were informed about this website and directed to it for additional information and updates through all channels.

NON-CONFIDENTIAL

Request IR-14:

Please provide any instructions, guidelines or scripts that were prepared by NS Power, or on its behalf, for use by NS Power's Customer Care Centre or TransUnion in its communications with customers about the cybersecurity breach and the theft of customer personal information.

Response IR-14:

Customer Care Associates were provided with key messages and speaking points to support their customer conversations throughout the cyber incident. This included an extensive Frequently Asked Questions (FAQ) resource that detailed our latest response to the incident including the customer notification process and the offer for the free credit monitoring service. This FAQ guide was developed with TransUnion to ensure customer interactions were empathic, accurate and consistent.

Customer Care Associates were also directed to use the dedicated webpage nspower.ca/cyber in their customer conversations to provide guidance on how to sign up for the credit monitoring service. This website serves as the single source of information for all cyber updates and customer supports including tips on how to protect personal information.

Below are the specific Frequently Asked Questions (FAQs) that were used to assist customers with general questions about the incident:

Nova Scotia Power – Customer FAQs

1. What happened?

On April 25, Nova Scotia Power discovered that an unauthorized third party had gained access to certain parts of its Canadian network and servers.

NON-CONFIDENTIAL

1 As soon as the incident was detected, Nova Scotia Power commenced a thorough investigation
2 with the assistance of external cybersecurity experts and has worked around the clock to investigate
3 this incident and restore its systems safely and securely.

4 The investigation is ongoing.
5

6 Based on the investigation, Nova Scotia Power identified that certain customer personal
7 information was accessed and taken by an unauthorized third party and began notifying those who
8 were potentially impacted by this cyber incident.
9

10 The company learned through the investigation that the personal data of former customers was
11 also part of the information that was accessed and taken by the unauthorized third party.

12 Nova Scotia Power is **expanding the free credit monitoring offer from two to five years**, and
13 will be **offering this free credit monitoring to all customers of Nova Scotia Power, past and**
14 **present**, even if they did not receive a letter about their data being stolen.

15 Customers who have already signed up will automatically be extended to five years.
16

17 **2. When did you first learn about this incident?**
18

19 Nova Scotia Power learned about this incident on April 25, 2025.
20

21 **3. When did this happen?**
22

23 As soon as the incident was detected, Nova Scotia Power commenced a thorough investigation
24 with the assistance of external cybersecurity experts and has worked around the clock to investigate
25 this incident and restore its systems safely and securely.
26

27 The investigation remains ongoing.

NON-CONFIDENTIAL

1 Based on the investigation to date, Nova Scotia Power has determined that on or around March
2 19, 2025, certain customer information stored on the impacted servers was accessed and taken by
3 an unauthorized third party.

4
5 **4. Why wasn't I contacted sooner?**
6

7 The process to identify what data was impacted has been extremely complex. Nova Scotia Power
8 has been working urgently to determine the full nature and scope of the data and individuals that
9 may have been affected.

10 Once Nova Scotia Power identified that certain personal information was accessed and taken, the
11 company immediately began coordinating direct notifications to affected individuals.

12
13 **5. How many people are involved?**
14

15 I do not have access to that information.
16

17 **6. Why was I notified/How does this impact me?**
18

19 If you received a notice about this incident, it means that Nova Scotia Power has identified that
20 your information was potentially impacted in connection with the recent cyber incident.

21 Nova Scotia Power also determined through their investigation that the personal information of
22 former customers was also accessed and later taken by an unauthorized third party, in addition to
23 the personal information of the current customers to whom notifications have already been sent.

24 Beginning June 25, Nova Scotia Power is offering **five years of free credit monitoring to ALL**
25 **customers of Nova Scotia Power, past and present, regardless of whether you received a**
26 **letter from them about the incident.** Those who want to sign up for the credit monitoring service
27 can go to [[Customer Verification Form| Nova Scotia Power](#)] to validate and secure a unique code
28 for the service. Anyone who has already signed up for credit monitoring will automatically be
29 extended to five years.

NON-CONFIDENTIAL

7. Does this mean that someone has my personal information?

While the investigation is ongoing, Nova Scotia Power has identified that certain customer information stored on the impacted servers was accessed and taken by an unauthorized third party. If you received a notice about this incident, your personal information was stored on the impacted servers.

Please refer to the notice you received about this incident for details about what information of yours may have been impacted.

8. I read an article that ransomware was involved, is this true?

This is an ongoing investigation. Nova Scotia Power will be reaching out to customers determined to have been impacted by this incident.

9. What should I do to protect myself?

While Nova Scotia Power has no evidence of misuse of your personal information, as a precautionary measure, we encourage you to take advantage of the offer for a 5 year subscription to TransUnion's comprehensive credit monitoring service, at no cost to you. Those who want to sign up for the credit monitoring service can go to [\[Customer Verification Form\] Nova Scotia Power](#) to validate and secure a unique code for the service. Anyone who has already signed up for credit monitoring will automatically be extended to five years.

In addition, as always, it is good practice to regularly take precautions:

Remain vigilant and cautious about any unsolicited communications (such as emails, text messages, social posts or phone calls), including messages that appear to be from Nova Scotia Power, asking you to provide your personal information.

NON-CONFIDENTIAL

1 Avoid clicking on suspicious web links or downloading attachments without confirming they are
2 from a legitimate source.

3
4 **10. What personal information of mine was impacted?**

5
6 I don't have that information.

7
8 Please refer to the notice you received about this incident for details about what information of
9 yours may have been impacted.

10
11 *If caller pushes, escalate.*

12
13 **11. Was my government-issued identification number impacted?**

14
15 I don't have that information.

16
17 Please refer to the notice you received about this incident for details about what information of
18 yours may have been impacted.

19
20 *If caller pushes, escalate.*

21
22 **12. Was my credit card information compromised? Should I cancel my credit card?**

23
24 Based on Nova Scotia Power's investigation, credit card information was not impacted by this
25 incident.

26
27 However, if you detect any unauthorized transactions in any of your financial accounts, promptly
28 notify your payment card company or financial institution.

NON-CONFIDENTIAL

1 Please refer to the notice you received for information on the steps you can take to protect your
2 personal information.

3
4 *If caller pushes, escalate.*
5

6 **13. How will I know if my information was used by someone else?**
7

8 While the investigation is ongoing, Nova Scotia Power has identified that certain customer
9 personal information was accessed and taken by an unauthorized third party.

10
11 However, there is no evidence of misuse of your personal information.

12 Those who want to sign up for the credit monitoring service can go to [[Customer Verification](#)
13 [Form](#)| [Nova Scotia Power](#)] to validate and secure a unique code for the service. Anyone who has
14 already signed up for credit monitoring will automatically be extended to five years.

15
16 *If caller pushes, escalate.*
17

18 **14. I did not receive a notice from Nova Scotia Power? Am I impacted?**
19

20 The company's investigation remains ongoing.

21 Beginning June 25, Nova Scotia Power is offering **five years of free credit monitoring to ALL**
22 **customers of Nova Scotia Power, past and present, regardless of whether you received a**
23 **letter from them about the incident.** Those who want to sign up for the credit monitoring service
24 can go to [[Customer Verification Form](#)| [Nova Scotia Power](#)] to validate and secure a unique code
25 for the service. Anyone who has already signed up for credit monitoring will automatically be
26 extended to five years.
27

NON-CONFIDENTIAL

15. Have the police/local authorities been notified?

Yes. Nova Scotia Power notified law enforcement regarding this cyber incident and have cooperated fully with them.

If the caller presses:

As this incident involves a criminal investigation, Nova Scotia Power is not in a position to provide details.

16. Has the Privacy Commissioner been notified?

Yes, Nova Scotia Power has reported the incident to the Office of the Privacy Commissioner of Canada.

17. Have the regulatory authorities been notified?

Nova Scotia Power has notified law enforcement and regulatory authorities about this cyber incident.

18. Do you know who did this/have the responsible parties been arrested?

I do not have that information.

19. Who/What is responsible for the incident?

The investigation is ongoing. We cannot speculate or share information while the investigation is ongoing.

NON-CONFIDENTIAL

20. Was the information encrypted/protected?

Nova Scotia Power employs a variety of security measures intended to safeguard data in the company's possession.

If the caller asks about specific security measures:

For security reasons, we cannot provide details about the specific safeguards the company has in place. I can assure you that Nova Scotia Power is taking this incident seriously and that protecting the privacy and security of personal information is a top priority for the company.

21. Why should I trust Nova Scotia Power with my personal information in the future?

The privacy of your personal information is a top priority for Nova Scotia Power, and the company sincerely apologizes for any concern or inconvenience this incident may cause you.

Nova Scotia Power employs a variety of security measures intended to safeguard data in the company's possession and has continued strengthening those security measures with the assistance of external cybersecurity experts.

22. What are you doing to prevent this from happening again?

As soon as this cyber incident was detected, Nova Scotia Power commenced a thorough investigation with the assistance of external cybersecurity experts and has worked around the clock to investigate this incident and restore its systems safely and securely.

Nova Scotia Power sincerely apologizes that this issue has occurred and is working closely around the clock with external cybersecurity experts to continue strengthening its security measures by implementing additional safeguards.

NON-CONFIDENTIAL

1 The protection of personal information is a top priority for Nova Scotia Power and the company
2 is taking further steps to prevent this type of incident from happening again.

3
4 **23. Is this incident part of a larger pattern of attacks?**

5
6 I do not have that information.

7
8 **24. I use/am buying another product to protect my identity. I want Nova Scotia Power to**
9 **reimburse me.**

10
11 Nova Scotia Power has arranged a subscription with TransUnion for five years of credit monitoring
12 services at no cost to you. While your letter indicates two years, this code will be automatically
13 converted to five years and you can use the code on your letter.

14 Nova Scotia Power is unable to reimburse you for other products, including if you already have a
15 subscription to TransUnion credit monitoring.

16
17 *If the caller insists on reimbursement, escalate.*

18
19 **25. Who are you? Are you an employee of Nova Scotia Power?**

20
21 I work for TransUnion, who has been contracted by Nova Scotia Power to provide credit
22 monitoring services and to help answer questions from people who may have been impacted by
23 this incident.

24
25 **26. I want to speak with someone at Nova Scotia Power.**

26
27 Nova Scotia Power takes this matter very seriously. To assist you with any questions you may
28 have regarding this incident, Nova Scotia Power has established this contact centre to address your
29 questions related to this incident.

NON-CONFIDENTIAL

1 *If caller pushes, escalate.*

2
3 **27. I received a call from Nova Scotia Power related to this incident asking for my**
4 **information. What should I do?**

5
6 Nova Scotia Power is not calling customers regarding this incident.

7
8 If you receive an unprompted or unexpected phone call requesting your personal information in
9 reference to this incident from someone that you do not know, that call is not from Nova Scotia
10 Power and may be an attempt to steal your personal information.

11
12 In this situation and generally, avoid giving out your personal information over the phone or by
13 email unless you have initiated the contact and you are sure you know who you are speaking with.

14
15 **28. Is the letter I received legitimate?**

16
17 Nova Scotia Power has provided written notice to potentially impacted customers, and has more
18 recently extended the offer of 5 years of credit monitoring to all current and past customers. If you
19 have concerns about whether the notice you received is legitimate, I would be happy to escalate
20 your request and a member of the Nova Scotia Power team will contact you directly.

21
22 **29. What services have been affected? What is the current status of billing and payments/**
23 **services and connections/online services (such as MyAccount)**

24
25 The incident did not disrupt Nova Scotia Power generation, transmission and distribution facilities
26 and no impact to its ability to safely and reliably serve customers.

27 Online access to MyAccount has been safely restored, and the company is able to issue bills for
28 customers.

NON-CONFIDENTIAL

Nova Scotia Power customers can speak with a member of the company's customer care team Monday to Friday from 8am to 6pm at 1-800-428-6230.

Customers can continue to report outages or emergencies at any time through their outage line at 1-877-428-6004.

Please refer to the Nova Scotia Power website (www.nspower.ca) for updates.

30. I am having difficulties getting through to your Customer Care line.

- Nova Scotia Power remains focused on supporting their customers through their Customer Care line. While wait times may be longer than usual, they are open and operating during their normal hours of business. They can be reached at 1-800-428-6230.

- Customers can also continue to report outages or emergencies such as downed wires through Nova Scotia Power's outage line at 1-877-428-6004.

Please refer to the Nova Scotia Power website (www.nspower.ca) for ongoing updates.

31. Will Billing & Payments be impacted?

- Nova Scotia Power is now able to issue bills and accept payments from customers.

- Please know that you will not be charged late fees or have your service disrupted as a result of this incident.

- If you have made a bill payment through your bank, those payments were processed by your financial institution. Rest assured, any potential for duplicate payments will be addressed and corrected.

NON-CONFIDENTIAL

1 Please refer to the Nova Scotia Power website (www.nspower.ca) for ongoing updates.

2
3 **32. I am moving homes and need to ensure I have a power connection/I am planning to do**
4 **some work near a power line/other service related requests:**

5
6 Please refer to the Nova Scotia Power website (www.nspower.ca) for further details or contact
7 Nova Scotia Power's Customer Care team.

8
9 **33. When will you be fully operational?**

10
11 The company's IT team is working diligently with third party cyber security experts to bring the
12 affected portions of the IT system back online.

13
14 The company is working around the clock to restore their systems in the most efficient and safe
15 manner.

16
17 Please refer to the Nova Scotia Power website (www.nspower.ca) for ongoing updates.

18
19 **34. Are Emera's US operations impacted as well?**

20
21 No. However, the company continues to be vigilant in reviewing and managing their network.

22
23 **35. Is your network currently secure?**

24
25 The company is working around the clock, along with external cybersecurity experts, to do
26 everything they can to restore affected systems in a safe and secure manner. Nova Scotia Power is
27 working hard to continue strengthening the security of its systems by implementing additional
28 safeguards to help prevent similar incidents in the future.

NON-CONFIDENTIAL

36. I am with (media) and I have some questions regarding the breach.

- Please contact news@nspower.ca for media inquiries.

Additional Questions on Personal Data

1a) Q: Can you confirm exactly what information of mine was included in the incident?

1b) Q: I received a letter. Can you confirm exactly what information of mine was included in the incident?

Answer:

- We sincerely apologize that this issue has occurred.
- If you receive a notice about this incident, it means that we have identified that your information was impacted in connection with the recent cyber incident.
- Please refer to the notice you received for details about what type of information may have been impacted.
- We encourage individuals who receive a notification to sign up for the credit monitoring service that we have made available at no cost.

2) Q: Can you confirm if my SIN# was breached in this incident?

Answer:

- We sincerely apologize that this issue has occurred.
- If you receive a notice about this incident, it means that we have identified that your information was impacted in connection with the recent cyber incident.

NON-CONFIDENTIAL

- 1 • Please refer to the notice you received for details about what type of information may have
2 been impacted. If your Social Insurance Number (SIN) was mentioned in the letter, it does
3 mean that your SIN may be among the data that may have been impacted.
- 4 • We encourage individuals who receive a notification to sign up for the credit monitoring
5 service that we have made available at no cost.

6
7
8 3) Q: Why do you keep SINs in your database?
9

10 Answer:

- 11 • Social Insurance Numbers (SINs) were used in certain circumstances for customer
12 authentication purposes.
- 13 • Our investigation into this incident is continuing.
- 14 • We encourage individuals who receive a notification to sign up for the credit monitoring
15 service that we have made available at no cost.

16
17
18 4) Q: Do you have my SIN on file?
19

- 20 • SINs were used in certain circumstances for customer authentication purposes. We do not
21 have access to confirm what data was on your account from your initial account setup.
- 22 • We have sent notices to individuals who have been impacted by the recent cyber incident.
23 If you received a letter, please refer to the notice for details about what type of information
24 may have been impacted.
- 25 • If your Social Insurance Number (SIN) was mentioned in the letter, it does mean that your
26 SIN may be among the data that may have been impacted.
- 27 • We encourage individuals who receive a notification to sign up for the credit monitoring
28 service that we have made available at no cost.

NON-CONFIDENTIAL

Request IR-15:

In its response to NSEB IR-1 (Exhibit N-2), NS Power said it “adopted a best-practices approach to mitigating potential harm to customers whose personal information was impacted by the Incident.” Please explain why NS Power considers its approach a “best-practice” and identify the benchmarks or metrics against which it assessed its approach.

Response IR-15:

This approach was grounded in a commitment to transparency, timely communication, and a customer-centric focus. The Company’s objective throughout has been to provide affected individuals with meaningful support, reduce the risk of harm, and maintain trust.

As previously noted, NS Power has relied on experienced external expert advice and technical expertise throughout the Incident response and investigation, including with respect to the steps it has taken to mitigate potential harm to customers. NS Power’s approach to mitigating potential harm to customers (as outlined in Section 4 of the Incident Report), was informed by consultation and engagement with experienced and skilled subject-matter experts who in the past have collectively advised on well over a thousand data incidents, and drew upon that depth of knowledge and experience in the course of advising NS Power from the commencement and throughout the Incident response effort. These experts ensured that NS Power’s approach aligned with evolving regulatory and other expert considerations and guidance in responding to and mitigating harm from incidents. Given that, due to the nature of the breach and the complexity of the systems involved, it was not possible to definitively identify on an individual basis what data was impacted, NS Power worked to share this information as broadly as possible out of an abundance of caution to ensure that customers could take steps to protect themselves.

See Section 4 and Section 6 of the Incident Report for further detail on the steps NS Power has taken to mitigate potential harm to customers, and the considerations involved in this approach.

NON-CONFIDENTIAL

Request IR-16:

Please provide any memos, assessments, reports or email messages prepared by NS Power or on its behalf about the difficulties that customers experienced contacting NS Power's Customer Care Centre and TransUnion in the days following NS Power's announcement of the cyber attack and the theft of customer information. Please include all call statistics about the cybersecurity breach and the theft of customer personal information, including number of calls, wait time, disconnections, number of calls abandoned, number of callbacks, time to wait for callbacks, average talk time, etc., from April 25, 2025, to October 31, 2025.

Response IR-16:

Response. The Cyber support line in NS Power was established on May 1, 2025, while support through TransUnion commenced May 13, 2025. Statistics within NS Power call answer, as well as the TransUnion call centre are set out below for the period requested.

Cyber Calls Directly Handled by Nova Scotia Power						
	Calls Offered	Calls Answered	Average Speed of Answer	Calls Abandoned	% Abandoned	Average Handle Time
Total	13,022	10,790	0:02:11	2,232	17.10%	0:09:00
May	1,750	1,671	0:00:50	79	4.50%	0:07:39
June	4,785	4,316	0:01:12	469	9.80%	0:09:42
July	2,809	2,471	0:01:01	338	12.00%	0:07:29
August	1,154	853	0:02:59	301	26.10%	0:09:05
September	1,206	783	0:06:18	423	35.10%	0:10:41
October	1,318	696	0:10:09	622	47.20%	0:11:14

Minister of Energy – Accountability for Nova Scotia Power (NSEB M12600)
NSPI Responses to NSEB Information Requests

NON-CONFIDENTIAL

1

Cyber Calls Handled by TransUnion			
	Calls Offered	Average Time in Queue	Average Handle Time
Total	10,958	0:01:29	0:06:10
May	7,018	0:02:11	0:06:16
June	3,097	0:00:10	0:05:57
July	399	0:00:24	0:06:14
August	155	0:00:26	0:05:55
September	202	0:01:01	0:06:31
October	87	0:00:39	0:06:43

2

NON-CONFIDENTIAL

Request IR-17:

Regarding the theft or suspected theft of personal information about individuals who were previously customers of NS Power, but who were no longer customers at the time of the cyber attack:

(a) Is NS Power able to provide more information about these customers than was provided in its response to NSEB IR-2(b) (Exhibit N-2)?

(iii) If so, please provide the total number of such customers who were impacted, and also provide a breakdown, by year, based on when they ceased to be an NS Power customer.

(iv) If not, please provide as much information as possible about the number of former customers impacted, and how long it had been since they were customers.

Response IR-17:

As detailed in Section 4.2 of the Incident Report, as the Company continued its investigation of the impacted data, NS Power determined that personal information relating to former customers had also been impacted by the Incident.

NS Power continued its investigation into the scope and nature of the impacted data with the assistance of leading third-party data analysis experts to determine the precise number of impacted individuals. This was a highly complex and time-consuming exercise, which included using data discovery tools, and extensive manual review.

Based on this investigation, NS Power was able to determine that approximately 540,000 of its former customers were impacted by the breach.

NON-CONFIDENTIAL

1 As further detailed in NSEB IR-2(b) filed with the Board on September 5, 2025, given the impact
2 of the Incident on the Company's systems, the information available to the Company is limited.
3 Due to the nature of the impacted records, and the structure of the data available, it remains not
4 possible to determine with certainty when these individuals ceased to be customers of NS Power.

NON-CONFIDENTIAL

Request IR-18:

Please provide any memos, assessments, reports or email messages about NS Power's collection, use, retention and destruction of customer social insurance numbers since April 25, 2015, 10 years before the cyber attack.

Response IR-18:

To the extent potentially responsive documents exist, most of them are subject to privilege. Without waiving privilege, however, NS Power can confirm that the general information requested is summarized in documents that NS Power has already provided. More specifically, see Section 8.5 of the Incident Report for information on NS Power's practices relating to customer social insurance numbers.

NON-CONFIDENTIAL

1 **Request IR-19:**

2
3 **How is the five-year credit monitoring provided to customers being funded?**

4
5 Response IR-19:

6
7 Please refer to NSEB IR-3 filed to the NSEB by NS Power on September 5, 2025. NS
8 Power anticipates that a portion of the cost for credit monitoring will be covered by insurance,
9 and has committed that customers will not pay for any costs incurred by NS Power related to the
10 credit monitoring service being provided.

NON-CONFIDENTIAL

1 **Request IR-20:**

2
3 **Please provide any memos, assessments, reports or email messages prepared by NS Power**
4 **or on its behalf about its initial pause to customer billing after the cyber attack and its**
5 **resumption of billing, including any discussions about the methods, processes or procedures**
6 **it would use to estimate customer bills until its systems were restored and meters were again**
7 **communicating, and any discussions about the resources required and its approach to**
8 **manually reading meters in the interim.**

9
10 **Response IR-20:**

11
12 To the extent potentially responsive documents exist, most of them are subject to privilege.

13
14 Without waiving privilege, however, NS Power can inform you that the information requested in
15 NSEB IR-20 is summarized in documents that NS Power has already provided to you. For
16 example, see the response to NSEB IR-12, filed with the Board on September 5, 2025, and NSEB
17 IRs 13-16 filed with the Board on December 23, 2025, and NSEB IR-01- 07 and 22-
18 24 for additional detail on NS Power’s practices relating to customer billing in the wake of the
19 Incident.

NON-CONFIDENTIAL

Request IR-21:

NS Power’s response to NSEB IR-1 (Exhibit N-2), Attachment 4, page 19 of 20 including the following frequently asked question and response:

I haven’t been a customer for 10 years? Do you still have my data?

Last updated: Wednesday, June 25, 2025

This is a really important question to be answered as part of the investigation into the incident. [Emphasis in original]

Please provide the answer to this question, as determined by NS Power in its investigation, and explain why, on June 25, 2025, NS Power did not know whether it had retained data related to individuals who had not been customers for 10 years.

Response IR-21:

As noted in the response to IR-2(b) filed with the NSEB by NS Power on September 5, 2025, given the impact of the Incident on the Company’s systems, the information available to the Company is limited. Due to the nature of the impacted records, and the structure of the data available, it was not at the time, and remains not possible to determine with certainty what data had been contained in the impacted data, and when these individuals ceased to be customers of NS Power.

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Request IR-22:

NS Power’s response to NSEB IR-12(a) (Exhibit N-2), NS Power said that

“some customers received bills closer together as NS Power caught up on billing after the pause from April 1 25 - June 4”.

(a) Does this mean that NS Power sent off-cycle bills to customers?

(i) If so, please explain why this was done given NS Power’s responses to Exhibit N-93, NSEB IR-3(b) and (c) in Matter M12451.

(ii) If not, please explain in detail.

Response IR-22:

(a) NS Power did not send off-cycle bills to customers after the pause of billing from April 25 – June 4.

(i) N/A

(ii) When billing was restarted after June 4, NS Power maintained the original billing schedule but deployed 3 billing batches per day in order to catch up. Payment due dates were adjusted to reflect the delayed processing of the bill batches.

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Request IR-23:

In a letter to the Honourable Tom Taggart, MLA for Colchester North, Chair, Nova Scotia Standing Committee on Natural Resources and Economic Development dated January 31, 2026, which was attached to Monthly Update #5, dated February 5, 2026, NS Power stated:

Actual overpayment and underpayment scenarios resultant from estimates are difficult to isolate, as trued-up usage cannot be ascribed to the date of use. However, patterns on the trued-up bill allow some sizing of customer experience in both areas.

- **Overpayment: Following the return to regular billing cycles post cyber-incident, less than 1% of bills issued have created a scenario where estimated usage, once paid, resulted in a credit balance for the customer on their next bill. Account credits are automatically applied to the customer's subsequent bill for ongoing energy use. However, for customers who prefer a refund, refunds by cheque are available upon customer request. In Q4 of 2025, NS Power supported customers with 2,080 refund requests, down from 2,268 in Q4 of 2024 and 2,542 in Q4 of 2023. Refunds can be issued for a variety of issues, including customers who might have entered a larger amount when paying through their bank or customers who have closed an account that had a credit balance on it.**
- **Underpayment: The percentage of active residential accounts in arrears is a useful gauge of underpayment and has run nearly double the rate persistent prior to the cyber incident. On December 31, 2025, 7.23% were in arrears, compared to 4.46% as of the same date in 2024. This trending is regularly reviewed by Nova Scotia Power, the Affordable Energy Coalition, and the Consumer Advocate and an annual report is filed with the Nova Scotia Energy Board each year. This is a major area of focus for NS Power- to help these customers get into an Equal Billing plan or additional payment arrangement if they need support paying their balance.**

- (a) Please provide any memos, assessments, reports or email messages prepared by NS Power or on its behalf about the patterns on trued up bills.**

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1 **(b) For the “less than 1%” of bills issued where there was a scenario where estimated**
2 **usage, once paid, resulted in a credit balance for the customer on their next bill:**

3
4 **(i) What was the actual number of bills where this scenario occurred?**

5
6 **(ii) What was the average amount of the credit for residential customers?**

7
8 **(c) How many bills were issued where there was a scenario where estimated usage, once**
9 **paid, did not result in a credit on the next bill but produced a bill in the period that**
10 **was lower than would have been expected for that billing period.**

11
12 **(d) Given that NS Power encouraged customers who were concerned about**
13 **overestimated bills to pay amounts that were different than the amount that was**
14 **presented on the bill and withheld late fees and interest and paused collection**
15 **activities, please explain why NS Power attributes an increase in the percentage of**
16 **accounts in “arrears” to underestimation.**

17
18 Response IR-23:

19
20 **(a) The Board has referenced the letter that NS Power sent to MLA Taggart which provides**
21 **the summary NS Power prepared. The additional information provided in the below**
22 **responses helps add to that response.**

23
24 **(b)**

25 **(i) 23,989 residential bills had a return of estimate bill (a ‘true up’ bill) where the new**
26 **bill amount was a credit.**

- 27
28
 - 14,740 of these bills resulted in a net new credit balance on the underlying
29 **account.**

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- 1 • 7,190 of these bills, while having a current period credit, continued to have
2 a balance owing on the underlying account
3

- 4 • 2,059 of these bills increased a pre-existing credit balance on the underlying
5 account
6

- 7 (ii) The average credit amount of the 23,989 true-up bills described above for
8 residential customers was \$169.
9

- 10 (c) The nature of meter readings is such that trued-up usage cannot be ascribed to the actual
11 date of use, making it difficult to assert that higher or lower bills are the result of estimation
12 variances. It is true that customer escalations relating to bills were 47 percent higher in Q1
13 of 2026 (9.3 percent estimated; 415 bill escalations) vs Q4 2025 (48.7 percent estimated;
14 282 bill escalations), the increase coinciding with the ramp-up of true-up bills as AMI came
15 back online, indicating greater concern with underestimation than overestimation.
16

- 17 (d) NS Power does not attribute the increase in accounts in arrears specifically to
18 underestimation. Customer doubt in the accuracy of their bill, in part the result of
19 estimation (both high and low), has created hesitance to repay, and the pause on collections
20 outreach and late fees has likely removed a sense of urgency in repayment for some
21 customers. The combined effect has led to an unprecedented number of accounts in an
22 arrears position.

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Request IR-24:

Please provide any memos, assessments, reports or email messages prepared by NS Power, or on its behalf, about concerns raised by customers about overestimated bills.

Response IR-24:

As mentioned in NS Power's letter to MLA Taggart on January 31, 2026, in response to a request for follow up from the Standing Committee on Natural Resources and Economic Development, NS Power was aware that some customers had high estimated bills from November 1-20, 2025. This letter provides the assessment prepared by NS Power, and the steps to mitigate which included proactively contacting customers and adding a website option to submit a photo read.

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Request IR-25:

Have NS Power’s billing practices relating to each of the following returned to their pre-cybersecurity breach state, and if not, what is the current status and timeline when normal function is expected to occur:

(a) Time of use/day rates.

(b) Net-metering billing arrangements.

(c) Single-phase meters without a physical demand reset feature for demand billing customers.

Response IR-25:

(a) Time-of-Day (TOD) rates billing have returned to pre-cybersecurity incident state. Time-of-Use (TOU) rates for off-peak and on-peak, winter and non-winter periods, were amended to be the same as the standard offer rates, effective November 1, 2025. Please refer to the Board Decision in Matter M12499. As reported in the Monthly Cyber Incident Report, all systems required for the administration of TOU Tariffs are expected to be restored by the end of Q3 2026.

(b) Net metering billing arrangements have returned to pre-cybersecurity incident state.

(c) Demand billing for single phase meters without a physical demand reset feature has returned to pre-cybersecurity incident state.