



Blackburn Law Inc.

April 30, 2026

VIA EMAIL

Ms. Crystal Henwood
Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
Halifax NS B3J 3S3

Dear Ms. Henwood,

Re: M12600 – Minister of Energy – Accountability for Nova Scotia Power

The SBA appreciates the opportunity to provide comments to the Board regarding Nova Scotia Power's (NS Power) objections, raised in its letter to the Board of April 27, 2026, regarding the subject matter and scope of certain Information requests filed by the Small Business Advocate (SBA), the Consumer Advocate (CA) and Intervenor David MacLeod. NS Power's objects to these Information Requests on the basis that they are more properly addressed as part of Board matter M12273 - Board Inquiry into Nova Scotia Power's Cybersecurity Incident.

The SBA has reviewed the Information Requests identified by NS Power, and NS Power's objections to them, and provides the following comments.

There are currently two matters before the board regarding the cybersecurity incident that occurred at NS Power in 2025. The SBA acknowledges that each matter has an area of focus, with M12273 reserved for addressing the more technical aspects of the Cybersecurity incident while M12600 is meant to review the reasonableness of NS Powers actions relating to its customers, billing and regulatory impact. The SBA respectfully submits this delineation between the two matters should not result in a strict or rigid interpretation with respect to the relevance of the Information Requests that have been filed. Rather, the SBA submits that some overlap in evidence between the two matters is contemplated and potentially necessary in order to understand the full context of the cybersecurity incident and NS Power's response within the regulatory context.

In its March 25, 2026 letter to the Parties, the Board confirmed the final issues list for this matter and noted the comments from NS Power and Intervenor regarding the scope of the issues and whether they are appropriately within Matter M12600 or M12273. The SBA submits that the potential cross over of issues between both matters M12600 and M12273 was acknowledged by the Board where it noted that while the technical aspects of one issue were more appropriately addressed in matter M12273, there could be non-technical aspects of the issue that should be reviewed within M12600.

The SBA respectfully submits that the Information Requests it submitted are intended to inform and clarify the evidence that has been filed in M12600 and while there may be overlap with M12273, the SBA respectfully submits that there is value in M12600 from having clarifications around standards and policies (SBA IR-6); the cybersecurity Framework (SBA IR-7); compliance with industry-specific rules and standards (SBA IR-8); timing of a cybersecurity update to comply with policy (IR-13); and questions arising from the Compliance Letter (SBA IR-18). The SBA recognizes that the IR responses in M12600 may not require the technical specificity that would be required in M12273; nonetheless the non-technical aspects of the SBA's questions will add value and insight into the regulatory oversight that is clearly within the scope of M12600.

The SBA respectfully requests that the Board consider NS Power's objections within the context of these dual proceedings where an overlap of evidence may lead to a more comprehensive review in both proceedings.

Yours truly,

A handwritten signature in blue ink, appearing to read "Melissa P. MacAdam", with a stylized flourish at the end.

Melissa P. MacAdam
Small Business Advocate