M12600

NOVA SCOTIA ENERGY BOARD

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

– and –

IN THE MATTER OF: **AN INQUIRY** about the impact of the cyber incident on **NOVA SCOTIA POWER INCORPORATED's** collection and retention of customer information, customer service and communications, billing processes and regulatory matters

INFORMATION REQUESTS

To: **INQ Law/Consulting**
c/o William Mahody, KC
Board Counsel Consultant
Washington & Mahody
503-5475 Spring Garden Road
Halifax, NS B3J 3T2

From: The Consumer Advocate

Responses Due: **July 29, 2026**

Copies: 1 electronic copy (PDF searchable)

Contact Person: **David J. Roberts**
Consumer Advocate
Pink Larkin
1463 South Park Street
Halifax, NS B3J 3S9
Tel: (902) 423-7777
Email: droberts@pinklarkin.com

Request IR-1:
With regard to paragraph 13, page 6 of the Report of INQ Law/Consulting:

A. What are the industry standards for organizations such as Nova Scotia Power regarding the content of a Personal Information Inventory?

B. How would a "well-structured PI inventory" have enabled Nova Scotia Power to determine what data points were affected by the cyber incident?

C. What does INQ Law/Consulting conclude about the Personal Information Inventory maintained by Nova Scotia Power as a result of its admission that "it does not know and will never know what data points for each individual impacted customer were exposed through the incident".

Request IR-2:
With reference to Paragraph 31, page 9 of the Report, what is the understanding of INQ Law/Consulting of the reason why periodic audits of internal access to personal information is a commonly expected practice in privacy management governance?

Request IR-3:
With regard to paragraph 89, page 21 of the Report, which states:

"…..In my opinion, the initial offer of two years of credit monitoring was insufficient to address the risks arising from the unauthorized access to SINs. Given that a SIN is a largely static identifier that cannot be readily changed, the risk of misuse by threat actors is not confined to a defined period but persists indefinitely. A two-year monitoring period did not, in my opinion, adequately reflect that ongoing exposure. However, in my opinion, the extension of credit monitoring to five years brought the remedial offering to a level that was reasonable given the nature of the information compromised."

A. What factors, including but not limited to best practices, examples from other similar events, legal or regulatory standards, did INQ Law/Consulting consider to support the conclusion that five years of credit monitoring is a reasonable mitigation of customer risk from fraud and identity theft?

B. Please provide any and all references or examples that were relied on to test the reasonableness of NSPI's five-year credit monitoring offer.

Request IR-4:
In paragraph 106, page 26 of the Report, INQ Law/Consulting concludes that 8 of the 18 actions of Nova Scotia Power relating to personal information that were reviewed, "did not meet best practices, and were unreasonable in terms of meeting the expectations of customers and limiting the impacts of the cyber security attack on customers."

Which of the actions listed in paragraph 106 were the most significant:

A. When viewed in light of the reasonable expectations of customers, and;

B. In failing to limit the impact of the cyber security attack on customers?