

NOVA SCOTIA ENERGY BOARD

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

-and -

IN THE MATTER OF: an application by **NOVA SCOTIA POWER INCORPORATED (NS POWER)** for approval of approximately \$284.0 million of its **ANNUAL CAPITAL EXPENDITURE (ACE) PLAN** for 2026 which totals \$702.1 million

OPENING STATEMENT OF THE CONSUMER ADVOCATE

April 17, 2026

In this Application, NS Power seeks Board approval for capital projects and routine capital spending totaling approximately \$284 million.

Apart from NS Power, the Consumer Advocate is the only party to have filed evidence in this matter.

The Consumer Advocate's expert, John Wilson of Grid Strategies, raised a number of issues arising from NS Power's application, and particularly regarding cost minimization opportunities related to distribution routines, projects without risk matrices, and reliability-related projects. Mr. Wilson also discussed updates to NS Power's Capital Expenditure Justification Criteria (CEJC), Mersey Hydro report, and Path to 2030 Report. His report contains fifteen recommendations relating to these topics.

With respect to cost minimization opportunities related to distribution routines, Mr. Wilson's recommendations primarily focus on NS Power's reporting requirements and other changes to its work management and data collection practices.

With respect to projects without risk matrices, Mr. Wilson recommends that such projects should be subject to a 10% cap on contingency amounts, to reflect NS Power's own assessment that the risks associated with such projects are well understood and consistent.

As for reliability-related projects, Mr. Wilson recommends certain changes to NS Power's tree contact reliability metrics, and also to obtain an inventory of NS Power's spare equipment.

1 Finally, Mr. Wilson provides additional recommendations concerning NS Power's proposed
2 updates to the CEJC, including development of a two-step process to better determine whether NS
3 Power may be proceeding with a sub-optimal alternative for a particular project.

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5 NS Power has accepted two of Mr. Wilson's 15 recommendations, and specifically those relating
6 to definitions of "scope change" and "related project" in the CEJC; the remaining 13
7 recommendations remain to be determined in this proceeding.

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9 The Consumer Advocate looks forward to exploring these issues further in this proceeding with
10 the NS Power witness panel.

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12 In addition, the Consumer Advocate acknowledges the Board's response to the April 15, 2026
13 letter from the Office of the Minister of Energy, and agrees that the letter appears potentially
14 relevant to future projects, but does not bear directly on any issues under consideration in this
15 proceeding.

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17 We thank the Board for the opportunity to make this Opening Statement.