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**Request IR-1:**

**Refer to M12619, Exhibit N-1, the Application for Approval of NS Power’s 2026 Annual Capital Expenditure (ACE) Plan (the “Application”), Page 22 of 782, Section 4, Annual Capital Expenditure Plan Follow Up, and item 4), which states:**

**The Board directs NS Power to update the equivalent of Figure 3 in the 2025 ACE Plan application about priority distribution feeders in the 2026 ACE Plan. Please refer to Appendix G.<sup>1</sup>**

**Refer also to Appendix G, Page 760 of 782, Figure 33 and Page 761 of 782, Figure 34 which show the extent of Right of Way (ROW) investment included in the 2026 ACE Plan, reproduced below:**

**Figure 33: 2026 Distribution Vegetation Work Plan by Region<sup>2</sup>**

| Region    | Distribution |     |
|-----------|--------------|-----|
|           | Spans        | Kms |
| Metro     | 1,770        | 97  |
| Northeast | 2,576        | 145 |
| East      | 4,020        | 224 |
| West      | 7,125        | 396 |
| Total     | 15,491       | 862 |

**Figure 34: 2026 Distribution Corridor Widening with Managed Rights-of-Way (ROW)<sup>3</sup>**

| Region        | Spans | Kms |
|---------------|-------|-----|
| Central/Metro | 560   | 30  |
| East          | 1,465 | 82  |
| Northeast     | 847   | 48  |
| West          | 2,389 | 133 |
| Total         | 5,261 | 293 |

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<sup>1</sup> M12619, Exhibit N-1, NS Power’s Application for Approval of NS Power 2026 ACE Plan, , Section 4.0 2025 Annual Capital Expenditure Plan Follow-Up, page 22 of 782, lines 24-26.

<sup>2</sup> M12619, Exhibit N-1, Application, Appendix G, Figure 33, page 52 of 71, line 13.

<sup>3</sup> M12619, Exhibit N-1, Application, Appendix G, Figure 34, page 53 of 71, line 2.

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- 1 **(a) What is the total amount of investment planned for 2026 for the ROW projects shown**  
2 **in Figure 33 and Figure 34?**  
3
- 4 **(b) What is the share of this total amount of planned investment requested in (a) above**  
5 **as a percent of:**  
6
- 7 **(i) Total Distribution capital projects in this Application?**  
8
- 9 **(ii) Total Transmission and Distribution projects in this Application?**  
10
- 11 **(c) Does NS Power expect that the proposed distribution investments described in**  
12 **Appendix G Section 7.1, being Storm Hardening for Distribution Rights of Way, will**  
13 **improve the reliability of the priority distribution feeders set out in the Application**  
14 **and, if so, to what extent and how?**  
15
- 16 **(d) Which priority distribution feeders will be impacted by this Application and which**  
17 **customer classes will be directly supplied with firm service from each of these feeders?**  
18
- 19 **(e) Does the Application contemplate upgrading the capacity as well as the reliability of**  
20 **these priority feeders?**  
21
- 22 **(f) Will the proposed investments in these priority distribution feeders support growth**  
23 **in these customer classes, and if so, how much growth is assumed to occur and over**  
24 **what time frame?**

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1 Response IR-1:

2  
3 (a) Figure 33 is the total distribution vegetation capital work plan which includes D010  
4 (widening of existing rights-of-way) and Phase 11 (the 2026 ACE Plan project for creation  
5 of new rights-of-way). The total investment forecast for both is \$31.8 million. Figure 34  
6 refers to D010 only and would account for \$13.2 million.

7  
8 (b) (i) The total Distribution vegetation capital for the 2026 ACE Plan application is \$31.8  
9 million, which is 16.7% of the total Distribution investment plan.

10  
11 (ii) The total Distribution vegetation capital for the 2026 ACE Plan application is \$31.8  
12 million, which is 10.5% of the total T&D investment plan (ECEI Energy Storage  
13 and Synchronous Condensers have been removed from this calculation).

14  
15 (c) NS Power expects that on circuits or lines where targeted vegetation management (ROW  
16 widening and/or ROW establishment) is executed, reliability performance will improve  
17 compared with a do-nothing option. Expected SAIDI improvement is between 0.7 and 1.25  
18 hours reduction by 2029.

19  
20 (d) Twenty-five of the 40 distribution priority feeders (63%) will benefit from the vegetation  
21 management work planned in the 2026 ACE Plan application. These feeders were  
22 identified based on outage causes observed in 2025 and previous years. All customer  
23 classes served from these feeders should expect a reduction in tree-caused outages from  
24 increasing clearance between vegetation and the power lines.

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1

| Western | Metro    | Northeast | Cape Breton |
|---------|----------|-----------|-------------|
| 25W-302 | 101H-412 | 4C-430    | 103C-314    |
| 89W-302 | 103H-432 | 57C-426   | 104S-311    |
| 91W-411 | 103H-434 | 62N-413   | 1C-411      |
|         | 113H-441 | 62N-414   | 22C-404     |
|         | 126H-312 | 62N-415   | 3S-302      |
|         | 129H-412 |           | 58C-403     |
|         | 137H-413 |           | 85S-401     |
|         | 58H-421  |           |             |
|         | 79V-401  |           |             |
|         | 92H-331  |           |             |

2

3 (e) No, this work only includes vegetation management. Any capacity upgrades would be  
4 completed as a standalone Distribution infrastructure project.

5

6 (f) The proposed investment on these priority feeders is intended to improve performance by  
7 reducing tree contact related outages; vegetation management investment does not, on its  
8 own, increase the loading capacity of a feeder.

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**Request IR-2:**

**Refer to the Application, 10.3 Like-for-Like Routine Replacements and Pages 69-70 of 782, Figure 42 documenting the forecast methodology used for the Distribution Routines.**

**(a) How did NS Power include or reflect the change in number of customers for the time frame shown in this table for Distribution Routines D004, D061 and D062?**

**(b) How many new Customers for the Commercial classes, and specifically for the three classes represented by the SBA, are assumed to be planned for in this Application?**

**(c) How did you calculate the change in number of customers for this table?**

**Response IR-2:**

**(a-c)** NS Power does not forecast the routines based on number of customers, the routines are only forecasted on historical project spend. Please refer to Figure 42 in the 2026 ACE Plan application for details on forecasting methodologies.

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**Request IR-3:**

**Refer to the Application confirming that the Board directed NS Power to add quality control steps to its Project Delivery Model (PDM) as an update to this 2026 ACE Plan, which update NS Power supplies as Appendix H, as described below:**

**Risk Register**

**Review this document against the Project Description, including the contingency statement to ensure that all risks are properly considered when applying a contingency percentage. Discuss with project manager to confirm that any risks included in the risk register are more appropriate to be considered within the project contingency or included as an explicit cost estimate if the risk of occurrence is high.**

- (a) What are some examples of projects included with this Application for which risks would be, or were deemed to be, more appropriately considered within the project contingency rather than as an explicit cost estimate?**
- (b) Which projects included in this Application have risks that are considered to have a high risk of occurrence? Provide an explanation for this risk assessment as well as the table, appendix or exhibit showing the project's cost estimate.**
- (c) Please identify projects in this Application whose costs were adjusted or timing for approval was revised due to NS Power deploying these proposed changes to the PDM.**
- (d) Please identify any projects that were excluded from this Application because NS Power determined that they would not meet this improved PDM test for quality control and risk assessment.**

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1 **(e) Were any projects included in NS Power's request for approval in the past two ACE**  
2 **Plans that would not meet this improved PDM test? If so, please identify and explain**  
3 **why.**

4  
5 Response IR-3:  
6

7 (a) In all cases where a project identifies a potential risk of additional cost to a project, that is  
8 factored into the project contingency and is not detailed as a known cost in the Detailed  
9 Cost Estimate. All costs explicitly detailed in the project estimate are costs expected to be  
10 required to complete the project. Therefore, every project included in the 2026 ACE Plan  
11 would have considered risks as part of the contingency percentage analysis and not  
12 included them as explicit cost estimates.  
13

14 (b) A large quantity of projects in the 2026 ACE Plan would have risks that would have a high  
15 potential of occurrence. An example of this would be a civil project such as C0021608  
16 TUC Shoreline Sheetpile Refurbishment, where site conditions cannot be completely  
17 known until work commences. In situations like this, the potential of finding unknowns is  
18 frequently high.  
19

20 (c) While no projects had adjusted cost or scheduling due to the addition of this requirement,  
21 projects do experience these adjustments through the risk review process in the project  
22 planning phase. An example of this is C0068898 TUC1 IP LP Last Stage Blade  
23 Replacement, which was a project originally planned to be completed in late 2025, however  
24 as project planning activities were taking place, the project schedule was determined not  
25 to be sufficient to complete the full scope of work intended, therefore it was decided to  
26 move a portion of the scope to 2026.  
27

28 (d) No projects were excluded from the 2026 ACE Plan due to this reason. This PDM  
29 requirement is not required for inclusion in the ACE Plan; it is only required when a project

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1 is requesting approval. A project can be included as a subsequent submittal project, as an  
2 example, without meeting a PDM requirement such as this.

3

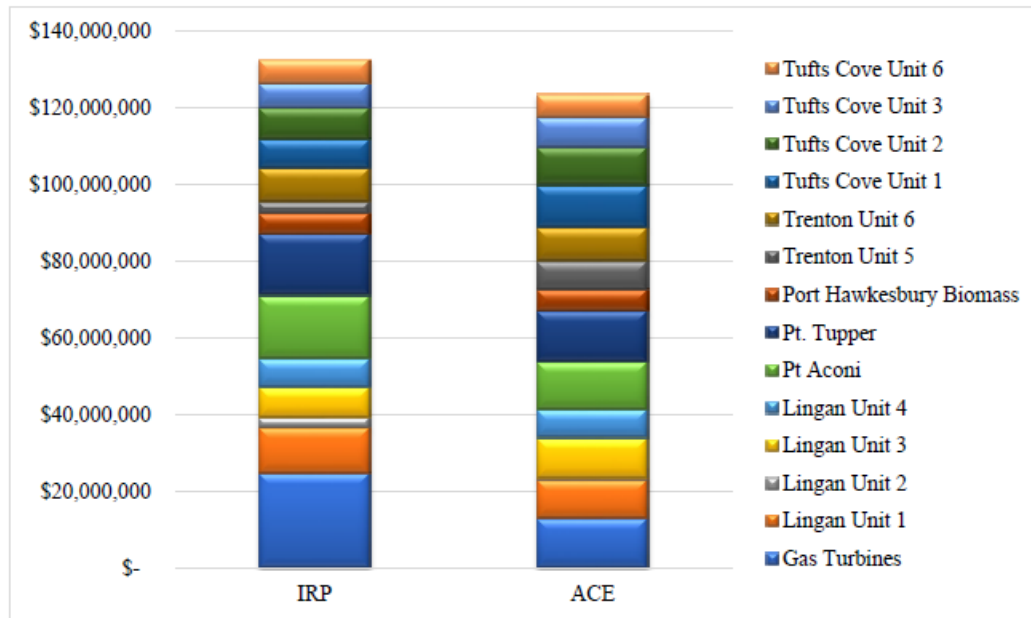
4 (e) No.

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**Request IR-4:**

**Refer [to] the Application Section 11.1.1 Sustaining Capital, Page 88 of 782, Figure 56: Evergreen IRP vs. 2026 ACE Plan Forecast Comparison by Unit, shown below:**

**Figure 56: Evergreen IRP vs. 2026 ACE Plan Forecast Comparison by Unit<sup>1</sup>**



**(a) Compared to the amount of investment in the last IRP shown on the left axis, please confirm which units shown on the right axis:**

**(i) have increased investment planned for 2026.**

**(ii) Have decreased investment planned for 2026.**

<sup>1</sup> M12619 Exh N-1, Application, Section 11.1.1, p. 88 of 782, line 9.

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1 **(b) Please explain which of the CEJC rating criteria listed on Page 89 of 782, Lines 4-12**  
2 **were relied on to determine this positive or negative change in investment level for**  
3 **each unit.**

4 **(c) Does NS Power expect or plan to have average annual investment levels for these units**  
5 **revert to the IRP planned amounts and if so, when?**

6  
7 Response IR-4:  
8

9 (a) (i-ii) The units that have increased investment planned for 2026 are Lingan Unit 3, PH  
10 Biomass, Trenton Unit 5, and Tufts Cove Unit 1, 2 & 3.

11  
12 The units that have decreased investment planned for 2026 are Gas Turbines,  
13 Lingan Unit 1,2 & 4, Pt. Aconi, Pt. Tupper, Trenton Unit 6, And Tufts Cove Unit  
14 6.

15  
16 (b) All three of those rating criteria (Health & Safety, Environment /Regulatory Compliance  
17 and Business Sustainability) are used when determining the 2026 investment plan. The  
18 2026 investment plan is not an update to the Evergreen IRP, rather, the 2026 investment  
19 plan utilizes a bottom-up approach in assessing the risk of all assets and determining what  
20 assets require capital investment to complete risk mitigation activities. The graph in Figure  
21 56 of the 2026 ACE Plan Application shows a comparison between the long-term planning  
22 exercise completed in the Evergreen IRP and the near term, bottom-up plan built on an  
23 annual basis for ACE Plans.

24  
25 (c) While investment levels in future years may be well aligned with the future forecasts in the  
26 Evergreen IRP, NS Power does not build its near-term forecast for ACE Plan purposes with  
27 the intention to align with the IRP forecast. Variances as seen in the comparison above,  
28 either as negative or positive variances, are not significant enough to alter what the IRP  
29 process would have chosen as the best approach to meet the system's generating needs.

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**Request IR-5:**

**Refer to the Application, Appendix D, Section 13, Page 570 of 782, Final Cost Application (FIN) Requirements, which states:**

**13.0 Final Cost Application (FIN) Requirements**

**Individual capital item projects that have final costs with a variance of more than the greater of +5%/+\$250,000 or -10%/- \$500,000 will require that a final cost application be submitted to the Board for approval.**

**(a) Did NS Power intend for this calculation of the variance when referring to -10% to mean the absolute value of the difference so that it can be compared to the positive variance threshold?**

**(b) If so, should the wording for the variance test be revised and accompanied by a hypothetical example to confirm the wording correctly reflects the intention of the CEJC?**

**Response IR-5:**

(a-b) The intent of the change was to increase the allowable underspend threshold to avoid the requirement to file a Final Cost application when a project is completed as planned, but the unused contingency causes the underspend threshold to be exceeded. The total approved value of a project determines whether the proposed underspend threshold will be -10% or -\$500,000, two examples are listed below:

Example 1: Project less than \$5,000,000 (threshold is -\$500,000)

Approved Amount - \$4,400,000

FIN Threshold - \$3,900,000

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1 Example 2: Project greater than \$5,000,000 (threshold is -10%)  
2

3 Approved amount - \$7,200,000

4 FIN Threshold - \$6,480,000  
5

6 In NS Power's view, the wording as proposed in the CEJC amendment is clear and does  
7 not require revision or addition of examples.

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**Request IR-6:**

**Refer the Application, Page 137 of 782, Line 13-19, Section 11.4 Quick Reference Sheet, subsection entitled “2026 O/H Rates” reproduced in the table below:**

**2026 O/H Rates**

| Generation |        | Customer Operations |        | Shared Services |        |
|------------|--------|---------------------|--------|-----------------|--------|
| PP Regular | 37.25% | Regular             | 53.98% | IT              | 56.12% |
| Hydro      | 88.84% | Contract            | 10.45% |                 |        |
| Contract   | 9.43%  | Vehicle             | 32.18% |                 |        |

**(a) Does the reference to “PP Regular” in this table mean Power Plant generation?**

**(b) What does the reference to “Regular” O/H Rates mean for “PP” Generation and Customer Operations, and where is this term defined in NS Power’s Accounting Policies?**

**(c) Why is the Hydro Generation O/H Rate of 88.84% more than double that for PP Regular Generation of 37.25%?**

**(d) What opportunities for procurement or change in resource deployment has NS Power considered pursuing to reduce the higher O/H rates shown in this table for PP Regular and Hydro Generation and Customer Operations and IT Shared Services?**

**Response IR-6:**

**(a) No. “PP Regular” in the table refers to Power Production.**

**(b) “Regular” refers to Regular Administrative Overhead, also known as Labour AO. NS Power has three types of AO Rates, which are calculated in accordance with Board-**

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1 approved Accounting Policy 6230 – Application of Administrative and Vehicle Overhead  
2 (Self-Constructed Assets) and 6235 – Application of Administrative Overhead  
3 (Constructed Assets).  
4

5 (c) The Administrative Overhead percentage is calculated based on the total budgeted eligible  
6 overhead costs for each generation class divided by the total capital labour costs of the  
7 generation class. The percentage correlates with the total planned capital labour spend to  
8 ensure that the eligible overhead costs are allocated. In the case of Hydro Generation,  
9 labour costs would be much lower than the total of all other Power Production, thus  
10 proportionally, it will have a higher allocation percentage.  
11

12 (d) Increased AO rates should not be interpreted to indicate an increase in costs to capital  
13 projects. Increased AO rates occur due to two reasons:  
14

- 15 1. Less capital labour budgeted, so the AO % goes up, and
- 16 2. An increase in administrative support necessary to complete the capital program.  
17

18 AO rates could be decreased by outsourcing efforts that are captured within AO; however,  
19 this would increase the overall cost of the capital program as those added external costs  
20 would outweigh the reduction seen from a reduced AO rate.

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1 **Request IR-7:**

2  
3 **Please refer to the Application Page 38 of 782, Figure 11: Historical Value of Projects Less**  
4 **than \$1M,**

5  
6 **(a) What is the reason for the increase in Steam projects in 2026 compared to prior**  
7 **years?**

8  
9 **Response IR-7:**

10  
11 **Please refer to NSEB IR-13.**

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**Request IR-8:**

Please refer to the announcement of a presentation to be made by NS Power with Ampacimon at the upcoming Distributech event scheduled for February 3, 2026, as described in this event link below:

[https://www.ampacimon.com/events/distributech-2026?utm\\_source=tdworld&utm\\_medium=newsletter&utm\\_campaign=distributech2026](https://www.ampacimon.com/events/distributech-2026?utm_source=tdworld&utm_medium=newsletter&utm_campaign=distributech2026)

(a) Please confirm whether the DLR Deployment project that NS Power will present at Distributech, described as the largest undertaken in North America, is included in this Application, and if not, please confirm when it was or will be filed for approval.

(b) How does the investment project for the Dynamic Line Rating upgrade on NS Power's system benefit customers? Please detail whether it is limited to the transmission system or specific customer classes?

(c) How will NS Power oversee and confirm the benefit of this investment following the transition of management of its Transmission system to IESO Nova Scotia?

(d) Please provide a copy of NS Power's presentation for this event.

**Response IR-8:**

(a) The capital submission for CI 47751 – ECC Dynamic Line Rating Implementation was filed in December 2025 and can be found under M12592.

(b) Within M12592, please refer to NSEB IR-1 (d) for the explanation of benefits to customers. This implementation is limited to a select set of transmission lines as outlined in the above noted submission.

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- 1 (c) NS Power fully expects to see the benefit of this project once operational, and these benefits  
2 would not change after the transition of transmission system operation to the IESO-NS.  
3
- 4 (d) NS Power did not provide a presentation. Abstracts for the DistribuTECH conference are  
5 required to be submitted several months in advance of the event. The Vendor did submit  
6 an abstract for consideration highlighting the project with a Canadian Utility.

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**Request IR-9:**

**Refer to the Application, Appendix G, Page 751 of 782, Lines 1-20, Section 6.0 Advanced Grid Modernization Programs.**

**(a) Please explain whether and how the investments in the Grid Modernization Programs, including FLISR, described in this section, will increase circuit feeder capacity and/or support increased customer demand on the transmission or distribution system, or both.**

**(b) Which of the feeders/substations listed in Appendix G, Page 754 of 782 Figure 29 would have increased capacity to serve demand growth based on the grid modernization investments in the transmission and distribution systems described in this section of the Application.**

**(c) Which regions listed in Figure 29 would receive the greatest improvement in transmission and distribution capacity and reliability?**

**Response IR-9:**

**(a) The investments in Grid Modernization Programs, including FLISR, do not directly increase the physical capacity of circuit feeders or the transmission/distribution system but indirectly support increased customer demand on the distribution system by enabling more efficient utilization of existing infrastructure through automatic reconfiguration, improved reliability, and optimized load management.**

Enhanced real time data and control, providing overall situational awareness, can enable some ability to dynamically manage feeders and the grid in response to changing capacity needs.

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1 The purpose of FLISR is for reliability and it does not create new capacity, but rather some  
2 ability to manage capacity across interconnected feeders remotely or automatically.  
3 Targeted deployments in high-demand areas (e.g., Halifax feeders serving approximately  
4 13,000 customers) can provide some support for addressing growing customer bases  
5 without immediate physical upgrades in the immediate term.  
6

7 Additionally, considering faster restoration times and remote visibility and control of  
8 protection devices, the impacts of elevated load due to “cold load” experienced following  
9 an outage event can be more effectively managed and can avoid operational costs by  
10 reducing hours spent responding. Regarding real feeder capacity impacts, it will take time  
11 to evaluate and understand the impacts as well as more wide-spread deployment before this  
12 would be considered for incorporation into design criteria in the future.

13  
14 (b) Increased capacity in response to demand growth is primarily addressed through other  
15 projects and programs such as transmission and substation upgrades, conductor upgrades,  
16 and other infrastructure investments. All areas listed in Appendix G, Page 754 of 782  
17 Figure 29 will benefit from devices being deployed with communications and integrated  
18 into ADMS for enhanced situational awareness. The following areas are planned for FLISR  
19 deployment and may benefit from the additional indirect increased customer demand as  
20 described in part (a):  
21

- 22 • Ingonish & Cape North 85S-401(multiple devices)  
23
  - 24 • Coxheath & Eskasoni 11S-411 (multiple devices)  
25
  - 26 • Lakeside 103H (multiple devices)  
27
  - 28 • Kearney Lake 129H (multiple devices)  
29
  - 30 • Hammonds Plains 137H (multiple devices)
-

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- 1           •       Armdale 2H (multiple devices)

- 2
- 3           •       Kempt Rd 104H (multiple devices)

- 4
- 5 (c)       Feeders in the Centralized and Decentralized FLISR deployment areas will experience the
- 6           greatest benefits due to the additional flexibility enabled by the ability to reconfigure
- 7           interconnected feeders.

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**Request IR-10:**

**Refer to the Application, Page 68 of 782, Lines 9 – 26, Section 10.4, 2026 Routine Capital Spending Project Details, which refers to the status of NS Power’s Right-of-Way (ROW) transmission and distribution projects**

**(a) Does any of the ROW widening projects mentioned in this Application create or support new demand for Transmission and/or Distribution capacity? If so, please identify the circuits impacted and customer classes affected and in what time frame.**

**(b) Please identify new ROW projects in this Application that support new customer demand.**

**(c) Please refer to CI 0080266, Page 413 of 782, and confirm whether it is the only “new ROW” project in this Application? If not, please identify any other “new ROW” projects in this Application.**

**Response IR-10:**

**(a) No.**

**(b) No ROW projects support new customer demand. Costs for creation of new ROWs that support customer demand would be captured under projects such as distribution line extensions or new customer routines.**

**(c) Confirmed.**

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**Request IR-11:**

**Please refer to the Application, Page 48 of 782, Figure 22: Transmission Carry-over Capital Spending Summary, C0045132 ECEI Energy Storage:**

**(a) Please confirm why the amount under Subsequent Spending is in brackets.**

**Response IR-11:**

(a) Brackets represent a negative number. In this instance, it is a forecast of Federal funding expected for the project that is expected be received in early 2027.

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**Request IR-12:**

**Please refer to the Application, Page 97 of 782 Lines 31- 30 and Page 98 of 782, Line 1 - 4, Centre for Energy Advancement through Technological Innovation (CEATI) Grid Resiliency Working Group Update.**

**(a) Have the final terms of the reference for the working group been approved?**

**(b) Is the discussion paper able to be provided? If so, please provide it.**

**(c) What is the timing for the key actions listed for 2026?**

**Response IR-12:**

**(a)** Please refer to NSEB IR-46, part (c).

**(b)** Please refer to NSEB IR-46, part (b).

**(c)** No specific timings have been confirmed as of this filing for the key 2026 actions referenced the discussion paper. However, based on feedback from the working group, NS Power anticipates these deliverables would be targeted for drafting to enable review by members during the next in-person workshop in November 2026.

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**Request IR-13:**

**Please refer to the Application Page 765 of 782, Figure 39 and confirm if the Country Harbour Cell Tower is a NS Power distribution tower or if it is a communication tower.**

**Response IR-13:**

This is a Bell Aliant communication tower.

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**Request IR-14:**

**Please refer to the Application Page 34 of 782, Figure 10: 2026 Capital Items Forecast for Subsequent Submittal, CI# 49595 HYD – TUS 1 Overhaul.**

**(a) How does this project connect or interact with the ongoing Tusket project, which is currently before the Board as an Application to Overspend in M10197?**

**Response IR-14:**

As part of advancing its plans for the Tusket Main Dam, NS Power has been working to develop its water management plans for future construction, while considering lessons learned from previous construction seasons. Through advancing this work, the Company and its external consultants determined that lowering the reservoir during construction added more risk to the project than the risks it mitigated.

As a result, water management plans for the execution of the Tusket Main Dam Refurbishment project have been developed in a manner that allows the Lake Vaughan Reservoir to remain within its regular operating range during construction and use the generators within the Tusket Powerhouse to manage the inflows and reservoir elevation as necessary. To ensure the reliability of the generating units during the Main Dam refurbishment, Tusket Unit 1 turbine and generator must be overhauled in advance of Main Dam construction.

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1 **Request IR-15:**

2  
3 **Please refer to the Application Page 35 of 782, Figure 10: Capital Items Forecast for**  
4 **Subsequent Submittal, Transmission, CI# C0081985 Michelin DVR Phase 2.**

5  
6 **(a) How does this project connect or interact with the previously approved Michelin**  
7 **Waterville Dynamic Voltage Restorer project in M11656?**

8  
9 **Response IR-15:**

10  
11 (a) DVR Phase 2 represents the addition of 5MW of protected capacity to the existing 15MW  
12 system. It will be connected in parallel and controlled identically to the three units in the  
13 previously approved Waterville Dynamic Voltage Restorer project in M11656.

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**Request IR-16:**

**Please refer to the Application Page 100 of 782, Value of Lost Load (VoLL)**

**(a) At Lines 17-20, there is reference to a residential customer survey regarding VoLL and a draft report on the survey expected to be available for NS Power's review in late 2025. Please advise if the draft report has been completed.**

**(b) At Lines 20-22, there is reference to the development of a survey for commercial and industrial customers. Please confirm the progress on that survey and whether the anticipated timeline for distribution in Q1 2026 will be met.**

**(c) Please confirm whether the results of these surveys, and any reports analyzing those results, will be available to be distributed to intervenors in this matter and what the timeline for that might be.**

**Response IR-16:**

**(a) Please refer to NSEB IR-49.**

**(b) A draft version of the VoLL survey for commercial and industrial customers has been developed and is in the process of review with NS Power subject matter experts and the contractor. NS Power anticipates that the survey will be distributed to customers in Q1 2026 as planned.**

**(c) NS Power plans to provide a summary report of the findings from both surveys once completed and finalized, and currently anticipates this information to be available to provide an update as part of the 2027 ACE Plan application.**

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1 **Request IR-17:**

2  
3 **Please refer to the Application Page 99 of 782, Line 8-9, Metrics.**

4  
5 **(a) Did NS Power consider or evaluate the potential use of the following customer centric**  
6 **metrics:**

7 **(i) Customers Experiencing Multiple Momentaries (CEMM)**

8 **(ii) Customer Experiencing Multiple Interruptions (CEMI)**

9 **(iii) Customers that have experienced a cumulative total of more than eight hours**  
10 **of outages (CELID-8)**

11  
12 **(b) If so, what were the observations or conclusions reached by NS Power and if not, why**  
13 **not.**

14  
15 **Response IR-17:**

16  
17 **(a-b) Please refer to M12185 – NS Power 2024 Annual Performance Standards Report, Section**  
18 **4.0 Customer-Level Reliability Data.**

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**Request IR-18:**

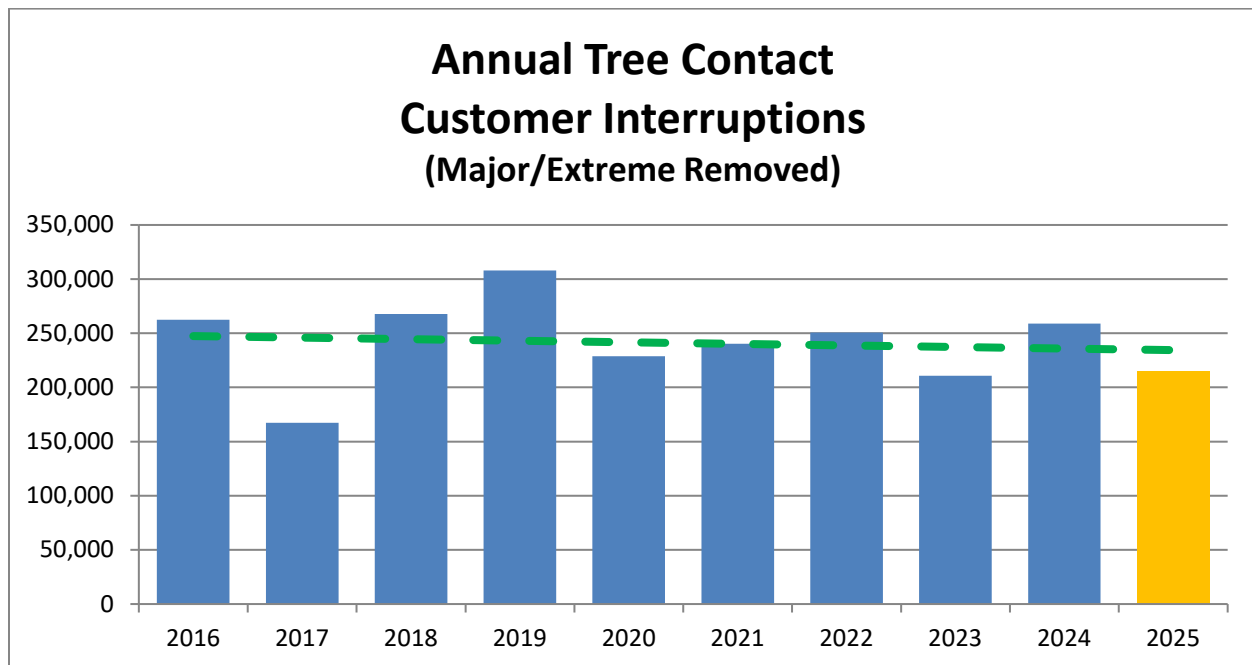
**Please refer to the Application Page 108 of 782, Figures 67: Annual Tree Contact – Customer Interruptions (Major/Extreme Events Removed) and Figure 68: Annual Tree Contact – Customer Hours of Interruption (Major/Extreme Events Removed).**

**(a) Please provide an updated version of both figures with the remainder of the 2025 results included.**

**Response IR-18:**

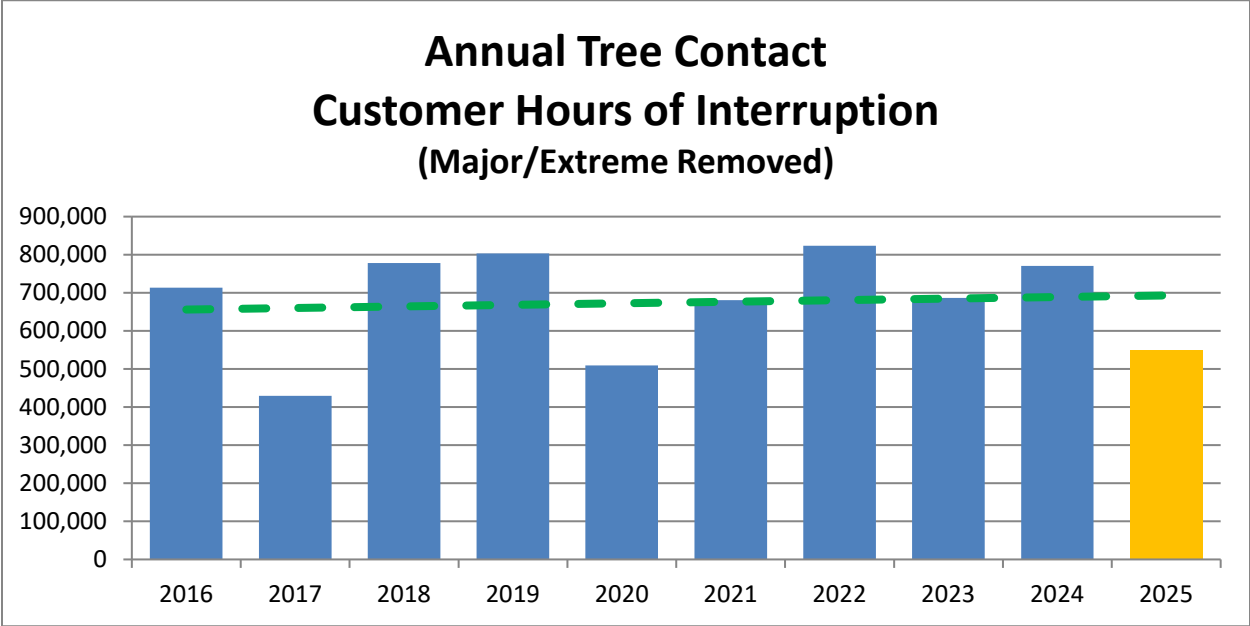
**(a) Please refer to the updated figures below.**

**Figure 67: Annual Tree Contact – Customer Interruptions (Major/Extreme Events Removed)**



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1 Figure 68: Annual Tree Contact – Customer Hours of Interruption (Major/Extreme Events  
2 Removed)



3

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1 **Request IR-19:**

2  
3 **Please refer to Page 111 of 782, Figure 71: Customer Hours of Interruption and confirm to**  
4 **what the percentage of hours refers (numerator and denominator).**

5  
6 Response IR-19:

7  
8 The percentage of hours shown on Page 111 of 782, Figure 71, represents each Device Type's  
9 Customer Hours of Interruption (CHI) as a proportion of the total annual CHI attributed to  
10 Defective Equipment. In other words, the numerator is the CHI for the specific Device Type, and  
11 the denominator is the total CHI for all outage events coded as Defective Equipment in that year.

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**Request IR-20:**

**Please refer to the Application Page 115 of 782, Lines 4-5, and Figure 75: Detail on Outage Causes for Identified Event Days.**

**(a) What are the 3 event days that are being referred to here.**

**(b) Please provide the total number of event days experienced in 2025, the dates on which the events occurred, and how those events were categorized (Significant, Major, or Extreme).**

**Response IR-20:**

(a-b) At the time of the application, only two event days had occurred in 2025, not three. This was a typographical error on page 115. However, the underlying data and associated graphs remained accurate for the two actual event days experienced year to date. Event Days on February 17 and July 26 were included in the graphs in the original 2026 ACE Plan application.

Please refer to the table below for a list of the five total Event Days that occurred in 2025.

| Date              | Event Day Type |
|-------------------|----------------|
| February 17, 2025 | Significant    |
| July 26, 2025     | Significant    |
| December 3, 2025  | Major          |
| December 20, 2025 | Major          |
| December 19, 2025 | Extreme        |

Please refer to NSEB IR-56 for an updated version of Figure 75, with data to the end of 2025.

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**Request IR-21:**

**Please refer to the Application Page 115-116 of 782, Figure 75: Detail on Outage Causes for identified Event Days.**

**(a) Please explain how the 11,601 hours of scheduled interruptions breaks down between the Significant Event Days and where the scheduled interruptions occurred in comparison to what area of the province was affected by the Significant Event Day.**

**Response IR-21:**

(a) 99% of the 11,601 customer hours of scheduled interruptions fall within the February 17 Winter Storm. Two specific feeders contributed a combined 10,952 (94.4%) customers hours of interruptions during a manual interruption in Middleton (65V-302) required to manage cold load pickup, and a safety-driven interruption in Glace Bay (81S-302) following a 911 call. These interruptions were proactively initiated by operations, as controlled measures taken to protect equipment, ensure safety, and minimize overall customer impact. The February 17 winter storm had widespread impacts across Nova Scotia, affecting multiple regions with freezing rain and high winds. Areas with highest reported customer impacts were Lunenburg County, Kings County, Halifax, Inverness County, Cape Breton, Cumberland County, and Colchester County. Please refer to NSEB IR-56 for an updated version of Figure 75, which includes data to the end of 2025.

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**Request IR-22:**

**Please refer to the Application Page 116 of 782, Lines 3-6. There is reference to a significant portion of events that are coded as ‘Adverse Weather’ that NS Power believes are actually tree contacts, which is estimated to be up to 40% (Appendix G, Page 718 of 782). There is then reference to Loss of Supply coded outages also being related to tree contacts.**

**(a) What is the estimated portion of Loss of Supply that is related to Tree Contacts?**

**(b) What is the definition of Loss of Supply and where on the system does it occur in relation to the final customer?**

**Response IR-22:**

**(a) Approximately 40% of customer hours of interruption (all events) from events coded as Loss of Supply are related to Tree Contacts on Transmission Lines.**

**(b) The Loss of Supply cause code is used to refer to outages that originate on the Bulk Electric System (BES) and includes events occurring on NS Power’s transmission lines or within substations that result in an interruption to the distribution system. These upstream events prevent electricity from flowing from the BES to the distribution system and ultimately to the final customer.**

2026 Annual Capital Expenditure (ACE) Plan (NSEB M12619)  
NSPI Responses to Small Business Advocate Information Requests

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1 **Request IR-23:**

2  
3 **Please refer to the Application Page 682 of 782, Lines 17-20.**

4  
5 **(a) Please provide a copy of the directive issued by the minister of DOE on January 16,**  
6 **2024.**

7  
8 **Response IR-23:**

9  
10 Please refer to Attachment 1.



**Natural Resources and Renewables**  
**Office of the Minister**

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PO Box 698, Halifax, Nova Scotia, Canada B3J 2T9 • Telephone 902-424-4037 • Fax 902-424-0594 • [novascotia.ca](http://novascotia.ca)

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January 16, 2024

Judith Ferguson  
Nova Scotia Power  
1223 Lower Water Street  
Halifax, Nova Scotia B3J 3S8

Dear Judith Ferguson:

Pursuant to the authority provided in 2B of the *Electricity Act*, the Minister of Natural Resources and Renewables directs Nova Scotia Power Inc. to:

1. NSP must provide equipment and systems necessary to supply the inertia response required to maintain the stability, reliability, and power quality of the transmission system for interconnection by wind energy conversion systems (WECS) procured pursuant to Sections 4B (1) (a), (b), and (e) of the *Electricity Act*.
  - a. NSP may continue to set minimum technical requirements for the wind turbines. The minimum technical requirements set out by NSP must be guided by features and functionality that are integral to commercially available wind turbines.
  - b. NSP must provide this equipment and systems for any project procured under section 4B (1) (a), (b), and (e) of the *Electricity Act*, including those procured before the date of this Directive.
  - c. NSP shall only provide the equipment and systems to supply the inertia response required when it is necessary to maintain the stability, reliability, and power quality of the transmission system and this capability is not typically provided by commercially available wind turbines.
  - d. Any expenses reasonably incurred by Nova Scotia Power Incorporated in ensuring compliance with subsection (1) will be allocated across all customer classes as a transmission network resource.

Regards,

A handwritten signature in blue ink, appearing to read 'Tory Rushton', with a long horizontal flourish extending to the right.

Tory Rushton  
Minister

- c Karen Gatien, Deputy Minister  
Peter Craig, Director, Electricity  
Chris Milligan ([Chris.Milligan@nspower.ca](mailto:Chris.Milligan@nspower.ca))

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1 **Request IR-24:**

2  
3 **Please refer to the Application Page 683 of 782, Lines 24 – 26.**

4  
5 **(a) What is the current status with respect to the Decision Gate 3 governance milestone?**

6  
7 **Response IR-24:**

8  
9 **(a) Please refer to NSEB IR-175.**

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1 **Request IR-25:**

2  
3 **Please refer to the Application Page 684 of 782, Lines 1-2.**

4  
5 **(a) Did NB Power receive a decision on the EIA in December 2025? If not, when is the**  
6 **decision expected?**

7  
8 Response IR-25:

9  
10 (a) New Brunswick Power received a *Certificate of Determination* for their Environmental  
11 Impact Assessment for the NS-NB Reliability Intertie Project on December 15, 2025.  
12 Please refer to Project number 1642 at the following link:

13  
14 [Record of EIA Registrations and Determinations 1642](#)

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1 **Request IR-26:**

2  
3 **Please refer to the Application Page 719 of 782, Figure 2: Contribution to CHI by Outage**  
4 **Cause (2020-2024) Performance Standards**

5  
6 **(a) Please explain what is meant by ‘Adverse Environment’.**

7  
8 **Response IR-26:**

9  
10 As defined by Electricity Canada, “Adverse Environment” outage events are due to distribution  
11 equipment being exposed to abnormal conditions such as salt spray, industrial contamination,  
12 humidity, corrosion, vibration, fire, or flooding.

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Request IR-27:

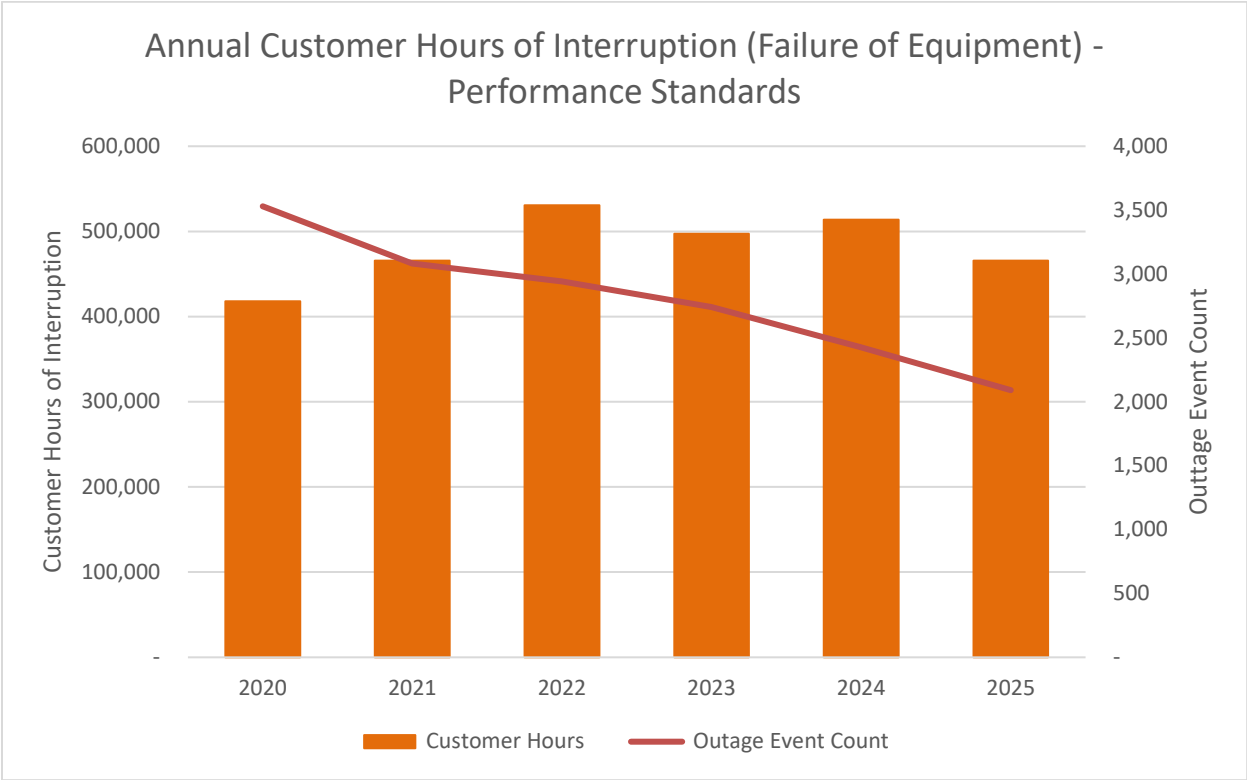
Please refer to the Application Page 721 of 782, Figure 4: Annual Customer Hours of Interruption (CHI) due to Failure of Equipment - Performance Standards

(a) Please define the left and right axes.

Response IR-27:

(a) In Figure 4: Annual Customer Hours of Interruption (CHI) due to Failure of Equipment, the left axis represents Customer Hours of Interruption, and the right axis represents Outage Event Count.

Please refer to the updated version of Figure 4 below, with 2025 full-year data.



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**Request IR-28:**

**Please refer to the Application Page 734 of 782, Figure 12: Establish New Rights-Of-Way – 2025**

**(a) Please confirm the definition of a ‘New Right-Of-Way’ applies only to pre-existing distribution lines that do not currently have a Right-Of-Way (ROW) cleared.**

**(b) As of January 1, 2026, how many kilometers of distribution lines do not have a cleared ROW and what percentage is that of all current distribution lines?**

**Response IR-28:**

**(a) Confirmed.**

**(b) NS Power defines an un-managed distribution ROW as a ROW that has not received treatment within 15 years. Since 2010, NS Power has cleared approximately 11,750 kilometres of distribution ROW. Additionally, there are approximately 5,723 kilometres in a condition where vegetation management is not required, totalling 17,473 kilometres. The total distribution overhead system is approximately 28,229 kilometres which equals approximately 10,756 kilometres that have not been managed since 2010, or 38 percent.**

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1 **Request IR-29:**

2  
3 **Please refer to the Application Page 769 of 782, Figure 42: Illustration of Targeted NS Power**  
4 **Transmission Projects Planned for 2026**

5  
6 **(a) L-6536 appears to extend into New Brunswick. Please confirm if that is the case and,**  
7 **if it is, what is the reason.**

8  
9 **Response IR-29:**

10  
11 (a) Confirmed. NS Power has three interconnection ties between New Brunswick and Nova  
12 Scotia, which all tie into Memramcook, New Brunswick and includes L-6536. The three  
13 lines (two 138kV, L-6536 and L-6535, and one 345kV, L-8001) are all essential for  
14 maximizing and contributing to the tie capacity between the two Provinces to support  
15 system reliability in the case of the largest loss of load contingency.