M12619

NOVA SCOTIA ENERGY BOARD

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

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**

INFORMATION REQUESTS (NON-CONFIDENTIAL)

To: **Michael Willett**
Director, Regulatory Finance
Nova Scotia Power, Inc. (NS Power)

From: Small Business Advocate

Responses Due: February 13, 2026

Copies: 1 electronic copy (PDF searchable)

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Issued at Bedford, Nova Scotia on this 23rd day of January, 2026

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.[1]

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[2]

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)[3]

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

a) What is the total amount of investment planned for 2026 for the ROW projects shown in Figure 33 and Figure 34?
b) What is the share of this total amount of planned investment requested in a) above as a percent of:
   i) Total Distribution capital projects in this Application?
   ii) Total Transmission and Distribution projects in this Application?

[1] 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.
[2] M12619, Exhibit N-1, Application, Appendix G, Figure 33, page 52 of 71, line 13.
[3] M12619, Exhibit N-1, Application, Appendix G, Figure 34, page 53 of 71, line 2.

c) Does NS Power expect that the proposed distribution investments described in Appendix G Section 7.1, being Storm Hardening for Distribution Rights of Way, will improve the reliability of the priority distribution feeders set out in the Application and, if so, to what extent and how?
d) Which priority distribution feeders will be impacted by this Application and which customer classes will be directly supplied with firm service from each of these feeders?
e) Does the Application contemplate upgrading the capacity as well as the reliability of these priority feeders?
f) Will the proposed investments in these priority distribution feeders support growth in these customer classes, and if so, how much growth is assumed to occur and over what time frame?

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?

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:

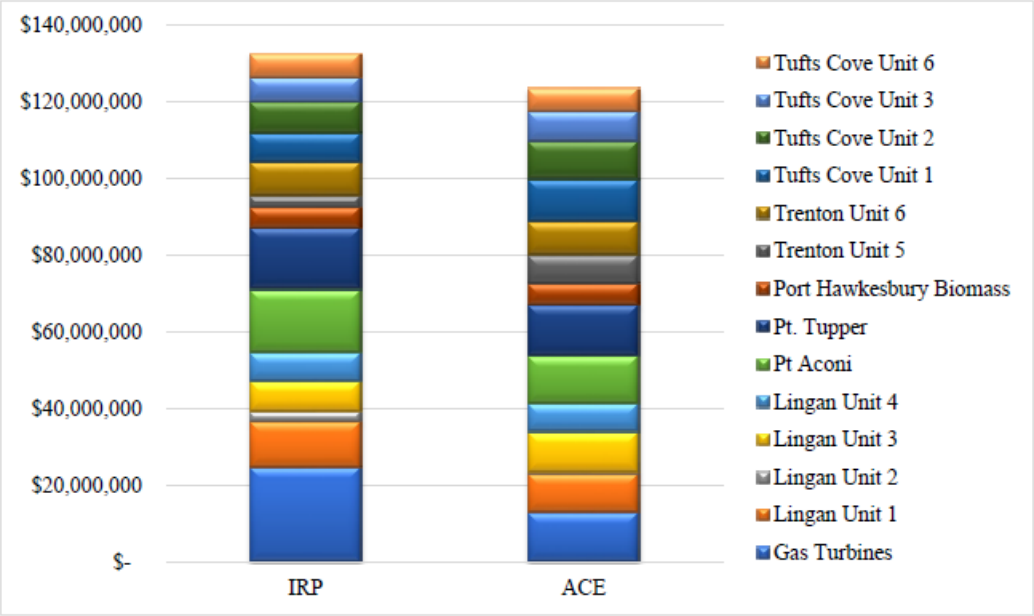
> Risk Register
> Review this document against the Project Description, including the contingency statement to ensure that all risks are properly considered when applying a contingency percentage. Discuss with project manager to confirm that any risks included in the risk register are more appropriate to be considered within the project contingency or included as an explicit cost estimate if the risk of occurrence is high. [4]

[4] M12619 Exh N-1, Application, Appendix H, the Capital Project Approval Process, Project Delivery Model (PDM) Documentation Review, page 2 of 2.

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

Request IR-4:
Refer 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[5]



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:

[5] M12619 Exh N-1, Application, Section 11.1.1, p. 88 of 782, line 9.

i) have increased investment planned for 2026.
ii) Have decreased investment planned for 2026.

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

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

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.[6]

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?

Request IR-6:

Refer the Application, Page 137 of 782, Line 13-19, Section 11.4 Quick Reference Sheet, sub-section 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?

[6] M12619 Exh N-1, Application, Appendix D, CEJC Summary Document, Section 13.0 Final Cost Application (FIN) Requirements, p. 117 of 179.

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?

Request IR-7:
Please refer to the Application Page 38 of 782, Figure 11: Historical Value of Projects Less than $1M,

a) What is the reason for the increase in Steam projects in 2026 compared to prior years?

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

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.

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.[7]

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

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.

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.

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?

[7] M12619 Application, Appendix G, Figure 29, Page 46 of 71, Line 1-22: 2025/2026 Planned Communications Path with Downline Reclosers Installation.

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.

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?

Request IR-15:
Please refer to the Application Page 35 of 782, Figure 10: Capital Items Forecast for Subsequent Submittal, Transmission, CI# C0081985 Michelin DVR Phase 2.

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

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.

Request IR-17:
Please refer to the Application Page 99 of 782, Line 8-9, Metrics.

a) Did NS Power consider or evaluate the potential use of the following customer centric metrics:
   i) Customers Experiencing Multiple Momentaries (CEMM)
   ii) Customer Experiencing Multiple Interruptions (CEMI)

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

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

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.

Request IR-19:

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

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).

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.

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?

Request IR-23:
Please refer to the Application Page 682 of 782, Lines 17-20.

a) Please provide a copy of the directive issued by the minister of DOE on January 16, 2024.

Request IR-24:
Please refer to the Application Page 683 of 782, Lines 24 – 26.

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

Request IR-25:
Please refer to the Application Page 684 of 782, Lines 1-2.

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

Request IR-26:
Please refer to the Application Page 719 of 782, Figure 2: Contribution to CHI by Outage Cause (2020-2024) Performance Standards

a) Please explain what is meant by 'Adverse Environment'.

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.

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?

Request IR-29:

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

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