

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: *The Public Utilities Act*

– and –

IN THE MATTER OF: **An Application by Nova Scotia Power Inc. for approval of its
2026 Annual Capital Expenditure (ACE) Plan**

INFORMATION REQUESTS

To: **Michael Willett**
Director Regulatory Finance
Nova Scotia Power Inc. (NS Power)
1223 Lower Water Street
Halifax, NS B3J 2A8
Email: michael.willett@nspower.ca

From: The Consumer Advocate

Responses Due: **Friday, February 13, 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

1 **Request IR-1:**

2
3 With respect to Section 4.1, please provide the “further language” discussed on p. 27, lines 15-20.
4

5 **Request IR-2:**

6
7 With respect to Appendix D, p. 7 and p. 44, would a scope change be considered to have occurred
8 when a new asset is added to the project? For example, a project involving refurbishment of a dam
9 and dyke is revised to include significant civil work on an adjacent (second) dyke. If, in responding
10 to this question, NS Power views it as reasonable to consider (not necessarily support) revised
11 language, please provide proposed edits that would effectuate the change.
12

13 **Request IR-3:**

14
15 With respect to Appendix D, p. 21, does NS Power view it as necessary or helpful to revise the
16 summary of the capital work budget thresholds to reflect the Board’s decision in M12417 that,
17 “NS Power is directed to submit any future capital expenditures that exceed \$1 million for approval
18 to the Board, regardless of the source of funding.” If, in responding to this question, NS Power
19 views it as reasonable to consider (not necessarily support) revised language, please provide
20 proposed edits that would effectuate the change.
21

22 **Request IR-4:**

23
24 With respect to Appendix D, p. 39, please provide NS Power’s view on a revision to the definition
25 of a related project that would include CIs for like assets at a Steam/Gas Turbine or Hydro unit,
26 where like would be defined as units that can be substituted for one another in the normal course
27 of business. For example, work on any of the rotating LM6000 engines. If, in responding to this
28 question, NS Power views it as reasonable to consider (not necessarily support) revised language,
29 please provide proposed edits that would effectuate the change.
30

31 **Request IR-5:**

32
33 With respect Figure 7, during the technical conference, NS Power explained that due to new wind
34 projects being added to the scope of work for C0072808 (Synchronous Condensers), the number
35 of units increased from 4 to 8 units and the budget has increased by \$121 million. Understanding
36 that the project will be defined in a subsequent submittal, please provide a description of:
37

- 38 (a) How the scope of the project was originally defined,
39
40 (b) How the scope of the project was increased, and
41
42 (c) How the procurement process was affected by the scope change.
43
44
45
46

1 **Request IR-6:**

2
3 With respect to Section 6.0:

- 4
- 5 (a) Please provide the number of hours of cumulative service and years of service for LM6000
6 Unit 191-253, identifying how many of those hours and years were accumulated before NS
7 Power took ownership of the unit in 2012.
- 8
- 9 (b) Please explain how many hours of cumulative service and years of service an LM6000 unit
10 might reasonably be expected to achieve before unit replacement given the coastal
11 operating conditions. If there is no official answer to this question (e.g., from GE), please
12 provide NS Power's best estimate. Please provide any supporting documentation, such as
13 data on the actual lifetime of comparable units.
- 14
- 15 (c) Please provide the date for the next scheduled major refurbishment or replacement for Unit
16 253.
- 17
- 18 (d) Please explain whether a decision has been made on whether Unit 253 will be a
19 refurbishment or replacement, and on what basis. Please include any supporting
20 documentation.
- 21
- 22 (e) If no decision has been made, please explain the process by which such a decision will be
23 made, including dates for key milestones.
- 24

25 **Request IR-7:**

26
27 With respect to Figure 35:

- 28
- 29 (a) Please provide actual (or forecast, for 2026) person-hours by regular and overtime for each
30 distribution routine, for the years 2022-2026.
- 31
- 32 (b) Please provide an explanation and justification for the quantity of overtime hours for each
33 routine, discussing any evident trends, identifying drivers, and explaining why sufficient
34 personnel cannot be assigned to complete the required work during regular hours.
- 35
- 36 (c) Please confirm that NS Power does not schedule powerline technicians for regular shifts
37 24 hours per day, 7 days per week but rather uses overtime to cover responses to outages
38 and trouble calls as well as for other scheduling reasons (see Exhibit N-7, CA RIR-31(b),
39 M12012) during hours outside of the regular workday. Please explain the response and the
40 reason for this business practice.
- 41
- 42 (d) Is it possible to procure external contractors for work that must be conducted outside of
43 regular hours at rates lower than overtime? Please distinguish between responses to outages
44 and trouble calls and work that is normally scheduled in advance.
- 45
46

1 **Request IR-8:**

2
3 With respect to Section 10, please explain how the Project Delivery Model (PDM) is applied to
4 capital routine projects. If the PDM is not applied to capital routine projects, please provide a table
5 with the following information:
6

7 (a) Each element of the PDM,

8
9 (b) The purpose, objective, etc. of the element in (a),

10
11 (c) Any equivalent practice(s) or process(es) in NS Power's management of capital routine
12 projects,

13
14 (d) The frequency or triggering event that causes the activities described in (c) to occur, and

15
16 (e) The reason for the difference in practice or process between the PDM element and the
17 activity described in (c).
18

19 **Request IR-9:**

20
21 With respect to Figure 43, please provide the number of meters actually procured for 2022-2025
22 along with the 2026 procurement count shown in Figure 43 in an excel spreadsheet, and provide a
23 narrative explanation of any significant trends in quantity or type of meter.
24

25 **Request IR-10:**

26
27 With respect to Section 11.1.4:

28
29 (a) Please provide tables with the data for Figures 59 and 60. Please provide columns for
30 Atlantic Utilities both with and without NS Power included,

31
32 (b) Please explain how the average of Atlantic Utilities outage frequency and duration is
33 calculated for Figures 59 and 60 (e.g., weighted based on peak load of each utility),
34

35 (c) Please provide the final 2024 reliability statistics (Figures 61-71),
36

37 (d) Please comment on any important developments in 2024 that influenced these outcomes,
38 and
39

40 (e) Please provide the final terms of reference for CEATI's Grid Resiliency Working Group
41 (p. 97).
42
43
44
45
46

1
2 **Request IR-11:**

3
4 With respect to C0068898 (TUC1 Blade Replacement):

5
6 (a) Please provide an update on the delivery of the replacement blades and any other project
7 developments that could affect budget or schedule, and

8
9 (b) Please provide a description of the procurement process for the contracts (Attachments 1
10 and 2). If the contracts were competitively bid, please provide documentation of the
11 selection process. If not, please explain how NS Power minimized cost.
12

13 **Request IR-12:**

14
15 With respect to C0080134 (TUC2 Stack), the CI states that the estimated life of the asset is 25
16 years, but that the prior major coating work had an expected lifetime of 15 years. Please explain
17 whether a shorter lifetime alternative was considered for the project. If so, please provide the
18 analysis and explain why it was not selected. If not, please explain why not, especially given the
19 likelihood that the TUC2 stack would be retired within 25 years due to carbon regulation.
20

21 **Request IR-13:**

22
23 With respect to C0068888 (TUC3 Ash Hauling), please provide the evaluation documents for the
24 RFP. To the extent that the evaluation documents are not self-explanatory as to the general basis
25 for the scoring or ranking method, please provide supporting documentation from the bids.
26

27 **Request IR-14:**

28
29 With respect to C0080135 (CT-BGT2 Engine Refurbishment), please provide a description of the
30 procurement process for the contract (Attachment 2). If the contract was competitively bid, please
31 provide documentation of the selection process. If not, please explain how NS Power minimized
32 cost.
33

34 **Request IR-15:**

35
36 With respect to Appendix I, CIs for transmission replacement and upgrade projects C0080110 and
37 C0080109, and 2024 ACE Plan Rebuttal Evidence (p. 22):

38
39 (a) Please confirm that NS Power's policy remains, "In the case of Transmission Replacement
40 and Upgrade projects, the project risks and their potential impacts are well understood by
41 the project team, therefore having a risk register for each of these projects does not add
42 value to the project, or other projects in terms of better understanding risks." If not
43 confirmed, please elaborate.
44

45 (b) With respect to the projects included in Appendix I that were at least 10% over budget,
46 please provide the risk register or explain why it does not exist.

- 1 (c) With respect to the projects included in Appendix I that were at least 10% over budget,
2 please explain why a larger contingency is a more appropriate budgeting and cost
3 accountability mechanism than an ATO filing.
4
- 5 (d) With respect to the discussion of C0011339 in Appendix I, did NS Power identify the risk
6 that the planned component replacements might not meet engineering requirements, and
7 that full structure replacements might be required for a substantial (in this case, 19
8 structures) number of structures? If so, please provide documentation. If not, please explain
9 why not.
10
- 11 (e) With respect to C0011339, does NS Power agree that the increase from 13 replacement
12 structures in the 2019 ACE Plan to 34 full structure replacements in the ATO is more
13 appropriately addressed in an ATO application than by increasing the contingency to
14 accommodate such circumstances? In other words, is NS Power's expectation that an
15 increase from 13 to 34 structure replacements is the sort of uncertainty that a contingency
16 budget is expected to accommodate?
17
- 18 (f) In the case of C0011339, did the substantial increase in replacement structures have an
19 impact on project procurement activities and the project schedule? If so, please elaborate.
20
- 21 (g) In the Board's decision in M12417, it stated that, "the Board remains concerned about the
22 amount of contingency included in transmission line replacement and upgrade projects
23 submitted for Board approval." Please explain why it would be unreasonable for the Board
24 to reduce the contingency for projects C0080110 and C0080109 to 10%.
25

26 **Request IR-16:**
27

28 With respect to projects C0070909, C0053234 and C0053214:
29

- 30 a) Please explain why there is no cost support reference for the cost of the C0070909 and
31 C0053234 transformers in the Capital Project Detailed Estimates.
32
- 33 b) If a firm quote for the transformer in C0070909 or C0053234 has been obtained since the
34 filing, please provide it and provide an updated cost estimate.
35
- 36 c) If a firm quote has been obtained since the filing, does NS Power agree that the transformer
37 cost in C0070909 and C0053234 should be excluded from the contingency? If not, why
38 not?
39
- 40 d) Please provide the project schedule and risk matrix for each project.
41
- 42 e) Please provide data on all transformer additions and replacements in the past seven years
43 in the same format as Appendix I. Please include partial responses for any incomplete
44 projects.
45
46

1 **Request IR-17:**

2
3 With respect to project C0070586:

- 4
- 5 a) Please provide support and context for the assertions that “it is not always possible to take
6 an outage to L-6536” and that “Taking an outage to this line negatively impacts customer
7 reliability in the area.” In your response, please explain whether these statements are
8 intended to emphasize distinct reliability risks that are more significant than exist for other
9 transmission lines, or whether these same considerations would apply to any and all
10 transmission line with switches that do not include “live line” capability.
11
 - 12 b) Please provide a table providing the number of in-line transmission switches, by switch
13 type (e.g., voltage and any other relevant characteristics for cost and planning purposes),
14 showing the number that have live-line capability and the number that do not.
15
 - 16 c) Please provide a table indicating the anticipated time period (e.g., 5 year ranges) during
17 which the switches without live-line capability, categorized as in part (b), will reach their
18 end of life.
19
 - 20 d) Has NS Power developed an economically optimized plan for replacing the switches
21 identified in part (c) of this question? If so, please provide it. If not, please provide a rough
22 estimate of the total cost to replace these switches if it were planned and completed using
23 current costs without assuming any particular schedule for replacements.
24
 - 25 e) Please provide a more detailed justification for the 20 percent contingency amount,
26 elaborating on each factor included in the contingency statement.
27
 - 28 f) Please identify any similar previous projects that provide a basis for the 20 percent
29 contingency amount, and supply any information not already filed with the Board in a
30 public document that would assist in understanding why some previous projects have
31 exceeded the without-contingency cost forecast.
32
 - 33 g) Please explain why the cost of the switches identified in Attachments 1 and 2 is not
34 excluded from the 20 percent contingency amount, similar to the approach taken for
35 C0053214.
36
 - 37 h) Please explain why the transmission structure replacement and substation construction
38 contracts are not provided as cost support, and justify the procurement process for those
39 contracts including supporting documents.
40

41 **Request IR-18:**

42
43 With respect to project C0068969 (Pennsylvania Breaker Replacements):

- 44
45 (a) Please provide the schedule for the replacement of the 14 remaining circuit breakers.

- 1 (b) Please explain why the circuit breaker and BS&G contracts are not provided as cost
2 support, and justify the procurement process for those contracts, including supporting
3 documents.
4

5 **Request IR-19:**
6

7 With respect to project C0080266 (New Distribution ROW 11), please provide the number of
8 outage events, by year, for each feeder listed in attachment 1. Please provide the number of both
9 total outage events and tree contact outage events. Please provide these data along with the data in
10 Attachment 1 in an excel spreadsheet.
11

12 **Request IR-20:**
13

14 With respect to project C0080252 (Intelligent Asset Data Capture & Integration Platform):
15

- 16 a) Please provide a forecast of future costs to maintain and develop this platform. If no such
17 forecast is available, please explain why NS Power did not consider future costs when
18 undertaking this project.
19
20 b) Please provide a copy of the federal funding agreement.
21
22 c) Please identify any risks that NS Power might be responsible for any costs currently
23 understood to be covered by the federal funding agreement, e.g. through some failure of
24 execution.
25
26 d) Please explain why the project is referenced as “ECC Renewable Dispatch Data on p. 4.”
27

28 **Request IR-21:**
29

30 With respect to Appendix E:
31

- 32 (a) Please provide a working copy of Appendix E, Attachment 1.
33
34 (b) Please explain the differences between the NPV analysis and an EAM (p. 10, lines 26-27).
35
36 (c) If NS Power has the additional information necessary to complete an EAM for the three
37 scenarios, please provide the information or a complete EAM.
38
39 (d) Please provide a summary of the actions NS Power has taken in the past two years to update
40 its decommissioning plan for Mersey and provide the deliverables from each action.
41

42 **Request IR-22:**
43

44 With respect to Appendix G, does NS Power’s distribution system experience strong winds or
45 microbursts that pull down multiple poles in sequence (e.g., over a stretch of at least several
46 hundred meters) due to the cable pulling down poles after the initial pole failure? If so, please

1 estimate the number of such incidents and the percentage of outage cost, effort, or equipment
2 replacement associated with this mode of failure.

3
4 **Request IR-23:**

5
6 With respect to Appendix G, Figure 1:

- 7
8 a) Please confirm that this figure is unchanged since the submission of the 2025-2029 Five-
9 Year Reliability Plan (December 20, 2024). If not confirmed, please identify the
10 differences.
11
12 b) If part (a) is confirmed, please explain why there has been no update to the reliability
13 program forecast investment in the past 12 months.
14

15 **Request IR-24:**

16
17 With respect to Appendix G, Figure 2:

- 18
19 a) Please explain the reasons for changes in the five-year average for each value. For example,
20 tree contacts declined from 49% adjusted contribution to CHI in the previous plan as
21 compared to 33% in this plan.
22
23 b) Please provide a definition for each cause code for power interruptions.
24
25 c) Please explain when (e.g., what year) NS Power's operations and vegetation management
26 subject matter experts provided the estimate that up to 40 percent of CHI coded as "Adverse
27 Weather" can be further attributed to tree contacts based on the noted impact to trees
28 throughout the province during severe weather.
29
30 d) If the date provided in response to part (c) is earlier than 2025, please explain why it has
31 not been updated.
32
33 e) Does NS Power expect that its right-of-way clearing and other related vegetation
34 management programs will reduce the number and percentage of outage events due to tree
35 contacts during adverse weather? If not, why not?
36
37 f) Does NS Power collect and review any data regarding events coded as "Adverse Weather"
38 to determine the attribution to tree contacts? If so, please provide relevant documents.
39
40 g) Does NS Power agree that it is important to understand the underlying causes of power
41 interruptions during adverse weather events for distribution system design, maintenance
42 and other decision-making? If so, please provide a narrative of how NS Power analyzes
43 these underlying causes and include supporting documentation that exists of any such
44 review processes.
45
46

1 **Request IR-25:**

2
3 With respect to Appendix G, Figures 3 and 4:

- 4
5 (a) Please explain how and why the outage event count has been reduced by more than 50%
6 since 2022 for tree contacts and by nearly 50% for failure of equipment, but the CHI has
7 decreased by a far lesser percentage and not at all for failure of equipment.
8
9 (b) The five-year reliability plan describes how NS Power expects to reduce outage events,
10 please elaborate on how execution of the plan is expected to reduce both outage events and
11 customer hours of interruption.
12

13 **Request IR-26:**

14
15 With respect to Appendix G, Figures 5 and 7, and p. 21-22:

- 16
17 a) Please explain what is meant by the vegetation management team's "careful management
18 of resources" in the note to Figure 5.
19
20 b) Please reconcile the statement in the note to Figure 5 that the "vegetation management team
21 was able to exceed the planned Kms" with the statement that there was a "reduction in the
22 number of kms of vegetation managed under the program in 2025" (p. 21-22).
23
24 c) The statement on p. 21-22 references two figures which refer to corridor widening and new
25 rights-of-way. It appears that vegetation management around existing powerlines (Figure
26 14) exceeded planned Kms. How was this program able to exceed the plan given the
27 wildfire risk described on p. 21?
28
29 d) Please provide a breakdown of planned Kms corresponding to each row in Figure 7.
30
31 e) Is vegetation management covered by the Project Delivery Model? If so, please provide
32 any available documentation of identified cost minimization actions and post project
33 review(s). If the amount of information is large, it may be limited to a reasonable subset of
34 the most recent information.
35
36 f) Has NS Power adopted the "careful management" practices into its budget forecast?
37
38 g) Will the reduced cost per km be used to increase the amount of storm hardening in the
39 reliability program or reduce the cost of the forecast investment in the reliability program?
40

41 **Request IR-27:**

42
43 With respect to Appendix G, Section 5.1.2 and the referenced Appendix C:

- 44
45 a) Please confirm that of the five feeders identified in Appendix C, only feeder 85S-401 is
46 listed as one of the "Highest Priority Distribution Feeders" in 2025 (Appendix G, Appendix

1 A) or 2026 (Appendix G, Figure 32). In other words, why hasn't NS Power prioritized
2 these pole replacement projects for feeders on these lists?

3
4 b) Will the poles included in CI 0080612 (57C-426H) and CI 0-080104 (365V-303) include
5 poles that align with the current CSA C22.3 overhead line standards?

6
7 c) If the answer to part (b) is yes, why are these poles not included in the Appendix C table?

8
9 d) Please explain how the priorities demonstrated by the referenced work complies with the
10 Board's direction in M12012 that "installations should be prioritized in areas that are more
11 frequently exposed to the highest winds and have the greatest impact on customer outages"
12 (para 89, page 31). If the list in Appendix C was not prioritized in this manner, please
13 explain NS Power's plan for complying with this direction.

14
15 e) Please provide NS Power's plan to "provide a post-storm evaluation to determine pole
16 status, survival rate, impact on customer outages, and whether the upgraded class improved
17 the resilience of the wooden poles," (M12012, para 90, page 31) including definitions of
18 quantified metrics, data collection plans (pre- and post-storm), and other elements of the
19 plan necessary to provide a fulsome evaluation.

20
21 **Request IR-28:**

22
23 With respect to Appendix G, Section 5.3 and Exhibit N-7, RIR-12 in M12012:

24
25 a) Is NS Power a member of Grid Assurance's sparing service program or any other program
26 to subscribe to that allows for immediate access to spare transmission equipment at original
27 cost in emergency circumstances? If so, please explain the scope of NS Power's
28 membership.

29
30 b) If the answer to part (a) is no, please explain whether NS Power has considered any such
31 programs and why it has not joined.

32
33 **Request IR-29:**

34
35 With respect to Appendix G, Section 7.3.2

36
37 a) Please confirm that the improved reliability performance anticipated from the FLISR
38 projects is expected to be caused by faster outage response (reduced power interruption
39 duration) across the distribution network (clarifying p. 65 lines 15-17). If there is any other
40 driver of improved reliability that NS Power anticipates being provided by FLISR projects,
41 please explain.

42
43 b) In the Board's decision in M12417, it stated that NS Power "offered a very general
44 approach to measuring the collective performance of all reliability measures, rather than
45 focusing specifically on [the FLISR] technology," and encouraged NS Power "to develop
46 metrics to measure and validate the technology's performance." Please describe any steps

1 that NS Power has taken or plans to take in response to the Board's direction, including a
2 timeline for completion and reporting to the Board and federal government.
3

4 **Request IR-30:**
5

6 With respect to Appendix H, please explain who is responsible for conducting reviews of PDM
7 documentation and how completion of the PDM documentation review, including that of the post-
8 project review, will be assured, as through tracking or some other management practice.
9

10 **Request IR-31:**
11

12 With respect to Appendix H:
13

14 (a) Please provide a list of all post-project reviews conducted over the past 18 months and
15 identify any that have previously been filed (e.g., in an ATO or in the 2024 ACE Plan
16 proceeding). Please provide a copy of a sample comprising at least 25% of any post-project
17 reviews that have not previously been filed. Please ensure that the sample includes at least
18 one example from each category (and subcategory), as follows:
19

- 20 i. Projects with actual spending > \$5M.
- 21
- 22 ii. Projects with actual spending between \$1M and \$5M, where at least one of the
23 following criteria are met:
 - 24 1. Unique or first-time undertaking
 - 25 2. Significant safety or environmental risk management deployed
 - 26 3. Significant schedule/budget under performance
 - 27 4. Significant schedule/budget over performance
 - 28
 - 29
- 30 iii. Projects activated between \$250K and \$1M that are over-spent by more than
31 30% from original activated amount.
- 32
- 33 iv. Projects whose budget is principally comprised of sole-source procurement.
- 34
- 35 v. Projects initiated by the Project Manager for sharing or recognition.
36

37 (b) Please explain, and provide examples of, how these post-project reviews have been
38 effective in NS Power's continuous improvement process. If they have not been effective,
39 or a good use of resources, please explain the basis for reaching that conclusion and any
40 planned or proposed changes to the process.
41

42 (c) Please identify one or more examples from the post-project reviews supplied in response
43 to (a) of the following considerations in the review process leading to an actionable finding
44 (recognizing success or identifying opportunity for improvement):
45
46

- i. Internal project coordination practices, including whether they were effective, efficient, or problematic;
- ii. Project risk registers, including identifications of risks that were overlooked, overstated, or successfully mitigated; and
- iii. Staff response to emerging problems, such as whether internal communication was effective and whether mid-course action mitigated those problems.

(d) If, for any of the subparts to item (c), no specific examples can be identified, please confirm that NS Power still “agrees that the items listed above are important considerations with respect to the post-project review process” (2024 ACE Plan Rebuttal Evidence, p. 25) and explain why those important considerations are not evident in post-project reviews.

(e) Please include any available evidence of the quality control process illustrated in Appendix H for each of the post-project reviews submitted in response to this question.

Request IR-32:

Reference: 2024 ACE Plan Rebuttal Evidence, p. 17, stating, “NS Power will continue to assess how this data could be obtained,” referencing a recommendation to breakdown distribution costs into four new categories, and Exhibit N-7, CA RIR-14(a)(i), M12012.

(a) Please describe actions taken by NS Power since April 2024 to assess how it could acquire historical and forecast distribution cost data for the following categories. Please respond to each item regarding both historical data and forecast data, explaining what type of historical cost data are available or and what type of forecast cost data could be created:

- i. New customers by single-family, multi-unit, and residential additions
- ii. Increased load capacity at existing residential and commercial sites
- iii. Unmetered services, such as streetlights; and
- iv. External factors driving costs, including supply chain issues, shifts in the regular/overtime labour breakdown due to other utility programs.

(b) In the referenced RIR, NS Power stated:

NS Power has data on single-family and multi-unit completions from the Conference Board of Canada, however, internal work orders do not distinguish between this type of work. NS Power does not currently have a means of tracking residential additions. To that end NS Power has created a continuous improvement initiative to analyze current internal data to identify gaps in data. This information will be used to determine if data could be accessed elsewhere,

1 whether system enhancements are possible or if the required data is better suited
2 for future system upgrade initiatives.

3
4 i. Please identify any changes that have been made to the format of internal work
5 orders since January 1, 2025.

6
7 ii. Please provide an update on NS Power's "continuous improvement initiative,"
8 with any results or findings that have occurred.

9
10 iii. Please explain whether NS Power has determined if data could be accessed
11 elsewhere, whether system enhancements are possible or if the required data is
12 better suited for future system upgrade initiatives.

13
14 iv. Please explain whether any relevant future system upgrade initiatives are
15 planned and, if so, provide documentation of the relevant portion of the scope
16 for such initiatives.

17
18 (c) Please describe any other actions that NS Power intends to undertake in the next three years
19 for the same purpose.