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Nova Scotia POWER
An Emera Company

PO Box 910 | Halifax, Nova Scotia | Canada | B3J

January 19, 2026

REDACTED

Lisa Wallace
Chief Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
Halifax, NS B3J 3S3

Re: M12654 – DRO Appeal – Michel McMahon

Dear Ms. Wallace:

In the Nova Scotia Energy Board's (Board, NSEB) letter dated January 5, 2026, the Board directed as follows:

> By copy of this letter, the Board directs Nova Scotia Power Inc. (NS Power, the Company) to file a response with the Board to the enclosed appeal on or before **2:00 PM on Monday, January 19, 2026.** NS Power must also provide a copy of their response to the appellant, Mr. Michel McMahon.

Mr. McMahon is appealing a decision by the Dispute Resolution Officer (DRO) dated December 13, 2025. The complete DRO file as provided by the DRO pertaining to this decision is included as **Confidential Attachment 1**. Copies of Mr. McMahon's bills for 2025 have been attached as **Confidential Attachment 2**.

Please accept the following summary of activities and communications pertaining to the December 13, 2025, DRO decision being appealed by Mr. McMahon:

- December 3, 2025 – Mr. McMahon emailed the DRO regarding the number of meters associated with his account. He stated that his property has one meter but indicated that some past bills have included charges for two meters. He requested a list of charges from 2015 to the present related to the inclusion of a second meter and attached a copy of his recent bill for reference. This is referenced on page 2 of 43 in the DRO file attached as **Confidential**

Attachment 1.

- December 3, 2025 – The DRO responded to the customer and NS Power. He summarized his role and asked NS Power to provide its position in the matter as well as relevant account documentation. This is referenced on page 1 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 3, 2025 – Mr. McMahon emailed the DRO and confirmed that consent could proceed by email. This is referenced on page 3 of 43 of in the DRO file attached as **Confidential Attachment 1**.

- December 3, 2025 – The DRO requested that Mr. McMahon copy NS Power on all future emails related to the matter, noting that NS Power would also copy him on its correspondence. This is referenced on page 3 of 43 of in the DRO file attached as **Confidential Attachment 1**.

- December 4, 2025 – Mr. McMahon emailed the DRO and NS Power and confirmed that consent could proceed by email. This is referenced on page 5 of 43 of in the DRO file attached as **Confidential Attachment 1**.

- December 4, 2025 – NS Power provided its position to DRO, stating the following:

  > [...] NS Power only shows that there is one meter at the property of [redacted]. Also, NS Power only has one billing account in the name of Michel McMahon.
  >
  > As shown on the Meter Read record, meter #68586 was installed at the property from 2015 to 2020. On January 20, 2020, meter #68586 was removed and replaced with meter #2135456. This is the current meter at the premises. The only bill that would have shown both meters was the March 2020 invoice when the meter was changed.
  >
  > It is NS Power's position that the customer has been billed appropriately for one meter at the property.

  NS Power attached the account ledger and meter reads for the subject account (No.[redacted]). This is referenced on pages 5 to 12 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 4, 2025 – Mr. McMahon responded to NS Power's position, stating that, based on his calculation from the billing statement, 492 days were charged over a one-year period and indicated that there appeared to be a discrepancy. He requested that the matter be addressed. This is referenced on page 13 of 43 of in the DRO file attached as **Confidential Attachment 1**.

- December 4, 2025 – The DRO asked Mr. McMahon to review the highlighted statement in NS Power's email and the attached ledger and meter record. The DRO requested that Mr. McMahon provide bills or evidence to support his statement regarding charges involving a second meter. This is referenced on page 14 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 4, 2025 – Mr. McMahon emailed the DRO and NS Power stating that there were two meter reads that showed incorrect, non-sequential values. This is referenced on page 15 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 4, 2025 – Mr. McMahon reiterated his previous point regarding 492 days of service being charged over a one-year period and noted that there were non-sequential meter readings on two occasions. He referenced attached images to support his statements. This is referenced on page 18 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 4, 2025 – The DRO clarified that the bill reflects a 123-day billing period between actual meter readings in July and November, adjusted by 67 days of previously estimated usage to reconcile any estimation error. The DRO requested that NS Power provide comment on the customer's recent communications. This is referenced on page 19 of 43 in the DRO file attached as **Confidential Attachment**.

- December 4, 2025 – Mr. McMahon noted that there were overlapping billing periods and also indicated that four months of charges were associated with previous bills issued less than four months ago, referencing details highlighted in red and green. This is referenced on pages 20 to 23 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 4, 2025 – Mr. McMahon indicated that there appear to be multiple discrepancies and requested fresh copies of specific bills. He noted that the billing should cover a one-year period with 12 base charges, and the total billed should reflect the difference between the first and last meter readings, with the total number of billed days being close to 365. This is referenced on pages 24 to 25 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 5, 2025 – NS Power explained that the number of days shown on the invoice reflects adjustments due to reconciliation of estimated bills. The Company confirmed that customers will not pay for power they do not use and that any differences between estimated and actual usage will be corrected in a future bill. NS Power noted that credits were applied during the reconciliation process, including $39.08 on the November invoice and $40.20 on the July invoice, for estimated energy charges from previous bills. This is referenced on page 26 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 8, 2025 – NS Power further explained that deductions listed under "Energy Charges" reflect adjustments for estimated charges since the last meter read. The Company clarified that the credit line includes both base and energy charges and provided examples of credits applied, including $40.20 and $39.08, to reconcile prior estimates. This is referenced on page 27 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 8, 2025 – Mr. McMahon requested a final comment and decision on the accuracy of the "days billed" section and the clarity of base rates and energy charges. He stated that the information should be presented in a way that aligns with GAAP accounting standards and indicated that, if the issue is not corrected, he would file a formal complaint with the NSEB. This is referenced on page 28 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 8, 2025 – The DRO clarified that his role is to review NS Power's interpretation and application of Board-approved regulations and does not extend to day-to-day operations or bill presentation format. The DRO asked Mr. McMahon whether he is satisfied that he has been appropriately billed and whether he intends to appeal to the NSEB on bill presentation only or on both matters. The DRO also requested NS Power to provide comment on the preceding email. This is referenced on page 29 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 8, 2025 – Mr. McMahon reiterated his concerns about bill presentation, stating that it includes mixed transactions not aligned with GAAP standards. He noted that he is not disputing billing amounts but is concerned about misleading information. He indicated that if there is no confirmation the matter will be addressed, he would proceed with a formal complaint within 48 hours. This is referenced on page 31 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 10, 2025 – NS Power clarified that GAAP applies to the preparation and presentation of financial statements and does not govern the format or presentation of customer bills. The Company explained that a customer bill is not a GAAP financial statement but a reconciliation of charges and credits for the billing period. NS Power noted that the credit on the adjusted bill reflects an adjustment for the estimated charges once actual meter readings are obtained and confirmed that customers are never charged twice for the same usage. This is referenced on page 32 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 10, 2025 – Mr. McMahon responded, stating that NS Power should fix its billing system so that the "days billed" are corrected and accurate after a credited bill. This is referenced on page 33 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 11, 2025 – The DRO reiterated his role, explaining that his jurisdiction is limited to investigating NS Power's interpretation and application of Board-approved regulations and does not extend to the format of bill presentation. He noted that there are no Board-approved regulations related to bill presentation and advised Mr. McMahon that he may file a complaint with the NSEB on that matter.

  The DRO asked whether Mr. McMahon is satisfied that he has been appropriately billed or wishes to receive a Final Written DRO Decision, which could be appealed to the Board. This is referenced on page 34 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 13, 2025 – The DRO issued his Final Written Decision pertaining to this appeal, finding as follows:

  > In the context of Board approved Regulation 5.1, N.S. Power has appropriately billed the Customer for service to [redacted] (Account #[redacted]).

  This is referenced on pages 37 to 38 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 17, 2025 – Mr. McMahon stated that the "Final Decision" does not address his dispute regarding the inaccurate number of days billed indicated on the right-hand side of the invoice. He noted that NS Power had previously confirmed this reporting was inaccurate and requested confirmation of the decision regarding this issue. He attached an image highlighting prior correspondence indicating that the number of days shown on the invoice was inaccurate due to reconciliation adjustments and asked that all issues be addressed in the Final Decision. This is referenced on pages 39 to 40 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 19, 2025 – The DRO advised that if the decision is not acceptable, Mr. McMahon should appeal to the NSEB and provided the Board's contact information. This is referenced on page 41 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 19, 2025 – Mr. McMahon stated that if NS Power is refusing to respond to his dispute, he would accept an email confirming this as their response. He noted that the Final Decision should address all disputes and indicated that the dispute regarding "Inaccurate Past Use Displayed on Billing Invoice" was omitted. He warned that failure to respond would create two disputes with the NSEB: (1) NS Power refusing to respond to a dispute, and (2) NS Power displaying inaccurate past use on billing invoices. This is referenced on pages 41 to 42 of 43 in the DRO file attached as **Confidential Attachment 1**.

- December 20, 2025 – Mr. McMahon appealed the DRO's decision with the NSEB.

NS Power agrees with the DRO's decision that NS Power has appropriately billed the customer.

Billing Reconciliation

Following the cyber incident, NS Power was unable to access meter data because meters could not transmit information remotely via the Advanced Metering Infrastructure (AMI) network. As a result, most bills issued prior to July 2025 were based on estimated consumption. To ensure billing reflected actual energy usage, NS Power began manual meter reading in late June. As actual readings were obtained, any discrepancies between estimated and actual consumption were reconciled through adjustments on subsequent bills, in accordance with Section 5.1 of the Regulations.

Mr. McMahon's bill dated May 14, 2025, was based on an estimated usage of 10 kWh for the 63-day period from March 12 to May 14. This estimate resulted in energy charges of $1.86 and a base charge of $38.34, bringing total charges before tax adjustments to $40.20. As noted above, copies of Mr. McMahon's bills from 2025 have been attached as **Confidential Attachment 2** for reference.

An actual meter read was obtained on July 10, 2025, showing a reading of 744.00. This was the first actual read following the period of estimated billing; the previous actual read was 741.45 on March 12, 2025. Based on these readings, NS Power calculated consumption of 3 kWh between March 12 and July 10, a period of 120 days. This replaced the previously estimated usage and formed the basis of the July 2025 bill. As part of the reconciliation process, NS Power credited $40.20 for the estimated energy charges previously billed in May and applied the correct charges for the full-service period, bringing the total amount due to $37.04 before tax adjustments.[1]

[1] Please note that refunds appear under the line titled "Energy" as a single consolidated credit. This credit represents the total of both the estimated energy charges and the base charges for the estimated period.

The subsequent bill dated September 15, 2025, was based on an estimated usage of 4 kWh for the 67-day period from July 10 to September 15. The energy charges on this bill were $0.74, with a base charge of $38.34, bringing total charges before tax adjustments to $39.08. The next bill, dated November 14, 2025, reconciled this estimate after an actual read confirmed no usage since the last actual read taken on July 10. As part of this billing, NS Power refunded the full amount of the September estimate, ensuring Mr. McMahon was charged only for electricity actually used during that period.

These reconciliations confirm that Mr. McMahon was charged only for electricity actually used and that estimated charges were replaced with actual usage data in accordance with Section 5.1 of the Regulations. Customers do not pay for power they do not use and any differences between estimated and actual usage are corrected through credits or adjustments on subsequent bills.

"Past electric use" Section

Mr. McMahon also raised concerns about the "Past electric use" section on his bills. He noted that summing the intervals shown (62 + 57 + 63 + 120 + 67 + 123) results in 492 days. This occurs because the display includes both the original estimated intervals and the later reconciled intervals that cover the same spans of time. In NS Power's billing process, a reconciled period replaces the earlier estimate for that identical interval. Specifically, the March 12 to May 14 estimate (63 days) is encompassed within the March 12 to July 10 reconciliation (120 days), and the July 10 to September 15 estimate (67 days) is encompassed within the July 10 to November 10 reconciliation (123 days). Removing those overlapping estimates from the calculation (492 – 63 – 67 = 362) produces the correct total, which matches the actual service period from November 13, 2024, to November 10, 2025 (362 days).

NS Power acknowledges that the current bill format may cause confusion when estimated intervals are later reconciled. While the underlying calculations remain accurate, the Company intends to enhance the clarity of bill presentation through its Customer Information System (CIS) modernization initiative, as outlined in M11884. Interim modifications to the legacy CIS are not feasible due to the complexity of the bill print program, the risk of unintended impacts across all customer bills, and the specialized resources required to maintain the current system while preparing for its replacement. Accordingly, NS Power will focus on implementing improvements once the new CIS is in place, leveraging its enhanced capabilities for clearer and more customer-friendly billing.

Conclusion

The Company sincerely apologizes for any confusion caused by estimated billing. The

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Company recognizes that this situation has been challenging for customers and appreciates their patience as accounts are reconciled based on actual usage. To support customers during this process, NS Power is not applying late fees or penalties on any outstanding balances. Customers will be notified in advance before late fees on unpaid amounts are reinstated.

Please consider the enclosed information confidential due to the personal nature of the information that has been provided. NS Power has forwarded a copy of this correspondence to Mr. McMahon by e-mail.

Yours truly,

Kathleen Murray

Kathleen Murray
Regulatory Counsel

Encl.

c. Mr. Michel McMahon

McMahon DRO Appeal Reply Confidential Attachment 1 has been removed due to confidentiality.

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McMahon DRO Appeal Reply Confidential Attachment 2 has been removed due to confidentiality.