

Extra Large Industrial Active Demand Control (ELIADC) Tariff
2025 Annual Report (NSEB M12768)
NSPI Responses to BW Information Requests

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Request IR-1:

For each month of 2025, please provide:

(a) ELIADC Energy Charge

(b) CBL Energy Charge

(c) Customer Baseline Adder

(d) Variable Capital Charge

Response IR-1:

(a-d) Please refer to page 2 of 3 of the Report Attachment. Note that the Customer Baseline Adder is the “ADC Differential” which is not charged or credited to PHP each month but is calculated at the end of the Tariff year. The Variable Capital Charge is found at page 1 of 3 of the Report Attachment, under the heading “Var Capital Adder.”

Extra Large Industrial Active Demand Control (ELIADC) Tariff

2025 Annual Report (NSEB M12768)

NSPI Responses to BW Information Requests

CONFIDENTIAL (Attachment Only)

1 **Request IR-2:**

2
3 **Please provide the calculation of the CBL Energy Charge for 2025. Please provide in Excel**
4 **format with all formulas intact.**

5
6 Response IR-2:

7
8 Please refer to Confidential Attachment 1. This was also provided as Confidential Appendix G2,
9 filed as Exhibit N-1(C)(i) in the 2025 Annually Adjusted Rates Application (M11989) proceeding.

2025 ELIADC BW IR-2 Confidential Attachment 1 has been removed due to confidentiality.

Extra Large Industrial Active Demand Control (ELIADC) Tariff
2025 Annual Report (NSEB M12768)
NSPI Responses to BW Information Requests

NON-CONFIDENTIAL

1 **Request IR-3:**

2
3 **Please refer to PDF page 2, where NSPI states:**

4
5 **“PHP will be billed the cost to serve above the amount that was collected on a**
6 **monthly basis, in addition to the \$4/MWh and other applicable fixed costs, to**
7 **ensure compliance with the Tariff. NS Power will include the required**
8 **adjustment of \$149,304, taking into account all of PHP’s payments during the**
9 **year, on PHP’s upcoming bill.”**

10
11 **(a) Please provide the total adjustment that will be added/credited to PHP’s “upcoming**
12 **bill” related to the 2025 ELIADC results.**

13
14 **(b) Please provide supporting calculations and line items (e.g., “cost to serve,” “amount**
15 **collected”) that were used to determine the value in (a).**

16
17 **(c) What are the “other applicable fixed costs” referenced in this statement?**

18
19 **Response IR-3:**

20
21 **(a-b) The total adjustment that will be added to PHP’s upcoming bill related to the 2025 ELIADC**
22 **Tariff results will be \$149,304. Please refer to IG IR-4 for a detailed breakdown of this**
23 **calculation. For supporting calculations, please refer to BW IR-7.**

24
25 **(c) The other applicable costs referenced in the quoted statement are the Variable Operating**
26 **& Maintenance Charge and the Variable Capital Cost.**

Extra Large Industrial Active Demand Control (ELIADC) Tariff
2025 Annual Report (NSEB M12768)
NSPI Responses to BW Information Requests

NON-CONFIDENTIAL

Request IR-4:

Please refer to PDF page 3, “Operation Summary.”

- (a) Did the cyber event have any impact on the process by which NSPI schedules PHP’s hourly load? Please explain.**
- (b) Please explain the NSPSO’s role in helping to administer the ELIADC Tariff both before and after the cyber event.**
- (c) Did the cyber event impact the availability of data relevant to the administration or reporting of the ELIADC Tariff? Please explain.**

Response IR-4:

- (a)** Due to the cyber incident, the last PortOps-generated day-ahead schedule was sent to PHP on April 25, 2025. In the absence of PortOps, the NS Power Energy & Risk Management group (NS Power ER&M) used PLEXOS to create optimized hourly load schedules for PHP. Historically, the PortOps and PLEXOS models consistently scheduled PHP at high loads overnight in the off-peak hours and reduced loads during the on-peak hours.

From April 26 to May 25, 2025, no schedules were sent from NS Power to PHP. However, with the suspended Open Access Transmission Tariff (OATT) Standards of Conduct, increased communication between NS Power ER&M and the Nova Scotia Power System Operator (NSPSO) was authorized. During this period, NS Power ER&M and the NSPSO worked collaboratively with PHP to discuss opportunities to serve PHP’s business needs while optimizing system dispatch. Day-ahead schedules resumed on May 26, 2025, and real-time schedules to PHP resumed on August 5, 2025, following the restoration of additional IT systems and hardware.

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2025 Annual Report (NSEB M12768)
NSPI Responses to BW Information Requests

NON-CONFIDENTIAL

1 (b) Both NS Power E&RM and the NSPSO have roles in the administration of the ELIADC
2 Tariff. Under normal operating conditions (pre-cyber incident), these roles are as
3 prescribed in Schedule 1: Active Demand Control Energy Supply Protocols to the ELIADC
4 Tariff, which are provided as IG IR-3 Attachment 1.

5
6 In the initial days following the cyber incident, the NSPSO suspended the OATT Standards
7 of Conduct which authorized the closer collaboration with NS Power ER&M and PHP to
8 meet PHP business needs while ensuring economic dispatch as described in part (a) and in
9 the response to IG IR-3 part (a).

10
11 (c) As it relates to the availability of data for ELIADC Tariff administration or reporting, NS
12 Power E&RM experienced the following cyber incident impacts:

- 13
- 14 • The cyber incident affected data and systems such as PI and the PortOps software's
15 availability (including front-end software and back-end databases and supporting
16 infrastructure), as well as the inputs to these systems, including generator data and
17 commodity pricing.
 - 18
 - 19 • Excel-based files which are used to process the PortOps data outputs were stored
20 on network drives which had to be vetted for cybersecurity integrity before being
21 restored.
 - 22
 - 23 • To track PHP's hourly and daily load volumes, PI data was temporarily replaced
24 with PHP meter data. Once PI data was restored, NS Power's meter data for PHP
25 was used for actual energy billing, as it has been in throughout the administration
26 of the ELIADC Tariff.
 - 27
 - 28 • NS Power ER&M had to recreate monthly and daily trackers.
 - 29

Extra Large Industrial Active Demand Control (ELIADC) Tariff
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NSPI Responses to BW Information Requests

NON-CONFIDENTIAL

1 For the NSPSO, data relevant to the administration or reporting of the ELIADC Tariff was
2 minimally impacted by the cyber incident. The web-based application used to maintain
3 System Operator logs was unavailable in the initial days of the cyber incident, resulting in
4 the need to switch to manual operator logs. System Operator logs are used to capture details
5 about system events, such as loss of a generating unit, which may result in the need to re-
6 dispatch PHP in real-time.

Extra Large Industrial Active Demand Control (ELIADC) Tariff
2025 Annual Report (NSEB M12768)
NSPI Responses to BW Information Requests

NON-CONFIDENTIAL

Request IR-5:

Please refer to PDF page 3, “Load Variations.” Did PHP’s lower-than-forecasted demand increase system costs, such as through retention of higher capacity, higher reserves, greater unit commitment, or greater long-term fuel or power contracting? Please explain and quantify these additional costs, if applicable.

Response IR-5:

Through the modeling done in PortOps, PHP pays for all generation which served its demand. PHP’s lower-than-forecasted demand did not impact any of NS Power’s longer-term procurement decisions such as gas and power RFPs. NS Power does not currently include PHP load in its long-term procurement decisions.

Extra Large Industrial Active Demand Control (ELIADC) Tariff
2025 Annual Report (NSEB M12768)
NSPI Responses to BW Information Requests

CONFIDENTIAL (Attachment Only)

Request IR-6:

Please refer to PDF page 4, “Off-Schedule Summary” and “Other Code Summary.”

(a) Please indicate if, from NSPI’s perspective, the cyber event increased, decreased, or otherwise changed the likelihood of the following cause codes:

(i) Cause Code 1

(ii) Cause Code 2

(iii) Cause Code 3

(iv) Cause Code 4

(v) Cause Code 5

(vi) Please include narrative explanations for the answers (a-e)

(b) Please explain the “shift in PHP’s dispatch process.”

(c) Does NSPI agree that the difference between Cause Code 4 and Cause Code 5 is whether NSPSO agrees to a PHP-requested new dispatch (Cause Code 4) or not (Cause Code 5)? Please explain.

(d) In determining whether to accommodate a PHP request to deviate from a “submitted schedule,” will NSPSO reject the request if it increases system costs? Please explain.

(e) Why were Cause Code 1, 2, and 4 instances not being tracked, post cyber event?

Extra Large Industrial Active Demand Control (ELIADC) Tariff
2025 Annual Report (NSEB M12768)
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CONFIDENTIAL (Attachment Only)

1 **(f) Was PHP receiving a daily day-ahead schedule from NSPI, post cyber event?**

2
3 **(g) For Cause Code 5 instances, what “submitted schedule” did PHP deviate from? Day-**
4 **ahead? Real-time?**

5
6 **(h) Please provide the “submitted schedules” that are the basis for all 95 hours referenced**
7 **in the “Off-Schedule Summary” section.**

8
9 Response IR-6:

10
11 (a-b) Other than the period in which Cause Codes 1, 2, and 4 were not applicable due to the
12 change in PHP’s dispatch process described further below, the cyber incident did not affect
13 the incidence of any of the Cause Codes.

14
15 Following the cyber incident, from late-April through early-August, PHP was being
16 dispatched in real time in coordination with the Nova Scotia Power System Operator
17 (NSPSO). As such, Cause Codes 1, 2, and 4 were not applicable, as the actions that those
18 Codes pertain to were inherent parts of PHP’s dispatch process during that time. Once the
19 NS Power Energy & Risk Management group (NS Power ER&M) resumed creating
20 schedules for PHP in early-August, the tracking of all five Cause Codes resumed.

21
22 Please also refer to NS Power’s 2025 Q2 FAM Quarterly Report, page 8 (note 2), and 2025
23 Q3 FAM Quarterly Report, page 8 (note 2).

24
25 (c) No. Cause Code 5 can also apply to situations where PHP is not initiating schedule changes
26 but is deviating from an existing NS Power schedule.

27
28 (d) An increase in system costs is most often associated with periods when capacity becomes
29 scarce. Should PHP request to deviate from schedule by increasing load at a time when the

Extra Large Industrial Active Demand Control (ELIADC) Tariff
2025 Annual Report (NSEB M12768)
NSPI Responses to BW Information Requests

CONFIDENTIAL (Attachment Only)

1 System Operator does not have the capacity available, the System Operator will deny the
2 request and thus avoid increasing system costs. Furthermore, under the ELIADC Tariff,
3 PHP pays the cost of the generation which served its load.
4

5 PHP requests to deviate from schedule by reducing load arise most often from issues with
6 the PHP production facility and, therefore, are generally not associated with increases in
7 system costs.
8

9 (e) Please refer to part (a-b).
10

11 (f) Yes. Day-ahead schedules for PHP resumed on May 26, 2025.
12

13 (g) Schedule deviations were from the real-time schedule.
14

15 (h) Please refer to Confidential Attachment 1. Please note that there are no schedules for the
16 Cause Code 5 instances prior to August 5, 2025, due to the circumstances explained in the
17 response to parts (a-b).

2025 ELIADC BW IR-6 Confidential Attachment 1 has been removed due to confidentiality.

Extra Large Industrial Active Demand Control (ELIADC) Tariff
2025 Annual Report (NSEB M12768)
NSPI Responses to BW Information Requests

CONFIDENTIAL (Attachment Only)

1 **Request IR-7:**

2
3 **Please refer to PDF page 10. Please provide this page in Excel format with all formulas**
4 **intact.**

5
6 Response IR-7:

7
8 Please refer to Confidential Attachment 1.

9
10 Note that Confidential Attachment 1 contains both confidential and non-confidential information.
11 In accordance with Board filing requirements, Excel files cannot be partially redacted and,
12 therefore, cannot be filed as partially confidential.

13
14 To enable public disclosure of all non-confidential information, the same content was also filed as
15 partially confidential – i.e. the Report Attachment in PDF format with confidential information
16 redacted. No partially confidential Excel version is available.

2025 ELIADC BW IR-7 Confidential Attachment 1 has been removed due to confidentiality.

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1 **Request IR-8:**

2
3 **Please refer to PDF page 11. Please provide this page in Excel format with all formulas**
4 **intact.**

5
6 Response IR-8:

7
8 Please refer to BW IR-7 Confidential Attachment 1.

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1 **Request IR-9:**

2
3 **Please refer to PDF page 12. Please provide this page in Excel format with all formulas**
4 **intact.**

5
6 Response IR-9:

7
8 Please refer to BW IR-7 Confidential Attachment 1.

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1 **Request IR-10:**

2

3 **Please confirm no top up payments were made during 2025.**

4

5 Response IR-10:

6

7 Confirmed.