

NOVA SCOTIA ENERGY BOARD

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

-and-

IN THE MATTER OF: **AN APPLICATION by NOVA SCOTIA POWER INCORPORATED
for approval of an Extra Large Industrial Dispatchable Above-
the-Line Tariff applicable to Port Hawkesbury Paper**

BATES WHITE INFORMATION REQUESTS RESPONSES

To: **Blake Williams**
VP, Legal and Regulatory
Nova Scotia Power Inc.
1223 Lower Water Street
Halifax, NS B3J 3S2
Blake.williams@nspower.ca

From: Vincent Musco
Collin Cain
Bates White Economic Consulting

Responses Due: **Thursday, June 18, 2026**

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Vincent Musco**
Bates White Economic Consulting
Tel: (202) 652-2180
Fax: (202) 408-7838
Email: vincent.musco@bateswhite.com

Issued at Halifax, Nova Scotia, this 18th day of June 2026.

1 **Request IR-1:**

2 Does Bates White consider the proposed ELID Tariff to be consistent with:

3 (a) The provisions of the General Rate Application Settlement Agreement? If
4 not, please explain why not.

5 (b) The provisions of the Power Sales Agreement? If not, please explain why
6 not.

7 **Response IR-1:**

- 8 (a) As it relates to our scope of work explained at page 7 of our Evidence, we identified no
9 inconsistencies between the ELID Tariff proposal and the GRA Settlement Agreement.
- 10 (b) Our Evidence did not identify any inconsistencies between the proposed ELID Tariff and
11 the Goose Harbour Power Sales Agreement, but rather that the PSA's terms disrupt the
12 likelihood of PHP paying its properly allocated embedded costs as an above-the-line
13 customers under the proposed ELID Tariff. Please see, for example, our Evidence at
14 page 8 lines 5 to 21.