

**M12661 - An Application by NS Power for approval of an Extra Large Industrial Dispatchable Above-the-Line Tariff applicable to Port Hawkesbury Paper ("PHP")**

***Redacted Undertaking Responses of PHP***

**Undertaking U-16:**

**To indicate when PHP understood that there was a disagreement with the utility's position about the 3-CP demand to be used.**

**Response Undertaking U-16:**

The Settlement Agreement was signed on August 28, 2025. PHP understood that the proposed final version of the Settlement Agreement that was executed by the Parties included language expressly stating that it remains open for all Parties to take any position they so choose in the Tariff and ADC processes.

As part of its subsequent discussions with NS Power in October and November 2025 leading up to the filing of the Tariff, which included further discussion on items such as the value of priority interruption and the reliability benefits of the Dispatchability Rider, PHP advised NS Power it was continuing to evaluate whether it would be more appropriate for PHP's interruptible load to be set at 0 MW rather than 57 MW, and requested and reviewed further modeling to this effect.

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**Undertaking U-17**

**To confirm that there is no data request on the record before the Settlement Agreement was signed in which PHP requested modelling for billing determinants other than 810 GWh of energy, with 8MW of firm demand and 65 MW of total demand at the time of NS Power's 3CP.**

**Response Undertaking U-17**

PHP can confirm the only Data Request submitted as part of the stakeholder process with respect to PHP costing determinants was PHP 4-01, in which PHP requested, in part, that: "PHP's interruptible load will be modelled at actual PHP metered load at the time of NS Power's 3CP (65MW for this model)." The value of the interruptible credit in the model provided in response to PHP 4-01 was calculated in accordance with NS Power's established practice for pricing the interruptible credit.

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**Undertaking U-18:**

**To confirm how PHP communicated to other Intervenorors that it was dissatisfied with the costing determinants used by NS Power and if communicated in writing, to provide the document.**

**Response Undertaking U-18:**

PHP is not aware of any communications in which PHP expressed dissatisfaction with the modelled costing determinants that are embedded in the Cost-of-Service Study for GRA settlement purposes. PHP understood that the proposed final version of the Settlement Agreement that was executed by the Parties included language expressly stating that it remains open for all Parties to take any position they so choose in the Tariff and ADC processes, and that a deferral account would be established to address any revenue variances from the GRA cost-of-service modelling assumptions.

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**Undertaking U-19:**

**Provide the shift log and any other records in the care, custody and control of PHP showing information relating to the call for interruption and its conclusion on January 9, 2021.**

**Response Undertaking U-19:**

The following three entries are from PHP's plant apps application in relation to the interruption call of January 9, 2021. Note the first two entries contain information relating to NSPSO operations, including System Operator comments and details regarding interruption directives, and have been redacted at the request of NS Power:

[09-Jan-2021 00:35:37] uPH33CON

[REDACTED]

[09-Jan-2021 22:37:40] uPH33CON

[REDACTED]

[10-Jan-2021 02:47:55] uPH33CON

Lots of problems after the interruption as would be expected. Lost mill and instrument air for quite some time and took a while to get stable when it returned. Treated pumps needed resets as did the chillers. Went up manually restarted all of the kidney pumps at the preses. A batch of refiner bay lights didn't come back on above the rejects refiners. Communication problems with the reject refiners as well as S1 PLC. L3 LCI also needs to be reset. Electricians tied up focusing on R2 problem.

[illegible]

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**Undertaking U-21:**

**To respond to the question posed at the bottom of page 3 of PHP's Reply Evidence (Exhibit N-37), using a P50 value.**

**Response Undertaking U-21:**

For ease of reference, the question and answer at the bottom of page 3 of PHP's Reply Evidence is as follows:

"Q. Using the forecast load of 774,000 MWh which PHP had provided to NS Power and the P90 value for 168 MW of 528,000 MWh yields what net load to be served by NS Power.

A. 246,000 MWh."

The P50 value for 168 MW from the same source is 577,200 MWs, so the answer to the question at page 3 of the Reply would be 196,800 MWh as opposed to 246,000 MWh.