

NOVA SCOTIA ENERGY BOARD

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

IN THE MATTER OF: **Application by Nova Scotia Power Inc. for Approval of an
Extra Large Industrial Dispatchable Above-the-Line
Tariff Applicable to Port Hawkesbury Paper**

INFORMATION REQUESTS
(NON-CONFIDENTIAL)

To: **Bevan Lock and John Esaiw
Port Hawkesbury Paper
c/o Melanie Gillis
McInnes Cooper**

From: Small Business Advocate

Responses Due: April 10, 2026

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Melissa P. MacAdam
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Issued at Bedford, Nova Scotia on this 12th day of March, 2026

1 **Request IR-1:**

2 Refer to M12661, Exhibit N-3, Direct Evidence of Port Hawkesbury Paper (“PHP”) (the “PHP
3 Evidence”). Regarding the statement, on page 5, line 3-6:

4 DA and RT Schedules can range from longer periods of stable load level, to being dispatched
5 down to base load for days at a time and not knowing the exact timing of when PHP will have
6 available power to produce paper
7 please provide the following information for events occurring between 2020 to present:
8

- 9 a) The reason NS Power initiated the event – i.e. active demand control (“ADC”),
10 interruptible rider, operational emergency or other reason.
11 b) The duration of the event, with start and end dates.
12 c) The base load reduction during the event and whether that was continuous across all hours.
13 d) The 5-minute interval load data in native spreadsheets as defined in the Extra Large
14 Industrial Dispatchable (“ELID”) tariff, as described in Exhibit N-1, Extra Large Industrial
15 Dispatchable Tariff Application – Attachment 1. Page 6 of 8. Paragraph 4.
16

17 **Request IR-2:**

18 Refer to M12661, Exhibit N-3, the PHP Evidence, page 6, lines 6-7, where it states, in reference
19 to the benefits that ADC provides the grid, “If this practice is expected to continue, an improved
20 tariff protocol will be required, if PHP chooses to move to the ELID tariff” and:

- 21 a) Please identify specifically which provisions within the tariff PHP believes need to be
22 improved under the ELID relative to ELIADC, for example:
23 (i) Reliability events
24 (ii) How each event is counted toward the allowed annual/hourly limit.¹
25 (iii) Dispatch communication
26 (iv) Other
27 b) Of the provisions within the tariff listed that PHP believes need improvement, which have
28 already been addressed in NS Power’s ELID filing and which remain unaddressed?
29 c) Please provide a redline version of NS Power’s ELID that would address all issues.
30

31 **Request IR-3:**

32 Refer to M12661, Exhibit N-3, the PHP Evidence. Regarding PHP’s desire to move to an above
33 the line (“ATL”) tariff, please answer the following:

- 34 a) Does PHP believe that the ATL ELID tariff should be designed as an embedded or marginal
35 based rate or combination?
36 b) If PHP supports a marginal-cost-based design, please explain how marginal pricing is
37 compatible with PHP’s stated objective of greater price stability under an ATL tariff.
38 c) If PHP supports a combination of embedded and marginal costs for the ELID tariff, does
39 PHP believe that this should apply for other ATL customers?
40

41 **Request IR-4:**

42 If PHP did not take service under the new ELID tariff:

- 43 a) When does PHP understand the development of a new tariff would occur?

- 1 b) Would it be a new ATL or a below-the-line tariff?
2 c) Would PHP require interim service if the alternative tariff was not developed prior to
3 January 1, 2027? If so, under what rate?
4

5 **Request IR-5:**

6 Refer to M12661, Exhibit N-2, Evidence of Colin T. Fitzhenry and Michael G. Gorman on behalf
7 of PHP, page 18, lines 5-23 and page 19, lines 1-6. specifically, the use of three coincident peak
8 (“3-CP”) and cost-causation principle guidance provided by the National Association of
9 Regulatory Utility Commissioners (“NARUC”), please answer the following:
10

- 11 a) Identify the National Association of Regulatory Utility Commissioners (“NARUC”)
12 Manual that you rely on to
13 (i) exclude interruptible capacity from CP allocations,
14 (ii) exclusion of a representative CP for controlled load, and
15 (iii) requirement to treat allocation of CP inclusive of full interruptible ability.
16 b) If the NARUC Manual does not expressly address interruptible loads, please state that cost-
17 causation principal claims are a matter of interpretation, or if NARUC Manual does,
18 provide a direct citation.
19 c) If the maximum interruptible hours are met in a month, i.e. more than 16 hours in a day
20 15% in a year or 30% in a month, would PHP still reduce load?
21 d) Could PHP not perform, i.e. not interrupt, when called by NS Power to interrupt. ?
22 e) What is the proposed penalty if PHP does not perform during an interruptible event?
23 f) Provide an example of penalty of non-performance during the last three interruptible
24 events.
25 g) Provide your proposed statistical method for developing a 3-CP allocator for a controlled
26 large load with formulas intact and in alignment with NARUC principles.
27 h) Explain why the historic contribution to peak as used by NS Power is not appropriate.
28 i) If 65MWs reflects the historical reliance of interruptibility (including suppressed meter
29 readings), why is this not an appropriate allocation?
30
31

32 **Request IR-6:**

33
34 Refer to M12661, Exhibit N-2, Evidence of Colin T. Fitzhenry and Michael G. Gorman on behalf
35 of PHP, regarding the non-fuel savings created by the Dispatchable Rider (“DR”), please answer
36 the following:
37

- 38 a) Does PHP believe the DR component should include avoided transmission and production
39 capacity costs? Please explain.
40 b) Does PHP believe the DR credit, as PHP proposes, would overlap with the interruptible
41 credit? Please explain.
42 c) Does PHP believe that the DR credit, as proposed by NS Power, fully passes the benefits
43 related to energy dispatch savings to PHP? Please explain.

- 1 d) Provide a table to show which credit is associated with each value attribute, i.e. generation
2 capacity, transmission capacity, ancillary service, etc. included in DR credit, interruptible
3 credit, priority credit, or unaccounted.
4

5 **Request IR-7:**
6

7 Refer to M12661, Exhibit N-2, Evidence of Colin T. Fitzhenry and Michael G. Gorman on behalf
8 of PHP, regarding the utilization of the marginal cost of capacity at \$13.107/kVa for the
9 interruptible credit, beginning at page 20 line 14 through page 22 line 7, and please answer the
10 following:
11

- 12 a) Confirm that PHP has not provided its own estimate of the value of capacity but is
13 referencing NS Power's estimate.
14 b) Does PHP believe that its performance should be valued as if no limits to its availability to
15 be called? Please explain.
16 c) Has PHP determined an accredited capacity factor to incorporate interruptibility? If so,
17 please provide with formulas intact.
18 d) Does PHP believe that a DR credit is duplicative if provided the full avoided cost of
19 capacity? Please explain.
20 e) Does PHP believe that it provides the same interruptible benefit as LIIR customers? Please
21 explain.
22

23 **Request IR-8:**
24

25 Refer to M12661, Exhibit N-2, Evidence of Colin T. Fitzhenry and Michael G. Gorman on behalf
26 of PHP, regarding the transmission avoided costs, please answer the following:
27

- 28 a) Identify the NS Power studies relied on to claim, at page 18, lines 1-2, "...PHP's demand
29 is minimal during system peaks."
30 b) For an N-1 contingency assessment, as referenced at page 17, list all high-voltage system
31 upgrades that would be triggered when PHP's winter coincident peak contribution is
32 modeled at:
33 (i) 65MW
34 (ii) PHP's actual load during most recent CP hour
35 (iii) at 8 MW
36 c) Is PHP recommending an additional credit for transmission capacity? Please explain.
37
38