M12661

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: **THE PUBLIC UTILITIES ACT**

- and -

IN THE MATTER OF: **Nova Scotia Power's Application for Approval of an Above-the-Line Tariff Applicable to Port Hawkesbury Paper**

INFORMATION REQUESTS

To: **Nova Scotia Power Inc.**
Blake Williams
Senior Regulatory Counsel
By e-mail: blake.williams@nspower.ca

From: **Bates White LLC**

Responses Due: **Thursday, March 26, 2026**

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Vincent Musco**
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Issued at Halifax, Nova Scotia, this 12th day of March 2026.

Crystal Henwood

Crystal Henwood, Clerk of the Board

Request IR-1: Please refer to Exhibit N-1, section 2.1 and Attachment 3.

a) Why did NSPI select the "low range" of costs as the basis for calculating the Customer Charge?
b) If the actual costs to administer the tariff exceed the "low range," who will pay the additional costs?
c) Please provide NSPI's estimates of labor hours and assumed hourly rates for each line item identified in Attachment 3. If no such assumptions exist, please explain the basis for the cost estimates.

Request IR-2: Please refer to Exhibit N-1, Attachment 4, and Exhibit N-3, page 8 lines 25-27.

a) If PHP's request is granted to update the forecast energy requirements for PHP in 2026 and 2027, would the change impact other FAM customers? Please explain.
b) Please provide the estimated Energy Charge for PHP in 2026 and 2027 assuming PHP's request to update the forecast energy requirements for PHP in 2026 and 2027 is granted.
c) Please provide the estimated changes to rates of other FAM customers assuming PHP's request to update the forecast energy requirements for PHP in 2026 and 2027 is granted.
d) In NSPI's view, is PHP's request to update the forecast energy requirements for PHP in 2026 and 2027 a contravention of the GRA Settlement Agreement terms, to which PHP was a signatory? Please explain.

Request IR-3: Please refer to Exhibit N-3, page 10 lines 5 to 7.

a) If PHP's request is granted to update the forecast generation from PHP Wind in 2026 and 2027, would the change impact other FAM customers? Please explain.

b) Please provide the estimated Energy Charge for PHP in 2026 and 2027 assuming PHP's request to update the forecast generation from PHP Wind in 2026 and 2027 is granted.

c) Please provide the estimated changes to rates of other FAM customers assuming PHP's request to update the forecast generation from PHP Wind in 2026 and 2027 is granted.

d) In NSPI's view, is PHP's request to update the forecast generation from PHP Wind in 2026 and 2027 a contravention of the GRA Settlement Agreement terms, to which PHP was a signatory? Please explain.

e) Please provide the estimated Energy Charge for PHP in 2026 and 2027 assuming PHP's requests to update (i) the forecast generation from PHP Wind in 2026 and 2027 and (ii) the forecast energy requirements for PHP in 2026 and 2027 are granted.

f) Please provide the estimated changes to rates of other FAM customers in 2026 and 2027 assuming PHP's requests to update (i) the forecast generation from PHP Wind in 2026 and 2027 and (ii) the forecast energy requirements for PHP in 2026 and 2027 are granted.

Request IR-4: Please refer to Exhibit N-3, page 10 lines 3 to 7.

a) What was NSPI's role in developing or vetting PHP's referenced forecasted energy requirements for 2026 and 2027?

b) What was NSPI's role in developing or vetting PHP's referenced forecast generation from PHP Wind in 2026 and 2027?

c) Notwithstanding the answers to a) and b), has NSPI received the detailed forecast from PHP for its forecasted energy or its forecasted generation from PHP Wind? If so, what is NSPI's assessment of these forecasts?

Request IR-5: Please refer to Exhibit N-1, page 7 lines 25-27.

a) Please explain whether the ELID Tariff, as proposed, includes payments for costs associated with the FLG. If included, please identify which tariff provision(s) (i.e., Energy Charge) reflect and recover those costs.

b) If not included in the ELID Tariff as proposed, please explain how the ELID Tariff would allow for the recovery of FLG costs from PHP, assuming the ongoing Court proceedings result in an unfavorable outcome for PHP on that issue.

Request IR-6: Please refer to Exhibit N-1, section 2.3.

a) Please provide PHP's annual energy demand forecast for 2020, 2021, 2022, 2023, 2024, and 2025. For clarity, this request refers to forecasts developed by PHP and provided to NSPI.

b) Please provide PHP's actual annual energy demand for 2020, 2021, 2022, 2023, 2024, and 2025.

c) Please provide NSPI's annual forecast of PHP's energy demand for 2020, 2021, 2022, 2023, 2024, and 2025.

d) Assume the Energy Charges for 2026 and 2027, respectively, are accepted as proposed. Please also assume PHP consumes 25% more energy in both years than was assumed in Exhibit N-1. Please explain the impact of this higher energy consumption on the anticipated FAM balance, all else equal.

e) Assume the Energy Charges for 2026 and 2027, respectively, are accepted as proposed. Please also assume PHP consumes 25% less energy in both years than was assumed in Exhibit N-1. Please explain the impact of this lower energy consumption on the anticipated FAM balance, all else equal.

f) Assume the Energy Charges for 2026 and 2027, respectively, are accepted as proposed. Please also assume the Goose Harbour Wind Farm produces 25% less energy in 2027 than was assumed in Exhibit N-1. Please explain the impact of this lower energy production on the anticipated FAM balance, all else equal.

g) Assume the Energy Charges for 2026 and 2027, respectively, are accepted as proposed. Please also assume the Goose Harbour Wind Farm produces 25% more energy in 2027 than was assumed in Exhibit N-1. Please explain the impact of this higher energy production on the anticipated FAM balance, all else equal.

Request IR-7: Please refer to Exhibit N-1.

a) Does NSPI consider the ELID Tariff as offering PHP a discounted rate for power relative to other customers? Please explain.

b) Is NSPI aware of PHP's financial condition? If so, please explain PHP's understanding of PHP's financial condition.

c) If the ELID Tariff is not accepted and never goes into effect, what is NSPI's understanding of PHP's options for continuing to take power services from NSPI?

d) Please provide the rates charged to Large Industrial Interruptible customers in 2026 and 2027 for energy.

e) Please provide an estimate of PHP's annual charges for 2026 and 2027 if PHP was to take power under the existing Large Industrial Interruptible Rate. For purposes of estimation, please assume PHP's load equal to its 2025 actual load.

f) Please provide an estimate of PHP's annual charges for 2026 and 2027 under the ELID Tariff. For purposes of estimation, please assume PHP's load equal to its 2025 actual load.

g) Is the Energy Charge in any way tied to other ELID Tariff elements, or is it strictly determined based on the cost of service study? Please explain.

Request IR-8: Please refer to Exhibit N-1 page 7 lines 21-23.

a) Please provided updated cost of service Attachments referenced in the text assuming PHP takes service as a Large Industrial Interruptible customer. Please provide in Excel format.
b) Please provide updated cost of service Attachments referenced in the text assuming PHP's updated energy forecast and Goose Harbour Wind Farm output forecasts are adopted for 2026 and 2027.
c) Please provide the forecasted generation output from Goose Harbour that was incorporated into NSPI's GRA forecast for 2026 and 2027, by year.

Request IR-9: Please refer to Exhibit N-1, page 10 lines 5-7 and section 2.5.

a) Please identify "the cost of providing DR service" that "is borne by PHP." Is this a reference to the Customer Charge, or are there additional costs "borne by PHP?"
b) When NSPI refers to "dispatch" of PHP, is NSPI referencing day-ahead scheduling in any way? Please explain.
c) Under the ELID Tariff, will NSPI be providing PHP with hourly loading schedules that are based on system cost optimization? Please explain.
d) Does the ELID Tariff contain any enforcement or penalty mechanisms to ensure that PHP is following NSPI dispatch instructions? Please explain.
e) Does the ELID Tariff contain any reporting requirements associated with the dispatch of PHP that would demonstrate the value of PHP's load flexibility to justify the payment of the Dispatchable Rider? Please explain.
f) Is it NSPI's view that the Customer Baseline, which assumes PHP has incentive to consume power on a levelized basis, appropriately ignores exogenous economic forces

that impact PHP and that are unpredictable and can be larger than the incremental cost of PHP's energy consumption decisions? Please explain.

g) If PHP simply consumes less than its forecast due to exogenous factors such as lower demand for its products, is it the case that PHP will receive credits (e.g., Dispatchable Rider credits) for that lower consumption? If so, please justify this outcome. If not, please explain.

h) Please confirm that the Dispatchable Rider costs are recovered from FAM customers.

Request IR-10: Please refer to the Goose Harbour PPA and PSA.

a) Please confirm that the PPA and PSA do not account for transmission losses. If not confirmed, please explain with references to specific PPA/PSA clauses.

b) Please confirm that the ELID Tariff provides PHP with full offsetting credit for *all* output from the wind farm at the point of injection to the grid. If not confirmed, please explain with references to specific PPA/PSA clauses.

c) Please confirm that the PPA contains no penalties for PHP should the wind farm fail to reach commercial operations on time. If not confirmed, please explain with references to specific PPA/PSA clauses.

d) Please confirm that the PPA contains no penalties for PHP should the wind farm fail to reach commercial operations at any time. If not confirmed, please explain with references to specific PPA/PSA clauses.

e) Regarding curtailed energy from the wind farm:

    a. Does NSPI pay Goose Harbour under the PPA for curtailed energy? Please explain.

    b. Does PHP pay NSPI under the PSA for curtailed energy? Please explain.

    c. Please confirm that curtailed energy counts as "Expected Output" under the PPA.

d. Please confirm that curtailed energy is included in the "Subject Energy Amount" in the PSA. If not confirmed, please explain with references to specific PPA/PSA clauses.

Request IR-11: Please provide PHP hourly load for 2020, 2021, 2022, 2023, 2024, and 2025.

Request IR-12: Please refer to the Power Sales Agreement Between Nova Scotia Power Incorporated and Port Hawkesbury Paper Limited Partnership (NSPI (IG) IR-1 Attachment 2), referred to below as "the PSA".

a) With respect to the PSA Sales Agreement Fee, described under item 3 (attachment page 3 of 33), the fee is set at $2.00/MWh unless the annual "total actual Energy Demand of the Buyer Facility is less than 625,000 MWh," in which case, the fee will be $4.00/MWh.

   i. What is the basis for the respective $2.00/MWh and $4.00/MWh fee levels?

   ii. What is the basis for the 625,000 MWh threshold that determines which fee rate will apply?

   iii. Specifically, given that the fee applies on MWh quantities of the Subject Energy Amount, which is based on the Net Output and Expected Net Output of the PHPW wind generation facility, why is the threshold for determining which rate applies based on PHP energy use?

b) For each calendar month of 2027, please provide estimated values for NSPI's average monthly Marginal Cost Rate (consistent with the meaning of that term applied in PPA).

Request IR-13: Please refer to the Power Purchase Agreement for Renewable Energy Between Nova Scotia Power Incorporated and Port Hawkesbury Paper Wind Ltd (NSPI (IG) IR-1

Attachment 1), referred to below as “the PPA”. The associated wind generation facility is referred to as “PHPW”.

a) If the Name Plate Capacity of the PHPW facility is the maximum 168 MW rather than the minimum 130.5 MW, would the Energy Bid scale proportionally? In other words, would the Energy Bid then equal 507,400 MWh/year x 168/130.5, or approximately 653,205 MW?

b) Provide the estimated P50 annual net output of the PHPW facility for the 130.5 MW and 168 MW Name Plate Capacity cases.

c) For each calendar month of 2027, please provide estimated values for the following:

   a. PHPW average Net Output at the P90 level, for 130.5 MW and 168 MW Name Plate Capacity

   b. PHPW average Net Output at the P50 level, for 130.5 and 168 MW Name Plate Capacity

   c. For all of the monthly PHPW Net Output levels, provide estimated volumes of Expected Output in excess of Net Output (e.g., estimated volumes of potential output that is curtailed or otherwise not dispatched)

Request IR-14: To the extent that any of the requested data are not provided in response to any IR in this set, provide an explanation as to why the information is not available, and provide, alternatively, any other relevant data, including historical data, and any other relevant information and explanation.