2025 **M12661**

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: ***The Public Utilities Act***

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**

INFORMATION REQUESTS

To:	Port Hawkesbury Paper ("PHP")
From:	The Industrial Group
Responses Due:	April 10, 2026
Contact Person	Nancy G. Rubin, K.C. Brianne Rudderham Stewart McKelvey Suite 600-1741 Lower Water Street P.O. Box 997 Halifax NS B3J 2X2 Telephone: (902) 420-3200 / Fax (902) 420-1417

Issued at Halifax, Nova Scotia, this 13th day of March 2026.

Request IR-1:

Reference: N-1, ELID Application, page 3.

Preamble: NSPI's Application states that *"[t]he Tariff costing and billing parameters are applied as noted in the Settlement Agreement (SA) which underpins the Company's 2026-2027 General Rate Application (GRA) (M12451) currently before the Board."* The SA has been provided as Attachment 4 to the Application.

(a) Please confirm whether PHP considers the ELID Tariff as filed to be consistent with the term of the M12451 Settlement Agreement relating to PHP treatment, including items (a) through (g) of the PHP Treatment section of Schedule "A."

(b) If not confirmed, please identify each provision of the proposed ELID Tariff that departs from, or goes beyond, the Settlement Agreement, and explain the nature of each such departure.

Request IR-2:

Preamble: **NSPI's evidence states that optimal dispatch of PHP's load could yield system savings of $7–$11 million annually – which would accrue to PHP under the DR credit – but that realized savings may be approximately half that amount.**

(a) Provide PHP's and/or BAI's assessment of the reasonableness of this range, including any independent production-cost modelling or analysis conducted or reviewed by BAI in support of that assessment.

(b) Identify the key assumptions and constraints that drive the difference between "optimal" and "realized" dispatch savings, including which of those constraints are within PHP's control versus NSPI's control.

Request IR-3:

Reference: N-2, Evidence of C. Fitzhenry and M. Gorman, page 3.

Preamble: PHP's consultant, Brubaker & Associates, Inc., states that the current ELID R/C ratio is 1.04373 and recommends an R/C ratio of 1.0 "*ensuring PHP pays its cost to serve without subsidizing or being subsidized by other classes.*"

(a) Please confirm that PHP agreed to an R/C ratio of higher than 1.0 within the GRA (M12451) proceeding?

(b) Identify the regulatory principle or precedent relied upon by PHP for the proposition that an R/C ratio above 1.0, but within the Board's approved range, is inappropriate for a new ATL tariff class and provide all supporting decisions or regulatory orders.

(c) Provide PHP's calculation (or BAI's) of the revenue requirement that would result from applying a R/C ratio of 1.0 to NSPI's proposed ELID Demand Charge, Energy Charge, and Customer Charge for 2026 and 2027.

(d) Provide a class-by-class table showing the impact on other ATL classes (including LI and MI specifically) of reducing PHP's R/C ratio from 1.04373 to PHP's recommended level of 1.0.

Request IR-4:

Reference: N-2, Evidence of C. Fitzhenry and M. Gorman, Interruptible Credit, page 12.

(a) Provide all workpapers, source documents, and derivation steps underlying BAI's recommended interruptible credit of $13.107/kVA-month, including: (i) the capital cost of the reference peaking unit; (ii) financing assumptions; (iii) applicable capacity factor; and (iv) the year in which the estimate was developed.

(b) Compare and contrast the methodology used by NSPI in the GRA to calculate the interruptible credit to the methodology proposed by BAI.

Request IR-5:

Reference: N-2, Evidence of C. Fitzhenry and M. Gorman, page 19, Rate Implications.

Preamble: BAI calculates that reducing PHP's demand determinant from 65 MW to 8 MW reduces PHP's revenue requirement by approximately $6.5 million in 2026 and approximately $9.4 million in 2027.

(a) Identify precisely where, in NSPI's COSS, the $6.5 million (2026) and $9.4 million (2027) are reallocated, confirming which other customer classes bear the incremental cost if PHP's demand determinant is reduced to 8 MW, and provide a class-by-class impact table of the requested change including LI and MI.

(b) Identify any additional cost components (beyond the demand charge) where the change in demand determinant cascades through to affect other charges (e.g., rider calculations, FAM allocation) and quantify those secondary effects.

Request IR-6:

(a) Set out in a single consolidated table BAI's recommended rate for each ELID tariff component for 2026 and 2027, compared to NSPI's proposed rate for the same component.

(b) For each component where BAI recommends a change from NSPI's proposal, identify: (i) the resulting impact on PHP's annual bill; and (ii) the resulting impact on the annual revenue requirement allocated to other ATL customer classes, including LI and MI specifically.

Request IR-7:

Reference: N-3, Evidence of PHP, page 9, ADC Energy Supply Protocol.

(a) Provide the Active Demand Control ("ADC") Energy Supply Protocol in its entirety, including all appendices, schedules, and amendments.

(b) Identify, in track-changes or side-by-side format, all provisions of the ADC Protocol that PHP proposes to retain, amend, or replace under the proposed ELID tariff, including any provisions relating to electronic dispatch.

(c) Identify all operational constraints (ramp rates, minimum run levels, production obligations, fibre and wood-supply commitments, and maintenance windows) that would limit PHP's ability to respond to RT or electronic dispatch instructions and quantify those constraints in MW and duration.

Request IR-8:

Reference: N-3, Evidence of PHP, pages 9-10 (PHP consumption forecast and PHP Wind forecast).

(a) Provide the full workpapers, assumptions, and inputs underlying PHP's 2026 and 2027 consumption forecasts (approximately 774,000 MWh per year as referenced in N-3) and PHP Wind (Goose Harbour Lake) production forecasts (approximately 154,610 MWh in 2026 and 507,400 MWh in 2027), including the basis for the projected increase in PHP Wind output from 2026 to 2027.

(b) Reconcile PHP's consumption and PHP Wind production forecasts to the figures used in NSPI's COSS (Tariff Energy of 810.5 GWh in 2026 and 304.3 GWh in 2027) and explain the reasons for all material differences.

(c) Identify the revenue risk to NSPI and the cost risk to other ATL customers, including Large Industrial and Medium Industrial, if PHP Wind commissions later than forecast, or produces materially less (or more) than forecast in 2026 or 2027, and confirm whether PHP bears any financial responsibility for such variance. Please provide any modeling done by PHP and/or BAI of these scenarios.

Request IR-9:

Reference: N-3, Evidence of PHP, page 12.

Unless PHP's areas of concern are addressed by the Board in a satisfactory manner it is unlikely PHP will proceed to accept service under the ELID tariff. PHP would need to undertake the development of a below-the-line tariff with NS Power that meets the mill's needs if it chooses to not accept service under the ELID.

(a) Please specifically identify what approvals PHP is seeking from the Board with respect to the ELID tariff or any alternative proposed tariff.

(b) Does this mean that, if it does not obtain all of the changes it is requesting to the ELID tariff, it will decline to take service under this proposed tariff? Please elaborate fully.

(c) Please describe in detail what PHP means by a below-the-line tariff that would "*meet the mill's needs*" if it chooses not to accept service under the ELID tariff.

(d) Describe in detail any below-the-line tariff alternative that PHP is considering if the ELID tariff as proposed is not modified to address PHP's concerns, including: (i) proposed rate structure; (ii) cost responsibility; (iii) dispatchability provisions; and (iv) relationship to the existing ELIADC tariff.

Request IR-10:

Reference: N-3, Evidence of PHP, page 12. PHP describes the February 13, 2026 Maritime Link trip event and states, *"This was neither a real time (RT) schedule dispatch nor an NSPSO call for interruption."*

And Reference: N-2, Evidence of C. Fitzhenry and M. Gorman, page 16, lines 9-11.

> ***Amidst this event, PHP's demand was dispatched down to approximately 9 MW, its lowest recorded level during any coincident peak in that two-year window.***

(a) Why does PHP conclude this was not a real time schedule dispatch?

(b) Provide a complete list of all events in which PHP reduced its load outside the formal RT schedule dispatch or interruption protocol, including date, time, duration, MW curtailed, and the triggering system event.

(c) Confirm whether PHP was, in fact, dispatched or instructed to curtail load by NSPI/NSPSO during each of the 2022–2023 winter 3CP hours identified in NSPI's ELID evidence. For each such hour, state: (i) PHP's metered demand immediately before any instruction; and (ii) PHP's metered demand at the time the system coincident peak was recorded.

(d) Explain, from PHP's perspective, how the operational reality of NSPI's dispatch control during system coincident peaks should inform the demand allocator used to assign production and transmission capacity costs to PHP under the ELID tariff, and provide quantitative support for PHP's position.

(e) If the lowest recorded demand level was approximately 9 MW, please explain why it would be reasonable to set the 3CP value at 8 MW?

(f) How many times in the past five years has PHP been dispatched down to 9 MW or lower?

Request IR-11:

Reference: N-3, Evidence of PHP, pages 12-13.

Preamble: PHP states that there are aspects of PHP's load flexibility that are not being captured in the ELID filing, and that the benefits from the February 13, 2026, Maritime Link event are something that needs to be considered as an "additional ancillary service value" beyond ADC and priority interruptible.

(a) Is PHP seeking separate compensation for this additional ancillary service value in this proceeding? If so, please provide PHP's proposed tariff mechanism or credit structure for quantifying and paying for this value, and confirm the source of funding (i.e., which class or classes would bear this cost).

(b) Quantify PHP's estimate of the system value of off-protocol curtailments (i.e., reductions in load made outside the formal RT schedule dispatch or interruption protocol) provided by PHP to NSPSO under the ELIADC to present, including the methodology used to estimate that value.