

2 **NOVA SCOTIA ENERGY BOARD**3 **IN THE MATTER OF:** *The Public Utilities Act*4 **IN THE MATTER OF:** **An Application by Nova Scotia Power Incorporated for**
5 **approval of an Extra Large Industrial Dispatchable Above-the-**
6 **Line Tariff applicable to Port Hawkesbury Paper**

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8 **REDACTED**9 **INFORMATION REQUESTS****To:** Bates White Economic Consulting ("BW")
Nova Scotia Energy Board**From:** The Industrial Group**Responses Due:** June 18, 2026**Contact Person** Nancy G. Rubin, K.C.
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12 Issued at Halifax, Nova Scotia, this 20th day of March 2026.

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14 **Request IR-1:**15 **Reference: N-20, Bates White Evidence, p.7.**16 ***[O]ur evidence addresses only the Customer Charge, Energy Charge,***
17 ***Dispatchable Rider, and treatment of Goose Harbour output.***18 Does Bates White's decision not to address the Interruptible Demand Credit or the Priority
19 Interruptible Credit reflect a limitation in the mandate assigned by Board counsel or a deliberate
20 decision not to opine on those components?

1 Request IR-2:

2 Reference: N-20, Bates White Evidence, pp.10-13.

3 Preamble: Throughout this section, Bates White assesses the Customer Charge
4 Methodology and the Risk of Under-Recovery. At p. 12, lines 10-22, the evidence states:

5 *NSPI did not use a bottom-up methodology (using assumed labour hours*
6 *and labour rates) to develop the estimate, nor did it use historical data to*
7 *develop its estimates despite operational process similarities between the*
8 *ELID and ELIADC Tariffs.*

9 And, at p. 12 line 24, and p. 13, lines 1-2:

10 *We do not agree that NSPI has made the “conservative” choice. Rather, NSPI*
11 *has selected the value from its range that is most likely to under-collect the*
12 *costs that the Customer Charge is intended to recover.*

13 (a) Does Bates White agree that, without either a bottom-up methodology or
14 historical ELIADC cost data to estimate the Customer Charge, the resulting
15 estimated low, mid, and high ranges of NSPI's projection cannot be
16 considered well-supported, regardless of which point in the range is
17 selected? Please explain why.

18 (b) Where NSPI has selected the value "most likely to under-collect" the costs
19 the Customer Charge is intended to recover, and that tracking challenges
20 will limit the ability to capture under-recoveries via the PHP Deferral
21 account, does Bates White agree that, in practice, any under-recovery will
22 be borne by other ATL customers rather than PHP? Why or why not?

23 (c) Is Bates White's recommended midpoint of \$12,291.67/month made on the
24 basis that the midpoint is the most accurate estimate, or is it a practical
25 compromise in the absence of a proper methodology? Please explain why
26 this approach would yield the most just and reasonable rate.

27 (d) Where Bates White recommends that if actual administration costs fall
28 *below* Customer Charge collections, PHP should receive 100% of the
29 excess as credits, does Bates White also recommend that the converse
30 should apply i.e., that costs *above* collections should be recovered 100%
31 from PHP?

- 1 (e) Does Bates White have a recommendation regarding tracking and
2 reporting to make either direction of adjustment verifiable?

3 **Request IR-3:**

4 **Reference:** N-20, Bates White Evidence, p. 15, lines 5-8:

5 *NSPI applied a projected output for Goose Harbour that assumes a facility*
6 *installed capacity of 130.5 MW, while the reported planned facility capacity*
7 *is 168 MW ... thus approximately 29% greater than represented in the COSS.*

8 **And at p. 16, lines 10-13 and 15-16:**

9 *Combining both the lower projected PHP gross load, and the higher*
10 *expected output from Goose Harbour, the net PHP load incorporated in the*
11 *COSS would more appropriately be 121 GWh rather than the 304 GWh*
12 *applied in determining the proposed ELID Energy Charge rates...*

13 *In most direct terms, if PHP's net load in 2027 subject to the Energy Charge*
14 *is 121 GWh rather than 304 GWh, a 60% reduction, the revenue from PHP to*
15 *NSPI would be lower by the same 60%, or approximately \$21 million.*

- 16 (a) Please confirm that Bates White has calculated that reduction in revenue
17 using the full 168 MW Goose Harbour capacity and a revised PHP gross
18 load. If so, is the COSS-modelled net PHP load approximately 2.5 times
19 too high, producing an Energy Charge rate that is materially too low?
20 Please elaborate.

- 21 (b) If the rates are approved without correction, please confirm that other FAM
22 customers will fund the resulting shortfall, estimated at approximately \$21
23 million annually in 2027? If not, what is the anticipated source of this
24 shortfall?

- 25 (c) Has Bates White calculated (or is it able to calculate) the revised Energy
26 Charge with these two adjustments? Please provide.

27 **Request IR-4:**

28 **Reference:** N-20, Bates White Evidence, pp. 16-17:

29 *Another issue that is notable, but likely of less significance than proper*
30 *representation of the Goose Harbour facility capacity, is the fact that the*
31 *generation of the facility assumed in the COSS is at the P90 level, meaning*
32 *the annual output from the facility that is expected to be exceeded 90% of*

1 *the time. Considering the potential distortions described above from actual*
2 *Goose Harbour output exceeding the modeled level used to set the Energy*
3 *Charge, it would be more appropriate to use a P50 output level in the COSS,*
4 *such that there is equal probability that actual generation is higher or lower*
5 *than that used to set rates. While we think the P50 level is more appropriate*
6 *in principle with respect to setting the ELID Energy Charge, we do not believe*
7 *moving to a P50 level (at the 168 MW capacity level) would be justified in*
8 *advance of actual operational performance at the Goose Harbour facility. The*
9 *reason for this position is that the P90 level reflected in the COSS (at the*
10 *130.5 MW capacity level) corresponds to a capacity factor of 44%, which is*
11 *relatively high, even in the context of Nova Scotia's high wind potential.*

12 **And Reference: N-4, NSPI (BW) RIR-4 (a-c), lines 20-23:**

13 *NS Power cannot comment on the amount of generation required to meet*
14 *PHP's energy demand as PHP's load forecasting is a PHP internal process.*
15 *This is similar for PHP's wind forecast in which PHP provided NS Power with*
16 *its P90 forecast to utilize in NS Power's F&PP forecasts.*

- 17 (a) Why does Bates White believe this issue is of less significance?
- 18 (b) What is the rate and cost impact of using P90, rather than P50 (holding all
19 other COSS inputs constant), from the perspective of PHP and other
20 ratepayers? Please provide any analysis.
- 21 (c) What is the risk to other ratepayers of setting the output level too
22 conservatively?
- 23 (d) Please provide the calculation underlying the 44% capacity factor figure,
24 including the specific annual generation output (in GWh) and installed
25 capacity (in MW) used to derive it.
- 26 (e) Given that the P90 level reportedly yields a 44% capacity factor, which
27 appears to be a concern to Bates White, can Bates White confirm that the
28 P90 in this case in fact refers to a conservative forecast rather than an
29 optimistic forecast? Please outline Bates White's source in reaching this
30 conclusion.
- 31 (f) What annual capacity factor does Bates White believe is more reasonable
32 than the noted 44% annual capacity factor? Please provide the studies or
33 comparables relied upon in answering.
- 34

(g) In principle, is it appropriate to use a P90 or P50 in preparing this cost-of-service study? Please specifically address whether it is more appropriate to use a conservative estimate or a likely estimate in setting a rate.

(h) Please confirm the record does not currently have a P50 estimate? If not, please indicate where this can be found for both 168 MW and 130.5 MW capacity levels.

(i) What specific threshold or quantum of operational data would Bates White require before it would recommend moving from a P90 generation level for purposes of setting the ELID Energy Charge? For example, would one year of operational data suffice?

(i) How and through what regulatory mechanism does Bates White envision the generation assumption being updated?

Request IR-5:

Reference: N-20, Bates White Evidence, at p. 21, lines 2-6 notes a second concern:

Our second concern is that the DR credit is built upon a shaky premise, namely, that PHP's load is sufficiently predictable as to allow for an after-the-fact determination of how PHP would have operated over an entire year. PHP's load can be volatile and unpredictable, as is demonstrated by recent historical data. [emphasis in original]

And Reference: N-20, Bates White Evidence, at p. 22, lines 6-10:

PHP's forecast error has averaged █████ per year and has reached as high as █████ (in 2023). This forecast error has averaged █████ GWh/year and peaked at █████ GWh (also in 2023).

And Reference: N-20, Bates White Evidence, at p. 24, lines 7-12, notes its third concern:

Further, other factors, such as PHP's book of business, equipment performance (e.g., partial outages) and efficiency (e.g., degradation), macroeconomic factors (e.g., tariffs), taxes, labour availability, and any other potential variable that impacts PHP's operational profile will be difficult or impossible to fully capture. Importantly, many of these variables are unrelated to the price of energy in Nova Scotia, meaning PHP's load may be moving around for reasons other than PHP seeking to lower system-wide FAM costs in the province.

- 1 (a) Does Bates White agree that NSPI, as an external party without access to
2 PHP's order book, equipment status, or operational plans, faces at least as
3 great a challenge in constructing a credible CBL as PHP faces in
4 forecasting its own load? If not, please explain.
- 5 (b) At p. 21, Bates White calculates that the spread between PHP's high and
6 low actual load years since 2020 is approximately [REDACTED] GWh, which at
7 \$100/MWh, is approximately \$[REDACTED] million in potential FAM cost variability.
8 Who bears the cost risk of percentage error in the CBL?
- 9 (c) Bates White identifies that many variables affecting PHP's load are
10 "unrelated to the price of energy in Nova Scotia." Is there a CBL
11 methodology that can reliably separate the price-responsive component of
12 PHP's load variation from the component driven by these external factors?
13 Please explain.
- 14 (d) Is this any different than how demand response was operationalized and
15 costed under ELIADC? Please explain and if not different, why this would
16 be of concern (or more concern) now.

17 **Request IR-6:**

18 **Reference: N-20 Bates White Evidence, at p. 23, lines 19-23.**

19 ***We are unconvinced that PHP would ever have incentive to levelize its load.***
20 ***PHP itself explains that its load is dependent on its business activity, is***
21 ***subject to seasonal fluctuations, and can spike up to consume as high as***
22 ***25% of the power in Nova Scotia at any given time. It is unrealistic to expect***
23 ***levelized load at PHP when its energy consumption is "closely tied to the***
24 ***order book for paper" and which is generally higher demand in winter and***
25 ***summer months (and lower demand in spring and fall months).***

26 **And Reference: N-11, PHP (BW) RIR -2.**

27 ***The market for paper is somewhat seasonal with winter and summer months***
28 ***having generally less demand than spring and fall.***

- 29 (a) Does Bates White agree that its finding that PHP would have higher
30 demand in winter and summer months is inconsistent with PHP's evidence
31 on this proceeding? If not, please explain.
- 32

1 (b) If confirmed, are there any consequential revisions to Bates White's
2 evidence?

3 (c) Does a levelized high load factor CBL overstate the savings attributable to
4 PHP's load pattern regardless of how accurately the CBL mechanics are
5 implemented? Please explain.

6 **Request IR-7:**

7 **Reference: N-20, Bates White Evidence, at p. 24, lines 12-13, third concern with the DR**
8 **credit:**

9 ***In such instances, it would be inappropriate for FAM customers to pay PHP***
10 ***for changes to its load profile that would have been made regardless of the***
11 ***ELID Tariff and its components.***

12 (a) Is Bates White saying that the ELID, or the DR credit specifically, should
13 not pay PHP for load variations that are done for reasons other than
14 responding to NSPI's pricing signals?

15 (i) If not, what does Bates White mean it would be
16 inappropriate for FAM customers to pay for these changes
17 in load profile?

18 (b) If so, how does Bates White propose the ELID Tariff be modified to track
19 the reasoning for load variations that fall outside of NSPI's price signalling
20 or requests?

21 (c) Under the ELIADC structure, have FAM customers been similarly
22 inappropriately paying PHP for its changes in load profiles it would have
23 made regardless of that tariff? Please explain why or why not, as compared
24 to the currently proposed structure of the ELID.

25 **Request IR-8:**

26 **Reference: N-20, Bates White Evidence, fourth concern, p.26, lines 3-11.**

27 ***According to NSPI, assuming that "for that [2025] period, if PHP load had***
28 ***been dispatched at 100 percent optimal," the DR credit would have been***
29 ***"approximately \$7 to \$11 million." However, NSPI explains that "[i]n reality"***
30 ***the calculated DR credit would have been "half that amount," or \$3.5 to \$5.5***

1 ***million. This means NSPI's discretionary adjustments would reduce the DR***
2 ***credit by \$3.5 to \$5.5 million. The adjustments NSPI made in its analysis***
3 ***included "system conditions, customer production constraints/***
4 ***requirements, etc.," which are subjective, vague, difficult to verify, or some***
5 ***combination of the three. NSPI could not provide the specifics of the***
6 ***adjustments made "due to the cyber incident," which rendered the analysis***
7 ***"no longer available."***

8 (a) Is it Bates White's opinion that there is currently no basis either in the
9 evidence or in the proposed Operating Procedures upon which the Board
10 or Intervenor could assess whether NSPI's annual discretionary
11 adjustments to the DR credit are appropriate? Please explain.

12 (b) Is the \$3.5 - \$5.5 million gap between the "optimized" DR credit (\$7–11
13 million) and the "realistic" DR credit (\$3.5–5.5 million), the measure of
14 NSPI's discretion? If not, what does it represent?

15 (c) What verification mechanism does Bates White consider necessary to
16 allow the Board and intervenors to assess NSPI's discretionary
17 adjustments after-the-fact? Please specify what data NSPI must produce,
18 in what form, and by what process a dispute about the appropriateness of
19 an adjustment would be resolved.

20 **Request IR-9:**

21 **Reference: N-20, Bates White Evidence, p.26, line 18- p. 27, line 2 describes its fifth**
22 **concern relating to the use of forward replacement fuel pricing:**

23 ***However, NSPI has specifically veered away from using forward replacement***
24 ***costs to conduct hypothetical system cost calculations in recent years,***
25 ***including in determining load-shifting benefits provided by PHP under the***
26 ***ELIADC Tariff due to concerns that use of forward replacement fuel pricing***
27 ***"overstates the cost of the actual fuel consumed." It is unclear why NSPI has***
28 ***proposed to use forward replacement pricing when calculating the DR credit***
29 ***for PHP despite its prior concerns.***

30 (a) Is it Bates White's understanding that NSPI is using the same forward
31 replacement fuel costs methodology which it argued was unreliable in 2022
32 due to significant volatility in commodity prices? If not, please explain the
33 difference.

(b) What is Bates White's understanding of NSPI's rationale to use this methodology in the proposed ELID tariff to calculate the credit?

(c) Is Bates White's objection to using forward replacement fuel costs in the ELID CBL simulation that it would inflate the hypothetical CBL system costs, and therefore inflate the DR credit payable to PHP, at the expense of other ATL customers? Please explain.

(d) Does Bates White recommend that NSPI use actual fuel costs (or an alternative), as a prerequisite to approval of the DR credit mechanism? Please explain.

Request IR-10:

Reference: N-20, Bates White Evidence, p. 27, lines 4-9.

Our sixth concern is that the DR credit represents a zero-sum mechanism that, if incorrectly calculated, could harm other FAM customers. Any load "smoothing" exercise inherently assumes that actual deviations from a smoother load profile represent changes actively provided by PHP rather than operational variations that might be entirely independent from system conditions. Consequently, the risk of incorrectly estimating the DR credit would likely be biased toward overestimation, to the detriment of FAM customers.

And at p. 28, lines 14-21:

We do not recommend that the Board approve the DR credit as proposed. To be reasonable, at least two things must be true: (1) any payments to PHP from FAM customers under the DR credit must demonstrably tied to PHP deciding to shift load due to energy prices and (2) that FAM customers not be at risk of providing any compensation to PHP in hours where no load-shifting activity due to energy prices occurred. It may be that, with additional elaboration, revisions, reporting requirements, and verifiability guardrails, the mechanism may achieve these objectives, but as proposed, it is our view that the DR credit is too vague, uncertain, unverifiable, and at risk of failing to match rider payments to load-shifting service to be recommendable for approval.

- 1 (a) Bates White identifies six concerns with the DR credit and recommends it
2 not be approved as proposed. Please confirm whether in Bates White's
3 view all six concerns should be resolved before the DR credit can be
4 approved in any form, or would resolution of a subset suffice? If a subset
5 would suffice, please identify which concerns are threshold requirements
6 for approval.
- 7 (b) Please describe, as precisely as possible, the specific elaborations,
8 revisions, reporting requirements, and guardrails Bates White considers as
9 the minimum necessary to make the DR credit approvable, addressing
10 each of the six stated concerns in turn.
- 11 (c) Where there is a bias toward overestimation because load smoothing
12 attributes all deviations from the CBL to price-responsive behaviour, does
13 Bates White agree that this structural bias cannot be fully eliminated by any
14 guardrails or reporting requirement?
- 15 (d) Under the current ELIADC tariff, load shifting savings are shared 75% to
16 other customers and 25% to PHP. Does Bates White agree that:
- 17 (i) The 75/25 benefit-sharing arrangement served as a
18 structural buffer that limited the damage to other customers
19 from CBL overestimation; and
- 20 (ii) Removing that buffer entirely, by moving to a 100%
21 allocation to PHP, materially increases the exposure of FAM
22 customers to the consequences of overestimation? If not,
23 please explain.
- 24 (e) Does Bates White agree that with a benefit-sharing arrangement, even if
25 the CBL overestimates PHP's contribution, FAM customers retain a portion
26 of the calculated savings as a hedge against that overestimation?
- 27 (f) The Bowman evidence (Exhibit N-25) at p. 12 identifies two potential
28 amendments to the structure of the tariff to address the overestimation risk:
29 either amend the CBL to better reflect PHP's expected seasonal load (e.g.,
30 reflective of the paper market order book) or retain a benefit-sharing
31 arrangement. Does Bates White have any objection in principle to a form

of benefit-sharing approach as is currently in place under the ELIADC (75/25 in favour of other customers) being carried forward into the ELID DR credit? Please explain.

- (g) If Bates White does object, please explain what specific objections make a 100% allocation to PHP preferable to benefit-sharing, given Bates White's concern regarding the bias toward overestimation.

Request IR-11:

Reference: N-20, Bates White Evidence, p.8, lines 22-24:

In addition to correcting the Energy Charge rates, we recommend that a true-up mechanism be created to address substantial deviations of PHP net load from expectations — including the extreme but plausible scenario in which PHP's annual net load subject to the tariff rate is zero.

And p. 33, lines 10 - 18:

Q. Is there a potential scenario in which PHP has zero net load subject to the ELID Energy Charge?

A. Yes. As discussed above, the 653 GWh of output from Goose Harbour is a reasonable estimate of potential generation from the full 168 MW facility, and in fact is conservative, since that is a P90 level that is expected to be exceeded 9 years out of 10. The PSA anticipates that PHP load fall below 625 GWh, as that is the established threshold below which the Sales Agreement Fee increases from \$2.00/MWh to \$4.00/MWh. Thus, there is a very plausible scenario in which PHP would have annual net load of zero under the ELID tariff, and would pay no Energy Charge at all, and cover none of the embedded costs reflected in the Energy Charge.

- (a) Please specify the threshold deviation of PHP net load from the COSS-modelled level that Bates White considers sufficient to trigger the true-up mechanism.

- (b) Please describe the methodology Bates White proposes for calculating the true-up amount — specifically:

- (i) Would the true-up apply only to the shortfall in Energy Charge revenue collections, or also to the embedded fixed cost allocation shortfall caused by understating PHP's net load in the rate-setting COSS; and

(ii) Would the true-up amount be recovered solely from PHP, or spread across all ATL customers?

(c) Bates White identifies a zero net load scenario, where Goose Harbour generates more energy than PHP consumes. Please confirm that in this scenario, PHP would pay no Energy Charge, make no contribution to embedded cost recovery, and yet remain connected to and served by the NSPI system?

(i) How could a true-up mechanism be designed to address this scenario specifically?

(d) Does Bates White recommend that the true-up mechanism be scoped and approved as part of any approved ATL tariff for PHP?

Request IR-12:

Reference: N-20, Bates White Evidence, p. 8, lines 10-20:

Perhaps most disruptive to recovery of fully embedded costs under the ELID, the PSA allows PHP to 'bank' excess Goose Harbour output, magnifying PHP's ability to avoid tariff energy charges by applying Goose Harbour generation in one period to offset tariff purchases in a later period. The PSA also allows PHP to claim unproduced, curtailed energy to reduce tariff purchases. Finally, the PSA fails to adjust Goose Harbour energy deliveries for transmission losses. Instead, the project is treated as a behind-the-meter resource, when in fact that project is not located behind the meter, but rather is part of the grid — and generating transmission losses — the cost of which will be borne by FAM customers.

To be clear, we are not taking issue with the terms of the PSA. Those terms are undoubtedly advantageous and preferential to PHP, but our concern in this Evidence is the disruptive effect of the PSA on the likelihood of PHP paying its properly allocated embedded costs as an ATL customer under the ELID.

(a) In relation to each of the three features of the PSA which Bates White identifies as disruptive to proper cost recovery, please discuss whether it is inconsistent with PHP's premised status as a fully ATL customer paying properly allocated embedded costs:

(i) Banking of excess output;

(ii) Credit for curtailed but unproduced energy; and

(iii) No transmission loss adjustment.

(b) Should all three disruptive features and not merely the 130.5 MW versus 168 MW capacity error be reflected in a corrected COSS before the Energy Charge rates can be approved, and if so, how?

Request IR-13:

Reference: N-20, Bates White Evidence, p. 32 Table 4: Effects of Goose Harbour Generation Treatment Under the PSA on PHP Energy Costs for 2027.

Preamble: In Table 4, and at p. 33 Bates White calculates that in an alternative scenario of 774 GWh PHP gross load and 653 GWh Goose Harbour output, PHP's tariff payments to NSPI would be reduced by \$20.6 million and net energy cost would be approximately [REDACTED] million lower than under COSS assumptions, because excess Goose Harbour generation displaces tariff energy at the embedded cost rate rather than the \$80/MWh PSA rate.

(a) Does this outcome effectively allow PHP to sell excess wind generation back to FAM customers at embedded cost rates?

(i) If so, does this create an unintended subsidy from those customers? If not, please explain.

(ii) If so, is any such subsidy consistent with the premise that PHP is a fully ATL customer?

(b) At p. 29, Bates White quotes NSPI's application that excess Goose Harbour output in a given month "will be carried forward to be applied to PHP consumption in a future billing period." Does this banking feature mean that essentially all Goose Harbour generation, regardless of when it is produced, will reduce PHP's tariff obligations, making hour-by-hour matching of generation to load irrelevant?

(c) In Bates White's opinion is this approach to rate setting compatible with the premise of PHP as an ATL customer paying for grid energy it actually consumes? Please explain.

1 **Request IR-14:**

2 **Reference:** N-20, Bates White Evidence, p. 35, lines 15-17 and p. 36, lines 1-3,

3 **Recommendations:**

4 ***Given the potential for variable Goose Harbour generation to have significant***
5 ***effects on cost recovery — to the potential disadvantage of PHP as well as***
6 ***FAM customers — we recommend that NSPI evaluate cost recovery under***
7 ***the ELID tariff at the conclusion of each annual period.***

8 **And:**

9 ***We also recommend NSPI explain the methodology for tracking the costs of***
10 ***administering the ELID Tariff and how NSPI plans to ensure that 100% of the***
11 ***costs incurred above in administering the ELID Tariff are paid by PHP,***
12 ***including those above the Customer Charge collections.***

13 (a) Would Bates White agree that quarterly reporting of key metrics (year-to-
14 date DR credit accrual estimates, actual Goose Harbour output versus
15 COSS-modelled levels) would be helpful to allow meaningful monitoring
16 before material over- or under-recovery has fully crystallized? Please
17 explain why or why not.

18 (b) Please confirm whether the recommended annual evaluation and true up
19 are intended to operate in parallel or whether the true-up mechanism is
20 intended to replace one or more elements of the annual evaluation.

21 (i) Specifically, would the true-up mechanism automatically
22 correct for Goose Harbour over-generation, or would the
23 annual evaluation be required first to determine whether the
24 true-up threshold has been triggered?

25 (ii) If both mechanisms operate in parallel, please describe how
26 they are sequenced in a year where Goose Harbour output
27 significantly exceeds the COSS-modelled level.

28 (c) Does Bates White agree that the Board should specify, as conditions of
29 approval, the following minimum reporting obligations: (i) monthly or
30 quarterly reporting of actual Goose Harbour output versus the COSS-
31 modelled level; (ii) quarterly estimates of the year-to-date DR credit
32 accrual, including identification of any discretionary adjustments made by

1 NSPI; and (iii) annual reporting of actual Customer Charge administration
2 costs against the eight identified tasks?

3 (i) If Bates White does not support quarterly reporting for items
4 (i) and (ii), please explain what reporting frequency it
5 considers adequate and why.

6