

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: THE PUBLIC UTILITIES ACT

and

IN THE MATTER OF: An Application by Nova Scotia Power Inc. (“NS Power”) for approval of an Extra Large Industrial Dispatchable Above-the-Line Tariff applicable to Port Hawkesbury Paper

NON-CONFIDENTIAL INFORMATION REQUESTS

To: Bates White

From: Port Hawkesbury Paper LP

Responses Due: June 18, 2026

Contact Person: James MacDuff
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3 **IR-1**

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5 **Reference: Testimony, Section III, Page 15, Lines 2–13. Bates White states that the**
6 **net PHP load used in deriving the Extra Large Industrial Dispatchable (ELID)**
7 **Energy Charge is too high because it fails to incorporate PHP's updated lower**
8 **estimate for gross load (774 GWh) and the full 168 MW capacity output of the Goose**
9 **Harbour Wind Farm (653 GWh). Bates White calculates that a more appropriate net**
10 **load would be 121 GWh instead of the 304 GWh applied by NSPI.**

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13 (a) Under the proposal would PHP's net load of 121 GWh be used for both COS and
14 rate design purposes? Please explain.
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1 **IR-2**

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3 **Reference: Testimony, Section IV, Page 28, Lines 18-21. “It may be that, with**
4 **additional elaboration, revisions, reporting requirements, and verifiability**
5 **guardrails, the mechanism may achieve these objectives, but as proposed, it is our**
6 **view that the DR credit is too vague, uncertain, unverifiable, and at risk of failing to**
7 **match rider payments to load-shifting service to be recommended for approval.”**
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9 (a) Please provide Bates White’s suggested additional elaboration, revisions,
10 reporting requirements and verifiability guardrails that would satisfy Bates White’s
11 concerns.

1 **IR-3**

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3 **Reference: Testimony, Section V, Page 33, Lines 11–18. Bates White outlines an**
4 **extreme but plausible scenario where PHP’s annual net load subject to the tariff**
5 **rate drops to zero, meaning the mill would pay no Energy Charge and fail to cover**
6 **any embedded fixed costs reflected in that charge.**
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- 8 (a) Does Bates White agree that if a customer class uses no energy from NSP’s
9 system as a result of a sleeving arrangement, the customer class should not be
10 subject to NSP’s embedded fixed energy costs? Please explain.
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1 **IR-4**

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3 **Reference: Testimony, Section VI, page 35, lines 23-25. "... we recommend that a**
4 **true-up mechanism be created to address substantial deviations of PHP net load**
5 **from expectations..."**

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7 (a) Please quantify the term "substantial" in this context.

8
9 (b) Please confirm that this true-up mechanism is meant to operate in both directions
10 and could provide a credit per MWh in favour of PHP if the actual PHP net load is
11 higher than used in the forecast for the COS. If not confirmed, please explain.

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13 (c) Please confirm Bates White's understanding of how the forecast energy usage is
14 determined by NSP for the LIIR class of customers.
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