2025 M12663

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF:	**The *More Access to Energy Act, SNS 2024, c. 2, Sch. B,* (the "Act")**
	and
IN THE MATTER OF:	**An application by the Nova Scotia Independent Energy System Operator for an Order or Orders made pursuant to Section 29 of the *Act* for the review of its proposed expenditure and revenue requirements and the fees it proposes to charge for the fiscal year between April 1, 2026 and March 31, 2027.**

INFORMATION REQUESTS

To:	Nova Scotia Independent System Operator ("IESO Nova Scotia")
From:	Port Hawkesbury Paper LP
Responses Due:	March 10, 2026
Contact Person:	David MacDougall McInnes Cooper Purdy's Wharf Tower II 1300 – 1969 Upper Water Street Halifax, NS B3J 3R7 Phone: 902-425-6500 david.macdougall@mcinnescooper.com

Request IR-1:

Reference: Application page 5, "IESO Nova Scotia notes that actual expenditures for fiscal year 2025/2026 are materially tracking against its proposed 2025/2026 Revenue Requirement".

Question: Please provide a full reconciliation between IESO Nova Scotia's actual and proposed 2025/2026 Revenue Requirement for the 10 month period April 1, 2025 to January 31, 2026 broken down between the categories shown on Table 1: Summary of OM&A costs on page 9 of the Application.

Request IR-2:

Reference: Application page 12, "The 23 employees needed [to provide effective functional management and administration support that is not accounted for within the scope of the operational employees transitioning from NS Power] during the fiscal year are anticipated to include personnel in the following disciplines: Legal and Regulatory Compliance, Human Resources Management, Financial Management, Stakeholder Engagement and Information Technology".

Questions:

a) Please indicate how many of these 23 employees are in each of the disciplines noted and how many are in other identified functional areas.
b) Please indicate how much of the $4.3 million requested as compensation for the 23 employees is in relation to each of the disciplines noted or other identified functional areas.

Request IR-3:

Reference: Application page 14, "Cost of living increases are foreseen to give rise to an overall 3% increase in the Administration Salaries compared to those in the 2025/2026 Revenue Requirement Application".

Questions:

a) Please provide the basis for the 3% increase.
b) Do all Administration Salaries have a built-in annual cost of living increase? If so, what is the identified basis for determining that increase.
c) Do any IESO Nova Scotia employees have incentive or bonus plans built into their compensation? If so, please indicate the positions which have such structures and provide a copy of the relevant plan or plans, including for certainty the criteria for earning the respective incentive or bonus.

Request IR-4:

Reference: Application page 17, "**Office Costs**: these costs cover various office administrative fees and resources."

Question: Please break down the proposed $100,000 for this cost category into each respective administrative fee and resource.

Request IR-5:

Reference: Application Page 19, "Table 7: OM&A Costs for the Legal and Regulatory Cost Category"

Questions:

a) Please confirm that these costs are in addition to the Legal and Regulatory Compliance costs that are built into the Employees (Administration) Cost Category in Table 3 of the Application. If not confirmed please explain any overlap.
b) Please advise if these costs are all for external legal and regulatory resources. If not, please break down the costs between in-house and external legal and regulatory resources.

Request IR-6:

Reference: Application page 20, "**Legal and Compliance:** These costs are tied to the foreseeable external legal advisory needs of IESO Nova Scotia during the 2026/2027 fiscal year".

Question: Please breakdown the $600,000 in costs proposed for this cost category into specified foreseeable external legal advisory needs of IESO Nova Scotia.

Request IR-7:

Reference: Application page 22, "For the 2026/2027 budget, the procurement costs include technical experts, legal, communications support, and a procurement consultant."

Questions:

a) Please confirm whether the legal costs in relation to the Procurement Cost Category are additional to the legal costs in Table 7: Legal and Regulatory Costs and the Legal and Regulatory Compliance costs that are built into the Employees (Administration) Cost Category in Table 3.
b) Has IESO Nova Scotia hired any in-house procurement staff?
c) If the answer to b) is no, does IESO Nova Scotia intend to hire in-house procurement staff. If not, please explain why not.

Request IR-8:

Reference: Application page 22, "$0.474 relates to the 2026/2027 commencement of a procurement for capacity and/or storage as the need is defined through IESO Nova Scotia's IRP process."

Questions:

a) When does IESO Nova Scotia expect to have the final results of its initial IRP completed.
b) Does IESO Nova Scotia anticipate that the results of its initial IRP will require Nova Scotia Energy Board approval?

Request IR-9:

Reference: Application page 22, "Capacity Contract: This amount includes the cost of managing an anticipated agreement for additional capacity through 2026/2027, including participating as an IESO Nova Scotia representative on the project oversight committee."

Question: Are these activities to be undertaken by contract resources or IESO Nova Scotia employees. If contract resources, please explain why these activities cannot be undertaken by IESO Nova Scotia employees.

Request IR-10:

Reference: Application page 24, Table 11, IT Application Software, 0.89M

Questions:

a) Please identify each specific software license required by IESO Nova Scotia which make-up this cost category.
b) How was the need for each of these software licenses determined?
c) Please indicate the use/function of each of these software licenses by the IESO Nova Scotia.

Request IR-11:

Reference: Application page 30, Table 15, Integrated Resource Planning Consulting Fees 1.0M, and page 31 "and issued a request for proposals on October 16, 2025 to hire an IRP consultant to review the current NS Power processes for Integrated Resource Planning. The successful proponent is expected to complete their review by the end of the 2025/2026 fiscal year".

Questions:

a) Please provide a copy of the RFP?

b) Does the $1.0 million dollars proposed for this cost category cover costs other than the costs of the IRP consultant retained pursuant to the RFP. If it does, please identify these costs.
c) What are the deliverables of the IRP consultant?
d) If the review is expected to be completed by the end of the 2025/2026 fiscal year why are these costs in the 2026/2027 fiscal year proposed budget.
e) As the costs are in relation to reviewing the current NS Power processes, why are they not identified as one-off transition costs.
f) Were the Table 16 2025/2026 Annualized Integrated Resource Planning Consulting Fees of 1.00M spent in 2025/2026 to date. If not, are they expected to be spent in that time period.
g) Based on Table 16 is the IESO Nova Scotia expecting to pay $2 million in IRP Consulting Fees in the two-year fiscal period 2025-2027? If not, what is it expecting to pay in IRP Consulting Fees over that period?
h) Please identify any subcontractors being used by the IRP consultant.

Request IR-12:

Reference: Application page 33, Table 4: Summary of Transitional Cost Category

Questions:

a) For each of the three identified sub-categories in Table 4 please describe the basis on how the estimate of the costs for each category were developed.
b) Has IESO Nova Scotia already retained either a change management or program and project management consultant as mentioned on page 34 of the Application. If so, were they chosen on the basis of an RFP? If not, why not?

Request IR-13:

Reference: Application page 37, "IESO Nova Scotia is requesting a continuation of the Net OM&A Deferral and Variance Account for 2026/2027 and in perpetuity for the purpose of tracking and deferring any variance from the approved revenue requirement."

Questions:

a) How does IESO Nova Scotia propose to have the balances in the variance account reviewed for approval?
b) How often does IESO Nova Scotia anticipate such reviews to occur.
c) Does IESO Nova Scotia agree that all IESO Nova Scotia expenditures are subject to prudency review? If not please explain.

Request IR-14:

Reference: Application page 4, "Phase II involves the transfer of real-time dispatch operations. Due to the complexity of this transition and the direct impact on real-time applications and system reliability, additional work is required to scope and plan the implementation of this phase. IESO Nova Scotia has engaged a third-party expert consultant selected through an open and competitive solicitation process, to support th delivery of this work in the first half of 2026. . . . work in early 2026 is required to be completed to provide a deliverable plan, appropriate target date, and budget."

Questions:

a) Please provide a copy of the RFP or other documentation that constituted the referenced "open and competitive solicitation process".
b) Please provide a copy of the "third-party expert consultant's" CV.
c) Where in either the 2025/2026 or 2026/2027 revenue requirement is the budget for the "third-party expert consultant" found, and indicate the amount and cost category to which it is allocated.
d) When is the referenced "work in early 2026 is required to be completed" anticipated to complete.
e) At this time please provide IESO Nova Scotia's high-level best estimate of:
    i. How many NS Power employees are anticipated to transfer to IESO Nova Scotia in Phase II;
    ii. How many additional non-NS Power employees are anticipated to be hired by IESO Nova Scotia in Phase II, if any, and
    iii. The budgeted cost for all such employees.

This information is understood to be subject to change but IESO Nova Scotia's best current view is being requested by this Information Request.

f) At this time is IESO Nova Scotia currently contemplating leasing or acquiring NS Power's Ragged Lake control centre or moving the Phase II employees to another location? Please provide IESO Nova Scotia's best current estimate of the costs required to accommodate the Phase II employees.

Request IR-15:

Reference: Application page 6, "Twenty-one (21) roles were transitioned from NS Power to IESO Nova Scotia on December 1, 2025."

Questions:

a) Are the 21 employees referenced, or some subset of them, carrying out the "generation interconnection functions" noted on page 4, line 3 of the Application?

b) Do the "generation interconnection functions" include generation interconnection studies?

c) If the answer to b) is yes, please provide a copy of the current IESO Nova Scotia generation interconnection queue.

d) Is IESO Nova Scotia using any outside consultants to assist with interconnection studies? If so, please identify the consultants and note in which cost category in the 2026/2027 revenue requirement costs associated with such consultants are allocated, and the amount of such costs.