Request IR-1:

Referring to M12743, Exhibit N-1, NS Power Inc. Application for Approval of Capital Work Order CI C0068714 – IT – Identity & Access Management, $6,756,522, Redacted, dated March 13, 2026, (the "C0068714 Project - Redacted"), page 1 of 5, and explain the difference between 'IAM procedures and tools' and 'Core deliverables'?

Response IR-1:

The project defines "IAM procedures and tools" as how IAM is achieved by NS Power. Some examples are user onboarding and offboarding processes, access requests and approval workflows, role-based access control policies, and periodic access reviews. IAM Tools are used to achieve these processes and workflows, such as Azure AD/Entra ID, Multi-factor authentication, Privilege Access Management tools (CyberArk Pcloud), and IGA platforms (Saviynt).

"Core deliverables" are not only the implementation of the tools, but the tangible outputs and artifacts the project produces, such as policies and process documentation, training materials, and audit and compliance evidence.

Request IR-2:

Referring to M12743, Exhibit N-1, the C0068714 Project - Redacted, page 1 of 5, which states in the section Description:

> **To ensure long-term sustainability and operational maturity, *the project will also transition Identity and Access Management (IAM) operational support services*—including manual provisioning, User Lifecycle Management (ULM), IGA, PAM, and EPM—to IBM's Managed Security Services (MSS). This transition will provide access to specialized security expertise, reduce operational risk, and augment NSPI's existing teams with 24/7 managed support capabilities. *(Italics added.)***
>
> **Overall, this initiative will modernize the organization's IAM and PAM environments, reduce cybersecurity risk exposure, improve regulatory compliance, and *create a scalable foundation for future identity-centric security programs. (Italics added.)***

(a) Please explain how the transition of the Identity and Access Management (IAM) operational support services will "create a scalable foundation for future identity-centric security programs".

Response IR-2:

(a) With onboarding the Managed Security Services team, NS Power is centralizing IAM. The centralization started with manual provisioning of access management requests, and will scale with the new capabilities such as PAM, EPM, and IGA to manage and support. The transition creates a scalable foundation by moving IAM operational execution toward a managed, repeatable, ServiceNow/routing/runbook-based support model. This improves consistency, operational maturity, audit readiness, and ability to support future IAM/PAM capabilities while NS Power retains governance, policy, approval, and accountability.

Request IR-3:

Referring to M12743, Exhibit N-1, the C0068714 Project - Redacted, page 2 of 5, which states in the section under "Why do this project now?":

> **The project was deemed in service upon the completion of *Release One* of the Identity and Access Management (IAM) Program, which was finalized in February 2026. Release one deployed a Privileged Access Management solution (CyberArk Privileged Cloud). The Final Cost Date (April 2027) is set to occur six months after the completion of all remaining project work, which will conclude with the operationalization of the Identity Governance and Administration (IGA) model at NS Power, forecasted in October 2026. This project began in 2024 with an RFP, vendor selection, and kickoff in 2025 with planning and design activities for the various workstreams and project releases. *(Italics added.)***

And, refer to Exhibit N-1, the CI C0068714 Project, -Redacted Page 5 of 5, T203 – Appendix A, Table A-1, Project Costs (CAPEX or OPEX), *Phase 1* Total Costs – CAPEX $6,756,522. *(Italics added.)*

(a) Comparing the phrases in the above excerpts that have been italicized for emphasis, what is the difference between the terms "Release One" and "Phase 1"?

(b) Please confirm if any further or additional releases or phases are being planned or are anticipated. Please provide as much detail as possible.

Response IR-3:

(a) "Release one" is a project term, meaning NS Power is delivering a capability within a specific scope of work that is a portion of a larger program (making a product available to end users). Phase 1 referenced in the Total Cost of Ownership (TCO) included with the application is a title in NS Power's TCO template and bears no relation to Release One.

(b) There are several releases structured within the IAM project delivering various capabilities, but all are accounted for in the current project scope. Any additional phases would be out of scope of this project but would include continued application onboarding over the next four years to the IGA platform, included in the TCO of this filing. The in-scope releases of the IAM project are:

Release	Description
R1	PAM - CyberArk Privilige Cloud (Pcloud) Corporate Network
R2	PAM - Cyberark Pcloud and Secure Infrastrucure Access (SIA) - Service Management Network
R3	PAM - CyberArk SIA – Corporate Network
R4	PAM - Endpoint Privilege Manager
R5	PAM - Additional CyberArk Capabilities (Secrets Hub, Central Credential Provider)
R6	Identity and Governance Administration (IGA)

Request IR-4:

Refer to Exhibit N-1, the C0068714 Project-Redacted, in the section Contingency Statement, on page 2 of 5 and Reason for Variance, on page 2 of 5 and refer also to Exhibit N-1(C) NS Power Inc. Application for Approval of Capital Work Order CI C0068714 – IT – Identity & Access Management, $6,756,522, Partially - Confidential Attachment 2, Introduction, page 1 of 16:

(a) [redacted]

(b) [redacted]

Response IR-4:

(a) There is a relationship between the [redacted] million increase in the 2026 ACE Plan subsequent submittal estimate and Attachment 2 to the application; however, it is not the sole contributing factor. Listed are the details:

- $[redacted] million - Vendor Project change request to account for overages to the original contract amount and to provide additional resourcing required for the re-baselined plan
- $[redacted] – Capitalized software (purchased before project was in-service)
- $[redacted] – Staff Augmentation – Additional resources for the IAM project outsourced to the vendor
- $[redacted] – Capitalized Managed services (invoiced prior to being in-service)
- $[redacted] – Infrastructure services from Managed Service Provider.

(b) Confirmed.

Request IR-5:

Refer to the C0068714 Project-Redacted which states on page 1 of 5 that the Estimated Life of the Asset is 10 Years and please confirm:

(a) That NS Power is capitalizing the software service agreement due to the Estimated Life of the Asset being 10 years.

(b) Whether there are required updates to the software to ensure updated cyber security protection and, if so, how often those updates are expected to occur.

Response IR-5:

(a) NS Power is capitalizing the costs required to integrate the SaaS solution into its network; the software service agreement itself is not being capitalized. The assets created as a result of this project will depreciate at NS Power's approved depreciation rates, which is a rate of 10% for assets within the Computer Software asset pool.

(b) Software updates are applied as needed by the vendor. NS Power receives service bulletins regularly on software updates and this would be anticipated to occur a few times per year. The solution is SaaS-based, so updates would be applied by the vendor, likely without any intervention required from NS Power.