

To Nova Scotia Energy Board
Response to NS Power submission of June 16, 2026 to NS Energy Board
M12749 - NSPI DRO Appeal - Billing Issues - Christine Cameron

After reading through the response from NS Power (June 16, 2026), I have requested to make further response and thank you for the approval.

I have taken the opportunity to look through other types of matters that have been and are before the Board. On a personal level, I have not known nor understood the role played by the NS Energy Board. I barely knew of it's existence. This process of dispute resolution has been an education as to the role played by the Board. Still, I am sure I do not understand it all fully yet.

The matters I looked through on the NSEB site were from individual customers, like me. Since the requirement for electricity is a necessity of life, customers can feel even more overwhelmed when it seems the company responsible for that electricity may not appear to be ethical or professional in their behavior.

I wanted to speak further to NS Power's response because I do not want my concerns to be dismissed by a barrage of attachments that do not truly speak to the issues at hand, seek to hide them or at best pretend to address them. Information has been submitted that, I believe, seeks to distract from NS Power's lack of transparency to customers of CPP.

As I work through these points, I notice that NS Power has presented numerous amounts of documents with information about various programs and responsibilities. Most of what has been presented are documents I have never seen before. Would it be better to ask if the information was advised to me in 2023 and if so, how did NS Power advise me of that exactly? Even though some of the documents have the date 2023 on them, I find no proof of how/when/what means NS Power utilized to ensure or confirm I was made aware of them.

Those questions lead back to the bulk of why we are going through this appeal process in addition to a rate change that occurred on a guess, instead of an actual reading. Which leads into a rate change that we were promised "would always be lower", without ever knowing that the NS Energy Board could intervene at any time. In other words, the numerous amounts of documents presented by NS Power do not speak of the lack of details provided to me as a customer in December 2023.

I address these issues in order of NS Power's response.

Request IR-1

Please provide the complete tariff provisions, customer terms and conditions, program rules, enrollment materials, FAQs, and any other customer-facing documentation applicable to the

Time Varying Pricing / Critical Peak Pricing (TVP/CPP) pilot program in effect when the customer enrolled in the program in December 2023, including identification of any language describing the pilot nature of the program, the Board's authority over rates, or the possibility of suspension, modification, or termination of the program.

Response IR-1

The table below summarizes the attachments to this IR response

I fear to address each of the 11 attachments will make for an extremely lengthy response. However, I can respond to the question contained in IR-1. Where NS Power has presented these attachments, it does not necessarily mean they were ever “customer-facing” or that customers were made aware of the information. Again, I never knew of the Board’s authority at all until NS Power presented documentation sent to them from the Board, in my original dispute.

I continue to reiterate the fact that there were no “terms & conditions” presented directly to me as a new customer in the CPP. The welcome email provides nothing at all indicating any terms, nothing of the Board’s authority, nothing of possible changes to the program.

Attachment 7, the email “first critical peak event of the season” also speaks nothing of “terms & conditions”, nothing of the Board’s authority, nothing of possible changes to the program.

Attachment 8 confirms the practice of NS Power to not include anything but encouragement into a program with no mention of terms or oversight by another body.

Page 2, line 2 of NS Power response:

Please note, the phrase “your rate will always be lower,” as provided in the CPP welcome email, (Attachment 4) was intended to convey that off-peak rates under the CPP Tariff are lower than standard rates in all non-critical peak hours.¹ However, as with all pilot programs and in accordance with the terms of the CPP Tariff, the program remains subject to modification, suspension, or discontinuation, and all tariff rates are subject to change through Board-approved proceedings.

Unfortunately, there was no indication provided by NS Power, to the customer, that the statement “your rate will always be lower” was “*intended*” for anything except what it was presented as, a benefit to being in the program.

Page 2, line 9 of NS Power response (April 1, 2026):

With respect language describing the pilot nature of the program, the Board’s authority over rates, or possibility of suspension, modification, or termination of the pilot, in addition to these terms and conditions provided in customer-facing documentation (such as those in Attachments 2 and 11)

There was no mention of the Board’s authority over rates or anything else regarding any terms provided to me as a customer of the CPP. Again, I did not even understand anything of the Board’s oversight until this dispute resolution process.

Regarding the Attachment 2 presented: *TVP Pilot Program 3 year report* is not something I was given as a participant in the CPP, nor do I believe I had access to it. The documentation might state various directives by the Board but they do not show in any way that I actually did receive the information. On page 21 of 28 for this document, it indicates that e-bill residents were directed to the TVP residential page. There is no indication on the document provided if there were terms and conditions. I can assure you, I knew nothing of terms and conditions other than the email that welcomed us to the program. Most importantly, I am enrolled in the CPP program and not TVP. For me to see “TVP” it would mean nothing to me because I’m on the “CPP” program.

Regarding the Attachment 11 presented: The registration confirmation message as indicated in NS Power's relevant details states that "prior to 2024/25 Season, the Company marketed the TVP Pilot as the "Time-of-Day Rate Plan Pilot". However, if this statement is correct then why does my welcome email of December 23 state "You're approved for CPP"? In NS Power's own submitted attachments and statements, there is clear mention of two separate programs, the Time of Day and the Critical Peak Period. They are not the same. I remember choosing between two different programs and chose the CPP. Why include different information from a different program than what I am actually in?

Request IR-2

Please explain in detail the methodology used to allocate the customer's consumption for the November 14, 2025, to January 29, 2026, billing period across:

- (a) The Critical Peak Pricing (CPP) pilot rate period;
- (b) The 2025 standard domestic rate period; and
- (c) The 2026 standard domestic rate period

Response IR-2

- (a) The CPP non-critical peak hours rate \$0.15852 was effective from February 18, 2025 to December 1, 2025.
- (b) The standard offer rate \$0.18561 was effective from December 1, 2025 to January 1, 2026
- (c) The standard offer rate \$0.18187 was effective from January 1, 2026.

Since there was no methodology shown as to how the allocation was decided, I believe it was by utilizing averages. However, I again confirm that there was no way for NS Power to accurately determine our usage on the actual date that the program rate change was directed by the Board.

As NS Power presented on page 4 of its first response to NS Energy Board (April 1, 2026):

Without photographs or other evidence of Ms. Cameron's meter reading on December 1, 2025 there is no way to determine how much of the 1341 kWh was used in November when the rate was \$0.15852/kWh and how much was used in December and January when the rates rose to the standard \$0.18561 and \$0.18187 respectively.

NS Power confirms that there was no way to determine what our actual power usage was on the rate change date of December 1, 2025. Therefore, this should have not been done until there actually could be an accurate reading.

Request IR-3

Please provide a copy of the communication sent to CPP customers advising them of the temporary suspension of the program due to the cyber incident.

Response IR-3

Please refer to Attachment 1.

This may have been an error but Attachment 1 states nothing of any temporary suspension of the program. It is "Critical Peak Pricing" and shows as an effective date of Nov 2023, long before the cyber incident.

At numerous times throughout this dispute process, NS Power has referred to directives from the NS Energy Board. Yet, NS Power's dealings with myself as a customer of the CPP give no hint of involvement by the NS Energy Board. But from a novice point of view, NS Power appears to hide behind decisions made by the Board in arguments presented. The authority of the NS Energy Board and any terms and conditions of the CPP should have been made known in the original CPP approval email. The attachment 1 listed makes no mention of the NS Energy Board's involvement in the decision making process.

May I please add, I am not insinuating that I would not have applied to enroll in the program if I knew of the NS Energy Board's oversight. What I continue to say is that the information was not provided to me, the customer. However, when I began the dispute resolution process, NS Power was quick to insinuate that they had no choice in the matters I raised. It is my full belief that NS Power has been caught not having been transparent with customers and are attempting to cover the facts. To promise that our rates will always be lower and then claim they had no choice is no different to false advertising or the breaking of a business promise.

Page 6 of first response to NS Energy Board April 1, 2026

NS Power is regulated by the Nova Scotia Energy Board (NSEB). They are responsible for ensuring customers receive power at fair rates. NS Power confirms that it is acting in accordance with the Nova Scotia Energy Board's October 28, 2025, decision confirming the applicable Time-Varying Pricing (TVP) tariffs for the 2025–2026 season.

Due to system limitations resulting from the cyber incident, the Board ordered that, while TVP system functionality is unavailable, all customers enrolled in the TVP program be billed at the applicable standard offer rate.

Appendix 9 – Time of Day Pilot Program terms & conditions:

This attachment is not the CPP, which is the one we are registered for.

Further, the bottom of the page has the year 2026 on it. So, it is not a document from the dates indicated on it. If NS Power is unable to present a document dated December 2023, it would only distract from what was actually asked.

I reiterate, the information that NS Power sent to me as a customer of the Critical Peak program was not upfront in providing information. It was not transparent and appears to have hidden facts from customers.

If the NS Energy Board has oversight of NS Power, to what extent is this oversight?

- Is there oversight of how the company operates?
 - If so, the lack of information provided to customers is a problem and the Board should be made aware of this as it ultimately reflects poorly on the Board.
 - If not, the lack of information provided to customers is more of a problem because how can the Board have valuable oversight while NS Power performs poorly in communication with actual customers? This option leaves the Board with oversight that is toothless and likely shares in any liabilities.
- Is NS Power required to advise of the Board's oversight to customers?
 - If so, this has not occurred with me on the CPP.

- If not, then NS Power is hiding from customers a type of loophole that they can utilize when issues arise by claiming the Board instructed them.

I have feared that my complaints would be lost beneath the overwhelming size of submissions from NS Power with documents that were not part of my enlistment into the CPP. I was promised I would always have lower rates. There were no terms or conditions. There was no mention of intervention by the NS Energy Board. And, my rates were changed based on guesses. To say I feel cheated and duped is putting it mildly.

Thank you for your patience in allowing me further comment.

Most Sincerely,
Christine Cameron