2026 **M12768**

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: **The Public Utilities Act, R.S.N.S. 1989, c.380 as amended**

IN THE MATTER OF: **Extra Large Industrial Active Demand Control (ELIADC) Tariff – 2025 Annual Report**

INFORMATION REQUESTS

To: Nova Scotia Power Incorporated ("**NSPI**")

From: The Industrial Group

Responses Due: May 8, 2026

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Issued at Halifax, Nova Scotia, this 17th day of April 2026.

Request IR-1:

Reference: 2025 Annual Report, Exhibit N-1, p. 3/9, Table 1

(a) Please explain how the level of benefit reported for 2025 compares to the range of benefits anticipated at the time the ELIADC tariff was approved.

(b) Of the $4.4 million benefit, what amount is associated with recovery of fixed costs, and what, if any, is applied to the FAM?

(c) Please explain the principal drivers of the positive ADC load shifting differential in 2025 after four years of negative differentials, distinguishing among:

(i) Commodity price effects;

(ii) Changes in PHP load levels or load profile;

(iii) System conditions and dispatch optimization;

(iv) Tariff administration or timing effects; and

(v) Any other effects.

(d) Does NSPI expect the ADC differential to remain positive under continued operation of the existing ELIADC tariff in 2026? Please explain and provide the forecasted benefit (if any).

Request IR-2:

Please quantify the impact of applying the 2024 ELIADC energy charge for January 2025 on:

(a) The monthly ADC differential for January 2025; and

(b) The total 2025 benefit to other customers.

Request IR-3:

(a) Please explain, step-by-step what was done by each of the Energy Marketing Team and PHP as they "adapted and worked collaboratively" following the cyber breach. In your explanation, specify when this began and when it concluded.

(b) Please detail any incremental costs to accomplish this (or decrease in costs).

(c) Please provide a clean copy of the existing ELIADC Protocols and redline of any revisions to the ELIADC Protocols which applied during this period.

Request IR-4:

Reference: 2025 Annual Report, Exhibit N-1, p. 2/9 and Benefit Breakdown, p. 2/3

PHP will be billed the cost to serve above the amount that was collected on a monthly basis, in addition to the $4/MWh and other applicable fixed costs, to ensure compliance with the Tariff. NS Power will include the required adjustment of $149,304, taking into account all of PHP's payments during the year, on PHP's upcoming bill.

(a) This figure ($149,304) is found in the final column of the Benefit Breakdown. Please explain the column heading "*Adjusted* PHP Benefit", compare to the column, "PHP Benefit (25%)" and explain the monthly adjustments made.

(b) Has this amount been billed and paid?

(c) Does this amount carry interest? If so, who pays?

Request IR-5:

Reference: 2025 Annual Report, Exhibit N-1, p. 3/9, Load Variations

PHP's initial 2025 forecast totalled 811 GWh. There were revisions to PHP's load forecast through the year, with a final actual demand requirement of 891 GWh.

(a) Please confirm that the December 2025 FAM monthly report, M-1, shows a full year forecast of 813.3 GWh (and in each prior monthly report). Please reconcile this figure with 811 GWh in N-1.

(b) On what date was PHP's initial 2025 load forecast of 811 GWh (or 813.3 GWh) received by NSPI?

(c) Is this in accordance with a standard schedule? Please explain.

(d) Please identify each revision to the PHP load forecast during 2025, including the month of revision and the revised annual forecast.

(e) What steps were taken by NSPI upon receipt of PHP's revised load forecast?

(f) Please provide a copy of the process and protocol for load forecast revisions. If there is no written protocol, please explain what is done in practice.

(g) Please explain how the divergence between the forecast and actual load affected:

(i) Dispatch optimization;

(ii) The calculation of the CBL energy charge; and

(iii) ADC load shifting benefits.

(h) Please compare the magnitude and causes of forecast error in 2025 with those in 2024 and prior years.

Request IR-6:

Reference: ELIADC Tariff Revenue Table p. 1/3 and 2025 Annual FAM Reporting

(a) Please reconcile the ELIADC revenue reported on A3 of the annual FAM report to:

(i) The CBL energy charge collected from PHP in 2025;

(ii) ADC and VOM adjustments relating to prior years;

(iii) The adjusted $149,304 amount stated as owing from PHP.

(b) Please explain why 2024 ADC and VOM adjustments were recorded in 2025 and how this practice affects transparency and year-to-year comparability.

(c) Does NSPI expect similar inter-year adjustments to persist under the 2026 ELIADC tariff? Please explain.

Request IR-7:

Reference: Monthly FAM reports, M-1 (non-confidential) and M-8 (redacted) and ELIADC Tariff Revenue Table, p. 1/3

(a) Please extract and compile the ELIADC data from M-1 and M-8 in the FAM monthly reports in a table similar to the ELIADC Tariff Revenue table. Highlight any cells that differ from what was filed in this Annual report and reconcile and provide an explanation for each variance.

(b) Please explain the notations for accrual booked and accrual reversed (e.g. November monthly FAM report.)

Request IR-8:

Reference: 2025 Annual Report, Exhibit N-1, p. 5/9 – Schedule Deviations (Clause Code 5, "PDN") and Off-schedule Details, p. 3/3

(a) Please describe in detail the methodology used to calculate the $706,609 system cost attributed to PDN deviations in 2025, including modeling assumptions and treatment of avoided or incremental system costs.

(b) Does the $706,609 figure represent a cost to customers (i.e. a harm caused by PHP's deviation from schedule) or a forgone benefit? Please explain.

(c) Is it accurate that regardless which Cause Code, FAM customers are assigned 75% of the costs (or benefits) and PHP is assigned 25%? Does this also apply when PHP chooses not to follow the assigned schedule?

(d) Please explain each of the column headings.

(e) Please explain the asterisked footnote, "*Off Schedule Charges are only included in billing with positive ADC value".

(f) Please sum the three shaded columns and provide the total, unredacted.

Request IR-9:

(a) Please identify the specific dates in 2025 during which Cause Code tracking was incomplete, and confirm the Cause Codes affected.

(b) Please explain how NSPI assessed ELIADC performance and benefits during periods when Cause Code data were unavailable. Specifically address what assumptions were used and how they were determined.

(c) In noting that comparisons to other years "are difficult" please indicate how reliable NSPI's year-over-year comparisons are.

(d) Is there a means to "normalize" the period when Cause Code tracking was unavailable? If so, please provide updated Tables 2 and 3, normalized.

Request IR-10:

Has NSPI omitted any data, analysis or internal assessments from the Annual Report regarding ELIADC operations in 2025 that were available to NSPI, on the basis that such information will not be required under a successor tariff? If so, please explain.

Request IR-11:

(a) For each FAM Audit recommendation not yet implemented, please explain why it was not implemented prior to filing the 2025 Annual Report and when NSPI expects implementation to be complete (if at all).

(b) Please provide a copy of any FAM SWG presentation materials and internal analysis done by NSPI regarding any outstanding directives and commitments.

Request IR-12:

Reference: 2025 Annual Report, Exhibit N-1, p. 7 and 8/9

Preamble: In response to Recommendation XV-3 in the 2022-2023 FAM Audit Report (M11533), NSPI states that it has updated Tables 1, 2 and 3 comparing 2025 and prior year ELIADC Tariff outcomes. However, with respect to "more detailed quantification of actual load shifting benefits (and costs)," NSPI states that it "continues to investigate whether and how this analysis may be able to be compiled, particularly in light of the restoration timing for key data and platforms (PI, PortOps)," with further discussion deferred to an upcoming meeting with the FAM Small Working Group.

(a) Is NSPI saying that it cannot currently provide more detailed quantifications as a result of the cybersecurity incident and is currently unable to access some of the necessary data on PI and PortOps? If not, explain what NSPI means when it says it “continues to investigate”.

(b) If so, please explain precisely what data is currently unavailable due to the restoration timing of the PI and PortOps platforms, and provide an estimate on when NSPI expects these platforms to be fully restored and operational for this purpose.

(c) Does NSPI agree that the absence of this data affects the ability to properly assess the current ELID Tariff and to quantify the actual load-shifting benefits proposed to be compensated to PHP? If not, please explain the basis for that view.

(d) Please confirm what specific steps NSPI has taken since its acceptance of Recommendation XV-3 in September 2024 to develop a more detailed quantification of actual load shifting benefits and costs and provide a timeline for completion of this work.

Request IR-13:

Reference: 2025 Annual Report, Exhibit N-1, p. 7/9

Preamble: Recommendation XV-1 provided that “*NSPI should be required to develop a*

***benefits calculation that takes into account the hourly benefits and costs of PHP load deviations based on hourly quantities and prices, by cause code type, to the extent possible*.”**

NSPI has now confirmed:

> ***After investigation and internal discussions, NS Power has concluded that it is unable to develop an hourly cost and benefit analysis of all individual Cause Codes. Modeling and isolating the costs and benefits of individual Cause Codes would necessitate the creation of several discrete models in the Portfolio Optimization (“PortOps”) software which would result in overlapping, incompatible dispatch results (e.g. unit starts and shutdowns which are in conflicting positions across the models). These conflicting results would collectively show a system that not only did not exist, but one which is not plausible.***
>
> ***Even if the PortOps software had the capability to segregate and execute the simulations required to assess the costs associated with each deviation code, the relatively low load level associated with each individual cause code is too low for the precision tolerance of the PortOps model, relative to the overall system load. The relatively low load increments and decrements associated with individual cause codes can result in unintuitive and contradictory results due to unit commitment variation across scenarios associated with individual cause codes in the model, contributing to unreliability of the analysis.***

(a) Given that NSPI previously accepted Recommendation XV-1 in September 2024, please explain:

(i) What assessment, if any, was undertaken prior to that acceptance of this recommendation as to NSPI's ability to implement it; and

(ii) Why NSPI did not raise these implementation barriers at the time of acceptance or in any subsequent proceeding before the Board?

(b) Given NSPI’s conclusion that it cannot implement Recommendation XV-1, does NSPI propose to seek formal relief from or modification to this obligation? Please explain.

(c) Does NSPI propose any alternative methodology as a substitute to demonstrate the hourly costs and benefits of PHP load deviations by cause code? Please explain and provide any internal analysis completed.

(d) Please explain why NSPI is unable to calculate hourly benefits or costs under all Cause Codes, when it is able to do so in relation to Cause Code 5 (calculated as $706,609 in impact on system costs for off-schedule hours).

(e) In light of this determination, does NSPI plan to modify or enhance any cost or load tracking practices under the ELIADC or the proposed ELID to enable accurate tracking of hourly load-shifting benefits or costs? Please elaborate.

Request IR-14:

Does NSPI consider the 2025 ELIADC Annual Report to be a complete and accurate representation of ELIADC performance for purposes of informing the Board's consideration of a successor tariff? Please explain.

Request IR-15:

(a) Please file NSPI's response to NSEB IR-3 in M12227 (2024 Annual and Regulated Financial Statements) for the purposes of this proceeding.

(b) Please produce a table for each year, 2020-2025, comparing ELIADC and Large Industrial Revenues in $, energy sales in GWh and revenue in ¢/kWh.