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: **Nova Scotia Power Inc. – Extra Large Industrial Active Demand Control Tariff – 2025 Annual Report**

INFORMATION REQUESTS (NON-CONFIDENTIAL)

To: **Karynne Munroe**
Manager, Regulatory Affairs
Nova Scotia Power, Inc. (NS Power)

From: Small Business Advocate

Responses Due: May 8, 2026

Copies: 1 electronic copy (PDF searchable)

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Issued at Bedford, Nova Scotia on this 17th day of April, 2026

Request IR-1:
Refer to M12768, Exhibit N-1, NS Power's Extra Large Industrial Active Demand Control (ELIADC) Tariff – 2025 Annual Report – Redacted, dated March 26, 2026, (the "2025 Report"), which states, on page 2 at para 2:

> In 2025, the difference between the forecast CBL Energy Charge and the actual cost to serve resulted in a positive value (i.e. ADC differential). In such circumstances, PHP is obligated to pay the full actual CBL cost to serve, inclusive of the additional costs arising from any variances by PHP from the dispatch schedules issued to it by NS Power, and the "Minimum Payment" section of the ELIADC Tariff applies.

And further, on page 3 in its Operation Summary, that:

> Despite challenges resulting from NS Power's cyber incident, the Nova Scotia Power System Operator (NSPSO), NS Power Energy Marketing team, and PHP adapted and worked collaboratively for the benefit of all customers. The relatively stable fuel pricing as compared to what was used in the CBL forecast, and continued flexibility of the Active Demand Control service contributed to a positive ADC Load Shifting Differential for 2025. (2025 Report, Summary of the 2025 Tariff Year, Operations Summary, page 3.)

a) What types of challenges, specifically related to NS Power's operations under the ELIADC protocol, referenced in the Operation Summary were caused by the cyber incident?
b) Are these challenges still present in 2026? If so, by what date does NS Power expect these challenges to be alleviated?
c) Please confirm which fuel prices and fuel pricing scenario assumptions were used in the CBL forecast?
   In your response to this question, please provide specific matter and exhibit numbers, where applicable.

Request IR-2:
Refer to the following sections of the Summary of the 2025 Tariff Year in the 2025 Report: ,Load Variations, on page 3, and Off Schedule Summary, on page 4:

a) Please identify the provisions of the ELIADC tariff that allow PHP to revise its forecast during the year and also confirm if there are any provisions that reference any limit on the number of times or number of hours that PHP can submit as a revised forecast.
b) In the event that there is a limit, as described in IR 2(a), how does this limit compare to the reported 1.1 percent of PHP's hours in 2025?
c) Does the ELIADC tariff include a Force Majeure term that would allow for revisions to PHP's forecast that incorporates the "challenging environment for global trade" mentioned in the Load Variation paragraph referenced above?

d) Did PHP communicate these challenging conditions to NS Power in a specific and timely manner, and if so, how did they describe them?

e) On page 4 in the 2025 Report, NS Power sets out the reasons from PHP for deviation in three bullets. Were these reasons referenced in previous years by PHP, in relation to its reason for having deviated from the submitted schedule? If it has, what does NS Power understand to be the specific impact of the challenging environment for global trade that affected these reasons during 2025?

f) Does the calculation of PHP's "net balance owing of $149,304" (see page 4 of 9, first paragraph) mean that as a result of PHP's deviations (categorized as Code 5 PDN) the $380,663 ADC benefit PHP earned was more than offset by the reduction in the ADC credit payment to PHP in the amount of $529,957?

g) Does NS Power expect, or has PHP given NS Power any reason to-date to expect, that a similar outcome related to Code 5 PDN deviations will occur during 2026?

Request IR-3:

Refer to the 2025 Report, section ELIADC Tariff Directives and Commitments from 2025 Proceedings, 1. 2022-2023 FAM Audit Report Recommendation XV-1, on page 7:

a) Please provide an example of the overlapping, incomparable dispatch results ("e.g., unit starts and shutdowns which are in conflicting positions across the models").

b) Do these conflicting positions involve many resources or just specific units? If so which units and does this include the biomass plant as well?

c) What is the precision tolerance of the PortOps model and how does this compare to the relatively low load level associated with each individual cause code and overall system load?

d) What are the values for the relatively low load increments and decrements associated with – or allowed for – individual cause codes?

e) Please confirm that PortOps software can model system output on an hourly basis.

f) Do the limitations of the PortOps software apply to modeling operational emergency situations as well, such as a small renewable energy unit or a short-lived Maritime Link trip?

Request IR-4:

Refer to the 2025 Report, section ELIADC Tariff Directives and Commitments from 2025 Proceedings, 3. 2022-2023 FAM Audit Report Recommendation XV-3, at pages 8-9, which states:

> …
>
> The Company has implemented additional reporting metrics and data, as requested in

Recommendation XV-3, consistent with the Board's direction in the 2023 Report (M12123), and the Board's M12184 Order, in Table 1-3 of this correspondence. With respect to "more detailed quantification of actual load shifting benefits (and costs)," the Company 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). The Company will discuss this further at an upcoming meeting with the FAM Small Working Group.

a) Please explain what is meant by the reference to "the restoration timing for key data and platforms (PI, PortOps)."
b) What is the timing for NS Power's plan to discuss this with the FAM Small Working Group? Will the topic of detailed quantification of actual load shifting benefits and costs as well as other metrics be added to the agenda for upcoming Quarterly FAM Small Working Group calls or will it be held as a separate event?
c) Will these benefits and costs be added as an amendment to the existing FAM reports reported monthly, quarterly or annually?