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June 8, 2026

Ms. Crystal Henwood
Regulatory Affairs Officer/Clerk of the Board
Nova Scotia Utility and Review Board
3rd Floor, 1601 Lower Water Street
Halifax, NS B3J 3P6

Dear Ms. Henwood:

Re: Matter M12768 – Nova Scotia Power Inc. ("NS Power") 2025 Extra Large Industrial Active Demand Control ("ELIADC") Tariff Report

On June 1, 2026, the Small Business Advocate ("SBA"), the Industrial Group ("IG"), and Bates White Economic Consulting ("Bates White") filed submissions regarding NS Power's 2025 ELIADC Tariff Report with the Nova Scotia Energy Board (the "Board"). The Consumer Advocate advised that it would not be making submissions. Pursuant to the schedule established by the Board, please accept the following brief Reply submissions on behalf of Port Hawkesbury Paper LP ("PHP").

Nothing in the various submissions suggests the 2025 ELIADC Tariff Report is inaccurate or that PHP failed to pay the full costs for electricity service in 2025 as required by the terms of the ELIADC Tariff. PHP requests that the 2025 ELIADC Tariff Report be approved as filed. As noted by Bates White at page 3 of its submission, the 2025 ELIADC results and NS Power's efforts to comply with prior FAM Audit recommendations will be addressed in the upcoming FAM Audit report.

At page 3 of its submission, Bates White states that the increase in Cause Code 5 hours from 2024 is concerning, but also notes that total Cause Code 5 hours were lower in 2025 than in the first four years of the ELIADC Tariff. With respect, there is no cause for concern. There were 95 total Cause Code 5 hours, or only 1.1% of all hours in the year, which as Bates White notes was the second lowest total of the six years of Tariff operation.

The IG submits on page 2 that "the absence of any constraint on load forecast revisions is a gap in the tariff" and recommends this be considered in the context of the ELID tariff design. At page 4, the IG recommends that the Board consider whether interest should apply to outstanding post-year-end balances in the successor ELID. PHP intends to address any relevant issues regarding the ELID Tariff as part of the Application process for approval of that Tariff, which remains ongoing.

The IG's submission also comments on the FAM Audit Recommendations related to the ELIADC Tariff and makes various requests for further information and updates to NS Power's reporting. The SBA similarly asks that the Board require NS Power commit to when it will provide an update on its ability to provide detailed quantification of actual load shifting benefits and costs, as well as the status of efforts to restore data and platforms following the recent cyber event. PHP remains fully supportive of transparency and stakeholders being provided access to any information the Board finds to be relevant in relation to the operation of the ELIADC Tariff. As NS Power is responsible for preparing and presenting such information, PHP defers to NS Power (and ultimately the Board) as to what improvements can and should be made to future reporting to address stakeholder comments and the FAM Audit recommendations.

Finally, PHP notes that once again, both Bates White and the IG have taken another opportunity to reiterate that the calculated 2025 ELIADC benefit for other customers remains substantially below the $10 million/year benefit expected by NS Power in 2019 when it submitted the ELIADC Tariff to the Board for approval. However, again they both fail to mention that the Application also forecast an average ELIADC Energy Charge of $62.72/MWh during the four year period (which was **inclusive** of the forecast benefit of $10 million/year). As noted in PHP's submissions in Matters M12004 and M12123, the actual costs incurred by PHP were in excess of $91/MWh, and PHP paid over $100 million more that originally forecast for electricity over those four years. As all parties are aware, the incremental fuel costs paid by PHP greatly exceeded forecasts compared to what was contemplated in the 2019 Application, and this context is critical in understanding why the fixed cost contributions for other customers and the costs under the Tariff paid by PHP did not occur as expected.

Thank you for the opportunity to submit these comments.

Yours truly,

James MacDuff

cc: M12768 Parties