

NOVA SCOTIA ENERGY BOARD**IN THE MATTER OF THE PUBLIC UTILITIES ACT****- and -****IN THE MATTER OF a review of NOVA SCOTIA POWER INCORPORATED's 2025
Annual Performance Standards Report****CLOSING SUBMISSIONS OF THE CONSUMER ADVOCATE****July 3, 2026**

These are the closing submissions of the Consumer Advocate regarding the 2025 Annual Performance Standards Report of Nova Scotia Power. The 2025 Report shows that while there was an improvement in some of the indices of reliability measured in the Report, Nova Scotia Power continues to struggle to meet its performance metrics overall. The Report confirms that in 2025 Nova Scotia Power failed to meet five of the fourteen standards assessed in the performance review: 2025 Annual Performance Standards Report, Exhibit N-1, page 20.

The Board will need to determine whether, in light of Nova Scotia Power failure to meet more than a third of its performance standards, an administrative penalty should be imposed on the Utility to encourage future compliance with the standards.

2025 Standards

The performance standards for 2025 were updated by the Board in an Appendix to its Letter Decision regarding Nova Scotia Power's 2024 Performance Standards Report: Letter Decision, M12185, September 10, 2025, page 19.

For the key measures of system reliability, the performance of Nova Scotia Power in 2025 was mixed. The Company easily met the Average System Interruption Frequency Index (SAIFI) recording a level of 1.57 versus the standard of 2.05, but again failed to meet the Interruption Duration Index (SAIFI), recording a level of 4.79 against the standard of 4.29: 2025 Annual Performance Standards Report, Exhibit N-1, pages 20-23.

Viewed on a circuit level, one of the circuits selected for review in 2025 failed to achieve the target for the interruption duration index (CKAIFI) and two of seven target circuits did not meet the

1 interruption frequency index (CKAIFI): 2025 Annual Performance Standards Report, Exhibit N-
2 1, page 23.

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4 2025 was the first year of Nova Scotia Power's Five Year Reliability Plan and the Company claims
5 it made progress in reducing the frequency and duration of outages in 2025: 2025 Annual
6 Performance Report, Exhibit N-1, page 8.

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8 In response to Board IR-2, Nova Scotia Power stated the following:

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10 Reliability performance is influenced by highly interconnected and confounding variables
11 such as:

- 12 • Weather variability
- 13 • External factors
- 14 • Lagging and cumulative effects of investment
- 15 • Multi-year investment planning

16
17 NSEB IR-3, Exhibit N-4.

18
19 While this may be true, the customers of the Utility are most concerned about the reliability they
20 actually experience; that is how long and how often do the lights go out. It is clear that from this
21 perspective, much remains to be done.

22 23 **Other Performance Indicators**

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25 The remaining performance targets which Nova Scotia Power failed to achieve concerned
26 customer service; namely, the regular business call answer rate and the percentage of customer
27 bills that were estimated.

28
29 In both of these cases, the failure to meet the prescribed target can be directly attributed to the
30 impact of the cyber attack that was experienced by Nova Scotia Power in 2025.

31
32 This may be considered a mitigating factor when assessing Nova Scotia Power's responsibility for
33 failing to meet the targets. It is also significant that in both areas, Nova Scotia Power's performance
34 improved toward target levels as the Utility responded to the cyber event.

35 36 **Apparent Improvements**

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38 A key feature of Nova Scotia Power's Five Year Reliability Plan is vegetation management and
39 increased investment in tree trimming along power lines. This appears to be bringing positive
40 results.

1 Nova Scotia Power reports that outages caused by trees making contact with power lines were at
2 their lowest level in the last five years in 2025, after the investment of 90 million dollars in
3 vegetation management over 2024 and 2025: 2025 Performance Standards Report, Exhibit N-1,
4 page 9.

5
6 Nova Scotia Power acknowledges that weather conditions in 2025 were generally favourable and
7 this would itself have reduced the number of outages due to tree contact. However, it maintains
8 that without its investment in vegetation management, there could have been more outages caused
9 by tree contact in 2025: CA IR-1, Exhibit N-2; IG IR-4(d), Exhibit N-3.

10 11 **2026 Standards**

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13 The Consumer Advocate takes no issue with the performance targets for 2026 proposed in the
14 Report. They are generally consistent with the targets which were in place for 2025.

15
16 However, the threshold for requiring an Outage Report should be applied with some flexibility.
17 There may well be instances where the provision of an Outage Report for events that affect fewer
18 than thirty thousand customers would be of benefit to the Utility and its customers.

19 20 **Conclusion**

21
22 This is the ninth consecutive year in which Nova Scotia Power has failed to meet one or more of
23 its performance targets. In closing submissions on the 2024 Annual Performance Standards Report
24 (M12185), the Consumer Advocate recommended that the Board use its statutory powers to
25 impose an administrative penalty on Nova Scotia Power for repeatedly failing to meet its
26 performance targets.

27
28 In 2025, the Utility again failed to meet important standards related to reliability and the imposition
29 of another administrative penalty could be appropriate. However, there have been improvements
30 in the two indices of reliability that measure the frequency and duration of outages. The Board
31 will have to determine if those improvements are sufficient to eliminate the justification for the
32 imposition of an administrative penalty on Nova Scotia Power for its performance in 2025.

33
34 Thank you for the opportunity to make these submissions.

35 Yours truly,

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37 

38
39 David Roberts
40 Consumer Advocate

