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1 **Request IR-1:**

2
3 **Reference: p.3, lines 6-10, quoting the GRA decision:**

4
5 **The Board directs NS Power to submit annual reports summarizing actual**
6 **storm restoration costs for each year ... including a summary of actual Level**
7 **1, 2, 3 and 4 storm restoration costs.**
8

9 **And Reference: p.6, line 8-9.**

10
11 **Storm restoration costs are tracked by storm event, for Level 3 storms and**
12 **above. NS Power does not track individual Level 1 & 2 storm costs.**
13

14 **(a) Please explain in detail how NSPI ensures that costs allocated to Level 1 & 2 storms**
15 **are accurately captured, not comingled with non-storm OM&G activity; and**
16 **appropriately excluded from potential rider recovery.**
17

18 **(b) Given that Level 1 & 2 costs exceeded base rate allowances by approximately \$2.3**
19 **million in 2025, please explain how NSPI monitored these accumulating variances**
20 **during the year, and whether any cost containment actions were considered or**
21 **implemented in response.**
22

23 **(c) Please provide a detailed explanation of the row in Figure 3 labeled “Level 3 Storms**
24 **– prior period” and why there is a positive capital charge and a negative operating**
25 **expenditure.**
26

27 **Response IR-1:**

28
29 **(a) Level 1 & 2 storm costs are not eligible for inclusion in the storm rider. NS Power tracks**
30 **all Storm costs within individual projects in PowerPlan. All operating storm projects use**
31 **cost center 117. Once a Level 3 or 4 storm event has been declared a unique operating**

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to IG Information Requests

NON-CONFIDENTIAL

1 project number with applicable account combinations for Level 3 and 4 storm events is
2 created and communicated to all key stakeholders. In addition, distinct capital projects for
3 substation, transmission and distribution asset replacements for the Level 3 or 4 storm
4 event. All storm related costs that are not charged to the specific Level 3 or 4 Storm Event
5 projects, are considered Level 1 and 2 and are not included in the calculation of the storm
6 rider.

7
8 (b) In the 2023-2024 GRA, NS Power forecast the amount of storm restoration operating costs
9 to be included in the Company's revenue requirement based on the average storm
10 restoration expense for the preceding five years, escalated by inflationary factors, however,
11 given the volatility of storm activity year over year, actual costs can vary significantly
12 compared to historical data. All storm costs are compared against actual storm activity
13 (event days) to ensure the costs being recorded are reasonable.

14
15 Based on the outage prediction model and location of impact NS Power will send available
16 internal crews to work restoration rather than contractors to contain costs in Level 1 storm
17 events.

18
19 (c) The negative operating expense and capital charges are related to adjustments for accrual
20 estimates and not related to any new invoices or charges. The accrued amounts were
21 adjusted once actual invoices were finalized and received.

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Request IR-2:

Reference: In its Decision in M12188, the Board directed NSPI to distinguish proactive (“storm readying”) from reactive (“storm response”) costs to the level that is operationally practical and explicitly noted that some costs (e.g. travel), should be distinguishable. In Section 4, p. 9, NSPI states that the storm readying category *includes* mobilization costs ... hotel accommodations ... and one day of meal per diems for PLT contractors. In addition, it states that costs associated with internal resources, traffic control and vegetation management contractors are *not included* in the storm-readying category.

(a) While NSPI provided categories of costs both included and excluded from “storm readying”, it did not offer definitions. Please provide NSPI’s definitions of “storm readying” and “storm response”, the source of these definitions and indicate if these definitions are new for 2025.

(b) In stating that storm readying “includes” is this intended to be an exhaustive list of costs? If not, please include all costs tracked as “storm readying”.

(c) Please explain why internal labour, traffic control and vegetation management costs are categorically excluded from storm readying costs, even where such activities occur prior to storm impact.

(d) Does NSPI have data to establish whether those resources were deployed before storm impact and the dollar value? If so, please provide. If not, why not?

Response IR-2:

(a) While no formal definition exists, for the purposes of this report, “storm readying” costs are the costs incurred before the storm event occurs and “storm response” costs are incurred once the storm starts and restoration activities begins.

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to IG Information Requests

NON-CONFIDENTIAL

- 1 (b) Yes, the costs listed as “includes” in Section 4 (mobilization costs for powerline technician
2 (PLT) contractors, hotel accommodations for PLT contractors for the night preceding the
3 start of restoration activities, and one day of meal per diems for those contractors) is the
4 complete list of what was included in storm readying costs for the purposes of this report.
5
- 6 (c) As stated in Section 4, costs associated with internal resources, traffic control, and
7 vegetation management contractors are not included in the storm-readying category, as
8 these resources do not incur mobilization costs, nor require pre-restoration hotel
9 accommodations, and are not eligible for meal per diems until restoration work begins.
10 These resources are reallocated from regular work to storm response, therefore there are
11 no incremental costs associated with these resources when preparing for a storm event.
12
- 13 (d) Internal resources, traffic control, and vegetation management contractors work in their
14 home regions/depots during initial storm response. Please refer to part (c).

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to IG Information Requests

NON-CONFIDENTIAL

Request IR-3:

Reference: p. 9, Figure 7.

(a) For each Level 3 storm in 2025 as shown in Figure 7, please identify:

(i) The decision point at which costs transition from storm readying to storm response; and

(ii) The operational or managerial criteria used to trigger that transition.

(b) Please provide, a detailed breakdown of each category of costs incurred as “storm readying” and “storm response” and identification as an operating expense or capital.

(c) Please expand Figure 7 to include “storm readying” costs and “storm response” costs for Level 1 & 2 Storms.

Response IR-3:

(a) (i) Please refer to IG IR-02 (a).

(ii) The time of the first outage attributed to the storm event is considered the point of distinction between storm readying and storm response.

(b) Storm readying costs are all operating expenses and are broken down as follows:

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to IG Information Requests

NON-CONFIDENTIAL

Storm	5-Dec-25	19-Dec-25	
Expense Type	Operating	Operating	
Contracts	118,089	\$353,880	
Total	\$118,089	\$353,880	

Storm response costs include both capital costs and operating expenses and are broken down as follows:

Storm	5-Dec-25	19-Dec-25	
Expense Type	Operating	Operating	Capital
Contracts	\$508,040	\$1,001,953	\$1,498,553
Overtime Labour	\$307,723	\$659,158	\$753,591
Meals and Travel	\$53,118	\$76,575	\$84,638
Regular labour	\$85,141	16,505	\$24,077
Materials		\$49,631	\$54,855
Other	-195		0
AO	-	-	\$635,932
Total	\$954,217	\$1,803,822	\$3,051,646

(c) Level 1 and 2 storm costs are not tracked by storm readying and storm response categories.

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Request IR-4:

Reference: Section 6, Cost Control and Performance Management for External Contractors.

(a) Please provide, for each Level 3 storm in 2025:

(i) Total contractor cost;

(ii) Total internal labour costs; and

(iii) The proportion of total storm OM&G attributable to contractors.

(iv) The specific cost control and contractor performance measures that were in effect;

(v) The metrics used to assess performance during the event (for example, does NSPI measure contractor cost per deployed crew or per restoration hour?);

(vi) The individual within NSPI accountable for enforcing those measures during storm response.

(b) For each cost control and performance measure identified above, please state:

(i) Whether the measure was fully implemented, partially implemented or not implemented;

(ii) How NSPI evaluated each measure's effectiveness; and

(iii) Any deficiencies, limitations, or failures identified post-event.

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to IG Information Requests

NON-CONFIDENTIAL

(c) Please quantify, where possible, the cost savings attributed to:

(i) Standardized storm contractors;

(ii) Per diem meal reimbursement practices; and

(iii) Early release of contractor crews.

(d) Please explain whether any contractor invoices were challenged, reduced, or rejected and, if not, how NSPI satisfied itself that all costs were reasonable and prudent.

Response IR-4:

(a) (i-iii) Please refer to the table below for contractor and internal labour costs for Level 3 Storms in 2025.

Cost	December 4-5, 2025	December 19-20, 2025
Total Contractor Cost	\$626,129	\$2,854,386
Total Internal Labour Costs	\$392,864	\$1,453,295
Proportion of total Storm OM&G attributable to contractors	58.4%	62.8%

(iv) For both Level 3 storms in 2025 the cost controls in place for contractors were based on the contractual agreements in place and which outline the applicable terms and conditions, labour rates, reimbursement guidelines, minimum equipment requirements, etc. Additionally, contractor invoices were reviewed post-event and cross-referenced with storm-specific crew tracking documentation. Any invoiced costs that are found to be in error are denied and resolved with the contractor.

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to IG Information Requests

NON-CONFIDENTIAL

1 (v) NS Power does not measure contractor cost by deployed crew or per hour of
2 restoration or employ other performance metrics with respect to contractor crews.

3
4 (vi) Each contractor crew is assigned a NS Power Crew Lead or is working directly
5 with an NS Power designate to facilitate restoration efficiency in the field.

6
7 (b) Cost Control Measures

8
9 (i) The cost control measures described in part (a) are fully implemented.

10
11 (ii) Cost control measures are evaluated based on whether the contractual agreement
12 was upheld. Invoices received are reviewed against storm specific external crew
13 tracking documentation and the contractual agreements.

14
15 (iii) There were no deficiencies, limitations, or failures identified post-event.

16
17 (c) Cost savings attributed to standardized storm contracts, per diem meal reimbursement
18 practices, and the early release of contractor crews have not been analyzed outside of what
19 was articulated in the report, namely that in general the cost of the per diems, compared to
20 meal costs in storms prior to 2025 was lower by approximately \$50 per person, per day.
21 This is due to the difficulty in directly comparing storms and the “but for” analysis that
22 would be required.

23
24 (d) No invoices were challenged or rejected following post event review for either of the two
25 Level 3 EOC events in 2025. Contractor invoice reviews did not indicate inappropriate
26 labour rates, mobilization costs or hours of work when compared to negotiated storm
27 response rates and crew tracking data.

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Request IR-5:

Reference: Section 7, Predicted and Actual Storm Levels for Reported Events, p.15, lines 5-8.

NS Power has included the prediction immediately prior to the decision to activate the company's Emergency Operations Centre. For clarification, once the storm level is declared, it is not reduced to a lower Level during the event, regardless of the actual impacts.

(a) In addition to the Predicted and Actual Customer Impact, please expand Figure 10 to include Predicted and Actual time of restoration.

(b) Please explain how the "predicted customer impact" figures shown in Figure 10 were used in real-time decision-making with respect to:

(i) EOC activation;

(ii) Contractor mobilization; and

(iii) Staging of external resources.

(c) Please describe the process undertaken by NSPI through its Post-Event Critique process, after each level 3 or 4 storm (whether anticipated or realized).

(d) Does the process change whether the storm level is realized or not? Please elaborate.

(e) What, if any, documentation is generated through the Post-Event Critique process?

(f) In the December 5, 2025 event, predicted impacts exceeded actual impacts by approximately 21,000 customers. Please explain what post event analysis was

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1 **undertaken to assess forecasting accuracy and whether any corrective action(s) were**
2 **identified or implemented as a result.**

3
4 **(g) Is NSPI able to provide a qualitative or quantitative assessment of forecasting**
5 **accuracy or bias across events? Please explain.**

6
7 Response IR-5:

8
9 (a)

10

Event Date	Predicted Customer Impact	Actual Customer Impact	Predicted Restoration Duration	Actual Restoration Duration*
December 5, 2025	28,308	7,222	~36 Hours	30 hours 51 minutes
December 19 - 20, 2025	54,162	198,998	~42 Hours	96 hours 35 minutes

11
12 *Total restoration duration would reflect the final customer restoration, including areas of severe
13 damage and/or challenging access, and would not represent the customer experience of the vast
14 majority of impacted customers as evidenced by the percentage of customers restored in the first
15 6, 12, 24, and 48 hours of response.

16
17 (b) For the December 5, 2025 event:

18
19 (i) The Level 3 EOC activation was based on the predication of a longer than 36 hour
20 duration restoration timeframe.

21
22 (ii) Based on the forecast, 108 external PLT and PLT Apprentice contractors from
23 Nova Scotia and New Brunswick were mobilized prior to the event.

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to IG Information Requests

NON-CONFIDENTIAL

1 (iii) Based on the forecast, 43 percent of the external PLT contractors were staged in the
2 Cape Breton region prior to the event; 24 percent West, 20 percent in the Northeast
3 and 13 percent in the Metro region.
4

5 For the December 19, 2025 event:
6

7 (i) The Level 3 EOC activation was based on the predication of expected customer
8 impact of 54,162.
9

10 (ii) Based on the forecast, 139 external PLT and PLT Apprentice contractors from
11 Nova Scotia, New Brunswick, Prince Edward Island and Quebec were mobilized
12 prior to the event.
13

14 (iii) Based on the forecast, 12 percent of the external PLT contractors were staged in the
15 Cape Breton region prior to the event; 42 percent West, 27 percent in the Northeast
16 and 19 percent in the Metro region.
17

18 (c) As outlined in Section 7.5 of the ESRP, within 3 days after any Level 3 or 4 storm event,
19 a post-event critique process is initiated and led by the Storm Lead or Alternate to review
20 the event, its impact on the power system and to evaluate the overall effectiveness of the
21 restoration effort. This approach takes input from all EOC Leads involved in the event and
22 identifies strengths and weaknesses, and corrective action plans are developed to ensure
23 that improvements are effectively implemented.
24

25 (d) The Post-Event Critique process is initiated after all Level 3 and 4 storm events.
26

27 (e) A Post-Event Critique summary document is created during each Post-Event Critique,
28 retained by the Duty Officer, and reviewed by the Storm Leads to generate any required
29 action items. The Post-Event Critique summary document is then stored on an internal
30 ESRP SharePoint site.

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to IG Information Requests

NON-CONFIDENTIAL

- 1 (f) A review of the forecast and actual weather conditions was conducted by NS Power as part
2 of the Post-Event Critique process. This included a discussion with NS Power's primary
3 party weather forecast provider on the potential drivers behind deviations between
4 forecasts and actuals. In many regions, the actual winds were not significantly different
5 than forecast with slight variations being within the expected margin of error considered
6 by NS Power in its range of potential pre-storm scenarios. No corrective actions were
7 identified as a result of this review. Please refer to IG IR-09 for further discussion on how
8 forecast uncertainty is treated by NS Power.
9
- 10 (g) No, NS Power is unable to provide a comprehensive quantitative assessment of the forecast
11 accuracy for all events at this time. Review of forecast accuracy is performed on an event-
12 by-event basis as appropriate and reported as required in NS Power's storm reporting
13 framework.

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Request IR-6:

Reference: At p. 3, NSPI sets out its storm classification scheme which includes two metrics – number of customers affected and time when restoration is expected.

(a) Regarding the estimated restoration, does this mean that 100% of affected customers must be restored within the stated 12, 24 or 36 hours? If not, please explain.

(b) Please confirm that where fewer than 50,000 customers are forecasted to be affected, the sole differentiating factor is the expected time to restore?

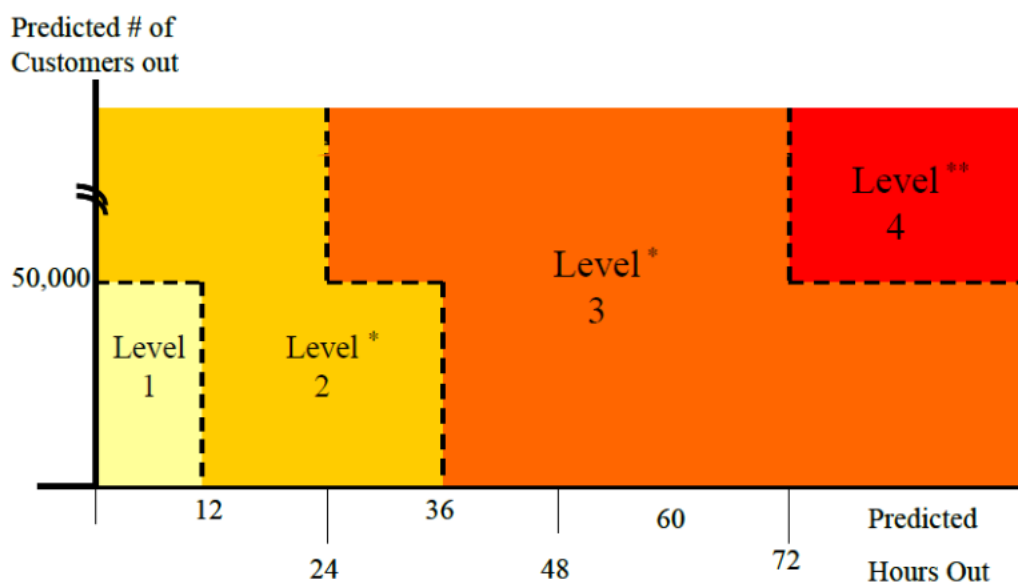
(c) Please provide the criteria that NSPI applies to establish the expected time to restore.

Response IR-6:

(a) No, this is the timeframe in which the affected customers are *expected* to be restored, not *must* be restored. Please also refer to Section 5.2, Figure 1 of the ESRP document (reproduced here for convenience) for a visual representation of the description on Page 3. The level of storm is determined based on the pre-storm estimated impacts and restoration profile prior to arrival of an event and may not reflect the actual weather conditions and restoration challenged experienced during the event itself.

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Figure 1– Response Trigger Levels



* Once triggered, a Level 2 or Level 3 restoration response must remain in place until power is restored to all customers affected by the storm event or until a higher response level is triggered.

** Once triggered, a Level 4 restoration response must remain in place until power is restored to all customers affected by the storm event.

- 1
- 2
- 3 (b) Yes. For events where fewer than 50,000 customers are expected to be impacted the
- 4 determination of the response level is based on the anticipated restoration duration.
- 5
- 6 (c) Please refer to NSEB IR-01 part (b).

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Request IR-7:

(a) NSPI has stated that a storm level, once declared, cannot be downgraded during the course of an event. Given this position, please confirm whether NSPI agrees that a conservative estimate of restoration time will effectively lock in a higher storm-level designation and, consequently, a higher-cost response model for the duration of the event, with the potential result of inflating overall storm costs. If NSPI does not agree, please explain why not.

(b) Given NSPI's position on storm-level declarations, please confirm whether a conservative restoration time forecast that results in a higher storm-level designation means that the associated costs would potentially be recoverable through the storm rider, rather than being absorbed by NSPI's shareholders as they would be under a Level 1 or Level 2 storm designation. If this is not the case, please explain.

Response IR-7:

(a) NS Power does not agree. All storm response planning, from Level 1 to Level 4, is commensurate with the predicted customer impacts, and duration of outage restoration is a consideration when determining NS Power's response level. The purpose in the statement that the response Level will be maintained from an ESRP perspective is to provide consistent and sustained storm response support in larger events. The example of Hurricane Fiona can be used to illustrate where, on Day 8 of the response when less than 50,000 customers were left to be restored, the Level 4 event did not become a Level 2 event. That said, as the restoration progresses, contractors are released as soon as there is no productive work remaining to assign to them.

(b) While professional judgement is used in the declaration of storm event ESRP Levels, NS Power relies on analytical tools such as multiple forecasts, damage prediction and scenario planning models. This reduces the impact of unwarranted optimism or

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to Industrial Group Information Requests

NON-CONFIDENTIAL

1 conservatism in declaring the storm event ESRP Level. Approval for operating costs
2 exceeding annual budgeted amounts for Level 3 and Level 4 storms can be requested
3 from the NSEB by submitting a Storm Cost Recovery Rider application.

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Request IR-8:

Reference: The Board Decision in M12188 acknowledged NSPI's commitment to provide

“more specific and detailed comments on lessons learned as requested by the IG”. Attachment 1, the December 19-20, 2025 Wind Storm Report at p. 27/29 sets out “lessons learned.”

(a) Does NSPI maintain that this fulfils its commitment and is responsive to the Board's decision?

(b) Please file a copy of NSPI's response to NSEB IR-14 in M12728 which sets out “associated action items”.

(c) Please provide a copy of the Post-Event Critique for this storm.

(d) Please tie the lessons learned and action items from this storm directly to measurable outcomes such as (but not limited to) reduced OM&G, avoided contractor mobilization, shorter restoration times, or lower customer hours of interruption.

Response IR-8:

(a) NS Power maintains that the Lessons Learned in the context of the December 19-20, 2025 storm outage report is responsive to the Board's direction. The December 19–20, 2025 event was a predominantly wind-driven storm with system impacts and restoration challenges that are not directly comparable to other recent major events (e.g., ice storms or mixed precipitation events). Restoration activities during this event relied on established practices for wind-related outages, which have been refined through prior operational experience. Accordingly, the lessons learned for this event are focused on incremental improvements and the reinforcement of existing practices, rather than fundamental changes to restoration approach.

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to Industrial Group Information Requests

NON-CONFIDENTIAL

1 (b) Please refer to Attachment 1.

2
3 (c) Please refer to Attachment 2 for the Post Event Critique document for the December 19-
4 20, 2025 storm event. A Post Event Critique document exists for every weather event that
5 warrants an EOC open.

6
7 (d) While it is not possible to directly measure the outcomes mentioned, the action items from
8 the December 19-20 Windstorm which could be tied to reduced OM&G, avoided
9 contractor mobilization, shorter restoration times, or lower customer hours of interruption
10 include:

- 11
12 • Action item: The Restoration, Planning and Performance team will update the
13 prediction model and undergo its annual calibration as planned with no special
14 considerations from this storm.

15 Value: Improvements to the prediction model help focus pre-storm planning
16 activities.

- 17
18 • Action item: Transmission team to explore the use of additional drone contractors
19 when helicopters cannot fly.

20 Value: Drone reconnaissance could improve restoration logistical planning in the
21 event helicopters are grounded/unavailable.

- 22
23 • Action item: Regional Operations to continue to use overnight damage assessment
24 teams to keep crews focused on high priority work and have a dedicated lead to
25 triage non-outages.

26 Value: This effort keeps crews on priority restoration incidents and uses non-PLT
27 resources to address non-outage incidents.

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Request IR-14:

The report's lesson learned section identifies observations but does not demonstrate what action NS Power has/will take. Please provide a comprehensive action plan arising from this storm. Does NS Power intend to make any changes to its vegetation management program as a result of lessons learned from this storm? If so, what changes? If not, why not?

Response IR-14:

As outlined in the NS Power Emergency Services Restoration Plan, NS Power conducts a Post-Event Critique led by Storm Leads across various teams and departments. Expanding on the lessons learned, the associated action items are as follows:

- The Restoration, Planning and Performance team will update the prediction model and undergo its annual calibration as planned with no special considerations from this storm.
- Transmission team to explore the use of additional drone contractors when helicopters cannot fly.
- Regional Operations to continue to use overnight damage assessment teams to keep crews focused on high priority work and have a dedicated lead to triage non-outages.
- Regional Operations to continue to provide media content where appropriate and educate the field from the media and communication perspective on content gathering and creation.
- Expand content creator roster for Communications Lead.
- Access passwords for some systems expire 30 days and mass resets need to be explored by the Operational Technology lead.

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1 NS Power does not intend to make any changes to its vegetation management program as a result
2 of this storm. NS Power will maintain its vegetation management spending as outlined in the Five-
3 Year Reliability Plan and prioritize annual plans based on condition assessments. The standards of
4 clearance remain the same based on safety standards and the Normal Limits of Approach in the
5 Occupational Health and Safety Act, Part 11, Section 126(4) and NS Power's Safe Work Practice
6 35. The industry standard for distribution right-of-way maintenance is generally a total width of
7 6 meters, or 3 meters on either side of the conductor, where feasible. The standard for transmission
8 right-of-way is based on line voltage.

Level 3: Wind & Rain Event – Dec. 19th – 20nd 2025**Post-Event Critique (PEC)****Attendees:**

Storm Leads:	☒ Pam Scully-Poirier; ☒ Charlene MacMullin, ☒ Jill Searle
Safety:	☐ Peter Murray, ☐ Suzanne MacDonald
Control Centre:	☐ Dave Downey, ☒ Shoaib Badshah
Transmission Ops:	☒ Mike Gagnier, ☒ Mike Breski, ☒ Justin Donovan
Regional Ops:	☒ Paul Warren, ☒ Dave Landry
Logistics:	☐ Amy Dolomount, ☐ Roger Williamson, ☒ Hugh Kerr
Customer:	☐ Chris Lanteigne, ☒ Aaron McLean
Corporate Communications:	☐ Kathryn O'Neill, ☒ Adam Cheyne, ☒ Casey Spears
Duty Officers:	☐ Carling Gratto, ☒ Lauren Boyle, ☒ Jonathan Au
EMO:	☒ Sanjeev Pushkarna, ☐ Jamie Chipp,
Rest. Plan. & Perf. (RPP):	☐ Glen MacLeod, ☒ Anthony Bell
Rest. Plan. & Perf Reporting:	☐ Mike MacMillan, ☒ Laura Sutherland, ☐ Damian Daniels, ☒ Jonathan Au
IT:	☒ Rob Harris, ☒ Nathan MacDougall
Internal Resources:	☐ N/A
UARB Rep:	☐ Blake Williams
Executive Team:	☐ Peter Gregg, ☐ Dave Pickles, ☐ Lia MacDonald, ☐ Matt Drover
Others:	☐ Emily MacNeil, ☒ Leanne Smith

Post Event Review (Per PEC Sub-Process 9 & ESRP Appendix 7)

Welcome and Overview:**Safety Lead:****Done Well:**

- Truck checks – contractors generally arrived with the required gear, except for Class 3 gloves (see 'Do Betters').
- We quickly responded when we found that contractors didn't have enough Class 3 gloves – we were able to provide loaner gloves and retrieved them once contractors were released.
- Safety performance generally – employees and contractors worked the storm response injury free despite some challenging conditions. Particularly notable since this was the first time in more than a year that we brought in contractors who don't normally work for us (i.e. Holland, Gagnon).

Do Better:

- NB & Quebec contractors arrived with mostly Class 2 rubber gloves and not enough Class 3's. This is despite the contract requirements specifying the need for Class 3s on each vehicle.
- Contractor personnel training records (orientation, fall protection, and first aid) were in many cases not made immediately available by contractors and required extensive follow-up by the Safety team to resolve gaps in documentation. Providing these records is a requirement not only to do work for NSP but to meet regulatory requirements to work in NS.

- For the near-miss incident that we had with one of the out of province contractors (where their fall arrest system was engaged), incident reporting and responses to our follow-up questions were not completed within the timelines that we require.
 - Actions/Feedback/Considerations:
 - Cletus and team to follow up on contractor shortcomings (gloves, providing records etc.) and get our documentation in order.
 - Enhancements to how we determine minimum requirements, which is our responsibility. Some folks didn't have enough info to come prepared, and some were just delinquent.
 - Create/strengthen a distribution list with an accurate membership for safety/storm communications

Control Centre Lead:

Done Well:

- One incident (1N), but fortunately a PNC staff was on site/in person and working closely with Operators. Could've been a different story if they were remote.
- Engineering / Fady's team readily available which was beneficial re: isolation permits for example

Do Better:

- Visibility of the critical communication sites
- Ensure back up supply available
- Actions/Feedback/Considerations:
 - Feedback from field was that we were understaffed re: dispatchers and prematurely let dispatch folks go.

Transmission Lead:

Done Well:

- We did a good job transitioning the Tx crews into Dx crews when transmission restoration was complete. We made sure there were distribution trucks nearby (ahead of the event) that the crews could easily jump to when transmission restoration was over.
- Worked closely with Distribution and Sub Ops during the event so that we could get a crew released to Higgins Mountain wind farm project as it was a high priority project to be completed before Christmas.
- Pre-staging crews and material checks. Crews were staged near transmission events so could respond quickly. Field Project Leads also completed transmission material checks at depots that have transmission critical spares.

Do Better:

- Connect with Forestry group to see where offroad forestry equipment is staged or if staged at all. If there was off road forestry gear near L6002 we could have utilized them instead of using CAUS.
- Look at utilizing more drones for inspections. We were unable to fly the helicopter immediately post storm due to weather. It would be good to have back-up plans in the future when this happens, drones may be good alternative and can utilize our drone contractor (Aerovision).
- Better communication with Sub Ops/Distribution regarding transmission material and where it's located. For the repair at 1N, Substation folks went to Antigonish to gather material when there was material available in Truro.
 - Actions/Feedback/Considerations:
 - Explore additional drone contractors for when Heli's can't fly

ROPS Lead:

Done Well:

- Field Ops: dispatcher/engineering done well
- DA: saw some good notes coming from the bird doggers which were very useful for restoration
- Overnight DA was valuable in keeping crews focused on high priority work. There was a dedicated lead triaging non-outs which worked well and so we will look to expand this going forward.
- Quality of boxed lunches from Logistics noteworthy
- Truck checks/identifying issues went well
- Dedicated crew leads – went particularly well in one area and we plan to expand this
- Kept a ROPs night shift on our last night (typically on call/standby at this point) which assisted with clean up and helped a lot. Will consider this again going forward. Same goes for keeping our garage/mechanics open/on-site – a big help.
 - Actions/Feedback/Considerations:
 - Consider - Keep garage open in SYD?
 - What are Schedulers doing?
 - TX Lead chain of command / workshop
 - Field provided a lot of content (a lot of pictures coming in and requests going out) but is it the correct type of content? Field education opportunity.

Do Better:

- Substation: getting access to Open View
- Need to get better at collecting/recording/analyzing 'auditable' information
- Logistics – the role of a runner, delivery timing and timing of donations. Improvements to be made re: crew leads delivering boxed lunches to contractor crews, don't want to overwhelm a depot.

- Actions/Feedback/Considerations:
 - Where do we want to capture DA data? (Dave & Dawn actioning). Continue to roll out while securing DA integrity. (Consider: Financial storm costs for DA).
 - Can we identify calls that were visited by DA? GIS?
 - Securing backhoes ahead of storm instead of assuming folks are going to assist
 - Collapse Transmission into ROPs lead role in a Level 3 +? Workshopping to be booked.
 - Late requests re: rentals from Logistics, per Ronnie
 - Per Diems – Warehouse issued per diems Friday afternoon of storm per Logistics documentation. (+2 hours of work clause – see Logistics Subplan document)

Customer Lead:

Done Well:

- Service levels & response times from CCC
- Our manual power on/off calls were successful and saved truck rolls

Do Better:

- ETR strategies can take a bit of time to update in ADMS typically early in the event when we're the busiest/volume of events are high. We saw ~ 30/45 minutes to an hour wait time for this storm event and would like to better match the info we're providing on calls. (*See RPP DA/NP/Connectivity notes – still under contingency plans*)
- Number of ETR strategies. A lot of ETR strategies implemented this storm (~11) – though it was a unique event with numbers much higher than anticipated.

- Actions/Feedback/Considerations:
 - Consider: The board is interested in how many ETRs we give and how accurate they are. Continue to consider the impact of how many ETRs we roll out.
 - How many ETRs ended up rolling up to larger events? Consider fuzzy calls, large # of unmodelled customers etc.

RPP Lead - Modeling/Forecasting:

Done Well:

- Good team availability (reps for new members)
- Tableau tools working well
- ETR process was smoother than previous storms

Do Better:

- Model wasn't what expected (calibration exercise to occur)
 - Actual vs. forecast
 - Determine abnormalities
 - Refine the model without over skewing/impacting different types of storms
- ETR profile sheet. Missing newer feeders and needs a refresh

- Timing out of Tableau (longer idle time before logout would be helpful)
 - Identifying “Critical Infrastructure” by customer in ADMS
 - Preemptively request access for all new members prior to storm
 - WebDMD dispatching for NTP – did not allow for mass dispatching
- Actions/Feedback/Considerations:
 - Could we create packages (similar to Veg) for DA based on our notes?
 - Consider: Analyze dispatch over the life of a storm for crews in order to better understand utilization. See sequencing of large to small calls.

RPP Lead - DA/NP & Connectivity:

Done Well:

- Op Tech – First Level 3 of 2025, acknowledging we’re operating under some contingency plans. We saw minor hiccups that were resolved quickly re: data integrations, but ADMS performed as expected.
- Nighttime packages went well. Got what we needed from the day to make an informed plan.

Do Better:

- Vacancies in DA roster – looking to fortify this, will align with ROPs structure.
 - In need of a DA Coordinator and leads to liaise with the field
- Maxed out WebDMD license account. This has since increased from 50 to 65 and will eventually be increased to 75 but requires work with the vendor.
 - Rob Bruce is currently working with Schneider Electric and Anthony's team on contract/permanent increase.
- Storm damage summary. Post event audit on DA data if we continue to use it for planning and allocating costs. Items mistagged etc. which affected the model.
 - Actions/Feedback/Considerations:
 - How do we determine Capital vs. Operating? How will we use the new DA model and use that info to measure expenditure splitting?
 - By analyzing and tracking this, it would allow us to identify N/As and chase those.
 - Consider: Accuracy in button clicking for DCC is extremely important as ADMS is the source of truth.
 - Consider: communication chain

Corporate Communications Lead:

Done Well:

- Quick turnaround on comms materials (within 3 hours) for EOC opening to ensure performance standard was met.
- Kudos to the team and crews for the quick and safe restoration work! Of the 192,000 impacted customers, 140,000 customers restored within the first ~24 hours, which is incredible.
- Sharing of approved messages with internal teams (social, CC, GR, Stakeholder Engagement) as updated throughout the day.
- New storm lead jumping in and doing media interviews.
- Great content from the field and Tim Feeley – impactful photos helped with social sentiment, overnight approvals
- Social media content performed well, sentiment was more positive than normally expected.

Do Better:

- Consider having a dedicated space for media interviews at EOC so we can set it up ahead of time and not scramble last minute (i.e. Jill's office) & have a media kit that we can grab and go ahead of EOC opening (tripod with iPad holder, iPad and light).
- Process for content (video/photo) uploading, approvals, filing was a little rusty – opportunity for improvement.
- Sprout login process for social media helpers was sometimes difficult due to two factor authentication and only some people having access to the accounts to receive codes required to authenticate. We'll need to figure this out so that people who are "off shift" don't need to be watching accounts to help people authenticate.
- Need additional Storm Content Creators as we're down resources now
- Continue work within the Communications and Engagement Teams to better understand storm roles and fine tune our response.

○ Actions/Feedback/Considerations:

- Content creator roster needs more names
- Consider: language on socials around how far to stay away from downed lines (2 power pole lengths, 2 buses, meters, feet..)
- Consider: poles down in yard and customer not feeling safe in home – how do we communicate safety/plan of action?

Logistics Lead:

Done Well:

- Facilities staff were prepared and conditioned facilities well (salt, sand etc.)
- Fleet – ARI/Holman cards available and distributed. Also had Irving cards as backup, which will be phased out soon

- Night fueling – Irving delivering to hotels etc.
- Boxed lunches delivery and quality

Do Better:

- Class 3 gloves – contract clearly states this
 - Contract copies were circulated in the field, but we can do better by communicating with folks ahead of time
- Idle time with BH contractors/pole setters. Would we benefit if they were under a storm contract?
- Considering the size of the Logistics team going forward – shuffling names, consider hours
- Tighten language around per diems and when they get issued
 - Actions/Feedback/Considerations:
 - Consider: BH Contractors/pole setters under a storm contract?
 - Align with ROPs re: per diems and update documented language (“if we activate EOC in the middle of your ‘regular’ shift, your Per Diem will kick in for your next full shift..”)

EMO Lead:

Done Well:

- Coordination with EMO in advance; effective support from PCC.
- When they active at a level 1 monitoring, their policy is to have someone physically located at the PCC with a duty officer on call.
- Reliability Advisors – updates and general situational awareness.

Do Better:

- Consistency in staffing roster
 - Leads responsible for forwarding communication from EOC to the rest of their team
- Shift timing
 - 6am-6pm does not align with EMO and so would like to shift back to 7am-7pm which is more effective re: coordination with EMO.
 - Ok’ed by storm leads
 - Actions/Feedback/Considerations:
 - Consider: Evaluate how to best communicate with EMO - reaching out to Ops Mgrs directly? WebEOC? (still in flight)
 - Warming centers – should come through PCC
 - Sanjeev to take away and follow up with EMO

IT Lead:**Done Well:**

- Thankful for the December 4th event/tabletop. Made everything more seamless for this L3 response.
- Storm operational technology performed very well. (ADMS, GIS, Supporting Layers, Tableau, etc.)
- Overall response was well staffed and responded to. There were no reported incidents that did not have the required resources to action. Incident triage and action occurred very efficiently.
- Proactive monitoring and increase of ADMS Database computer resources. Shout out to ShuYuan Liu.
- Kenny O'Donnel using the storm event to identify the root cause of a pre-storm (but storm impacting) ADMS incident (3:00-4:00 AM)

Do Better:

- Holiday onsite ADC and BCC coverage for an L3+ event, lead to some exceptions. DBA and OnX examples.
- ADMS to GIS integration issues "bad data" - Suspicion is that end users are copy and pasting text from MS Word into ADMS but not conclusively proven over this event. The T&D BSA team is working with Virginia to improve/avoid going forward.
- Avoid Web DMD and Web CC password resets during a storm event. 100+ over the December storm events. Not a problem to action, just takes away from higher value work. Kenny has brought this to Elie and Lauren's attention.
 - Actions
 - WebDMD passwords expire every 30 days, and we need a way to avoid mass resets during a storm event. Anthony to take this away.

Storm Lead:**Done Well:**

- Overall, a storm well done

Do Better:

- We found ourselves competing with NB and may have missed out on some contractors.
 - Actions/Feedback/Considerations:
 - Consider timing of calling on contractors and CAUS' right to refusal
 - Consider the accuracy of the model – did we know what we needed at the time per our expected forecast?
 - 6am-6pm shift change – discussions/feedback needed
 - Storm Lead involvement in contract management – night shift lead not engaged

- Consider a PNC expert on night shift at the beginning of/during event – Brad F being there in person (for 1N event) was by chance, but very valuable.

Additional Storm Lead Comments (or general comments)

Action Item List				
#	EOC Function	Action Item	Responsible	Due Date

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Request IR-9:

Preamble: Regarding the December 5, 2025 event, NSPI acknowledges the over-forecast, but as no Storm Report was filed, ratepayers have no insight into lessons learned from this event.

(a) Did NSPI undertake an internal review of the December 5, 2025 event (whether a formal Post-Event Critique or otherwise)? If so, please provide or describe the outcome.

(b) What, if any, lesson(s) were learned from this forecast deviation for future decision-making regarding forecasting and mobilization decisions?

(c) What, if any, enhancements has NSPI made to the Storm Tracker tool and/or Damage Prediction Model following this event?

Response IR-9:

(a) Yes, as consistent with NS Power's Emergency Services Restoration Plan (M12441) all activations of the Emergency Operations Centre (EOC) for a Level 3 or 4 event are followed by a Post-Event Critique (PEC). The PEC findings from this event included positive resource and system availability in the first EOC activation since the cyber incident. The main lessons learned were focused on up-to-date EOC rosters, resource availability, and properly communicating status to the EOC leads and Duty Officer.

(b) NS Power recognizes that the accuracy of pre-storm planning, including predicting the scale of customer impact, is dependant on the accuracy of the forecasts received by NS Power from third party forecasters, including Environment Canada. However, NS Power's equipment is subject to the actual weather which occurs and its relative accuracy to a forecast produced in advance of an event and may change considerably over time. Third-

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1 party weather forecasters pursue continuous improvements of the underlying weather
2 models, but as with all predictions of highly complex systems there are limitations to the
3 possible accuracy. For this reason, consistent with its pre-storm planning methodology, the
4 Company considers a range of potential forecasts, updated multiple times per day, to
5 determine the possible system impacts. While this particular event did not materialize as
6 forecast, it is prudent for NS Power to be prepared to address the forecast conditions and
7 associated impacts. NS Power is guided by the forecast information it receives to
8 appropriately plan for crews and staging in order to minimize outages and interruptions for
9 customers.

- 10
- 11 (c) As detailed in NS Power's 2025 Storm Restoration Costs report and its ESRP, the
12 Company's Damage Prediction Model is calibrated regularly with past weather actuals and
13 storm performance to refine its parameters for future use. As in previous years NS Power
14 will include event performance, including December 5, 2025, in a future model calibration
15 anticipated in Q3 2026.

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Request IR-10:

Reference: p. 14, lines 1-17.

Preamble: NSPI outlines a new software platform which will be used to further monitor and control contractor costs, along with better manage storm events.

(a) Please confirm that this project is the subsequent submittal listed in the 2026 ACE Plan as C0082274 – Storm Management Software, estimated at \$2.2 million in total. If not, what is the CI number for this project?

(b) Will this new software system replace or supplement the Storm Tracker tool and Damage Prediction Model? Please explain.

(c) Will this new software system allow for additional tracking and/or reporting functions for storm costs, beyond what NSPI current has access to? If so, please explain how this new software will impact NSPI's Storm Restoration Cost Reporting.

Response IR-10:

(a) Confirmed.

(b) The proposed software platform would replace some existing tools related to the securement, tracking, and logistics of internal and contractor crews, and would also act as a complement, rather than replacement, to NS Power's current pre-storm planning tools.

(c) Yes, NS Power anticipates that additional tracking and reporting of storm costs beyond what is currently possible with existing tools would be enabled by the implementation of the proposed software platform. Potential improvements to post-storm reporting would include:

2025 Storm Restoration Cost Report (NSEB M12786)
NSPI Responses to Industrial Group Information Requests

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- 1 • Daily timesheet review and approval by crew leads
- 2 • Crew securement details and reporting
- 3 • Improved tracking of pre and during-storm travel by contractor crews
- 4 • Day-by-Day crew location and composition tracking
- 5 • Crew meal and lodging tracking and expense
- 6 • Contractor crew productivity metrics