

NOVA SCOTIA ENERGY BOARD

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

IN THE MATTER OF: **NOVA SCOTIA POWER INCORPORATED 2025 Storm
Restoration Cost Report**

INFORMATION REQUESTS

To: Nova Scotia Power Incorporated ("NSPI")

From: The Industrial Group

Responses Due: May 21, 2026

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Issued at Halifax, Nova Scotia, this 30th day of April, 2026.

ALL REFERENCES ARE TO THE 2025 REPORT, EXHIBIT N-1.

Request IR-1:

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

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

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

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

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

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

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

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?

1 **Request IR-3:**

2 **Reference: p. 9, Figure 7.**

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

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

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

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

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

13 **Request IR-4:**

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

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

17 (i) Total contractor cost;

18 (ii) Total internal labour costs; and

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

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

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

26

(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.

(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.

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

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

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.

1 **Request IR-7:**

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

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

15 **Request IR-8:**

16 **Reference:** The Board Decision in M12188 acknowledged NSPI's commitment to provide
17 **“more specific and detailed comments on lessons learned as requested by the IG”.**
18 **Attachment 1, the December 19-20, 2025 Wind Storm Report at p. 27/29 sets out “lessons**
19 **learned.”**

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

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

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

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

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1 **Request IR-9:**

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

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

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

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

12 **Request IR-10:**

13 **Reference: p. 14, lines 1-17.**

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

16 (a) Please confirm that this project is the subsequent submittal listed in the
17 2026 ACE Plan as C0082274 – Storm Management Software, estimated
18 at \$2.2 million in total. If not, what is the CI number for this project?

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

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

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