



Blackburn Law Inc.

June 11, 2026

VIA EMAIL

Ms. Crystal Henwood
Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
Halifax NS B3J 3S3

Dear Ms. Henwood:

Re: M12786 - Nova Scotia Power Incorporated – 2025 Storm Restoration Cost Report

The Small Business Advocate (SBA) has reviewed Nova Scotia Power Incorporated's (NSPI) 2025 Storm Restoration Cost Report, dated April 1, 2026 (the "Report"), as well as the responses to Information Requests filed by the Board, the Consumer Advocate, the Industrial Group (IG) and the SBA, and has the following comments.

In response to IG IR-7(a)¹, NSPI states that the assigned storm level (1-4) will not change over time, in order to maintain the applicable storm response, but notes that contractors are released over time, as and when they are no longer needed. However, it is unclear why a storm classification would not be adjusted over time, assuming that both of the determining factors for the assignment of a storm level (being the forecasted numbers of customers to be affected and the expected time to restore all customers affected) should be changing as work is underway.

While the transition from a Storm Level 4 to a Storm Level 3 may not result in a significant impact on customers, there is a direct cost risk for customers when work is undertaken under a Level 3 or 4 storm instead of a Level 1 or 2. The response to IG IR-7(a) refers to a 'larger event' but there is a concern, as has been experienced in the past, of expected storms being smaller than anticipated. In those cases, the approach taken by NSPI could have a significant impact on customer costs.

With respect to the use of AI-driven prediction models, as referred to in response to SBA IR(b), the SBA respectfully submits that NS Power should include in future Storm Cost reports whether the AI-driven prediction model was deployed and how well it performed. NS Power should also provide an explanation of how the cost of the AI-driven prediction model is accounted for in rates or within the storm cost recovery rider.

Yours truly,

Melissa P. MacAdam
Small Business Advocate

¹ M12786, Exhibit N-3 – NSPI Responses to IG Information Requests – IR-7(a), Page 1 of 2.