
Nova Scotia Energy Board

IN THE MATTER OF *The Public Utilities Act*, R.S.N.S. 1989, c.380, as amended

M12861

2026 Load Forecast Report

NS Power
Rebuttal Evidence

September 8, 2026

NON-CONFIDENTIAL

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

TABLE OF CONTENTS

1.0	INTRODUCTION	3
2.0	RECOMMENDATIONS.....	5
2.1	Synapse	5
2.1.1	Recommendation 1	5
2.1.2	Recommendation 2	5
2.1.3	Recommendation 3	6
2.1.4	Recommendation 4	6
2.1.5	Recommendation 5	8
2.1.6	Recommendation 6	9
2.1.7	Recommendation 7	9
2.1.8	Recommendation 8	10
2.1.9	Recommendation 9	10
2.1.10	Recommendation 10	11
2.2	Consumer Advocate.....	12
2.2.1	Recommendation 1	12
2.2.2	Recommendation 2	15
2.2.3	Recommendation 3	17
2.2.4	Recommendation 4	19
2.2.5	Recommendation 5	19
2.2.6	Recommendation 6	20
2.2.7	Recommendation 7	21
2.3	Small Business Advocate.....	21
2.3.1	Recommendation 1	22
3.0	CONCLUSION.....	23

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1.0 INTRODUCTION

In accordance with the Nova Scotia Wholesale Electricity and Renewable to Retail Market Rules¹ Nova Scotia Power Incorporated (NS Power, the Company) is required to provide the Nova Scotia Energy Board (NSEB, Board) with its 10-year energy and demand forecast by the end of April each year for the 10-year period beginning in the following January (Load Forecast). For 2026, NS Power requested, and was granted, an extension of the filing date to May 15, 2026.

NS Power develops an annual forecast of energy sales and peak demand requirements which is used to assess the effects of end-use and economic factors on the future power system load and load shape. The forecast is a foundational input to the overall planning, budgeting and operating activities of the Company. Produced in the winter of 2025-2026 and using information available at the time, this forecast covers the period of 2026-2036.

Following the filing of the 2026 Load Forecast Report on May 15, 2026, the Board issued a Hearing Order directing a paper hearing associated with its consideration of the Report.² Interventions were received from the Consumer Advocate (CA), the Small Business Advocate (SBA), counsel for the Industrial Group (IG), the Independent Energy System Operator Nova Scotia (IESO-NS), EfficiencyOne (E1), Eastward Energy (EE), the Department of Energy (DOE), Port Hawksbury Paper LP (PHP), Renewall Energy Inc. (REI), and Solar Nova Scotia (SNS).

On July 7, 2026, NS Power provided responses to Information Requests (IRs) issued by NSEB staff, Synapse Energy Economics, Inc. (Synapse) on behalf of NSEB Counsel, the CA and the SBA. Intervenor Evidence was subsequently filed by Synapse, and by John Wilson, on behalf of the CA. Submissions were filed by the SBA.

¹ Nova Scotia Wholesale and Renewable to Retail Electricity Market Rules, effective 2007 02 01, amended 2016 06 01.

² M12861, NSEB, Hearing Order, 2026, Load Forecast Report, May 20, 2026.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 NS Power has agreed to many intervenor recommendations, as outlined in Section 2 below. The
2 Company's responses to the Intervenor's specific recommendations are set out in this Rebuttal
3 Evidence. With respect specifically to incorporating Advanced Metering Infrastructure (AMI) data
4 into variance analysis activities and forecasting, NS Power reiterates that this is a long-term
5 process that will require a period of assessing the available data, and either integrating it into the
6 existing model or building a new or modified version to make use of this data. It is anticipated that
7 changes to the load forecasting model will continue to be incorporated incrementally in the coming
8 years as more granular data becomes available.

9
10 Commitments made in this Rebuttal Evidence specifically pertain to NS Power's load forecast,
11 which, as noted above, is an input to the overall planning, budgeting and operating activities of NS
12 Power and is provided to the Independent Energy System Operator Nova Scotia (IESO-NS), to
13 assist with system planning responsibilities. The More Access to Energy Act (SNS 2024, c 2, Sch
14 B.) sets out that the objectives of the IESO-NS include, among other things, to "forecast electricity
15 demand and the adequacy and reliability of electricity resources for the Province for the short,
16 medium and long terms." As the transition of responsibilities to the IESO-NS progresses, the
17 Company will continue to work with the IESO-NS to develop an approach for future submissions
18 of the Load Forecast Report.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

2.0 RECOMMENDATIONS

Synapse, John Wilson on behalf of the CA, and the SBA provided recommendations for future load forecasts. NS Power's responses to those recommendations are set out below.

2.1 Synapse

The Synapse Evidence notes that Synapse has been engaged in the review of NS Power's load forecasts for many years and recognizes the iterative improvements in the forecast. Synapse provides ten recommendations on the 2026 Load Forecast Report, which are discussed below.

2.1.1 Recommendation 1

NS Power should continue to monitor the impact of trade policy and consider explicitly incorporating tariff impacts into its future forecast if they are expected to have a material impact on load growth.³

NS Power Response:

NS Power will continue to monitor the impact of trade policy. In circumstances where tariff impacts are expected to have a material impact on load growth, NS Power will consider explicitly incorporating the impacts into future forecasts to the extent possible and appropriate.

2.1.2 Recommendation 2

Concerning the adjustment to Signal49's housing completions forecast and the associated high degree of uncertainty, NS Power should continue to monitor actual completions, consider the forecasts of the major banks, and assess whether revisions to this projection are warranted in next year's load forecast.⁴

³ M12861, N-9, Synapse Energy Economics Inc., Direct Evidence of Synapse on behalf of NSEB Counsel, NS Power 2026 Load Forecast Report, July 21, 2026, page 19.

⁴ M12861, N-9, Synapse Evidence, page 19.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

NS Power Response:

NS Power will continue to monitor actual housing completions and to consider the forecasts produced by Canada's five major banks. Forecast adjustments will be considered where appropriate.

2.1.3 Recommendation 3

While the inclusion of the 24-hour lagged temperature variable appears to be well supported, NS Power should consider the suitability of other modeling approaches that would reflect possible interactions between lagged temperature and other variables or otherwise capture the possible non-linear impacts of long duration cold on peak.⁵

NS Power Response:

The temperature input in the 2025 load forecast model was based on a 12-hour lagged temperature. This was updated in the 2026 model to include a 24-hour lagged temperature, as set out in Section 4.3 and 10.1 of the Report. In its Evidence, Synapse states that it supports continued use of the approach if validated in future peak load forecasts.⁶

NS Power will continue to use the current approach in its peak load forecasting model and will monitor forecast performance as new peak load observations become available. As part of its ongoing forecast development and validation process, NS Power will consider the suitability of alternative modelling approaches where appropriate.

2.1.4 Recommendation 4

For hybrid heating, NS Power's assumed participation among new installations – 50 percent of NAE systems beginning in 2028 – does not ramp gradually. NS Power

⁵ M12861, N-9, Synapse Evidence, page 19.

⁶ M12861, N-9, Synapse Evidence, page 11.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 should apply a more moderate ramp rate. Meanwhile, NS Power should expand
2 modeled eligibility to include all existing NAE systems, but with substantially
3 lower participation rates. Finally, NS Power should reassess and document whether
4 the assumed commercial hybrid-heating trajectory represents a reasonable central
5 forecast. At a minimum, it should apply explicit eligibility, participation, and ramp-
6 rate assumptions and use an implementation date supported by commercial
7 program or market conditions, while presenting lower and higher participation
8 cases as sensitivities.⁷
9

10 **NS Power Response:**
11

12 At the time the hybrid heating assumptions were developed, NS Power relied on the best
13 information reasonably available, including an analysis of AMI data for over 20,000 electrically
14 heated NS Power customers and a study of actual heat pump load in Nova Scotia. Given the
15 absence of an existing or planned hybrid heating program and the limited availability of current
16 market potential information, this provided a reasonable basis for forecasting potential hybrid
17 heating impacts in the 2026 Load Forecast.
18

19 NS Power understands that E1 has initiated an accelerated Demand Side Management (DSM)
20 Potential Study that includes consideration of hybrid heating opportunities and will be used to
21 inform the upcoming Integrated Resource Plan (IRP) being led by IESO-NS. NS Power expects to
22 incorporate relevant hybrid heating data from the E1 DSM Potential Study and IRP into its 2027
23 Load Forecast. In addition, available program-level information and forecasts will be incorporated
24 into the modelling process as they are developed.
25

26 With respect to presenting lower and higher participation cases as sensitivities for commercial
27 hybrid heating, NS Power notes that scenario analyses are a planning exercise which is beyond the
28 scope of the load forecast and would introduce significant additional complexity and effort without
29 clear justification or benefit. Rather than specific scenarios, a sensitivity analysis is provided in
30 Section 11 of the Report and the impact of several specific forecast inputs (DSM, solar, EV,

⁷ M12861, N-9, Synapse Evidence, page 19.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 hydrogen production, batteries, weather/economics) are outlined in Appendix D and provide the
2 relative magnitude of their contribution to both energy consumption and peak.

3
4 **2.1.5 Recommendation 5**

5
6 NS Power should clarify which heat pump efficiency metric (HSPF or HSPF2)
7 underlies its forecast and, in future forecasts, it should use HSPF2 ratings for new
8 heat pump installations. NS Power should also describe its heat-pump heating-
9 intensity calibration more clearly, although the resulting intensity is generally
10 consistent with the metered results from the Itron Cold Climate Heat Pump Load
11 Study and supporting calculations are provided in the workpapers.⁸
12

13 **NS Power Response:**

14
15 The efficiency metric currently incorporated into the load forecast is HSPF, which comes from
16 EIA data for New England (for the historical and forecast period). However, to clarify how heat
17 pump efficiency is incorporated into the load forecast, the actual efficiency ratings of individual
18 heat pumps are not explicitly represented. What is modelled is the impact of the estimated change
19 in the average efficiency of the overall heat pump stock relative to a base year (2020). Changes in
20 stock efficiency over time are represented by the EIA average HSPF forecast.

21
22 It is NS Power's understanding that EIA currently relies on HSPF because their underlying
23 residential model and equipment databases were built around the legacy HSPF metric, and EIA
24 has not yet fully transitioned those inputs to HSPF2. If, or when, EIA provides HSPF2 instead of
25 HSPF, NS Power will adopt the updated data.

26
27 NS Power agrees that future Load Forecast Reports would benefit from a clearer description of its
28 heat-pump heating-intensity calibration. The Company will update the End-Use Trend section of
29 the Report in the 2027 to include additional details about the calibration.
30

⁸ M12861, N-9, Synapse Evidence, page 19.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

2.1.6 Recommendation 6

NS Power should construct its reference-case EV forecast primarily in a bottom-up fashion based on realistic inputs from a reputable source, reserving the federal-target trajectory for a high case. NS Power should model managed charging explicitly, based on projected participation rates, rather than combinations of actual and modeled average reductions under different scenarios.⁹

NS Power Response:

NS Power will engage a third-party consultant to provide an updated EV forecast using a bottom-up approach which it will incorporate into the 2027 Load Forecast.

Though managed charging will impact the load forecast, it is neither the intent of, nor within the scope of, the load forecast to study managed charging market potential or to develop and model managed charging programs; these are expected to be developed through a separate process, such as a potential study and/or DSM planning exercise. Available market potential, program-level or rate-related information and forecasts will be incorporated into the forecast as they are developed.

2.1.7 Recommendation 7

NS Power should remove any modeled PHEV charging from its DCFC and workplace L2 peak modeling because it is unlikely to contribute to peak.¹⁰

NS Power Response:

NS Power agrees with this recommendation and will remove any modeled PHEV charging from its DCFC and workplace L2 peak modeling.

⁹ M12861, N-9, Synapse Evidence, page 19.

¹⁰ M12861, N-9, Synapse Evidence, page 19.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

2.1.8 Recommendation 8

NS Power should evaluate why 2025 had lower-than-forecast residential solar installations to determine whether this was an anomaly or indicative of a broader trend. The incremental distributed solar growth rate forecast should incorporate multiple years of historical data to minimize the impact of any single year. Further, NS Power should continue to evaluate and update its solar installation projections and coincidence factors for solar so they align with the latest data.¹¹

NS Power Response:

NS Power evaluated the lower-than-forecast residential solar installations in 2025, as set out in Synapse IR-12(b). The main driver was assumed to be the removal of financial incentives for residential customers in 2025. Accordingly, NS Power reduced the incremental residential installation growth rate from 15 percent to 10 percent in the 2026 Load Forecast. NS Power will continue to monitor solar installations and adjust the growth rate, as appropriate, based on identified trends.

NS Power agrees that the incremental distributed solar growth rates should be informed by multiple years of historical data to minimize the influence of any single year; however, notes that the value of historical data may be limited in circumstances where there has been a material and change in the policy environment. Should such circumstances occur, NS Power will consider whether reliance on historical data is appropriate. The Company will continue to update solar installation projections and coincidence factors to align with the latest data.

2.1.9 Recommendation 9

NS Power should continue monitoring trends in behind-the-meter storage adoption, both standalone and solar-plus-storage.¹²

¹¹ M12861, N-9, Synapse Evidence, page 19.

¹² M12861, N-9, Synapse Evidence, page 19.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

NS Power Response:

NS Power will continue to monitor trends in and will seek opportunities to obtain data on provincial behind-the-meter storage installations, including both standalone storage and solar-plus-storage systems.

2.1.10 Recommendation 10

NS Power should replace its uniform 10-year DSM savings accumulation window with a vintage-based persistence model using measure-category lives and decay curves. NS Power should also estimate embedded energy and peak savings separately, using cumulative DSM demand savings as the input to the peak forecast regression.¹³

NS Power Response:

Justification for the uniform 10-year DSM savings accumulation window is provided in response to Synapse IR-15. While a vintage-based persistence model may provide a more granular representation of DSM savings persistence, it would also increase model complexity and data requirements. NS Power currently employs an average savings accumulation approach that provides a reasonable representation of the persistence of DSM impacts at the system level. Absent evidence that the additional granularity would materially improve forecast accuracy, the benefits of implementing a more complex methodology are uncertain at this time.

Additionally, as noted in Synapse IR-15, this DSM savings series in the load forecast is derived from E1's annually reported savings result. Those results do not currently include the measure-level DSM savings, measure-lives, persistence assumptions and vintage data which would be required to develop a vintage-based persistence model.

¹³ M12861, N-9, Synapse Evidence, pages 19-20.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 With respect to estimating energy and peak savings separately using cumulative DSM demand
2 savings as the input to the peak forecast regression, NS Power tested this approach in the 2022
3 Load Forecast proceeding (Matter M10569, CA IR-7), estimating a peak regression specification
4 with DSM demand savings included as an explicit independent variable. That test produced a
5 positive coefficient on the DSM variable - indicating the model interpreted incremental DSM
6 savings as increasing rather than reducing peak demand - the opposite of the expected physical
7 relationship. It was concluded that the coefficient was not statistically valid and therefore the
8 update was not adopted.

9
10 **2.2 Consumer Advocate**

11
12 John Wilson's Evidence, submitted on behalf of the CA, provides seven recommendations, which
13 are discussed below.

14
15 **2.2.1 Recommendation 1**

16
17 The should Board direct NS Power to revise its load forecast workbooks to identify
18 factors used in formulas in separate tables. Each set of factors should be
19 accompanied by a source (if based on hard data) or a suitable narrative explanation
20 as to why NS Power believes it has reasonably selected those factors. Ideally, this
21 would be supplied as a compliance filing but it could be deferred to the 2027 Load
22 Forecast Report.¹⁴
23

24 **NS Power Response:**

25
26 NS Power will update the Calibration and StructuralVars tabs of Attachment 1: Residential
27 Intensities in future Load Forecast Reports to identify the factors used in formulas. NS Power
28 anticipates that preparation for the 2027 Load Forecast Report filing will be underway when a
29 Decision is issued in this proceeding. Accordingly, NS Power believes it would be most

¹⁴ M12861, N-8, John D. Wilson, Direct Evidence of John Wilson on behalf of the Consumer Advocate, NS Power 2026 Load Forecast Report, July 21, 2026, page 3, lines 12-17.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 appropriate for this additional information to be provided in the 2027 Load Forecast Report, as
2 opposed to a 2026 Load Forecast compliance filing.

3
4 Based on Mr. Wilson comments on the residential heating intensity forecast for customers with
5 heat pumps, NS Power believes some additional clarification would be beneficial.

6
7 Mr. Wilson indicates that Table 2 on page 7 of the CA's Evidence provides a "Comparison of
8 Residential Heating Intensity for Customers With and Without Heat Pumps (kWh/house), 2022-
9 2026 Load Forecast Reports". However, the values provided in that table ("No Heat Pump" and
10 "Heat Pump" columns) are not residential heating intensity values for customers without/with heat
11 pumps, as presented. Instead, these values represent the population-average heating intensity for
12 baseboards/electric furnaces ("EFurn" in the Attachment 1) and heat pumps, respectively. In other
13 words, in the 2026 Load Forecast, the average NS Power residential customer is forecast to use
14 1,520 kwh for EFurn heating and 2,521 kwh for heat pump heating in 2030. As the heat pump
15 saturation increases (and EFurn saturation decreases) over time, the population-average heat pump
16 intensity increases (and EFurn intensity decreases).

17
18 While the heat pump intensity for a given forecast year varies between load forecasts, it cannot be
19 considered without reference to saturation. Please refer to Figure 1 below, which includes the heat
20 pump saturation values. These values are provided in each Load Forecast Report in the
21 "Residential Heat Pump Forecast" Figure.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

Figure 1: 2030 Heat Pump Heating Intensity and Saturation

Load Forecast Report	Forecast Overall Heat Pump Heating Intensity in 2030 (KWh/house)	Forecast Heat Pump Saturation (%) in 2030
2022	2,005	60
2023	2,250	65
2024	3,128	64
2025	3,188	64
2026	2,521	58

As illustrated above, much of the variation between years is attributable to changes in saturation, notwithstanding the documented change made in 2024 to account for a large unallocated variance, which was determined to be driven by heating loads. The heat pump heating intensity, saturation, and an illustrative total forecast load are included each year in the report.

NS Power acknowledges that even after normalizing for saturation, heat pump intensity will vary to some degree with each load forecast, as is the case for all modelled end uses. This variance is a function of model calibration each year, which is necessary to account for annual updates to the underlying model data such as:

- the incorporation of new billing data used in model estimation (i.e. compared to the 2025 Load Forecast, the 2026 Load Forecast models incorporated billing data for 2025 and removed billing data for 2015);
- updates to the end use saturation and efficiency data from EIA and NRCan (as documented in Section 4.5 of the Report); and
- updates to the heat pump installation forecast.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 This calibration is done to optimize model performance (i.e. minimize variance to the training
2 data). Calibration details are set out in the Calibration and StructuralVars tabs of Attachment 1:
3 Residential Intensities workbook, which, as noted above, will be updated in future Load Forecast
4 Reports to provide further clarity with respect to the methodology.

5
6 **2.2.2 Recommendation 2**

7
8 The Board should immediately reject NS Power's flawed residential hybrid heating
9 forecast as unsupported by facts or sound reasoning. The Board should direct NS
10 Power to instead adopt a forecast based on its proposed hybrid heat pump adoption
11 rate (e.g., the 27,378 customers with hybrid heat pumps in 2036) and the per
12 customer peak demand and energy savings rate associated with the temperature
13 below -10°C scenario in its modeling (2.76 kW peak reduction and 527 kWh annual
14 energy savings).¹⁵
15

16 **NS Power Response:**

17
18 NS Power does not agree with Mr. Wilson's recommendation.

19
20 The residential hybrid heating forecast is based on analysis of AMI data for over 20,000
21 electrically-heated NS Power customers and a study of actual heat pump load in Nova Scotia.
22 Given the absence of an existing or planned hybrid heating program and the limited availability of
23 current market potential information, this provided a reasonable basis for forecasting potential
24 hybrid heating impacts for the purposes of the 2026 Load Forecast. The potential peak impact of
25 hybrid heating included in the 2026 Load Forecast Report was consistent with assumptions
26 adopted for prior load forecasts based on E3 hybrid scenario, which was developed for the 2022
27 Evergreen IRP (both E3's hybrid scenario and the 2026 Load Forecast assumed a reduction of -48
28 MW by 2036). The energy reduction modelled in the 2026 Report was less than half what was
29 previously incorporated (E3's hybrid scenario assumed 200 GWh energy reduction by 2036,
30 whereas the 2026 Load forecast assumed 83 GWh energy reduction by 2036).
31

¹⁵ M12861, N-8, John Wilson Evidence, page 3, lines 18-24.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 Mr. Wilson's evidence appears to be founded on a misinterpretation of the baseline heating profile
2 used in NS Power's modelling, and an assumption that hybrid heating customers would rely
3 exclusively on electric heat sources outside of "hybrid event" hours that is at odds with NS Power's
4 assumptions, which are documented at length in the 2026 Load Forecast report in Section 4.5.2 as
5 well as in response to CA IR-1 and E1 IR-2.

6
7 In contrast, the points raised by Synapse with respect to the hybrid heating forecast, as set out in
8 Synapse Recommendation 4, are primarily focused on implementation timing and participation
9 rate assumptions. While Synapse recommends some changes to the hybrid heating forecast for
10 future Load Forecast Reports, they indicate that they consider NS Power's methodology for
11 estimating residential hybrid-heating potential to be reasonable.¹⁶ The SBA does not provide any
12 comments on the hybrid heating forecast. Furthermore, the hybrid impact modelling was subject
13 to review by members of the Hybrid Heating Working Group as part of the Net Zero Atlantic
14 (NZA) Hybrid Heating study and agreed upon as providing a reasonable basis for further
15 modelling to quantify the potential system benefit of a program.

16
17 While parties may disagree on the specifics of the hybrid heating forecast methodology, NS Power
18 does not believe the 2026 hybrid heating forecast should be rejected given that it was considered
19 reasonable by Synapse and the NZA Hybrid Heating Working Group and that the peak impact is
20 largely consistent with prior forecasts informed by the E3 Hybrid Scenario used in the 2022
21 Evergreen IRP process.

22
23 Mr. Wilson suggests immediate modification of the forecast is required due to the ongoing IESO-
24 NS IRP; however, the IRP process is specifically designed to evaluate a range of load and DSM
25 assumptions. Accordingly, it is expected that hybrid heating impacts can be appropriately assessed
26 by the IESO-NS through E1's DSM Potential Study and the IRP process.

¹⁶ M12861, N-9, Synapse Evidence, page 13.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

As outlined in response to Synapse Recommendation 4, NS Power expects to incorporate relevant hybrid heating data from E1's DSM Potential Study and the IESO-NS IRP into its 2027 Load Forecast. In addition, available program-level information and forecasts will be incorporated into the modelling process as they are developed.

2.2.3 Recommendation 3

The Board should direct NS Power to expedite its use of AMI data and other external data sources to fully revisit this topic no later than in its 2027 Load Forecast, and to publish its findings on an expedited basis if possible.¹⁷

NS Power Response:

Mr. Wilson's evidence states the following with respect to AMI data:

Q: Did NS Power implement Synapse's recommendation to validate heating intensity assumptions?

A: No. In its decision on the 2025 Load Forecast Report, the Board endorsed NS Power's acceptance of Synapse's recommendations. Synapse recommended that NS Power, "[v]alidate heat pump displacement and intensity assumptions with AMI or other empirical data."

I did not find any evidence that NS Power validated its assumptions with AMI or other empirical data. NS Power states that the heating intensity assumptions are based on "a rigorous study of actual heat pump load in Nova Scotia" by Itron in 2022. However, the load forecast does not clearly reference these data.¹⁸

For the purposes of clarity, NS Power has reproduced Synapse's full recommendation and NS Power's response from its 2025 Rebuttal Evidence below:

2.1.2 Recommendation 2

For its residential heat pump forecast, NSPI should retain its own modeled heat pump load impacts as the foundation of the forecast and apply a scaling factor based

¹⁷ M12861, N-8, John Wilson Evidence, page 3, lines 25-27.

¹⁸ M12861, N-8, John Wilson Evidence, page 8, lines 25-32 and page 9, lines 1-2.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

on the difference between E3’s hybrid and non-hybrid scenarios. This adjustment would allow NSPI to incorporate the mitigating effects of hybrid heating while preserving its own saturation assumptions and ensuring consistency across sectors. Over the longer term, NSPI should develop the capability to model hybrid electric heating explicitly within its load forecasting framework—not only for residential forecasts, but also for commercial heating—rather than relying on simplified post modeling corrections. This recommendation builds on the guidance we provided in our 2024 evidence and remains critical for improving the accuracy and transparency of future forecasts. In both the residential and commercial sectors, NSPI should also validate its heat pump displacement and intensity assumptions using AMI data or other empirical sources. We strongly support NSPI’s new commitment to analyzing AMI data and encourage the utility to prioritize this effort as it works to refine its modeling of electric heating impacts.

NS Power Response:

NS Power agrees that modeling the impact of hybrid heat pumps should be included in the underlying residential intensity calculations and will update the calculations accordingly for 2026. **Where possible [emphasis added]**, AMI data will be used to validate assumptions. NS Power also agrees with developing the capability to explicitly model hybrid commercial heating in future forecasts, but this will not likely be available for the 2026 forecast.¹⁹

As set out above, NS Power has indicated that AMI data would be used to validate hybrid heating assumptions for the 2026 Load Forecast, where possible. For the 2026 load forecast, a residential electric heating load shape was derived from AMI data and used to inform the hybrid heating forecast assumptions. The Company does not agree with Mr. Wilson’s assertion that that the hybrid heating forecast “is at odds with the Board’s directive in the 2025 Load Forecast Report proceeding.”²⁰

NS Power has indicated that incorporating AMI data into variance analysis activities and forecasting is a long-term process that will require a period of assessing the available data, and either integrating it into the existing model or building a new or modified version to make use of this data.

¹⁹ M12349, N-9, NS Power, Rebuttal Evidence, 2025 Load Forecast Report, November 6, 2025, page 5, lines 27-32 and page 6, lines 1-11.

²⁰ M12861, N-8, John Wilson Evidence, page 13.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

2.2.4 Recommendation 4

The Board should direct that the DLC forecast be reduced to 4 MW beginning in 2032 until there is a basis for a forecast increase.²¹

NS Power Response:

The load forecast relies on data and assumptions available at the time of development. DLC has been modelled for the 2026 Load Forecast using an approach that is consistent with prior reports, specifically, demand response amounts for 2026-2031 are consistent with E1/NS Power's 2026 Demand Side Management Supply Agreement and E1's proposed 2027-2031 DSM Plan Application. For 2032 and beyond, the DR amounts revert to the achievable potential for these programs that was used in the 2022 Evergreen IRP. At the time the 2026 Load Forecast was prepared, the demand response potential from the 2022 Evergreen IRP represented the most current and comprehensive assessment available for the period beyond 2031.

E1 is currently undertaking an accelerated DSM Potential Study that will inform the IESO-NS's Integrated Resource Plan. The DSM Potential Study and resulting IRP analyses will provide an updated assessment of demand response potential beyond 2031 which will be incorporated into future load forecasts, including the 2027 Load Forecast Report.

2.2.5 Recommendation 5

The Board should direct that the TVP forecast be reduced to 4 MW in 2027 with a growth rate no higher than 0.5 MW per year until there is a basis for a forecast increase.²²

²¹ M12861, N-8, John Wilson Evidence, page 3, lines 33-34.

²² M12861, N-8, John Wilson Evidence, page 4, lines 1-3.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

NS Power Response:

NS Power updated its approach to the TVP forecast in 2026 based on prior feedback received by Mr. Wilson. Forecast TVP load reductions were adjusted to reflect learnings from program recruitment and actual enrollment rates, as set Figure 69 of the Report.²³ Specifically, TVP load reductions were reduced to a stabilizing level of 3 MW in 2027 and, as set out in CA IR-3, part (a), a slower ramp rate was used compared to prior load forecasts.

Holding a ramp rate of 0.5 MW would put the forecast below actual ramp rates achieved in the two most recent active TVP recruitment seasons. A ramp rate of 0.8 was achieved in 2024 and a ramp rate of 2.3 MW was achieved in 2025.²⁴ Capping ramp rates below historically achieved values would be an arbitrary restriction with an unclear basis.

NS Power will continue to revise the TVP forecast annual based on program learnings and actual enrollment rates. Accordingly, the 2027 Load Forecast Report will be informed by the most current TVP program forecast.

2.2.6 Recommendation 6

The Board should direct that the BNI curtailment program forecast be increased to 26 MW beginning in 2032.²⁵

NS Power Response:

The load forecast relies on data and assumptions available at the time of development. As with DLC, BNI curtailment was modelled for the 2026 Load Forecast using an approach consistent with prior Reports. At the time of developing the 2026 Load Forecast Report, the Demand Response

²³ M12861, N-1, Nova Scotia Power, NS Power 2026 Load Forecast Report, May 15, 2026, page 93.

²⁴ M12861, N-2, NS Power (Consumer Advocate) RIR, July 7, 2026, CA IR-3, part (a).

²⁵ M12861, N-8, John Wilson Evidence, page 4, lines 4-5.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 scenarios 2022 Evergreen IRP were the most currently available potential for 2032 and beyond,
2 and as such, formed the basis for this program forecast.

3
4 The 2027 Load Forecast Report will be informed by the E1 DSM Potential Study update and the
5 2027-2031 DSM Plan which is currently before the Board in M12780.

6
7 **2.2.7 Recommendation 7**

8
9 The Board should direct NS Power to remove the damping method in its 2027 load
10 forecast.²⁶
11

12 **NS Power Response:**

13
14 NS Power considers the damping method applied to the trended HDD and CDD variables to be
15 appropriate and believes it should be maintained in future load forecasts. Without it, the values
16 will eventually be reduced to 0 (in the case of HDD) and increase indefinitely (in the case of CDD),
17 neither of which is reasonable. NS Power's damped HDD/CDD trend has been a consistent,
18 disclosed feature of its forecast methodology since its introduction with the trended approach in
19 the 2022 Load Forecast Report (M10569). This method has been applied without material change
20 across four prior Board proceedings without objection or directed change. Its effect is also
21 demonstrably immaterial, per Mr. Wilson's own evidence.²⁷ Given this five-cycle track record and
22 negligible impact, there is no basis to treat it as a modeling defect warranting removal in 2027.

23
24 **2.3 Small Business Advocate**

25
26 The SBA's submission acknowledges the positive strides that NS Power has made over the years
27 in terms of the contents of the Load Forecast Report. They note that the Report is thorough and
28 provides a great deal of information in support of the conclusions reached.
29

²⁶ M12861, N-8, John Wilson Evidence, page 4, lines 8-9.

²⁷ M12861, N-8, John Wilson Evidence, page 18, lines 15-16.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

1 The SBA's submission notes that NS Power's IR responses confirm that provides one
2 recommendation, regarding the housing completions adjustment.

3
4 **2.3.1 Recommendation 1**

5
6 The SBA submits that the Report, and the responses to information requests
7 provided by NSPI do not fully demonstrate that the chosen 10% decline rate is a
8 well-supported central forecast. The SBA submits that housing development as a
9 material source of uncertainty and recommends that the Board order NSPI to
10 provide a lower-housing sensitivity case and updated development pipeline
11 tracking in future forecasts.²⁸
12

13 **NS Power Response:**
14

15 Please refer to Synapse Recommendation 2. As outlined in the response to Synapse IR-9, the
16 adjustment to the new housing forecast aligns future completions with historic averages. In terms
17 of sensitivity, adjusting the new housing forecast by +/- 15 percent would change the overall load
18 by approximately 60 GWh by 2036, or around 0.5 percent of NSR. NS Power agrees to provide a
19 similar calculation of the relative impact of new housing estimates in future forecasts. Although
20 the market conditions highlighted by the SBA (development delays, financing constraints, lower
21 international student demand, and developer deferrals) would all have an impact on the forecast
22 for new housing, it would not be possible to account for each with respect to the approximately
23 100 individual projects identified in response to SBA IR-3. Planned housing developments are
24 tracked at an aggregate level on an ongoing basis and the total will be updated in the next forecast.
25

²⁸ M12861, Small Business Advocate, SBA Submission, NS Power 2026 Load Forecast Report, July 21, 2026, page 2.

2026 Load Forecast Report Reply Evidence
NON-CONFIDENTIAL

3.0 CONCLUSION

NS Power has continued to refine its load forecast each year, based on input from Synapse and various stakeholders as part of the NSEB's written proceedings. Each annual Load Forecast report reflects continuous improvement in methodologies and better explanation of the inputs and models as confirmed by Synapse and the SBA.^{29 30}

NS Power appreciates the comments and feedback on this year's Load Forecast Report. Pursuant to the Company's responses in this reply, NS Power has considered the comments and feedback received and, subject to the Board's determination in this matter, will incorporate adjustments in the load forecast where appropriate. As the transition of responsibilities to the IESO-NS progresses, the Company will continue to work with the IESO-NS to develop an approach for future submissions of the Load Forecast Report.

NS Power respectfully requests that the NSEB accept the 2026 Load Forecast Report as filed.

²⁹ M12861, N-9, Synapse Evidence, page 1.

³⁰ M12861, SBA Submission, page 1.