

CI Various - Distribution Routines - D055 - Planned Replacement of Deteriorated Equipment
(ATO) (NSEB M12898)
NSPI Responses to NSEB Information Requests

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Request IR-1:

In its August 8, 2025, response to NSEB IR-2a) in Matter M12319 (2024 Various Distribution Routines ATO), Nova Scotia Power Incorporated (NS Power) stated:

“Currently, NS Power does not expect these routines to exceed ATO thresholds in 2025. At this time, the forecast for these routines is aligned with external customer requests (D061, D062, D004), historical predictions for reactive events (D005) and provincial and municipal requests (D006). However, as these external factors/bodies can change throughout the year, this expectation remains subject to change in the second half of 2025. (i) At this time, NS Power is still forecasting these routines to align with the amounts budgeted in the 2025 ACE Plan.”

(a) Board staff note that the ATO application in M12319 included an ATO approval for Routine D005. As such, please explain specifically what changed between August 8, 2025, and December 31, 2025, to drive a change in forecast spending in D055 by an amount of \$11.5M (and increase of 107% of the budgeted amount for the routine).

(b) At what point during the 2025 budget year did NS Power become aware that actual spending for routine D055 would likely exceed the approved ACE Plan budget by the ATO threshold?

(c) List the objectives the utility would be unable to achieve without this budget increase.

Response IR-1:

(a) At the time of responding to information requests related to M12319, financial information related to actual and forecast spend for routines was still being actively reconciled following the cyber incident earlier in 2025. Ultimately, this led to an underestimate of where D055 was expected to end in relation to the 2025 ACE Plan budget. In a year where all financial information would have been readily available, NS Power would have been in

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1 a position to more accurately forecast this overspend. While a clear picture of the overall
2 expected spend of D055 was not well understood, the decisions to complete each individual
3 piece of work within the routine remain consistent with the asset management mechanism,
4 and were not based on what the impact to the D055 budget would be.
5

6 (b) NS Power became aware that an ATO would be needed in the fall of 2025 as financial
7 information for distribution routines was more complete.
8

9 (c) Without this level of investment, NS Power would not have executed on the volume of
10 condition-driven equipment replacements identified as necessary to maintain system safety
11 and reliability in 2025. The replacements prioritized in 2025 in the D055 routine included
12 poles (replaced with poles as per the upgraded standard), primary and secondary conductor,
13 upgraded insulators and cutouts. The reliability team has been prioritizing the changeout
14 of complex reliability projects including deteriorated pole upgrades. These projects require
15 coordination between engineering, operations and often require planned customer outages
16 and may need permits from Department of the Environment and Climate Change,
17 Navigable waters Canada and or Canadian National Railway.
18

19 Recent inspections on high criticality feeders such as 103C-314 and 50N-410 identified a
20 higher volume of deficiencies than observed in previous years, including deteriorated
21 poles, insulators, and transformers. These findings increased the assessed risk of failure
22 and potential reliability impacts, necessitating additional scope beyond the original work
23 plan.
24

25 The alternative to proceeding with this work would expose the power system to additional
26 reliability risk, increasing the likelihood of unplanned failures. Unplanned failures result
27 in customer outages and higher emergency response costs along with missed coordination
28 opportunities, increasing the number of planned outages and overall program costs.
29

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1 Reprioritizing work based on updated asset condition and risk information is a fundamental
2 element of NS Power's asset management framework, enabling prudent investment
3 decisions and focusing resources where they provide the greatest reduction in customer
4 and reliability risk. Overall, this budget increase enables NS Power to proactively manage
5 asset condition, improve reliability in priority areas, prevent reactive failures, and execute
6 work cost-effectively through coordination with other initiatives.

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Request IR-2:

(a) For 2025, please provide a breakdown of budgeted vs actual expenditures by major cost categories (e.g., labour, materials, contractor services, overhead, etc.).

(b) Please provide a year-by-year breakdown from 2019 to 2025 of the costs and volumes associated with Bin Work, Field Driven Work, and Street Light and Service Removals under Routine D055?

Response IR-2:

(a) Please refer to the below table:

Cost Category	2025	
	Budget (\$)	Actuals (\$)
Regular Labour and Term Labour	1,908,102	3,446,135
Overtime Labour	498,552	604,444
Materials	1,507,467	4,102,720
Contracts/Consulting	3,808,550	8,579,368
Meals/Travel and Other	26,747	127,280
Royalty, Easement, Appraisal	112,391	91,385
Contractor Overhead	545,811	1,215,559
Vehicle Allocated Costs	1,062,008	1,794,948
Admin Overheads	1,221,637	2,115,834
Salvage	(61,688)	(91,806)
Total	10,629,577	21,985,867
Capital Contributions	(8,715)	(5,183)
Overall Total	10,620,862	21,980,684

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(b) Please refer to the below table:

D055	Bin Work (\$)	# of Bin Work Orders	Field Drive Work (\$)	# of Field Driven Work Orders	Street Light and Service Removals (\$)	# of Streetlight Work Orders
2019	1,925,070	-	1,288,320	-	1,290,827	-
2020	2,929,890	-	1,516,798	-	1,357,957	-
2021	4,571,900	-	1,811,154	-	1,128,045	-
2022	2,567,200	779	3,630,286	2,451	1,119,659	2,064
2023	2,953,982	751	3,920,592	1,303	1,995,714	3,070
2024	3,857,084	1,016	4,857,028	247	2,324,084	3,843
2025	12,052,623	1,555*	5,419,607	227*	2,646,542	2,344*

*Please note that due to the cyber incident NS Power cannot detail January 2025 work order details. Consequently, the work order numbers shown for 2025 are from February-December 2025.

Work order counts do not provide a complete picture of work volume, as individual work orders can encompass widely varying scopes and asset quantities. A more reliable indicator is asset replacement volume by type. For example, the volume of pole replacements under this routine increased by approximately 2.5 times in 2025 compared to 2024. Moving forward to improve transparency and reporting for distribution routine spending, NS Power is actively working on developing enhanced tracking in 2026 to capture spend associated with specific feeder-level projects identified in the Five-Year Reliability Plan.

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Request IR-3:

(a) Does NS Power intend to revise its forecasting methodology for this routine going forward, and if so, how will it improve accuracy?

(b) If not, please explain why the current approach remains appropriate.

Response IR-3:

(a) No, NS Power does not currently plan to revise the forecasting methodology for D055. However, the Company will continue to monitor trends and the effectiveness of the forecasting methodology for this routine, identify and evaluate alternative forecasting methodologies as may be appropriate, and disclose adjustments to forecasting methodologies in ACE Plan applications going forward.

(b) The current forecasting approach remains appropriate as it incorporates recent work volume trends through the use of prior year Q3 forecast data while accounting for inflation and project-specific estimates, providing a more responsive methodology than historical averages alone. This methodology has proven effective in improving the accuracy of other Distribution routines and NS Power does foresee this occurring with D055 as well, despite the variance seen in 2025.

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Request IR-4:

In its application, NS Power states:

Bin Work is up by \$10.2 million due to the advancement of higher-priority condition-driven work identified during the feeder inspection program, including projects in the Glace Bay area.

(a) Please explain specifically why it was necessary to advance this higher-priority condition-driven work rather than deferring this work beyond 2025.

(b) Please explain specifically why this advanced higher-priority condition-driven work was \$10.2M more expensive than the bin-work envisioned in the 2025 D005 budget.

Response IR-4:

(a) The higher-priority condition-driven work advanced in 2025 was identified through NS Power's Feeder Inspection program as requiring near-term replacement to mitigate reliability and safety risks that could not be deferred without compromising system performance and public safety obligations. For example, in 2025 NS Power replaced approximately 2.5 times the amount of poles when compared to 2024. Deferring planned replacements under D055 increases the risk that deteriorated equipment will fail, requiring more costly emergency reactive replacement. All work completed under D055 is assessed and consistent with the asset management mechanism where the condition and criticality of assets determine when mitigating measures are required. The impact to an individual routine's budget is not a consideration when determining the timing of required investment in an asset, thus NS Power would not have considered deferring any of this work to 2025 for that reason. The additional work completed under this routine in 2025, would have led to other distribution work that was considered to be lower risk to be deferred as resources were allocated to the higher priority work in D055.

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- 1 (b) The \$10.2 million increase in D055 reflects higher volumes of deteriorated assets being
2 proactively replaced. An example of this is Glace Bay, where NS Power invested
3 approximately \$4 million dollars on replacing deteriorated equipment, which consisted of
4 over 160 poles across 7 feeders, insulator and transformer replacements, splice
5 replacements, re-sagging of neutral and secondary insulators. This was completed by
6 having 6,300 plus PLT hours dedicated to this work.

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Request IR-5:

In its application, NS Power states:

Field driven work is up by \$1.7 million due to the increased deficiencies driven by regional operations and regional engineering.

(a) Please explain what NS Power means by “increased deficiencies driven by regional operations and regional engineering.”

(b) Please identify these specific increased deficiencies.

Response IR-5:

(a) Increased deficiencies driven by regional operations and regional engineering refers to higher than budgeted volumes of deteriorated distribution assets identified through Field Driven Work. Field Driven Work is work identified by NS Power employees in the field outside of the formal Feeder Inspection program, and typically requires input and approval from NS Power's engineering group. Regional operations refers to field employees and planners (including Power Line Technicians, planners, and other operations staff) who identify deteriorated equipment during routine patrols, customer service calls, and day-to-day operations, while regional engineering refers to engineering staff who review and approve this field-identified work or may identify deficiencies through engineering analysis of system performance, outage history reviews, and equipment assessments during design work for other projects. Deficiencies means deteriorated, damaged or otherwise inadequate distribution equipment that must be replaced or upgraded to maintain long term safe and reliable system operation but does not require immediate emergency response. Increased deficiencies means these volumes exceeded the 2025 budget based on historical trends, resulting in a \$1.7 million variance.

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- 1 (b) Field Driven Work encompasses a broad range of deteriorated equipment replacements,
2 typically including deteriorated poles, failed or aging overhead conductors, crossarms and
3 hardware, transformers, insulators, guy wire systems, underground cables, and other
4 distribution infrastructure requiring replacement to maintain system reliability and safety.

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Request IR-6:

In its application, NS Power states:

Bin Work is up by \$10.2 million due to the advancement of higher-priority condition-driven work identified during the feeder inspection program, including projects in the Glace Bay area. Field driven work is up by \$1.7 million due to the increased deficiencies driven by regional operations and regional engineering.

(a) Please provide a list of works under Bin Work and Field Work in an Excel sheet, including the estimated cost, feeder number, length, number of customers served, risks, and location.

(b) For each feeder identified in a), provide the following in an Excel sheet for the period since 2021, excluding Major Events and Loss of Supply:

(i) A percentage breakdown of outage causes, along with the number of outages, customer-hours of interruptions.

(ii) The distribution system average interruption frequency index (SAIFI).

(iii) The distribution system average interruption duration index (SAIDI).

(iv) Number of customer interruptions that occurred as a result of the cause of interruption noted above in i.

Response IR-6:

(a) Bin Work and Field Driven Work costs under D055 are tracked at the regional account or project level and not at the individual work order level with the granular detail requested.

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1 Additional details regarding spend associated with specific feeder-level projects identified
2 in the Five-Year Reliability Plan are not currently available at this level of granularity. NS
3 Power is undertaking work in 2026 to enhance its tracking and reporting capabilities to
4 provide this information in future filings.

5
6 (b) As detailed in part (a), a breakdown of feeder-by-feeder work is not available and
7 consequently, a summary of outage details in these work locations as requested is not
8 possible. Substantive feeder work was completed in 2025 under D055 in alignment with
9 the Five-Year Reliability Plan.

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Request IR-7:

Please identify and summarize the data used to support the identification, selection, prioritization, optimization, and pacing of project execution for the projects included in this Matter (e.g., asset condition by major asset type and reliability information).

Response IR-7:

Planned replacements of distribution equipment included in D055 are driven predominantly by the risk profiles of NS Power distribution feeders. As detailed in responses to IRs in the Review of NS Power's Five-Year Reliability Plan (M12558) and consistent with the Board-approved Capital Expenditure Justification Criteria (CEJC), risk-based decision-making for distribution investments includes factors quantifying condition and criticality. Condition factors include both leading and lagging indicators such as reliability performance metrics, inspection results, loading and balancing, and other equipment conditions informed by subject matter expertise. Criticality factors include customer count, energy usage, performance-based standards, as well as consideration for access and communications. When combined together, the resulting risk ratings help NS Power personnel to identify and prioritize areas requiring risk mitigation, including interventions covered by D055. This risk-based prioritization can be further informed by potential execution constraints, resource limitations, and expert judgement by NS Power SMEs that may result in re-ordering, consolidation, or deferral of actions as appropriate. Please refer to responses to IRs 29-34 from M12558 for detailed descriptions of the risk profiling calculations and data sets, reproduced here as Attachment 1.

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Request IR-29:

Please describe whether and how each of the following is weighted in the criticality score:

(a) the number of customers;

(b) the load of customers;

(c) the performance standard.

Response IR-29:

The ultimate criticality score for each feeder is based on the maximum score of any of the three factors, as described below. Please refer to Synapse IR-030 for a more detailed explanation.

(a) Yes, the number of customers is included in the calculation of feeder criticality. NS Power groups feeders based on the quintiles of overall customer count, with the top 20 percent of feeders by customer count given a score of 5 for criticality, and the lowest 20 percent of feeders by customer count given a score of 1 for criticality. Feeders in the other three quintiles are assigned a corresponding score of 2, 3, or 4.

(b) While the peak loading and balance of feeders are considered as part of the condition scoring for feeder, the energy usage is included in the calculation of feeder criticality. NS Power groups feeders based on the quintiles of overall usage (kWh), with the top 20 percent of feeders by usage given a score of 5 for criticality, and the lowest 20 percent of feeders by usage given a score of 1 for criticality. Feeders in the other three quintiles are assigned a corresponding score of 2, 3, or 4.

(c) The performance standards are included in the calculation of feeder criticality, specifically with respect to CKAIPI and CKAIPI measures. Feeders that are potential problem feeders

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- 1 for the given year are scored as a 4 for criticality, with problem feeders for the year scored
- 2 with a 5. All other feeders are scored as a 1 for this category of criticality.

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Request IR-30:

Please demonstrate the mathematical calculation showing how the various components of the criticality score are used to derive the criticality score for a single feeder. For the same feeder, please demonstrate the mathematical calculation showing how the asset condition is combined with the criticality score to arrive at the risk rating.

Response IR-30:

Once the scoring for each factor of the criticality is determined for the feeder (Usage, Customers, Problem Feeder, Communications, Maintenance Access), the scores are combined with the following equation:

$$\text{Criticality} = \text{Max}(\text{Usage}, \text{Customer}, \text{Perf. Stand.}) + \text{Maint. Access} - \text{Communication}$$

In the case of Communications and Maintenance Access, these factors are considered modifiers and are only scored as follows:

- Communications: If feeder telemetered for indication and/or control = 1, otherwise 0.
- Maintenance Access: If feeder has >30 percent of structures off-road = 1, otherwise 0.

Finally, the maximum possible criticality for a feeder is 5 and the minimum is 1, so if the combination of factors would otherwise result in a score outside this band, it is rounded to the closest valid score.

The ultimate feeder risk score is obtained via the following equation:

$$\text{Feeder Risk (1 - 25)} = \text{Feeder Condition (1 - 5)} * \text{Feeder Criticality (1 - 5)}$$

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Request IR-31:

Please describe how the condition of each asset is scored, the range of scores applied to the risk rating, what each score means, and how asset condition is weighted in the risk rating.

Response IR-31:

The condition score for a feeder is based on five main factors that can each be scored from 1 to 5:

- Loading and Balance:
 - Greater of the loading or imbalance score
 - Imbalance = Maximum of percentage imbalance and average amp imbalance
 - 5 if greater than 33% or 60 amps
 - 4 if greater than 25% or 50 amps
 - 3 if greater than 20% or 40 amps
 - 2 if greater than 15% or 30 amps
 - 1 for all others
 - Loading = Maximum phase amps compared with rating
 - 5 if greater than rating
 - 4 if greater than 90 percent of rating
 - 1 for all others
- Outage Frequency (CKAIFI)
 - Quintile distribution of outage frequency for distribution outages
- Outage Duration (CKAIDI)
 - Quintile distribution of outage duration for distribution outages
- Feeder Inspections
 - Quintile distribution of risk-weighted feeder inspection findings divided by feeder length (inspection findings per km)
- Forestry Condition

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- 1 ○ Based on satellite imagery condition assessment by feeder

2
3 There is also a Condition Modifier factor based on known adverse conditions that are not covered
4 by the other five factors that can be scored by NS Power subject matter experts as either a 1 or 2,
5 depending on severity.

6
7 The overall condition score for a feeder is calculated by the following equation:

8
9
$$\text{Feeder Condition} = \text{Average (Insp., Loading, CKAIFI, CKAIDI, Forestry)} + \text{Cond. Mod.}$$

10
11 If the condition score for a feeder exceeds 5 according to this equation, it is rounded down to 5 for
12 the final result.

13
14 Please refer to Synapse IR-30 for how the condition is combined with criticality to obtain feeder
15 risk.

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Request IR-32:

Please describe how the ability to access each asset is scored, the range of scores applied to the risk rating, what each score means, and how asset condition is weighted in the criticality score.

Response IR-32:

Maintenance access is a modifying factor used in determining feeder criticality scoring. As described in Synapse IR-30, it is based on the percentage of feeder structures that are considered off-road. For percentages above 30 percent, this modifying factor increases a feeder's criticality by one (to a maximum of 5 overall). Asset condition is not directly included in the criticality score, but is assessed separately and combined with criticality to determine overall feeder risk, as described in Synapse IR-30 and Synapse IR-31.

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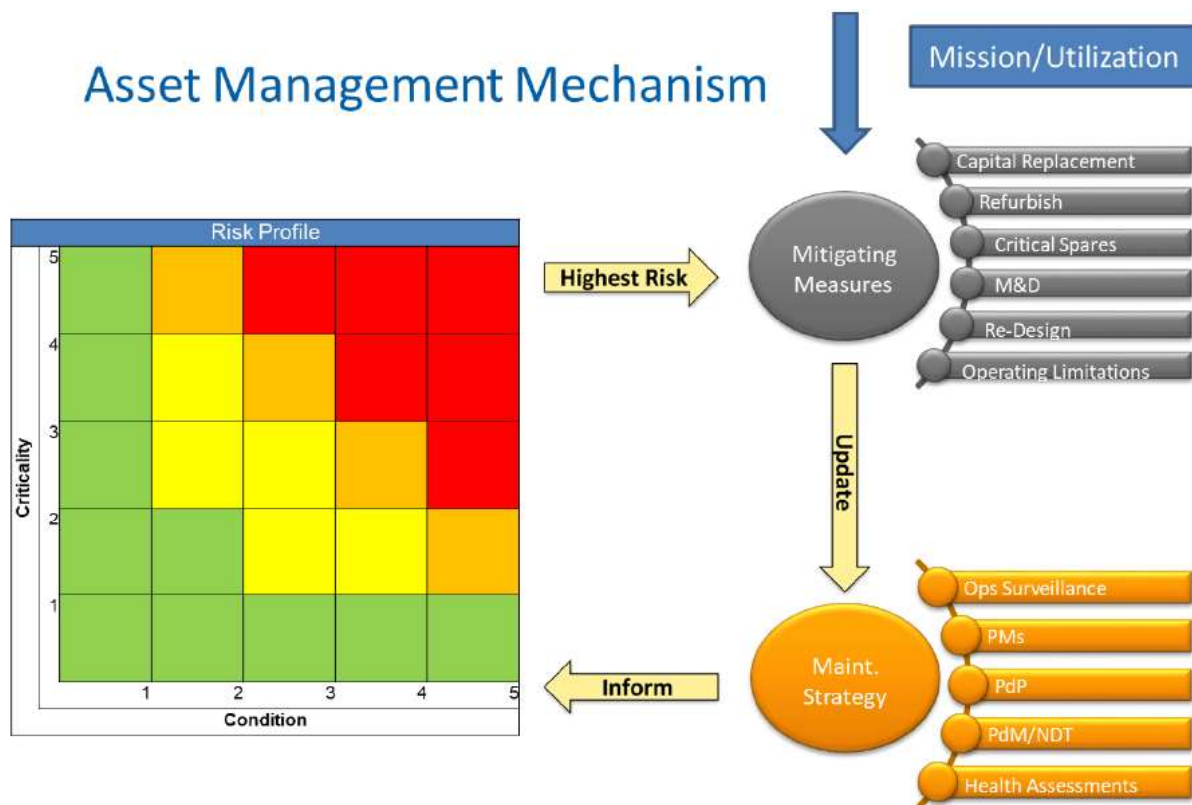
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Request IR-33:

Please describe how the ability to mitigate each asset is scored, the range of scores applied to the risk rating, what each score means, and how asset condition is weighted in the criticality score.

Response IR-33:

NS Power does not understand what the “ability to mitigate each asset” in this IR is referring to. No such factor exists in the Company’s condition or criticality scoring for feeder risks. In NS Power’s asset management mechanism shown below, risk mitigation measures follow from risk identification; it is not a factor of the risk itself.



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1 **Request IR-34:**

2
3 **Please provide all documentation and data related to the derivation of the feeder reliability**
4 **risk score and how it was used to identify and prioritize investments. Please identify the**
5 **proceedings where this documentation and data was filed.**

6
7 Response IR-34:

8
9 As described in Synapse IR-30, feeder performance (CKAIFI and CKAIID) is included in the
10 determination of feeder condition and ultimately included in determining overall feeder risk. NS
11 Power's risk-based decision-making approach is well documented in the Company's ACE Plans
12 (most recently in the 2026 ACE Plan, M12619) as well as the Property and Assets proceeding
13 (M11067). As previously evidenced, feeder performance is not the sole factor used to identify
14 and/or prioritize feeders for investment; rather, consideration for other condition factors,
15 criticality, and subject matter expertise is also included.

16
17 Please refer to Synapse IR-28 for the detailed CKAIFI and CKAIID performance results by feeder.

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Request IR-8:

- (a) Please confirm whether any of the assets have been replaced prematurely.
- (b) If so, please provide a list of those assets, remaining useful life cost, along with the justification.

Response IR-8:

- (a) Assets under D055 are not replaced prematurely and are only replaced when the risk related to that asset indicates replacement is necessary at this time.
- (b) N/A.

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Request IR-9:

Please describe how the utility has addressed system hardening solutions and resilience in the project selection.

Response IR-9:

With respect to D055, system hardening and resilience is addressed through two main avenues. The first is the identification of target locations through risk ratings and the selection of appropriate mitigating measures driven by risk factors. By developing projects that address high risk areas with the most appropriate measures based on the assessed risks, such as a build-to-roadside project to mitigate both deteriorating equipment and access challenges rather than just replacing equipment along a difficult to reach right-of-way, NS Power puts these targeted portions of the system in a more resilient state. The Company is better able to reduce the likelihood of future outages and respond to events faster and more effectively should they occur.

Secondly, is the application of modern materials and design standards during the replacement and/or upgrade of deteriorated equipment. This may include larger and stronger poles, new polymer insulators and cutouts, and design improvements (such as the coastal framing standard). As these updated materials and designs are implemented on the system, the resulting equipment is better able to withstand adverse weather conditions compared with previous generation designs and equipment. This contributes to improved performance for customers on blue-sky days as well as during storm events.

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Request IR-10:

For the project described in this application, please explain how the project keeps pace with technological changes and integrates cost effective, reliable solutions.

Response IR-10:

Distribution investment under D055 is driven by NS Power's asset management approach, evaluating both condition and criticality to determine the risk of different assets and systems. NS Power continues to enhance existing inspection and condition assessment programs and develop new condition assessment methodologies aimed at improving NS Power's ability to proactively identify and prioritize risks across the distribution system, including equipment. In addition to risk identification, the mitigation of these risks also accounts for advances in design, materials, and technology. Equipment replaced within D055 apply modern designs (including larger, more robust poles) and new materials offering improved performance over legacy options (such as polymer insulators and cutouts replacing historical porcelain-based assets). NS Power's asset strategy committees leverage subject matter expertise to drive not only design and material improvements, but also identify emerging technologies that may provide new, more effective functionality, such as advanced protective devices. Finally, NS Power's asset management framework is used to ensure that the applied risk mitigating measure is appropriate for the specific risk, including consideration of how new designs and technology may be used. This supports the completion of risk mitigating work in a cost-effective manner for the benefit of customers.