Douglas J. Fulljames & Karen Ward
[redacted]

June 26, 2026

Nova Scotia Energy Board
Suite 300, 1601 Lower Water Street
PO Box 1692, Unit M
Halifax, NS, B3J 2S3
By Email

Dear Members of the Board:

Re: Appeal of DRO Final Written Decision: Account [redacted] — Billing Dispute, Nova Scotia Power

We write to appeal the Final Written Decision of Dispute Resolution Officer Don Farmer, P.Eng., dated June 25, 2026, regarding a billing dispute with Nova Scotia Power for service at [redacted]). The DRO found in favour of Nova Scotia Power on the grounds that the meter tested accurate and that cumulative billing methodology was correctly applied. We respectfully submit that the DRO's decision, while addressing meter accuracy, did not address the central question of whether the consumption recorded is physically plausible given the property's known electrical infrastructure. These are distinct questions, and the failure to address the latter renders the decision incomplete.

I. The Property and Its Electrical Infrastructure

[redacted] is a seasonal guest cabin. Its connected electrical load consists solely of:

1. One standard refrigerator
2. One small chest freezer
3. A water pump serving the main residence

The property's baseboard electric heating is disconnected at the breaker panel. The hot water tank was removed at the end of the 2024 season and has not been replaced. The cabin was uninhabited throughout the disputed billing period of September 22, 2025 to May 20, 2026.

II. The Disputed Bill and the Consumption Impossibility

The bill dated May 26, 2026 (due June 25, 2026) charged $2,131.97 for 10,811 kWh of consumption over 240 days. This implies an average daily consumption of 45.0 kWh per day.

This figure is physically impossible given the property's connected load. On June 4, 2026, a verified physical meter reading was taken fifteen days after the disputed billing period ended. During those fifteen days, the meter recorded 64 kWh — a daily rate of 4.26 kWh. This figure is consistent with the operational draw of a refrigerator and a small chest freezer and represents the true baseline consumption of this property.

The implied consumption of 45.0 kWh per day during the disputed period is more than ten times the verified baseline. No change was made to the property's electrical infrastructure between the disputed period and the verification period. The cabin was uninhabited throughout both periods. There is no credible explanation for a ten-fold increase in consumption from an empty building with two appliances.

III. NS Power's Own Historical Data Confirms the Baseline

The "Past electric use" table printed on the disputed bill itself provides the most compelling evidence. NS Power's own actual meter readings consistently show consumption of 2.0 to 2.5 kWh per day during autumn and winter periods at this property:

- September 2025: 134 kWh over 66 days = 2.0 kWh/day
- September 2024: 118 kWh over 58 days = 2.0 kWh/day
- July 2024: 150 kWh over 61 days = 2.5 kWh/day

Applied to the disputed period of 240 days, a consumption rate of 2.0–2.5 kWh/day would produce a bill of approximately $80–$100, consistent with our historical billing of $60–$100 per month at this property over 3.5 years.

The Board's attention is also drawn to a pattern visible in the same historical table: the two anomalously high readings both occur in May and both follow extended periods of estimated billing. May 2025 recorded 3,379 kWh over 245 days (13.8 kWh/day) — already six times the verified baseline — and May 2026 recorded 10,811 kWh over 240 days (45.0 kWh/day). By contrast, every actual reading taken by NS Power in intervening months shows consumption of 2.0–2.5 kWh/day. This pattern is consistent with systematic over-estimation during unread periods that compounds across billing cycles, producing increasingly inaccurate reconciliation bills.

IV. The DRO's Decision Did Not Address the Central Question

The DRO's Final Written Decision rests on two findings: that the meter tested accurate within prescribed limits, and that NS Power's cumulative billing methodology was correctly applied under Regulation 5.1.

However, a meter that accurately records phantom consumption is not evidence of appropriate billing. Meter accuracy confirms that the meter correctly measured whatever signal passed through it. It does not confirm that the signal reflected actual energy delivered to and consumed at the property. These are distinct questions. The DRO's decision conflates them.

Similarly, the cumulative billing explanation — repeated at length in both the DRO's correspondence and his Final Written Decision — addresses how estimated readings are reconciled with actual readings. It does not address whether the September 2025 estimated reading was accurate, nor whether the estimation methodology applied to a seasonal cabin with a known minimal load was appropriate. The question of whether NS Power's estimation was reasonable has not been examined.

V. Relief Requested

We respectfully request that the Board:

- Order NS Power to provide the full estimation methodology and data used to generate the September 2025 estimated reading for Account [redacted], and to demonstrate that the estimation was reasonable given the property's known seasonal load profile.
- Order a billing adjustment based on the verified consumption baseline of 2.0–2.5 kWh/day, consistent with NS Power's own actual meter readings at this property, applied to the 240-day disputed period.
- Review NS Power's estimation practices for seasonal accounts to determine whether the pattern of compounding estimation error evidenced in this account's billing history constitutes a systemic issue affecting other customers.
- Note that a Measurement Canada independent meter test has been requested and is in progress under Regulation 5.5(c), and that the Board's consideration of this appeal should be coordinated with those findings.

We note that NS Power has indicated it is not applying late fees or penalties to the outstanding balance during this dispute process, and we have not made payment pending resolution. We remain prepared to pay whatever amount is determined to reflect actual consumption at this property.

We thank the Board for its consideration and would welcome the opportunity to provide any further documentation or clarification required.

Yours sincerely,

Douglas J. Fulljames
[redacted]

Enclosures:

Disputed bill dated May 26, 2026 — $2,131.97 / 10,811 kWh

Prior bill dated October 22, 2025 — $66.37 / 134 kWh (66 days, 2.0 kWh/day)

DRO Final Written Decision dated June 25, 2026

NS Power account usage history showing historical consumption rates

Correspondence with DRO including verified June 4, 2026 meter reading and consumption calculation