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Request IR-1:

(a) Please describe NS Power's typical collection process, from the issuance of a bill to escalation via an external collection agency. Please include applicable timelines; required notices, contact attempts, contact methods, and opportunities to establish payment arrangements. Please explain whether the process was followed in this case.

(b) Was this process changed due to the cyber incident?

(c) Are there any differences in the process between active and closed accounts?

Response IR-1:

a)

Nova Scotia Power's Collection Process (closed accounts)

When a customer's account closes with an outstanding balance, the account is assigned to the Collections cycle and a final bill is issued. The final bill is due approximately 30 days after issuance.

Initial Billing and Internal Collection Activity

Day 0: The account closes.

- A final bill is issued.
- The balance is assigned to Collections ("CL" status).
- A due date approximately 30 days from billing is established.

Day 30: The final bill is due.

Days 36-51

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- 1 • Accounts that remain unpaid are typically subject to automated collection efforts.
- 2 • Customers may receive automated telephone calls and email reminders advising that the
- 3 balance remains outstanding and encouraging payment or contact with Nova Scotia Power.
- 4

5 **Day 51**

- 6 • Unpaid accounts are reviewed by a Customer Service Associate ("CSA").
- 7 • Where contact is established and mutually acceptable payment terms are arranged, the
- 8 account is assigned a collection-term status ("CT") and is not referred to an external
- 9 collection agency while those terms remain in effect.
- 10 • Where payment is not received, satisfactory arrangements are not established, or contact
- 11 attempts are unsuccessful, the account is coded for collection-agency referral ("CA").
- 12

13 **Opportunity to Establish Payment Arrangements**

14 Throughout the internal collection stage, customers are provided with opportunities to contact NS

15 Power to discuss payment options. Accounts placed on payment arrangements are generally held

16 from referral to an external collection agency while those arrangements are maintained. If a

17 payment arrangement subsequently defaults, the account may be returned to collection-agency

18 referral status.

19

20 **Referral to an External Collection Agency**

21

22 **Day 60**

- 23 • Accounts that remain unpaid and unresolved are assigned to the primary external collection
- 24 agency, ICCS.
- 25 • Upon assignment, the external collection agency commences its collection activities, which
- 26 may include:
- 27 o Issuing a collection letter;
- 28 o Telephone contact attempts;
- 29 o Skip-tracing activities to obtain updated contact information; and
- 30 o Other lawful collection efforts.
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Credit Bureau Reporting

Day 90

- Accounts that remain unpaid are reported by the external collection agency to both major Canadian credit bureaus.

Secondary Collection Agency Placement

Day 300

- The primary collection agency returns accounts that it has been unable to collect.

Day 307

- Returned accounts are reassigned to a secondary external collection agency, Credit Bureau of Canada Collections ("CBCC"), for further collection efforts.

Further Collection Activity

Day 540

- The secondary collection agency returns accounts that remain uncollected.

Day 550

- Returned accounts may be reassigned for a third placement with an additional collection agency or may proceed to other recovery options, depending on the circumstances of the account.

The process set out above was essentially followed in this case, with the only variance being that the automated callouts were not made. Instead, NS Power had a live agent make 4 attempts by telephone to reach the customer.

The account closed April 16, 2026 with the balance due May 19, 2026. NS Power made 4 attempts to contact the customer between June 2 to June 23. With no customer communication, no forwarding address, and no new connection under Haryana Brooks the account was released on July 10, 2026. This was approximately 2 months after the closing bill was due, following the process timeline above.

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- 1
- 2 b) This process was not changed due to the Cyber incident.
- 3
- 4 c) Yes, there are differences in the collection process between closed and active accounts.
- 5 Active accounts are worked longer as they are actively billing. Closed accounts, after
- 6 attempting to reach the customer via phone and/or email with no response are sent to a
- 7 collection agency to work.

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1 **Request IR-2:**

2
3 **The Customers' payment history indicates that their bills were generally paid on time before**
4 **their move to the new service address. Was their previous payment history considered before**
5 **referral to collections?**

6
7 **Response IR-2:**

8
9 No. The previous payment history was not considered before the account was released to a
10 collection agency. Once an account is closed and NS Power can no longer reach the customer, NS
11 Power must make a reasonable effort to recover the debt from the inactive customer.

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REDACTED

Request IR-3:

The Customers' final bill at the previous service address covers April 24 to July 29, 2025, while the initial bill for their new service address covers July 16 to October 2025.

(a) When did NS Power receive the request to transfer service and requested end date at the previous address and the start date at the new address? Please provide the relevant supporting notes.

(b) Was the starting meter read at [REDACTED] based on an estimate or was it an actual read?

Response IR-3:

(a) NS Power received the request to connect service at [REDACTED] on July 14, 2025. The request to disconnect service at [REDACTED] was requested during the same call. Please refer to Confidential Attachment 1.

(b) The starting meter read at [REDACTED] was an actual read.

**Brooks DRO Appeal IR-3 Confidential Attachment 1 has
been removed due to confidentiality.**

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REDACTED

Request IR-4:

Please explain whether delays in issuing the initial bill for [REDACTED] and the subsequent revision in December 2025 contributed to the accumulation of an outstanding balance.

Please explain how the payment deadlines and the aging of arrears were determined for the revised charges and whether these circumstances affected the timing of the collection activity.

Response IR-4:

The initial bill issued October 22, 2025 was not delayed, it was sent per the meter read cycle at that property. There was no revision in the December bill, but it was estimated.

A true read was captured for the February bill. This bill was higher due to the December bill usage being underestimated. The outstanding balance was an accumulation of the initial bill and the December bill not being paid on time.

The customer's billing cycle is read on a bimonthly basis. The revised charges, or true read bill, had no effect on the timing of the collection activity. At that time the customer had no late charges as NS Power was not charging interest on overdue accounts.

The customer is provided a due date on each specified bill, and the customer received 3 bills before any payment was made. Therefore, the balance was for a total of 6 months of usage with no payment. Once the account closed, there were 4 contact attempts to the customer with no success. The account was worked within NS Power's closed account collection timeline as outline in IR-1.

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Request IR-5:

(a) Please describe NS Power's account closure process for confirming a customer's contact information and delivery instructions for the final bill.

(b) Were the Customers' asked to verify their contact details, email address and forwarding address when closing the account?

Response IR-5:

(a) When a customer contacts NS Power to disconnect service, the account closure process includes confirming the customer's contact information and preferred delivery method for the final bill. During the call, the NS Power representative reviews and confirms the disconnection date and verifies either the customer's forwarding address or their email address if they are enrolled in eBilling. This helps ensure the final bill is delivered to the correct destination.

(b) While NS Power's standard account closure process includes confirming a customer's contact information and delivery instructions for the final bill at the time of disconnection, this was not possible in this case because neither Ms. Brooks nor Mr. Bernard contacted NS Power to close the account.

When a new customer establishes service at an address, the system automatically issues a disconnection for the previous customer's account. This is what occurred in this case. As a result, NS Power was not in contact with either Ms. Brooks or Mr. Bernard at the time the account was closed and therefore was unable to verify or update their forwarding address, email address, or preferred method of receiving the final bill. The account closure occurred as part of the automated transfer of service when the new occupant connected service at the premises.

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REDACTED

Request IR-6:

(a) Please confirm the date and delivery method used to send the Customers' final bill and each subsequent arrears notice. Please provide copies and available supporting records.

(b) Please explain how the notice requirements under Regulation 5.4 were satisfied.

Response IR-6:

(a) The Customer's final bill was sent to her email address [REDACTED] There were no subsequent arrears notices sent. Please refer to Confidential Attachment 1.

(b) Regulation 5.4 reads, in part, as follows regarding notice to customers in arrears:

“NSPI must provide notice to customers who have bills thirty days overdue, and the notice may be automated and must be postmarked no later than the day the bill becomes 30 days overdue stating: Your account is in default. Options for repayment and a payment plan are available to you. As soon as possible, contact us to find out what your options are @ ...”

NS Power did not mail a written notice to the customer containing this language and, as a result, the requirements of Regulation 5.4 were not strictly met. However, NS Power did not have a new mailing address for this customer as they did not contact NS Power to inform them of the move. This resulted in their account being auto disconnected when the new occupant connected service to that address. In lieu of a mailed notice, NS Power made four attempts to call the customer.

**Brooks DRO Appeal IR-6 Confidential Attachment 1 has
been removed due to confidentiality.**

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REDACTED

Request IR-7:

(a) Please confirm the telephone number used for each June 2026 contact attempt and the recorded outcome.

(b) What other contact information was available to NS Power at that time and explain why an alternate telephone number or email was not used.

Response IR-7:

(a) The telephone number used for each June 2026 contact attempt was [REDACTED] The outcome of each contact attempt was that there was no answer and no voicemail to leave a message.

(b) [REDACTED] om was also on file.

Email was not used as a contact method, as NS Power was attempting to reach customers by phone. However, the closing bill was sent to Haryana Brooks and was reviewed multiple times between May 1, 2026 and September 29, 2026 via the MyAccount portal. NS Power's records indicate the MyAccount portal had login activity on:

May 1, 2026

June 10, 2026

July 28, 2026

July 30, 2026

July 31, 2026

September 29, 2026

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REDACTED

1 On August 5th, 2026, Haryana Brooks added Paul Bernard to the account with full access.
2 NS Power did not have this information at the time it was trying to contact Haryana in June
3 2026.

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Request IR-8:

Please explain how the referral to collections and the resulting credit report impact was consistent with NS Power's February 12, 2026, public assurance that Customers' credit scores would not be affected by outstanding balances resulting from the billing estimation/catch up activity.

Response IR-8:

NS Power clarified in the November 2025 Legislative Committee proceeding that the approach was limited to active customers, and that inactive account balances would continue to be pursued.¹ An excerpt from this discussion reads as follows:

I can't get into any specific customer situation here. What I can mention, though, is that for any former customers of Nova Scotia Power, we do follow up with them on outstanding balances.²

At the February 2026 Press Conference, NS Power was speaking specifically about active NS Power customers and estimated reads. The following statement regarding this was reported by the Chronicle Herald:

If a customer doesn't pay the entirety of a bill, can it impact their credit score?

Knowing that we had estimated bills, we wanted to make sure we weren't causing concerns about credit history for customers. We paused late fees and weren't charging interest on accounts. For any of our customers in that scenario, there are no consequences if they have

¹ Nova Scotia House of Assembly, Standing Committee on Natural Resources and Economic Development, *Archive for the Natural Resources and Economic Development Committee (Hansard)*, Review of Nova Scotia Power (25 November 2025) at pages 23 and 24. | online: https://nslegislature.ca/sites/default/files/pdfs/committees/ne/ne_20251125.pdf?5691.

² Nova Scotia House of Assembly, Standing Committee on Natural Resources and Economic Development, *Archive for the Natural Resources and Economic Development Committee (Hansard)*, Review of Nova Scotia Power (25 November 2025) at page 24. | online: https://nslegislature.ca/sites/default/files/pdfs/committees/ne/ne_20251125.pdf?5691.

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1 not made full payments. Now that we are in a position with meters being restored and on
2 track for full restoration by the end of March, if a customer does have a balance, we want
3 to make sure that there are options.³
4

5 The above is the most accurate media account of what was said at the February 2026 press
6 conference. No representations were made during that press conference as to whether outstanding
7 final balances from inactive accounts would be pursued through the collections process. The
8 customer no longer had an active account with NS Power, received their final bill via email
9 delivery, and was not responsive to several attempts by NS Power to communicate by phone
10 regarding their bill. The amount owing was legitimate, final usage.

³ George Myrer, The Chronicle Herald, "Nova Scotia Power says 84 per cent of customer now getting a 'true bill'" (6 February 2026) | online:
<<https://www.saltwire.com/nova-scotia/halifax/nova-scotia-power-cyberattack-hack-data-stolen-estimated-bill-billing>>.

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Request IR-9:

(a) What is the current collection status?

(b) Has the debt been reported to a credit bureau?

(c) What measures are available to suspend collection activity, withdraw the referral, or correct credit reporting if warranted by the outcome of this appeal?

Response IR-9:

a) The status of the account is Closed and released to a 3rd party agency due to non-payment. Collection activity has been suspended with the 3rd party, they will not contact the customer until advised.

b) The debt was reported to the credit bureaus. This is done 30 days after an account is given to an agency. As of October 6, 2026 the account has been removed from credit reporting, until further notice.

c) Collection activity has been suspended with the 3rd party agency as of August 12, 2026. If need be, the account can be withdrawn with suitable arrangements on the balance owing and the customer's credit report can be updated, depending on the outcome of this DRO appeal. If the account is withdrawn NS Power's understanding is that the customer credit score impact from the NS Power report will be removed.