

REPLY IN SUPPORT OF DRO APPEAL

Nova Scotia Energy Board | Matter M13075

Appellants	Berin MacNabb and Julie Bibby-MacNabb
Nova Scotia Power Account	██████████
Service Address	██
Meter	██████████
Date of Submission	October 7, 2026
Regarding	Reply to Nova Scotia Power Inc. response dated September 22, 2026

Dear Ms. Wallace:

I am writing in reply to Nova Scotia Power Inc.'s September 22, 2026 response in Matter M13075.

I have reviewed NS Power's response and the supporting material filed with it. The response confirms several important facts underlying this appeal, but in my respectful submission it does not resolve the central issue before the Board: whether the disputed reconciliation was sufficiently substantiated and whether the account was appropriately administered and billed during the extended period of estimated billing.

I am not asking the Board simply to disregard a cumulative meter reading because the resulting bill is unusually high. Nor do I dispute that the meter subsequently tested within prescribed accuracy limits.

Rather, I ask the Board to consider whether NS Power's records adequately establish the basis upon which the disputed consumption was attributed, allocated and billed, particularly in circumstances involving almost a year without an actual billing read, a wildfire-related interruption of service, the physical removal and subsequent reinstallation of the meter, and a very substantial reconciliation following a series of estimates.

KEY ISSUE

The accuracy of the meter when eventually tested does not, by itself, establish that Nova Scotia Power properly administered the account during the preceding months of estimated billing.

1. NS Power confirms that there was no actual billing read for approximately one year

NS Power confirms that the last true meter reading before the reconciliation was taken in June 2025 and that the next actual reading was obtained in June 2026.

NS Power further confirms that the August 2025, October 2025, December 2025, February 2026 and April 2026 bills were based on estimated consumption.

The actual readings relied upon are therefore:

- June 4, 2025: 16,064 kWh
- June 3, 2026: 29,248 kWh

This produces a cumulative difference of 13,184 kWh.

I understand the arithmetic. The issue in this appeal has never simply been whether 29,248 minus 16,064 equals 13,184.

The issue is whether NS Power has sufficiently established that the entire difference can appropriately be attributed, allocated and billed to this customer given what occurred during the intervening period.

2. NS Power's explanation regarding restoration of meter reading creates an unanswered question

NS Power states in its September 22 response that, following the cyber incident, it implemented manual meter reading beginning in July 2025 in order to obtain actual readings as soon as practicable.

NS Power also states that, as of March 31, 2026, meter connections to its billing system had been restored to normal operation and customer billing had returned to normal.

However, this particular account continued to receive estimated bills through April 2026.

NS Power has not explained why no actual reading was obtained for this property between June 4, 2025 and June 3, 2026, despite manual meter reading beginning in July 2025 and normal meter connections reportedly being restored by March 31, 2026.

This is particularly relevant because the absence of an intervening actual reading is the reason such a large amount of consumption was ultimately accumulated into a single reconciliation.

3. The wildfire meter removal and reinstallation remains unresolved

During the original DRO process, we specifically advised that during the West Dalhousie wildfire NS Power physically removed the meter from the property and subsequently reinstalled it when electrical service was restored.

That circumstance is significant.

NS Power's September 22 response acknowledges that this information was provided during the DRO process, but it does not provide or identify the operational records associated with that removal and reinstallation, including:

- the date and time the meter was removed;
- the meter reading recorded when it was removed, if any;
- the date and time it was reinstalled;
- the meter reading recorded when it was reinstalled, if any; and
- the dates during which electrical service to the property was interrupted.

These records are directly relevant to establishing continuity between the two actual meter readings upon which the entire reconciliation depends.

The meter was physically handled by NS Power during the very period for which there is otherwise no actual billing read. In my submission, simply establishing that the meter subsequently tested within accuracy tolerances does not answer what records existed when the meter was removed and reinstalled or what those records show.

4. The meter test does not resolve the billing-administration issue

I accept that NS Power tested meter [REDACTED] in August 2026 and found it operating within prescribed accuracy limits.

That establishes evidence regarding the accuracy of the meter when tested.

It does not, however, establish when the 13,184 kWh accumulated between the June 2025 and June 2026 actual readings.

Nor does it establish whether a meter reading was recorded when the meter was physically removed and reinstalled, or what any such reading may show, nor does it explain the continued estimated billing or allocation of accumulated consumption across the relevant billing periods.

Accordingly, I respectfully submit that the meter test should not be treated as determinative of the broader issues raised in this appeal.

5. Timing of accumulated consumption and rate allocation

NS Power acknowledges that the estimated invoices did not necessarily reflect actual consumption during each individual billing period and that the June reconciliation likely included electricity consumed during earlier periods that had not been fully captured by the estimates.

Because the June invoice spans a May 1, 2026 rate change, I respectfully request confirmation that any accumulated consumption was allocated to the applicable tariff periods using an appropriate and supportable methodology. This is a secondary issue, but it further illustrates why the timing of the accumulated consumption matters.

6. The consumption pattern warrants further examination rather than assumption

The account history also provides relevant context.

The June 2025 actual bill recorded 1,222 kWh over 62 days, approximately 19.7 kWh per day.

The estimates subsequently became:

- August 2025 – 1,134 kWh;
- October 2025 – 150 kWh;
- December 2025 – 779 kWh;
- February 2026 – 419 kWh; and
- April 2026 – 254 kWh.

The June 2026 reconciliation then billed 9,614 kWh.

Following the June 3, 2026 actual reading of 29,248, another actual reading was obtained on June 30, 2026 of 29,397, representing only 149 kWh over 27 days, or approximately 5.5 kWh per day.

I recognize that electricity consumption can vary and that historical consumption alone cannot prove what occurred during a particular period. However, the scale of the reconciliation, combined with the property's established billing history, the interruption in service during the wildfire, and the subsequent actual consumption, makes it reasonable to require a complete evidentiary explanation rather than relying solely upon the difference between two readings taken approximately one year apart.

7. A payment arrangement does not resolve the issue under appeal

NS Power offers to establish a payment arrangement for the outstanding balance.

We appreciate that offer, but affordability is not the issue before the Board.

We have continued to pay for legitimate ongoing electricity consumption. The disputed issue is whether the approximately \$1,934 June 2026 reconciliation was properly substantiated, allocated and billed.

A payment arrangement therefore does not resolve the underlying dispute.

Requested Determination

In light of the above, I respectfully ask the Board not to affirm the DRO decision on the present record without further examination of these outstanding issues.

Specifically, I request that the Board require NS Power to provide and/or clarify:

- 1. The operational records associated with the removal and reinstallation of meter [REDACTED] during the West Dalhousie wildfire, including any readings recorded at either event;**
- 2. The dates during which electrical service to the property was interrupted in connection with the wildfire;**
- 3. Why this account continued to be estimated through April 2026 despite NS Power's statement that manual meter reading began in July 2025 and that meter connections and normal billing had been restored by March 31, 2026;**
- 4. Whether any actual, remote, manual, interval or other meter data exists between the June 4, 2025 reading of 16,064 and the June 3, 2026 reading of 29,248;**
- 5. Confirmation of the methodology used to allocate any accumulated consumption across the May 1, 2026 rate change, and that the applicable tariff periods were correctly applied; and**
- 6. Whether, after consideration of the above information and Regulations 5.1 and 5.5, the disputed reconciliation requires adjustment.**

If NS Power cannot produce records sufficient to establish the continuity and administration of the account, including the meter removal and reinstallation and any intervening consumption data, I respectfully request that the Board determine an appropriate adjustment based upon the evidence available and the requirements of the Board-approved regulations.

Conclusion

NS Power has demonstrated that meter [REDACTED] subsequently tested within prescribed accuracy limits and that there is a mathematical difference of 13,184 kWh between the June 2025 and June 2026 readings.

Those facts are not disputed.

What remains unresolved is whether NS Power has sufficiently demonstrated when that accumulated consumption occurred, how the account was administered during the intervening period, and what occurred when the meter was removed and reinstalled during the wildfire. The rate-allocation question is secondary, but should also be confirmed because the reconciliation spans a change in electricity rates.

In my respectful submission, those questions should be resolved before the Board concludes that the disputed reconciliation was appropriately billed.

Thank you for considering this reply.

Sincerely,

Berin MacNabb and Julie Bibby-MacNabb

Appellants

Matter M13075