

**NON-CONFIDENTIAL**

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1 **Request IR-20:**

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3 **Nova Scotia Power has stated the process of asking for a multi-year increase and the**  
4 **deferred costs expected in the future is a “smoothing out” method so customers will not be**  
5 **burdened with large increases at once. If there were no “smoothing out” method, what**  
6 **would the percentage increase be between 2013, 2014, and 2015?**

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8 **Response IR-20:**

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10 Please refer to DE-03-DE-04 Figures 11-3 and 11-4 of the Application.

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1 **Request IR-21:**

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3 **Response to Information Request from June 11, 2012 – IR – 4:** *“We are able to provide the*  
4 *breakdown by counter party (of exported power from Nova Scotia Power to other jurisdictions*  
5 *between 2002 and 2010). Please refer to Confidential Attachment 1.”* **Why is this information**  
6 **deemed “confidential” by Nova Scotia Power and not readily available to the public?**

7  
8 Response IR-21:

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10 The information provided in Liberal IR-4 is confidential due to its commercially sensitive  
11 contents.

12  
13 NS Power takes very seriously its duty to provide its customers with as much information as  
14 possible about its operations. The Company must balance this against the need to protect  
15 customer interests from being compromised by the public release of commercially sensitive  
16 information.

17  
18 NS Power procures fuel, purchased power, and capital equipment in a market that is driven by  
19 competitive forces and suppliers looking to create value for themselves. The more a supplier is  
20 aware of NS Power’s specific requirements and procurement practices, the better their ability to  
21 obtain the highest price, reduce competition and ultimately increase the cost for NS Power and  
22 its customers.

23  
24 Suppliers will seek information from regulatory proceedings that could provide them competitive  
25 advantage over other suppliers, and that could be advantageous in bidding or negotiation.

26  
27 A supplier could combine their own market knowledge with NS Power provided volume, date  
28 and counterparty information to gain competitive information on purchase and sale trends and  
29 pricing thresholds.

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1 From a counterparty point of view, publishing transaction (including price, volume and dates)  
2 could negatively affect their ability to transact in our region or expose volume and pricing trends  
3 that could benefit market competitors. This could also affect how the counterparty is viewed in  
4 the marketplace and could force the counterparty to cease dealings with NS Power to protect  
5 their price and volume information from becoming public information. Having fewer  
6 counterparties to deal with provides fewer transaction options and could increase costs to  
7 customers.

8

9 Requests for confidential treatment of information are submitted to the Board by NS Power in  
10 accordance with Regulatory Rule 12 of the Board's Rules. The Board then rules on the request  
11 for confidential treatment of the information. In this instance the Board has previously ruled that  
12 the protection of similar information under similar proceedings (Fuel Adjustment Mechanism) is  
13 in the interest of customers.

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1 **Request IR-22:**

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3 **Response to Information Request from June 11, 2012 – IR – 5:** *“NS Power does not track*  
4 *imports by jurisdiction since our counterparties do not necessarily represent a specific single*  
5 *jurisdiction or at least not one that is always known to us. However, we are able to provide the*  
6 *breakdown by counterparty. Please refer to Confidential Attachment 1.”* **Why is this**  
7 **information deemed “confidential” by Nova Scotia Power and not readily available to the**  
8 **public?**

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10 Response IR-22:

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12 Please refer to Liberal IR-21.

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1 **Request IR-23:**

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3 **Aside from certain non-LED streetlight that may become stranded assets, is it accurate that**  
4 **Nova Scotia Power does not estimate that any other assets will become stranded in the**  
5 **future? Either through legislative alterations, changes in market conditions or technical?**

6

7 Response IR-23:

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9 Future legislative changes and market/technical changes do pose the chance that the useful lives  
10 of some assets may change from those underlying current depreciation rates. In such cases,  
11 future depreciation studies will consider appropriate changes to assure timely recovery of  
12 prudently incurred costs.