

November 6, 2014

Doreen Friis  
Regulatory Affairs Officer/Clerk  
Nova Scotia Utility and Review Board  
1601 Lower Water Street, 3rd Floor  
P.O. Box 1692, Unit "M"  
Halifax, NS B3J 3S3

**Re: 2015 Annual Capital Expenditure Plan**

Dear Ms. Friis:

A confidential copy of NS Power's 2015 Annual Capital Expenditure (ACE) Plan Application has been uploaded to the Board's confidential repository. A redacted version has been posted to the Board's public website. Six confidential hard copies and one redacted hard copy of the Application will be provided to the Board.

Notable items in the 2015 ACE Plan include:

- A list of projects included in the ACE Plan for which NS Power is seeking approval.
- A list of projects to be submitted at a later date for subsequent approval.
- A list of routines included in the ACE Plan for which NS Power is seeking approval.
- Responses to UARB ACE Plan Decision directives from prior proceedings.

Certain information filed in support of the 2015 ACE Plan Application is filed with the request that the Board hold it in confidence. Such information has been redacted from the publically available copy of the Application.

NS Power has attempted to minimize the information for which it seeks confidential treatment in this Application. Attached to this letter is a "Confidentiality Matrix" which lists the individual capital work orders submitted for approval and their corresponding

cost and technical support attachments. Designation of partial or full confidentiality for the capital work orders and their supporting documents is identified in the Confidentiality Matrix, and it includes explanations for the confidentiality being claimed.

Supporting documentation for individual capital work orders, and referenced in the Confidentiality Matrix, include:

- 32 Cost Support documents
  - Includes quotes, estimates, proposals, offers, supporting reports, and price indications.
- 21 Technical Support documents
  - Includes assessment reports, letters, site maps, planning studies, line maps, and photos.

Confidentiality of this information falls into the following three broad categories:

- Commercially sensitive cost information
- Third party propriety information
- System security

With respect to third party proprietary and commercially sensitive cost information, NS Power has made efforts to contact the vendors to advise of the Board's preference for transparency and non-confidentiality, and to request that they advise if there is confidential content which requires redaction.

Unless a vendor asserted full confidentiality of their document, only commercially sensitive cost information was redacted. Where a vendor asserted confidentiality of other portions of the supporting document such as technical information, NS Power has redacted the document in accordance with the vendor's specifications.

To aid the UARB and stakeholders in their review of NS Power's economically justified projects, NS Power has uploaded to the Board's confidential repository the Excel versions of the Economic Analysis Models filed in support of the individual capital items. Due to the inability to properly redact partially confidential information in electronic Excel files, these documents are filed as confidential. The PDF versions of these files have been partially redacted.

NS Power respectfully requests:

1. The Board establish a hearing process for review of NS Power's 2015 ACE Plan.
2. UARB approval of the attached Confidentiality Undertaking, and confidential treatment of certain information filed in support of the 2015 ACE Plan as described herein and in accordance with Board Rule 12.
3. 84 Capital Items with 2015 budget spending of \$65,638,037 and total project spending of \$83,627,912.
4. Capital routine programs with 2015 budget spending of \$73,097,621.
5. 2015 AFUDC Rate of 7.23%.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Mark Peachey', with a large, sweeping flourish extending to the right.

Mark Peachey