

January 22, 2016

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: Nova Scotia Power Inc (NSPI) 2016 ACE Plan – IR Responses – M07176

Dear Ms. Friis:

Enclosed are NS Power's responses to the Information Requests (IR) received by NS Power in the above referenced matter.

Confidentiality of IR responses and corresponding attachments is consistent with the 2016 ACE Plan. A listing of IRs and attachments by confidentiality justification are provided below.

Commercially sensitive cost information has been redacted where practicable. Where a vendor has asserted confidentiality of other portions of the supporting document such as proprietary technical information, NS Power has redacted the document in accordance with the vendor's specifications.

Electronic versions of Excel files that include confidential information, such as Economic Analysis Models, are filed fully confidentially due to the inability to properly redact partially confidential information in those files. The PDF versions of these files have been partially redacted.

Commercial Sensitivity

- CA IR-5 Attachment 1 (PDF - Partially Confidential, Excel – Fully Confidential)
- CA IR-16 Attachments 1 and 2 (PDFs – Partially Confidential, Excel – Fully Confidential)

- NSUARB IR-35 (Partially Confidential) and Attachments 1 and 2 (Fully Confidential)
- NSUARB IR-44 (Partially Confidential)
- NSUARB IR-45 Attachment 1 (Fully Confidential)
- NSUARB IR-57 Attachment 1 (Partially Confidential)
- NSUARB IR-68 (Partially Confidential) and Attachment 1 (Partially Confidential)
- SBA IR-15 Attachment 1 (PDF - Partially Confidential), Excel – Fully Confidential)
- SBA IR-17 Attachment 1 (PDF - Partially Confidential), Excel – Fully Confidential)
- SBA IR-50 (Partially Confidential) and Attachments 1 and 2 (Partially Confidential)

To protect value for customers and mitigate the risk of prospective suppliers having access to the information itemized above this information is confidential.

The more a supplier is aware of NS Power's specific requirements and competing vendor's costs, the better their ability to obtain the highest price, reduce competition and ultimately increase the cost for NS Power and its customers. The cost of such transparency is not always immediately evident. Information from regulatory proceedings can provide competitive advantages over other suppliers, and that could be advantageous in bidding or negotiation. Higher prices, or avoidable contractual constraints, will result in unnecessary higher costs to customers.

NS Power strives to keep the terms and conditions of suppliers' pricing and arrangements confidential from their other customers or potential competitors if requested to do so. This prevents competitors from using their information to gain a competitive advantage.

This is equally true for NS Power, which desires to protect its ability to acquire services and equipment on the most competitive terms. Those "best" terms may not be available if there is a risk that they will be disclosed to the customers or competitors of the supplier.

Since NS Power customer rates are cost-based, the maintenance of confidentiality for this item is to the direct benefit of customers.

Third Party Proprietary Information

- SBA IR-24 Attachment 1 (Fully Confidential)
- SBA IR-26 Attachment 1 (Fully Confidential)
- SBA IR-27 Attachment 1 (Fully Confidential)
- SBA IR-48 Attachments 2-4 (Fully Confidential)

This is proprietary information belonging to third parties over which the third parties have asserted confidentiality.

NS Power has reached out to the various third parties to advise of the Board's direction regarding fully confidential third party information, and to request that they advise if there is confidential content which requires redaction. In the case of each of the above, the corresponding vendor has requested full confidential treatment of that document.

Procurement and Sole Source Recommendations

- SBA IR-43 Attachments 1 and 2 (Partially Confidential)

Reports that relate to procurement strategies or evaluation are inherently confidential. This information provides details on how NS Power procures goods or services, and the structure of requirements to be met. Public disclosure of this information would allow suppliers to understand the structuring of risk mitigation and provide insight to the NS Power's procurement strategies, in turn decreasing the level of competition. This would be advantageous to suppliers bidding for NS Power contracts, who could understand what factors could influence NS Power procurement and thereby tailor bids in a manner that could increase costs to NS Power and its customers.

Internal Procurement and Sole Source Recommendations are partially redacted based on commercial sensitivity which includes cost information, losing bidders names, and evaluation details. Internal Procurement Recommendations were not written with a view that they would be published for the public. They contain candid assessments of the bidders with details supporting the writers' view of why the bid was not suitable for acceptance.

Security

- NSUARB IR-78 Attachment 1 (Partially Confidential)
- SBA IR-45 Attachment 1 (Fully Confidential)

Transmission and distribution drawings are confidential due to system security concerns. Protection of the power system preserves reliability and reduces the risks associated with external threats.

NS Power respectfully requests UARB approval of the confidential treatment of information filed in support of the 2016 ACE Plan IR responses as described herein and in accordance with Board Rule 12.

Yours truly,

A handwritten signature in black ink, appearing to read "Brian Curry". The signature is stylized and cursive.

Brian Curry
Regulatory Counsel

c: Tim Wood, Acting Director Regulatory and Legal Services, NS Power
Intervenors