

REDACTED (CONFIDENTIAL INFORMATION REMOVED)

2017-2019 Fuel Stability Plan and Base Cost of Fuel Reset (NSUARB M07348)

NSPI Responses to NS Department of Energy Information Requests

NON-CONFIDENTIAL

1 **Request IR-1:**

2
3 **Reference: NSPI Evidence, Page 10, Lines 22-26**

4
5 **For purposes of this Application, what is the period of time over which the Maritime Link**
6 **has been depreciated? What is the exact end date?**

7
8 **Response IR-1:**

9
10 Maritime Link will be amortized straight line over approximately 35 years and the amortization
11 is forecast to start on the in-service date of January 1, 2018 and end on March 31, 2052.

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1 **Request IR-2:**

2
3 **Reference: NSPI Evidence, Page 16, Lines 18-22**

4
5 **Please confirm that this Application does not include a request to phase in the recovery of**
6 **the Maritime Link assessment pursuant to section 4(4) of the *Electricity Plan***
7 ***Implementation (2015) Act.***

8
9 **Response IR-2:**

10
11 Confirmed. The Application includes a request to fully recover the forecasted 2018 & 2019
12 Maritime Link assessment over the three-year Rate Stability Period.

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1 **Request IR-3:**

2
3 **Reference: NSPI Evidence, Page 18, Lines 18-20 and Page 24, Lines 6-8**

4
5 **Is NSPI projecting that there will be AA/BA balances for any rate class at the end of 2016?**

6 **If so, in what amounts?**

7
8 **Response IR-3:**

9
10 NS Power is not currently projecting an AA/BA balance at the end of 2016 for the purposes of
11 this filing. Please refer to CA IR-04.

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NSPI Responses to NS Department of Energy Information Requests

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Request IR-4:

Reference: NSPI Evidence, Page 31, Lines 9-12 and Page 32, Lines 8-11

Please explain how COMFIT costs have been estimated for purposes of this Application.

Response IR-4:

The COMFIT forecasts were based on NS Department of Energy's list of approved and active COMFIT projects. Please refer to Partially Confidential Attachment 1. Each project is listed individually, however the projects that are expected to come in service in 2016-2018, for which NS Power did not have any specific details from the Department of Energy (other than expected in-service year), were grouped together by generation type and year (e.g. Additional Projects – 2017 Small Wind etc.) and were forecast to come in service throughout the year.

Where specific project details were not known, capacity factors of 40% for large wind, 25% for small wind, and 92% for biomass were used to forecast generation volumes for these projects. These capacity factors were based on the average capacity factor as provided by COMFIT developers (by generation type) for COMFIT projects with completed Power Purchase Agreements (PPA). For small tidal COMFIT projects NS Power assumed a capacity factor of 26% based on industry knowledge.

For projects with a completed PPA the estimated net output provided by the project developers were used in the forecasts, with a capacity factor cap of 40% applied for large wind and 25% for small wind projects. Please refer to Liberty IR-19.

The UARB approved COMFIT energy rates (M03632) of \$499/MWh for small wind, \$131/MWh for large wind, \$140/MWh for run-of-river hydro and \$652/MWh for small tidal were used to forecast COMFIT costs. A portion of the approved COMFIT biomass rate is adjusted annually and is indexed based on the Consumer Price Index and the price of diesel fuel

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1 in Halifax. A year-over-year increase (from 2015) of 0.5% was assumed as this was the average
2 COMFIT biomass energy rate change from 2013-2015. This resulted in the following COMFIT
3 biomass energy rates: 2017 = \$179.52/MWH; 2018 = \$180.42; and 2019 = \$181.32.

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REDACTED Fuel Stability Plan NSDOE IR-4 Attachment 1 Page 1 of 2

2017 - 2019 BCF Forecast									
COMFIT Project Status									
#ID	Applicant Name	Technology	Energy Rate (\$/MWh)	MW	Status	Applicant location	Project Status (Approval Date)	Required In-service Date	Include in Forecast Year
72	Colchester Cumberland Wind Field	Large Wind	\$131.00	0.8	A	Spiddle Hill	2012-05	2013-11 (COD)	2015
74	Town of New Glasgow	Small Wind	\$499.00	0.05	A	New Glasgow	2012-02	2013-06 (COD)	2015
77	The Chebucto Wind Field Inc.	Large Wind	\$131.00	10	A	Halifax	2012-03	2015-01 (COD)	2015
81	CBEX	Biomass	\$179.52 *	6	A	Cape Breton	2012-11	2016-12	
84	Watts Wind Energy Inc	Large Wind	\$131.00	6.4	A	Irish Mountain	2013-04	2015-05 (COD)	2015
86	Watts Wind Energy Inc	Large Wind	\$131.00	4.6	A	Ketch Harbour	2012-02	2016-02	
109	Municipality of the District of Guysborough	Small Wind	\$499.00	0.05	A	Middle Melford	2012-03	2013-11 (COD)	2015
110	Municipality of the District of Guysborough	Small Wind	\$499.00	0.05	A	Middle Melford	2012-05	2013-11 (COD)	2015
111	Municipality of the District of Guysborough	Small Wind	\$499.00	0.05	A	Goldboro	2012-09	2013-06 (COD)	2015
112	Municipality of the District of Guysborough	Small Wind	\$499.00	0.05	A	Goldboro	2012-09	2013-06 (COD)	2015
113	Municipality of the District of Guysborough	Small Wind	\$499.00	0.05	A	Goldboro	2012-04	2013-06 (COD)	2015
116	Universite Sainte Anne	Small Wind	\$499.00	0.05	A	Church Point	2012-06	2014-05 (COD)	2015
118	Municipality of the County of Pictou	Small Wind	\$499.00	0.05	A	Riverton	2012-09	2015-09 (COD)	2015
138	Municipality of the District of Shelburne	Small Wind	\$499.00	0.05	A	Shelburne	2012-04	2014-01 (COD)	2015
139	The Northumberland Wind Field Inc. (Combined with project 238)	Large Wind	\$131.00	1.6	A	Barney's River	2015-02	2015-11 (COD)	2015
143	Municipality of the District of Digby	Biomass	\$179.52 *	0.3	A	Hassets	2012-02	2016-02 (COD 300kW)	2015
150	Wind4all Communities	Large Wind	\$131.00	2.3	A	Gaetzbrook	2012-05	2014-01 (COD)	2015
158	Colchester Cumberland Wind Field	Small Wind	\$499.00	0.05	A	Spiddle Hill	2011-12	2013-06 (COD)	2015
159	Colchester-Cumberland Wind Field	Small Wind	\$499.00	0.05	A	Spiddle Hill	2012-02	2013-06 (COD)	2015
161	Town of Amherst	Small Wind	\$499.00	0.05	A	Fort Lawrence, Cumb. County	2012-03	2014-09 (COD)	2015
162	Municipality of Chester	Large Wind	\$131.00	2	A	Chester	2011-12	2014-03 (COD)	2015
164	The Northumberland Wind Field Inc	Small Wind	\$499.00	0.05	A	Barney's River	2012-02	2015-12	
171	Scotian Wind	Large Wind	\$131.00	1.99	A	Isle Madame	2012-06	2014-03 (COD)	2015
181	Affinity Renewables (SPCA)	Large Wind	\$131.00	1.4	A	Dalhousie Mountain	2014-11	2015-10 (COD)	2015
182	Affinity Renewables (SPCA)	Large Wind	\$131.00	4.99	A	Kemptown	2014-11	2015-10 (COD)	2015
183	Affinity Renewables (SPCA)	Large Wind	\$131.00	3.2	A	Greenfield (prefer Colchester)	2014-11	2015-11 (COD)	2015
184	Affinity Renewables (SPCA)	Large Wind	\$131.00	4.99	A	New Glasgow	2014-11	2015-10 (COD)	2015
190	Celtic Current	Large Wind	\$131.00	2.3	A	McVicker's Lake, Bateston	2012-06	2015-06 (COD)	2015
191	Celtic Current	Large Wind	\$131.00	1.9	A	Lingan	2015-02	2018-02	
192	Celtic Current	Large Wind	\$131.00	1.9	A	Point Aconi	2012-09	2015-09 (COD)	2015
193	Celtic Current	Large Wind	\$131.00	0.9	A	Grand Etang	2012-02	2015-05 (COD)	2015
198	Celtic Current	Large Wind	\$131.00	2.3	A	Mulgrave	2012-02	2015-01 (COD)	2015
203	Fundy Tidal	Tidal	\$652.00	0.5	A	Digby	2012-04	2018-12	
204	Fundy Tidal	Tidal	\$652.00	0.5	A	Petit Passage	2012-02	2018-12	
205	Fundy Tidal	Tidal	\$652.00	1.95	A	Digby	2011-12	2018-12	
212	Cape Breton University	Large Wind	\$131.00	5.4	A	Sydney	2015-05	2016-06	
216	Scotian Wind	Large Wind	\$131.00	1.99	A	St Rose	2012-07	2014-03 (COD)	2015
222	Scotian Wind	Large Wind	\$131.00	1.99	A	Wedgeport	2012-02	2014-03 (COD)	2015
224	Scotian Wind	Large Wind	\$131.00	1.99	A	Sandford	2013-07	2016-06	
225	Scotian Wind	Large Wind	\$131.00	6	A	Martock Ridge (3 Mile Plains)	2012-04	2015-02 (COD)	2015
226	Scotian Wind	Large Wind	\$131.00	4	A	Elmsdale	2012-04	2015-04 (COD)	2015
228	Scotian Wind	Large Wind	\$131.00	6	A	Stewiack (Fort Ellis)	2013-06	2016-05	
229	Scotian Wind	Large Wind	\$131.00	2	A	Centre Curlington	2013-05	2016-05	
230	Scotian Wind	Large Wind	\$131.00	1.99	A	Bucklaw	2012-02	2015-03	
235	Watts Wind Energy Inc	Large Wind	\$131.00	1.68	A	Lower Wedgeport	2012-09	2015-04 (COD)	2015
239	The Northumberland Wind Field Inc	Small Wind	\$499.00	0.05	A	Avondale	2012-12	2015-09	
240	Kwilmu'kw Maw-klusuaqn***	Large Wind	\$131.00	4	A	Whynott's Settlement	2012-04	2014-12 (COD)	2015
241	Eskasoni Band Council	Large Wind	\$131.00	4	A	Millbrook	2012-10	2014-12 (COD)	2015
242	Millbrook First Nation	Large Wind	\$131.00	6	A	Millbrook	2012-02	2014-12 (COD)	2015
243	Chebucto	Large Wind	\$131.00	7.05	A	Terrance Bay	2015-06	2015-12	
245	Scotian Wind	Large Wind	\$131.00	0.8	A	West Green Harbour	2013-01	2016-01	
247	Watts Wind Energy Inc	Large Wind	\$131.00	3.2	A	Porter's Lake	2013-01	2016-04	
251	Wind4all Communities	Large Wind	\$131.00	4.6	A	Merigomish	2012-04	2015-05 (COD)	2015
254	Valley Region SWRM Authority	Small Wind	\$499.00	0.05	A	Kentville, Kings County	2013-02	2015-12 (COD)	2015
255	Kwilmu'kw Maw-klusuaqn***	Large Wind	\$131.00	6	A	Amherst	2012-07	2017-01	
256	Pictou Landing First Nation	Large Wind	\$131.00	1.6	A	Pictou	2015-02	2018-02	
264	Wind4all Communities	Large Wind	\$131.00	4	A	Grove's point	2012-02	2015-03 (COD)	2015
268	David Stewart 3277924 N.S. Ltd.	Biomass	\$179.52 *	3.2	A	Bridgewater	2014-08	2018-08	
271	Windmill Holsteins	Biomass	\$179.52 *	0.5	A	Shubenacadie	2012-07	2014-06 (COD)	2015
272	Scotian Wind	Large Wind	\$131.00	8	A	North Beaverbank	2012-11	2015-03 (COD)	2015
273	Scotian Wind	Large Wind	\$131.00	1.99	A	Yarmouth	2012-11	2015-04 (COD)	2015
277	Watts Wind Energy Inc	Large Wind	\$131.00	3.2	A	Shag Harbour	2012-07	2015-05 (COD)	2015

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REDACTED Fuel Stability Plan NSDOE IR-4 Attachment 1 Page 2 of 2

2017 - 2019 BCF Forecast										COMFIT Project Status
#ID	Applicant Name	Technology	Energy Rate (\$/MWh)	MW	Status	Applicant location	Project Status (Approval Date)	Required In-service Date	Include in Forecast Year	
280	Colchester Cumberland Wind Field	Small Wind	\$499.00	0.05	A	Spiddle Hill	2012-09	2016-09		
281	Municipality of the County of Pictou	Small Wind	\$499.00	0.05	A	Riverton	2012-09	2015-09 (COD)	2015	
282	Municipality of the County of Pictou	Small Wind	\$499.00	0.05	A	Riverton	2012-09	2015-09 (COD)	2015	
283	Halifax Regional Water Commission	Hydro	\$140	0.0335	A	Bedford	2012-11	2015-02 (COD)	2015	
284	Port Hood & District Rec Commission	Small Wind	\$499.00	0.05	A	Cheticamp	2012-09	2015-12 (COD)	2015	
286	Celtic Current	Small Wind	\$499.00	0.05	A	Mulgrave	2012-11	2016-04		
287	Port Hood & District Rec Commission	Small Wind	\$499.00	0.05	A	Cheticamp	2012-09	2015-12 (COD)	2015	
288	Celtic Current	Small Wind	\$499.00	0.05	A	Mulgrave	2012-11	2016-04		
289	Smart Tower Energy	Biomass	\$179.52 *	6	A	Kentville	2013-10	2017-10		
296	Miller Waste	Biomass	\$179.52 *	2	A	Dartmouth	2015-02	2019-02		
309	The Northumberland Wind Field Inc.	Small Wind	\$499.00	0.05	A	Mulgrave	2015-02	2018-02		
310	Courthouse Hill Farm	Biomass	\$179.52 *	0.5	A	Shubenacadie	2013-09	2017-09		
311	Hefler Forest Products	Biomass	\$179.52 *	3.1	A	Middle Sackville, Halifax	2013-07	2015-06 (COD)	2015	
313	The Northumberland Wind Field Inc.	Small Wind	\$499.00	0.05	A	Pictou	2015-02	2018-02		
317	Municipality of the County of Pictou	Small Wind	\$499.00	0.05	A	Riverton	2013-11	2015-08 (COD)	2015	
318	Municipality of the County of Pictou	Small Wind	\$499.00	0.05	A	Riverton	2013-11	2015-08 (COD)	2015	
319	Municipality of the County of Pictou	Small Wind	\$499.00	0.05	A	Riverton	2013-11	2015-08 (COD)	2015	
323	Hilly Acres Farms	Biomass	\$179.52 *	0.25	A	Millville	2013-10	2017-10		
326	Watts Wind Energy Inc	Large Wind	\$131.00	3.6	A	Liverpool	2014-05	2017-05		
335	Grant Holdings 1983 Ltd.	Biomass	\$179.52 *	0.6	A	Hardwood	2014-10	2018-10		
361	TE Boyle Farm and Forestry Limited	Biomass	\$179.52 *	0.5	A	Tracadie	2014-09	2018-06		
363	Dalhousie University	Biomass	\$179.52 *	1.5	A	Bible Hill	2015-02	2018-05		
364	Municipality of Chester	Biomass	\$179.52 *	0.5	A	Chester	2015-02	2019-02		
365	Celtic Current	Small Wind	\$499.00	0.05	A	Cheticamp	2015-02	2018-02		
366	Celtic Current	Small Wind	\$499.00	0.05	A		2015-02	2018-02		
367	Municipality of the District of Barrington	Small Wind	\$499.00	0.05	A	Barrington	2014-10	2015-10 (COD)	2015	
368	Celtic Current	Small Wind	\$499.00	0.05	A	Inverness	2015-02	2018-02		
369	Celtic Current	Small Wind	\$499.00	0.05	A	Inverness	2015-02	2018-02		
370	Mun. of the District of Yarmouth	Small Wind	\$499.00	0.05	A	Overton	2015-02	2018-02		
371	Mun. of the District of Yarmouth	Small Wind	\$499.00	0.05	A	Overton	2015-02	2018-02		
372	Mun.of Digby	Small Wind	\$499.00	0.05	A	Digby	2015-11	2018-11		
375	Wind4all Communities	Large Wind	\$131.00	4	A	Barrachois	2014-08	2015-09 (COD)	2015	
376	Fireblade Holsteins Limited	Biomass	\$179.52 *	0.5	A	Port Hood	2014-11	2018-09		
378	Afton Hills Farm Limited	Biomass	\$179.52 *	0.5	A	Antigonish	2014-10	2019-10		
380	Halifax Regional Water Commission	Biomass	\$179.52 *	0.1	A	Bedford	2015-02	2019-02		
391	Chestico Museum and Historical Society 1	Small Wind	\$499.00	0.05	A	Port Hood	2015-02	2018-02		
393	The Northumberland Wind Field Inc. - Avondale	Small Wind	\$499.00	0.05	A	Barney's River	2015-02	2018-02		
394	The Northumberland Wind Field Inc. - Fitzpatrick	Small Wind	\$499.00	0.05	A	Fitzpatrick Mountain	2015-02	2018-02		
395	Chestico Museum and Historical Society 2	Small Wind	\$499.00	0.05	A	Port Hood	2015-02	2018-02		
401	Municipality of the County of Colchester	Small Wind	\$499.00	0.05	A	Kempton	2015-02	2018-02		
402	Municipality of the County of Colchester	Small Wind	\$499.00	0.05	A	Kempton	2015-02	2018-02		
TOTAL Capacity				179.7						

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* 2017 Energy Rate. The COMFIT Biomass Energy Rate is adjusted annually in accordance with the Tariff (based on CPI and price of diesel fuel). A year-over-year increase of 0.5% was assumed.

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2017-2019 Fuel Stability Plan and Base Cost of Fuel Reset (NSUARB M07348)

NSPI Responses to NS Department of Energy Information Requests

NON-CONFIDENTIAL

1 **Request IR-5:**

2
3 **Reference: NSPI Evidence, Page 31, Lines 9-12 and Page 32, Lines 8-11**

4
5 **Please explain how Tidal FIT costs have been estimated for purposes of this Application.**

6
7 **Response IR-5:**

8
9 Please refer to NSUARB IR-9(c) for calculation of generation volumes. The UARB-approved
10 Tidal Feed-In-Tariff – Developmental Tariff energy rate of \$530/MWh was then used to
11 calculate the Tidal FIT costs.

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2017-2019 Fuel Stability Plan and Base Cost of Fuel Reset (NSUARB M07348)
NSPI Responses to NS Department of Energy Information Requests

NON-CONFIDENTIAL

1 **Request IR-6:**

2
3 **Reference: NSPI Evidence, Page 32, Lines 11-14**

4
5 **Please explain what is driving the increase in HFO consumption.**

6
7 **Response IR-6:**

8
9 The relative increase in HFO consumption in 2018 as compared to 2017 is primarily attributable
10 to steam unit commitment decisions. Generating unit commitment decisions are made taking
11 into account the entire set of system parameters and constraints, including, but not limited to
12 distribution of wind generation, forced outages, assumed fleet retirements and emissions
13 constraint. For example, system dispatch optimization simulation has determined it to be
14 optimal to commit Tufts Cove 1 generating unit during the month of December 2018. Since
15 Tufts Cove 1 is not a cycling unit and, as such, cannot exploit daily drops in Natural Gas Price
16 by frequent starts and shutdowns, it switches to HFO, where the price coupled with the more
17 favourable heat rate associated with this fuel make it an economic choice.

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NSPI Responses to NS Department of Energy Information Requests

NON-CONFIDENTIAL

1 **Request IR-7:**

2
3 **Reference: NSPI Evidence, Appendix A-OP-06-Attachment 1, Pages 2-3**

4
5 **What are the generation sources of the volumes of Surplus Energy imported through the**
6 **Maritime Link in 2018 and 2019?**

7
8 Response IR-7:

9
10 Surplus Energy is delivered from Nalcor Generated Energy as defined in the Energy Access
11 Agreement.

12
13 “**Nalcor Generated Energy**” means Energy from all interconnected generation
14 facilities located within NL, whether in full or partial operation, that are now or
15 hereafter:

- 16
17 (a) directly or indirectly owned by or contracted to Nalcor or any Affiliate of
18 Nalcor or its successors or assigns, or
19
20 (b) directly or indirectly operated or controlled by Nalcor or any Affiliate of
21 Nalcor or its successors or assigns for the purpose of generating Energy to
22 satisfy NL Native Load.
23

24 Notwithstanding the foregoing, Nalcor Generated Energy excludes (i) Energy
25 from the Upper Churchill hydro-electric project that is required to be delivered to
26 Hydro Quebec under existing contract, and (ii) any Energy from a facility
27 described in paragraph (b) of this definition, to the extent that a third party is
28 contractually entitled to, and does, dispose of such Energy for consumption other
29 than by NL Native Load

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NSPI Responses to NS Department of Energy Information Requests

REDACTED

1 **Request IR-8:**

2

3 **Reference: NSPI Evidence, Page 56, Figure 23 (Confidential)**

4

5 **What accounts for the increase in [REDACTED] in 2017 and the decrease in**
6 **2018?**

7

8 **Response IR-8:**

9

10 Please refer to IG IR-19(a).

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REDACTED

Request IR-9:

Reference: NSPI Evidence, Page 56, Figure 23 (Confidential)

Explain what constrains NSPI from:

(a) Acquiring additional [REDACTED] in 2019?

(b) Acquiring additional [REDACTED] in 2019?

Response IR-9:

(a-b) The volumes in Figure 23 of the Application resulted from NS Power's forecasting process to derive fuel and purchased power costs for the rate stability period. The volumes included in Figure 23 are outputs from the forecasting process and are a function of many variables, including the forecast price of the imported energy relative to the forecast price of other alternatives (i.e. electricity generated from solid fuel, natural gas, heavy fuel oil). The NS to NB import volume and the Maritime Link Surplus Energy volume could be higher in 2019 than is reflected in Figure 23 if the price of this imported energy is less than alternative sources of energy more often than has been assumed in the Application.

The maximum volume of imported energy is a function of the transmission limits that have been assumed in this Application.

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NSPI Responses to NS Department of Energy Information Requests

NON-CONFIDENTIAL

1 **Request IR-10:**

2
3 **Reference: NSPI Evidence, Pages 55-58**

4
5 **Are additional volumes of energy flowing over the Maritime Link through Nova Scotia to**
6 **other markets in 2019? If so, how much?**

7
8 Response IR-10:

9
10 Energy forecast to flow over the Maritime Link through Nova Scotia to other markets in 2019 is
11 820 GWh.

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NSPI Responses to NS Department of Energy Information Requests

NON-CONFIDENTIAL

1 **Request IR-11:**

2

3 **Reference: NSPI Evidence, Page 74, Lines 19-23**

4

5 **What accounts for the \$4 million increase in operating costs for the Maritime Link from**
6 **2018 to 2019? Please provide all available details.**

7

8 Response IR-11:

9

10 Please refer to NSUARB IR-17(b).