

November 29, 2018

Ms. 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: 2019 Annual Capital Expenditure (ACE) Plan

Dear Ms. Friis:

A confidential copy of Nova Scotia Power Inc.'s (NS Power) 2019 Annual Capital Expenditure (ACE) Plan Application has been uploaded to the Nova Scotia Utility and Review Board's (Board, UARB) confidential repository. Due to file size, the redacted version has also been posted to the Board's confidential repository. Seven confidential hard copies of the Application will be provided to the Board.

Notable items in the 2019 ACF Plan include:

- A list of capital projects for which NS Power is seeking approval.
- A list of capital routines for which NS Power is seeking approval.
- A list of capital projects to be submitted at a later date for subsequent approval.

Certain information filed in support of the 2019 ACE Plan is filed with the request that the Board hold it in confidence. Pursuant to Rule 12 of the Board Regulatory Rules, NS Power requests confidential treatment of that information. Attached to this correspondence is a Confidential Undertaking for the Board's approval.

NS Power has minimized the information for which it seeks confidential treatment in this Application. Appendix A to the 2019 ACE Plan 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 confidentiality for the capital work orders and their supporting documents is identified in the Confidentiality Matrix, and it includes justifications for the confidentiality being claimed. Confidentiality of this information falls into the following three categories of information:

- 1. Commercially Sensitive;
- 2. Third Party Proprietary; and
- 3. System Security.

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

- 48 Cost Support documents (includes quotes, proposals, bids and cost estimates).
- 22 Technical Support documents (includes inspection/service reports, stability assessments, product bulletins, discontinuation notices, operating approvals, and planning and other studies).

NS Power respectfully requests:

- 1. The UARB establish a process for review of NS Power's 2019 ACE Plan;
- 2. UARB approval of the attached Confidentiality Undertaking, and confidential treatment of certain information filed in support of the 2019 ACE Plan as described herein and in accordance with Board Rule 12;
- 3. UARB approval of 89 Capital Items with 2019 budget spending of approximately \$75.9 million and total project spending of approximately \$108.1 million; and
- 4. UARB approval of the capital routine programs with 2019 budget spending of approximately \$82.3 million.

If there are any questions or comments with respect to any of the above, please contact the undersigned.

Yours truly,

Brian Curry

Senior Regulatory Counsel

Encl.

c. Judith Ferguson Nicole Godbout