NOVA SCOTIA UTILITY AND REVIEW BOARD

IN THE MATTER OF: The ***Public Utilities Act***, R.S.N.S. 1989, c.380 as amended

IN THE MATTER OF: An Application by Efficiency Nova Scotia Corporation ("ENSC"). for Approval of its Electricity Demand Side Management Plan for 2013

INFORMATION REQUESTS

To: Efficiency Nova Scotia Corporation
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From: The Avon Group

Responses Due: March 30, 2012

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Issued at Halifax, Nova Scotia, this 20th day of March, 2012.

Request IR-1

Please provide a Lexicon for the acronyms used in the evidence and appendices.

Request IR-2

Reference: Econoler Report, February 23, 2012, E-03, p.3, Table 2

Please include columns to show $ budget, $ actual and TRC tests for each DSM program.

(a) Please provide an explanation for any variance of 20% or more in spending or savings.

(b) For each variance of 20% or more, please explain any program changes or other action taken by ENSC as a result of the variance. If no changes or actions were taken, please explain.

Request IR-3

Reference: ENSC Evidence, 2013 – 2015 DSM Plan.

(a) Please provide the “DSM Technical Tables” in the same form as ENSC Response to NPB IR-3(b) in the 2012 DSM Plan Application.

(b) With respect to the 2013 – 2015 DSM Plan, please provide customer participation rates for each of the programs for Residential and “Business, Non-profit and Institutional” (“BNI”), (formerly Commercial and Industrial) presented in terms of the eligible customers, number of participants/units/facilities and participation rate.

(c) For the BNI programs, please provide a further breakdown of participation information among the eligible NSPI customer rate classes e.g. General Demand, Small Industrial etc. …

(d) Please provide customer participation rates for each of the Residential and BNI DSM Programs, separately, for each of the years 2008 – 2009, 2010, 2011 and 2012F.

(e) For the BNI programs, please provide a further breakdown by year for each of the eligible NSPI customer rate classes.

Request IR-4

If, in any program, the 2013 participation or savings targets are within 20% of the 2011 targets and if the 2011 targets were not achieved in that program, please explain what conditions have changed and/or what steps are being taken to ensure that the 2013 targets will be achieved?

Request IR-5

With respect to Figure 4.1 – 2013 to 2015 DSM Plan Savings and Investment Including Outlook to 2017 (ENSC Evidence, p. 18), it is noted that the total investments listed for each year are different from the total program investments that were presented at the December 8, 2011, DSM Stakeholders Meeting in the Navigant Consulting presentation "Multi-Year DSM Planning Targets" (p.4).

(a) Please explain the differences in each year, providing specific information with respect to changes for budgets for DSM programs.

(b) Please explain the rationale for these changes, including any new information received by ENSC between the Stakeholders Meeting and the filing of ENSC's evidence in this matter.

Request IR-6

The benefits of the programs are shown in terms of energy savings (GWh) and demand savings (MW), but the dollar Lifetime Benefits are shown as a single number ($million, second column). Please provide ENSC Evidence, Tables 4.1 – 4.4 showing Lifetime Benefits separately for demand and energy.

Request IR-7

Reference: Figure 4.1 ENSC Evidence, p. 18 states that "an avoided cost of $135/MWh was provided by NSPI in February 2012 and includes the combined cost of energy and capacity." (Also noted in Figures 4.2, 4.3 and 4.4).

(a) Please provide NSPI reports, work papers, calculations and other supporting materials for the development of the $135/MWh avoided cost figure.

(b) How much of the $135/MWh is energy cost and how much is demand cost?

(c) What is the time frame used for the avoided cost figure?

(d) Why are the avoided costs identical for all three years, 2013-2015?

(e) Does ENSC agree that changes in load, fuel cost and other factors produce different avoided costs each year? Why or why not?

(f) Was this accounted for? If so, how? If not, why not?

Request IR-8

(a) Does ENSC have the responsibility to determine whether the avoided cost(s) used in its evaluation and application are reasonable?

(b) If so, please explain what steps were taken by ENSC to evaluate the $135/MWh avoided cost and its conclusion on the reliability of this figure for the years 2013, 2014 and 2015.

(c) If not, who has that responsibility and in what forum is this determined?

Request IR-9

(a) Please confirm that the levelized avoided costs used in the development of TRCs and PACs for the 2011 and 2012 DSM Plan were $166/MWh for energy and $79/MW/year for demand. If these amounts are incorrect, please provide the correct avoided costs for energy and demand used in 2011 and 2012.

(b) Please explain whether the avoided cost(s) used in this application were derived using same methodology as was used to develop the avoided costs for the 2011 and 2012 DSM programs. If not, please provide the new methodology and explain why it has changed

(c) Since the avoided costs have changed in 2013 as compared with previous years, please provide a complete explanation for the changes along with any supporting documentation that is referenced.

Request IR-10

In the Load Retention portion of NSPI's 2012 General Rate Application, NSPI provided calculations to the Load Retention applicants (NewPage Port Hawkesbury and Bowater Mersey) showing an average levelized avoided cost of $62.89/MWh for the period 2012-2016. Undertaking U-7, provided by NSPI, showed levelized avoided costs of $73.80/MWh for a high gas and high coal price scenario. Please explain the differences between those avoided costs and the avoided costs relied upon in the 2013 to 2015 DSM Plan.

Request IR-11

Reference: Figure 4.2 – 2013 DSM Plan Savings and Investment (ENSC Evidence, p. 19).

(a) Please provide the data and spreadsheets (in excel with formulas intact) used to prepare Tables 4.2-4.4.

(b) To the extent that a program does not meet or is neutral in the TRC test (namely, is equal to 1.0 or less), please explain the "strategic or long term benefits" which ENSC believes would otherwise warrant its inclusion in the program.

(c) The "dual baseline" approach (discussed in Section 6.3) results in lower calculated savings for certain programs (see ENSC Evidence page 40, bottom bullet). Which programs' TRC values are most likely to be affected by the dual baseline approach?

Request IR-12

Please provide versions of tables 4.2-4.4 (including the spreadsheets used to prepare them) using avoided costs of: $63/MWh and $74/MWh.

Request IR-13

Reference: ENSC Evidence, p.23, lines 4-5, states that "…[C]onservation and energy efficiency [are] a lower-cost alternative to new supply".

(a) What assumptions were made about NSPI's need for new supply?

(b) What is NSPI's forecast reserve margin for the period 2012-2017?

Request IR-14

Reference: ENSC Evidence, p.32, Recommendation #2, lines 11 – 14,

(a) Please provide details of the specific measures to be undertaken, the target market and budgets for each measure in 2013 (from Figure 4.2):

(i) Education and outreach $2.5 million;

(ii) Development and Research $1.4 million;

(iii) Other enabling strategies $1.0 million.

(b) Please identify how participating or benefitting customer classes are identified for purposes of allocating the costs of each enabling strategy.

(c) Please identify any specific enabling strategy which is not currently able to be allocated directly.

(d) In your response, please identify the barrier to direct assignment, if there are means to overcome those barriers, and the timing when direct assignment will be implemented.

Request IR-15

To the extent that DSM programs included as part of the "Enabling Strategies" are funded by sources other than the Electricity DSM Fund, please provide the details of the other sources of funding and an explanation of the allocation of the total program expenses between or among the different sources of funding.

Request IR-16

(a) Please indicate the total energy savings and demand savings in 2011 associated with the shutdown of NewPage Port Hawkesbury.

(b) What assumptions have been made regarding the level of operations of NewPage Port Hawkesbury and Bowater Mersey in 2013-2015?

(c) What impact, if any, did this have on the development of the 2013 – 2015 DSM Plan? Please explain qualitatively and quantitatively, providing all workpapers and studies.

Request IR-17

Reference: 4.4 Capacity Building Programs (Appendix A, pp. 27-28)

(a) Please provide the details of training and associated expenses anticipated in connection with proposed capacity building programs for trade allies. Specifically, please provide information on the type and number of programs that will be offered, the number of anticipated participants, the entire budgeted cost of the training programs and the ENSC portion of the training costs.

(b) Please provide the details (as outlined above) of training programs for trade allies offered by ENSC in 2011 and 2012.

Request IR-18

Reference: 4.5 Working with Governments (Appendix A, pp. 29-32)

(a) Please provide project details and associated costs for the studies and evaluations that are referenced under the Codes and Standards projects (page 30).

(b) If there are additional sources of funding to support these studies and evaluations, please provide information about the source, the amount of funding provided and the total project costs.

Request IR-19

Reference: Appendix C, Elenchus Report, p.13, footnote 3.

(a) Please confirm that to date, enabling strategies have been allocated on the basis of customer count.

(b) Please confirm that the 2012 DSM Plan allocated $343 to Large Industrial customers for enabling strategies and in 2013, the allocation is $286,480 (an 83,521% increase)? If not, explain.

(c) Please confirm that the allocation to the Residential class in 2012 was $4,530,014 and in 2013 it is proposed to be $2,207,482. If not, explain.

(d) Footnote 3 states that direct allocations are not yet “presently available” but “direct allocations *are expected to be practical and appropriate*” for many of the actual 2013-2015 enabling strategy costs in the true-up process”. Does ENSC agree that once the information and data regarding direct allocations is collected and available, enabling strategies will be able to be more accurately assigned reflecting a truer cost of service?

(e) Does ENSC agree that the DSM true-up has a two year lag such that if customers overpay, they must wait two years for a refund?

Request IR-20

Reference: Appendix C, Attachment 1-2, Table 2 (2013)

Please provide a similar table showing the program costs assigned to the Large Industrial Class for 2010F, 2010A, 2011F, 2011A, 2012F, 2013F, 2014F and 2015F.

Request IR-21

Reference: Appendix C, Attachment 1-4, Table 2(b) (2013)

Please provide a similar table showing the relative share of program costs by the Large Industrial Class for 2010F, 2010A, 2011F, 2011A, 2012F, 2013F, 2014F and 2015F.

Request IR-22

Reference: Appendix C, Footnote 1 to Attachment 1-4, Table 2(b) (2013), Attachment 1-9, Table 2(b) (2014) and Attachment 1-14, Table 2(b) (2015), states that the breakdown of Municipal Class sales is based on a 2011 forecast provided by MEUNSC.

(a) Did ENSC secure the most current forecast from MEUNSC or NSPI for 2012? For 2013 to 2015? If so, please provide and explain why it was not used. If not, why not?

(b) Please provide updated Tables 2(b) based on the more current forecast.

Request IR-23

How many customers comprise the Large Industrial Class in each of 2010, 2011, 2012, 2013, 2014 and 2015?

Request IR-24

(a) Does ENSC have a “program manager” (or similarly otherwise titled individual) responsible to liaise with each Large Industrial customer with respect to its DSM programs?

(b) What, if any, surveys were done with the Large Industrial customers with respect to planned DSM programs in 2013-2015? Were such surveys used in developing the DSM Plan and assigning program costs to the Large Industrial customers? If not, why not?

(c) Does ENSC agree there is value in such discussions or surveys?

Request IR-25

(a) In the BNI programs is it possible (and does ENSC) track all measures by customer class? If not, for any BNI Program measure which is not tracked, evaluated and validated by customer class, please explain what alternative methodology is used to ensure that the Large Industrial customers are, in fact, paying their appropriate share of costs assigned to the Large Industrial class.

(b) Please identify any measures in the BNI programs which have been added to or deleted from the measures filed in the 2011 Plan and the 2012 Plan. Of these, which are targeted for the Large Industrial Class?

(c) Please provide a variance analysis of budget versus actual DSM program expenditures by measure related to the Large Industrial Class for the DSM programs offered in 2010, 2011 and 2012 similar to ENSC Avon IR-4 (2012 DSM Plan filing). Where names or programs have changed, please explain.

Request IR-26

Reference: Appendix C, Attachment 2-2, Table 2.2 DSM Rate Rider Impacts.

Please confirm that ENSC's proposed programs would result in a 52% increase in the DSM rider in 2013 for the Large Industrial Class over the current rate rider which includes the DSM balance adjustment.

Request IR-27

Reference: Appendix C, Table 3 (2013), (2014) and (2015), Attachments 1-2, 1-10 and 1-15..

Please confirm that ENSC is allocating the following program costs to the ELI-2P-RTP class:

2013	$1,437,469
2014	$1,465,869
2015	$1,533,347

(a) In the event there are no customers receiving service under the ELI rate, how will the unrecovered DSM revenues be treated?