

NOVA SCOTIA UTILITY AND REVIEW BOARD

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

-and-

IN THE MATTER OF: An Application to Approve Efficiency Nova Scotia Corporation's
Electricity Demand Side Management (DSM) Plan for 2013-2015

INFORMATION REQUEST

To: Efficiency Nova Scotia Corporation (ENSC)

From: Nova Scotia Chapter – Canadian Oil Heat Association (COHA-NS)

Questions

COHA IR-1:

ENSC utilizes DSM Screening Tests to assist in determining what fuel appliances will be included in ENSC DSM programs. Please provide the:

- a. Results of the Total Recovery Cost (TRC) screening test for Energy Star® oil-fired appliances as compared to TRC results for natural gas, propane, pellet and wood furnace/boilers.
- b. Results of the Program Administrator Cost (PAC) screening test for Energy Star® oil-fired appliances as compared to PAC results for natural gas, propane, pellet and wood furnaces/boilers.
- c. If TRC and PAC screening tests were not performed for oil appliances, please explain why not?

COHA IR-2:

Dramatic improvements have been made in the areas of fuel oil storage, equipment efficiency and fuel properties. Based on the Dunskey Energy Consulting report dated December 16th, 2010 and filed as *Appendix D, Residential Fuel Substitution Pilot Program* as part of proposed ENSC 2012 DSM Plan, heating oil was eliminated based on pricing, environmental and home insurance concerns. Reasons outlined within the Scope of the 2010 report, continue to form the basis for the exclusion of oil appliances within the 2013-2015 ENSC DSM filing.

- 1** *Heating oil was excluded as a target fuel, primarily because of its significant negative environmental and economic impacts for Nova Scotia relative to other fuel substitution options, as well as concerns around price volatility. Heating oil is also problematic for residential heating because of increasing issues with home insurance policies due to potential soil contamination from fuel leaks (Page 5, Scope of Pilot, Residential Fuel Substitution Pilot Program, Dunskey Energy Consulting, December 16th, 2010)*
- a. Please explain how ENSC, according to the ACT under which they are governed, has the authority to exclude oil appliances within its Fuel Substitution Program, effectively eliminating consumer choice, based on today's fuel costs.
- b. Please explain how ENSC, according to the ACT under which they are governed, has the authority to exclude oil appliances within its Fuel Substitution Program, effectively eliminating consumer choice, based on GHG emissions levels.
- c. Please explain how ENSC, according to the ACT under which they are governed, has the authority to exclude oil appliances within its Fuel Substitution Program, effectively eliminating consumer choice, based on home insurance costs.
- d. Please explain why heating oil is the only petroleum-based heating fuel/gas not included under the Fuel Substitution Program.

COHA IR-3:

ENSC is forecasting energy savings attributed to the province adopting new energy efficiency codes and standards (p.22, Evidence, ENSC 2013-2015 DSM Filing). ENSC supports and builds DSM programs around the new Nova Scotia residential building code, adopted in 2010. The code requires all new residential houses to either meet prescriptive requirements (intended to achieve an EnerGuide rating of 80) or demonstrate energy efficiency performance through an EnerGuide rating of 80. (p.30, Appendix A, ENSC 2013-2015 DSM Filing)

- a. Please advise if ENSC DSM 2013-2015 Plan will be adapting its program design and eligibility criteria based on EnerGuide80 performance-based rating system.
- b. If EnerGuide80 is the performance-based rating system used by ENSC, is the performance-path to EnerGuide80 compliance based on NRCan's HOT2000 method and software?
- c. If HOT2000 software is the performance-path to EnerGuide80, are you aware the HOT2000 method skews builders/owners decisions (since credits are awarded based on certain design directions within the software) which drives them to install electric heat in order to achieve the highest EnerGuide rating, and subsequently, a larger rebate?
- d. If DSM is ENSC's main goal, why are new home builders/owners being rewarded for installing electric heat?

COHA IR-4:

ENSC has included a Green Heating System component to their Existing Residential Programs & Services (p.11, Appendix A, ENSC 2013-2015 DSM Plan). We applaud the inevitable move toward renewables, however we question the effectiveness of this program within the context of electricity demand-side management as these incentives will drive more homes to heat with electricity than already exist in Nova Scotia today.

Please provide the following residential electric savings (kWhs) comparisons:

- a. How many kWhs are saved by *replacing* electric baseboard heating with a ductless air source heat pump?
- b. How many kWhs are saved by *replacing* electric baseboard heating with a ducted air source heat pump?
- c. How many kWhs are saved by *replacing* electric baseboard heating with an Energy Star® oil-fired appliance? With an Energy Star® oil-fired appliance with electrically commutated motor?

- d. How many kWhs are saved by *off-setting* electric baseboard heating with a ductless air source heat pump?
- e. How many kWhs are saved by *off-setting* electric baseboard heating with a ducted air source heat pump?
- f. How many kWhs are saved by *off-setting* electric baseboard heating with an Energy Star® oil-fired appliance? With an oil-fired appliance with electrically commutated motor?

Respectfully submitted by,

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