IN THE MATTER OF an application by Efficiency Nova Scotia Corporation for approval of its Electricity Demand Side Management Plan for 2013

NSUARB-E-ENSC-R-12

Consumer Advocate Information Requests to ENSC

NON-CONFIDENTIAL

Request IR-28:

Please provide an explanation of why **Figure 4.1 - 2013-2015 DSM Plan Savings and Investment including Outlook to 2017** on Page 18 of the revised application shows a significant increase in investment as compared to **Figure 4.1 - 2013-2015 DSM Plan Savings and Investment including Outlook to 2017** on Page 18 of the original application but does not show a commensurate increase in incremental net energy savings at generator or incremental net demand savings at generator.

Request IR-29:

Please identify which sub-program elements as described in the figures provided in response to Consumer Advocate IR-3 account for the majority of additional investment in the revised application and please explain why these program costs are substantially higher for these sub-program elements.

Request IR-30:

Please compare where possible lifetime benefits per dollar invested, and costs per GWh of net incremental savings in energy at generator and costs per MW of incremental demand savings at generator as shown in **Figure 4.1 - 2013-2015 DSM Plan Savings and Investment including Outlook to 2017** on Page 18 of the revised application with those of the 2007 and 2009 IRPs.

Request IR-31:

Please explain the what is meant by the term "No New DSM" in Column 4 for 2011 Load Forecast rev. 2011 on Page 10 of ENSC's Response to CA IR-6 and the term "Without Future DSM used to describe in Column 4 of **Figure 13 Total Energy Requirement** on Page 20 in of the attached 2011 NSPI Load Forecast as part of the response to CA IR-6 and why these numbers differ from those found in Column 11 (Total Energy GWh) of **Table A1: Energy Requirement** 1 – **2011 NSPI** Forecast of Appendix A to the 2011 Load Forecast.

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Request IR-32:

Please provide a breakdown of actual and forecast administration costs for the DSM for the years 2011 to 2015 inclusive, including number of employees, total salary costs, consultants, travel and office space.

Request IR-33:

Please indicate whether ENSC is planning to undertake a management audit in 2012 or, if not, when it contemplates moving forward with a management audit as discussed in the 2011 DSM decision.

Request IR-34:

Please explain why ENSC chose to use in Appendix C, Attachment 1, the classification factors from the "'Base Cost of Fuel Cost of Service Allocation of Fuel Expenses among Rate Classes' table in line #32 under Purchased Power Regular / Fixed section in Appendix C of the 2011 Base Cost of Fuel Compliance Filing submission" (66.51% on energy) rather than the December 9, 2011, Compliance Filing in the 2012 GRA, which classifies 70.94% of overall generation function rate base as energy-related?

Request IR-35:

Does ENSC agree that the average customer will have lower usage in 2013– with the energy-efficiency program than without?

Request IR-36:

Appendix C, Attachment 3 computes the annual bills for a customer who uses the same amount of energy each year.

a) Please provide the equivalent of Appendix C, Attachment 3, for a customer whose bill is reduced by the projected average class savings each year 2013 through 2015.

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Request IR-37:

Does ENSC agree that NSPI's fuel adjustment charge will be lower with the energy-efficiency programs than without?

a) If not, please explain why.

b) If so, please provide ENSC's estimate of the reduction in the fuel adjustment charge due to the energy-efficiency programs, for each year 2013–2015.

Request IR-38:

Has ENSC or NSPI identified any capital investments in generation, transmission or distribution that have been deferred, or are expected to be deferred in 2013–2015, due to reduced loads resulting from the energy-efficiency programs?

a) If so, please provide the estimated reductions in revenue requirements resulting from those deferrals.

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