

September 24, 2013

By Electronic Delivery

#55246-SF

Ms. Doreen Friis
Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
3rd Floor, Summit Place
1601 Lower Water Street
Halifax, Nova Scotia B3J 3P6

Dear Ms. Friis:

Re: [M04819] E-ENSC-R-12 – 2014 DSM Cost Recovery Rider (“DCRR”)

We are writing regarding the upcoming filing of the 2014 DSM Cost Recovery Rider (“DCRR”) by Efficiency Nova Scotia Corporation (“ENSC”).

In an effort to provide stakeholders with more time to engage with and review the annual DCRR filing, ENSC provided the DSM Advisory Group with a draft copy of the DCRR tables on September 13, 2013. The DSM Advisory Group then came together for a meeting on September 17, 2013. In addition to ENSC, in attendance were representatives of:

- The Consumer Advocate (CA)
- Halifax Regional Municipality (HRM)
- The Industrial Group
- Municipal Electric Utilities of Nova Scotia Cooperative (MEUNSC)
- Nova Scotia Power Inc. (NSPI)
- Small Business Advocate (SBA)
- Union of Nova Scotia Municipalities (UNSM)
- Utility & Review Board (UARB)

During this recent meeting, the DSM Advisory Group identified that the existing methodology for assigning DSM costs to rate classes has resulted in at least one rate class seeing a significant increase in both the DSM rate rider and its overall electricity bills projected for 2014.

#1219593

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In reviewing this anomaly, members of the DSM Advisory Group all expressed concern that without revision, filing the DCRR "as is" would result in rate-shock for at least one rate class, which is not appropriate and should be avoided if possible.

As such, members of the DSM Advisory Group agreed to collaborate further in reviewing this specific issue and to come together again for a special meeting on Friday September 20, 2013, with the goal of finding a mutually acceptable solution prior to filing the DCRR as planned on October 1, 2013.

ENSC is pleased to report that the collaborative meeting on September 20th resulted in stakeholders and ENSC identifying a number of potential ways to address both this immediate issue, and the longer-term question of avoiding this issue in the future.

ENSC is committed to working with the DSM Advisory Group to respond to stakeholder concerns, and to avoiding significant rate and bill impacts on specific groups where possible. ENSC would like to continue working with the Advisory Group to finalize an appropriate, feasible solution to this issue, prior to filing the 2014 DCRR with the Board.

At the September 20th meeting, the DSM Advisory Group acknowledged both this desire to work out a mutual solution and the need to seek an extension of the usual October 1st filing date for the DCRR to complete this work.

ENSC therefore requests from the Board an extension to the October 1st filing date for the 2014 DCRR and related Rate and Bill Impacts. ENSC is confident, following the productive and collaborative discussions to date, that it can work with the Advisory Group to develop the appropriate short and longer term solutions to this issue, and have revised 2014 DCRR tables and related Rate and Bill Impacts complete and ready for filing on or before November 14, 2013.

ENSC submits that an extension of the 2014 DCRR filing to November 14, 2013 will not adversely affect the review, approval and implementation of the 2014 DCRR for the following reasons:

- NSPI has been involved in reviewing this matter and the need for an extension, and we understand will have sufficient time to implement the 2014 DCRR on this revised timeline;
- The DSM Advisory Group have had an opportunity to review, ask questions and comment on the 2014 draft DCRR tables prior to filing, and members have agreed with the need to resolve this particular issue prior to filing with the Board and the need for an extension;

- ENSC will continue to work openly and transparently with the Advisory Group to refine the 2014 DCRR to finalize a feasible solution that addresses stakeholders concerns regarding the issue.

ENSC submits it is in the interests of all parties to permit the requested extension for the filing of the 2014 DCRR to November 14, 2013. At that time, the material to be filed will have been subject to further collaborative engagement and review by ENSC and the DSM Advisory Group.

As such, the purpose and intent of the DSM Advisory Group is being fully realized, in ensuring important issues are brought forward and resolved in a collaborative fashion to the benefit of all parties, avoiding unnecessary multiple filings and adversarial submissions to the Board. This will streamline the subsequent review and approval process for all parties and the Board, leaving sufficient time for NSPI to implement the necessary 2014 DCRR for January 1, 2014.

If you require any further information, please do not hesitate to let me know. We look forward to further direction from the Board as may be required, and remain,

Yours very truly,

WICKWIRE HOLM



Sean Foreman

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Cc: ENSC
Bruce Outhouse, Q.C.
Participant List (E-ENSC-R-12)

Friis, Doreen

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Subject: Efficiency Nova Scotia Corporation (ENSC) - 2014 DCRR Filing Extension
Attachments: DOCS-#1219593-v1-Letter_to_UARB_re_DCRR_filing_extension.pdf
Follow Up Flag: Follow up
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Dear Ms. Friis,

Kindly accept the attached letter submission to the Board, requesting an extension to the October 1, 2013 filing date for the 2014 DCRR.

As noted, if you require anything further on review please let me know.

Regards,
Sean.

Sean Foreman
Partner

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