



THE BRETON LAW GROUP

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File No. 41736-71

September 19, 2018

Nova Scotia Utility & Review Board

PO Box 1692, Unit "M"

Halifax, Nova Scotia B3J 3S3

Attention: Doreen Friis, Regulatory Affairs Officer / Clerk

Dear Ms. Friis:

Re: EfficiencyOne – Application for Approval for the Use of Measure Level Non-Energy Benefits within the Context of Cost Effectiveness Testing

Please find enclosed an Application on behalf of EfficiencyOne for approval for the use of measure-level Non-Energy Benefits (NEBs) within the context of Cost-Effectiveness (CE) testing associated with future DSM planning regulatory processes.

This Application originates from Board Matter M06733, Application for Approval of the 2016-2018 DSM Supply Agreement and Plan. The Consensus Agreement executed by the Parties established an agreement to collaborate, through the DSM Advisory group, to pursue a method of quantification of NEBs to improve the CE test. Specifically, the Consensus Agreement stated:

7. COST-EFFECTIVENESS TESTING METHODOLOGY FOR FUTURE APPLICATIONS TO APPROVE A DSM SUPPLY AGREEMENT

a) The Parties agree to work collaboratively with the DSM Advisory Group to pursue the nature and quantification of estimates associated with participant non-energy benefits to improve the TRC test in future Applications.

b) EfficiencyOne will update the UARB prior to December 31, 2016 on the DSM Advisory Group's progress on this work.

c) The Parties acknowledge that specific measures and/or programs exclusively targeted toward low-income Nova Scotians may not pass a cost-effectiveness test.

In its December 22, 2016, update to the Board, EfficiencyOne confirmed that the scope of work for a consulting engagement regarding non-energy benefits was being finalized, and that initial estimates

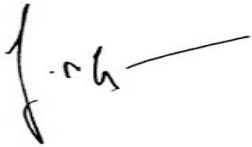
were expected to be available for the Board's review by the end of Q3 2017. E1 also indicated that estimated timelines might change based on the final form of the Scope of Work.

By correspondence January 30, 2017, in response to EfficiencyOne's December 22, 2016 update, the Board stated its understanding that the work associated with the methodology and assumptions of the cost effectiveness screening test was intended to be applied to future DSM Resource Plan applications, and in consideration of this objective, confirmed further updates were not necessary pending EfficiencyOne's completion of its analysis and submission of this Application.

EfficiencyOne has consulted extensively with the DSM Advisory Group and incorporated a number of suggestions in this final submission. EfficiencyOne is pleased to submit the recommendations to the Board as set out in the accompanying Application.

Five (5) original hard copies will be submitted to the Board. EfficiencyOne requests that it be permitted to file only the electronic copy of Attachment 4, Appendix C, given its size.

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A handwritten signature in black ink, appearing to read 'J. R. Gogan', with a long horizontal line extending to the right.

James R. Gogan