2018 **M08888**

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 EfficiencyOne for approval for the use of measure-level Non-Energy Benefits within the context of Cost-Effectiveness testing associated with future Demand Side Management (DSM) planning regulatory processes**

INFORMATION REQUESTS

To: EfficiencyOne ("E1")

From: The Industrial Group

Responses Due: November 14, 2018

Contact Person:
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Issued at Halifax, Nova Scotia, this 24th day of October, 2018.

Request IR-1:

Please provide evidence of the "general agreement that the TRC test was flawed" (page 2 of 15, lines 8-10).

Request IR-2:

Please confirm that the "Draft Settlement Language" shared by EfficiencyOne on May 18, 2016 (referenced at page 3) originated with EfficiencyOne and was never agreed to by the participants.

Request IR-3:

With respect to the Specific Requests for Approval in s.3.3 (p.13-14)

(a) Is E1 proposing to include the per measure values in Table 10 in its application for approval of a Plan and Budget for 2020-2022?

(b) Will any approved per measure values be reviewed and subject to modification following the 2019 IRP Update for inclusion in future Plans and Budgets?

(c) Regarding the Low-Income NEBs, what is intended by the modifier "subject to discussion on implementation at the DSMAG" i.e. what specific or general approval is sought versus what will be discussed at the DSMAG?

Request IR-4:

Please explain E1's view of the relationship, if any, in quantifying NEBs and incentive levels.

Request IR-5:

At Attachment 1 (Page 14 of 27), E1 states that the "Custom Program is the sole ENS Program that uses customer simple back [sic – payback] as a metric to modify incentives".

(a) Why is the custom program the sole program to do so?

(b) Is customer simple payback a relevant input for most, if not all, measures when considering the appropriate incentive? Please explain your answer if you disagree.

Request IR-6:

(a) Are the increased property value/anticipated ease of selling or leasing NEBs primarily derived from the research studies appended at Attachment 4, Appendix A and particularly, the NMR Group Inc./Tetra Tech 2011 Study?

(b) Please produce a copy of the section from this Study, including the questions asked, relating to property value NEBs.

(c) Please identify that the sample size for that 2011 Study (breaking down between low income households non-low-income) and geographic residence of respondents.

(d) Has E1 obtained any independent verification in Nova Scotia regarding the validity and reliability of the sample size and survey questions and its applicability in Nova Scotia?

Request IR-7:

(a) Does E1 agree that an owner's perceived increase in property value due to non-energy impacts (“NEI”) is subjective?

(b) Does E1 agree that the subjectivity of this perception raises questions about reliability and accuracy?

(c) What, if any, factors has E1 employed to reduce or mitigate the risks of unreliability and inaccuracy of this subjective perceived increase in property value when assigning an NEB to property value?

Request IR-8:

Please refile the Spreadsheet and Table for which measure-level approval is sought, without the inclusion of NEBs associated with increased property values.

Request IR-9:

Regarding Attachment 4, Appendix C, please confirm that the data other than Non-Energy Benefits (e.g., Annual Energy Savings per Unit [Column F], One Time Incremental Measure Cost [Column H], Present Value Avoided Cost [Column N] and so on) are identical to the values in earlier (filed) versions of the workbook. If not confirmed, please explain which numbers are different and why.

Request IR-10:

Please identify which numbers are copied from earlier versions as opposed to being calculated within the workbook or in a linked workbook.

Request IR-11:

Please provide a version of Appendix C using the annual avoided costs from NSPI's latest version of the Rate and Bill Impact Analysis.

Request IR-12:

What conclusions, if any, does EfficiencyOne want the Board to draw from the TRC values calculated in Appendix C?

Request IR-13:

Please expand Appendix C to include the direct savings to customers from each measure, including the direct savings from NEBs. Please show electric bill savings, gas bill savings and water/wastewater bill savings separately.

Request IR-14:

Please provide the source or derivation of the $2.729/m^3 figure in cell AC3.