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1 **Request IR-1:**

2
3 **With respect to the customers in the domestic class, please confirm the current proportion**
4 **of those customers who heat their homes using electricity in Nova Scotia?**

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6 Response IR-1:

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8 NS Power estimates that 45 percent of residential customers heat their homes with electricity.

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Request IR-2:

With respect to the E1 utility funded programs designed to address the needs of low income customers in the domestic class, including the homeowner programs and the multi family residential program, please confirm that to NSPI knowledge there are no comparable existing programs in Nova Scotia for both heating and non heating customers?

Response IR-2:

As stated in its evidence, NS Power supports continuing to assist under-served communities in Nova Scotia such as low-income and First Nations customers through the 2020-2022 DSM budget. However, in order to maximize support for low-income and First Nations customers, NS Power has recommended E1 implement some form of income testing in order to ensure that the people who receive the benefit of the E1 subsidies are those who need it the most. NS Power confirms that there are additional programs such as the HomeWarming program, the Heating Assistance Rebate Program, the Good Neighbour Energy Fund and the provincial HST rebate to assist customers with non-electric heating sources.

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Request IR-3:

Provide year over year data, annually, from 2012 to the present concerning the number of disconnections from the domestic customer class.

Response IR-3:

NS Power can only disconnect customers in accordance with the NSUARB-approved regulation applicable to disconnection of electric service which specifies the permitted reasons for disconnection, the rules governing disconnection, and the notice requirements. If a customer disputes a disconnection, the customer is able to contact the Dispute Resolution Officer who is able to review the decision to disconnect and render a decision.

Please see the figure below for the number of disconnections for non-payment in the domestic customer class from 2012 to the end of April 2019. This figure does not include disconnections requested by customers who are moving, relocating, or otherwise closing their accounts.

2012	2013	2014	2015	2016	2017	2018	2019 (YTD)
2,081	3,423	4,687	3,257	3,782	2,908	2,694	3

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Request IR-4:

Provide year over year data, annually, from 2012 to the present concerning the number of customers who qualify for payment agreements under the NSPI regulations, from the domestic customer class, as well as the total number of members of the customer class for the same period.

Response IR-4:

NS Power considers all customers eligible for payment arrangements, with the exception of customers who have a history of fraud, multiple broken payment arrangements or who have failed to comply with the terms set forth in a decision by the Dispute Resolution Officer. The number of customers who would not qualify for the reasons listed above represents less than 0.5 percent of customers.

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1 **Request IR-5:**

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3 **Provide year over year data, annually, from 2012 to the present concerning the number**
4 **payment agreements that are varied and renewed, from the domestic customer class.**

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6 Response IR-5:

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8 NS Power's Customer Information System does not track this information.

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Request IR-6:

Provide year over year data, annually, from 2012 to the present concerning the number of payment agreements that were breached and forwarded to collection, from the domestic customer class.

Response IR-6:

NS Power makes every effort to be aware of and respond to the needs of low-income customers. Please refer to AEC IR-8 and AEC IR-9. Under the NSUARB-approved regulations, NS Power is permitted to enter into payment arrangements with customers who are unable to pay their full outstanding electricity bills. These payment arrangements permit the customer to pay outstanding amounts over a period of time while still continuing to receive electric service.

There are two types of payment arrangements: a standard payment arrangement sets out a payment schedule to bring the customer's account back to current, and a Budget Settlement Agreement spreads out a customer's arrears over a longer payment period of 12-24 months and includes the customer's current electricity usage.

The figure below shows the number of broken payment arrangements from 2012 to the present. If a customer breaches the payment arrangement with NS Power, the Company's internal Credit Services team begins collection work to reach the customer, determine whether the customer is willing or able to honour the payment arrangement, and set up a different payment arrangement where needed and appropriate. Accounts are not sent to external collection agencies until they become closed accounts.

2012	2013	2014	2015	2016	2017	2018	2019 to Present
74,793	72,863	57,284	55,841	52,332	54,886	56,608	12,081

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- 1 NS Power does not track the number of Budget Settlement Agreements that are breached.

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1 **Request IR-7:**

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3 **Provide year over year data, annually, from 2012 to the present concerning the number of**
4 **payment agreements that were breached and forwarded to collection, from the domestic**
5 **customer class.**

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7 **Response IR-7:**

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9 NS Power's Customer Information System does not track this information.

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Request IR-8:

Identify NSPI's understanding of energy burden in the domestic class?

Response IR-8:

Energy burden is the percentage of income which customers spend on energy. NS Power acknowledges that energy burden creates a hardship for some customers. NS Power is in contact with customers on a daily basis and is aware of the challenges faced by low income customers who spend a disproportionate amount of their income on basic living needs such as housing and heating.

NS Power is involved with the Low Income Advocacy committee whose representatives meet to discuss the impact of energy burden on the residential class and seek solutions to assist this class of customers.

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Request IR-9:

Identify what steps NSPI has taken to ensure that energy burdens for members of the domestic class whose income falls below the low income cut-offs are sustainable?

Response IR-9:

NS Power is aware that electricity prices create a hardship for some customers and continually looks for opportunities to assist those customers wherever possible.

NS Power has a Customer Care Centre employee whose sole focus is dealing with low-income customers through low-income agencies and social workers. NS Power also continues to host Low Income Advocacy committee meetings twice each year, and meets with the stakeholder members of that group on a regular basis. The Low Income Advocacy committee is tasked with hearing from low income advocates and stakeholders on the challenges facing low income Nova Scotians as they relate to electricity, and finding solutions to assist low-income earners in being able to make ends meet and address issues such as affordability of housing and utilities.

The Equal Billing Plan is a tool which provides the ability for customers to spread out their annual electricity costs equally over the course of a year (with a reset each January and a mid-year adjustment in July). This provides certainty for customers with respect to their electricity bills and assists in planning and budgeting.

Additional steps which NS Power takes to assist customers through its Low Income Advocacy program include waiving the requirement for a security deposit and making longer-term payment arrangements that allow customers to pay their arrears over longer periods of time.

In December 2018, NS Power also launched a pilot project which will remove barriers which make it harder for people who were formerly homeless to get back into housing and open

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1 electricity accounts. This includes the waiver of security deposits and the ability to use the equal
2 billing plan.

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4 NS Power's Customer Care team is also trained to recognize accounts where customer electricity
5 usage is high and offers these customers options to understand and address what is causing their
6 high bills through the HomeWarming program and through EfficiencyOne's programming.

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8 The HomeWarming program, which is sponsored by NS Power and the Province of Nova Scotia
9 provides energy efficient upgrades to low-income homeowners. These upgrades reduce
10 customers' energy burden.

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12 NS Power also sponsors the Good Neighbour Energy Fund which is administered by the
13 Salvation Army. This program provides funding for emergency heating requirements.

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15 NS Power, its parent company, and its employees are the biggest sponsor of the United Way
16 each year. The Company is also a significant sponsor of Feed Nova Scotia.

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1 **Request IR-10:**

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3 **Does NSPI acknowledge that the Affordable Multi-Family Housing and Non-Profit**
4 **Organizations Program is an effective response to unsustainable energy burdens**
5 **experienced by members of the domestic class whose incomes fall below the low income**
6 **cut-offs? If not, please provide reasons for disputing that the Affordable Multi-Family**
7 **Housing and Non-Profit Organizations Program is an effective response to unsustainable**
8 **energy burdens.**

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10 **Response IR-10:**

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12 Yes. NS Power supports initiatives which provide relief to low-income renters in the province.
13 Some of the energy efficiency housing programs are not available to renters, and NS Power
14 recognizes there is a gap which needs to be addressed. Feedback from low-income customers
15 and members of the Low-Income Assistance program would be aligned with the aims of this
16 program.

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Request IR-11:

In NSPI's projections of program costs and funding models, please identify what level of funding has been allocated the Affordable Multi-Family Housing and Non-Profit Organizations Program

(a) under NSPI's \$27 Million funding model?

(b) Under NSPI's \$34 Million funding model?

Response IR-11:

(a-b) NS Power has not identified a specific level of funding. NS Power has recommended that E1 be directed to design a program in the \$27 to \$34 million range. The Company had E1 and Navigant present scenarios to demonstrate that this affordable investment level could provide comparable energy and demand savings to current DSM programs. NS Power proposes that the revised program should increase investment for low-income Nova Scotians. The Company has also recommended E1 implement income testing which would help save low-income Nova Scotians money on DSM programming as well as make more funding available for customers at lower income levels.

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1 **Request IR-12:**

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3 **The E1 application based on funding levels of \$43 million allocates \$1 Million for the**
4 **Affordable Multi-Family Housing and Non-Profit Organizations Program. Does NSPI**
5 **agree that this the appropriate level of funding for this program that should be maintained**
6 **under NSPI's 2 funding level models. If not, please state the reasons for reducing the**
7 **commitment to the Affordable Multi-Family Housing and Non-Profit Organizations**
8 **Program.**

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10 Response IR-12:

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12 Please refer to AEC IR-11.

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1 **Request IR-13:**

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3 **Does NSPI acknowledge that the First Nations Program is an effective response to**
4 **unsustainable energy burdens experienced by members of the domestic class whose**
5 **incomes fall below the low income cut-offs? If not, please provide reasons for disputing**
6 **that the First Nations Program is an effective response to unsustainable energy burdens.**

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8 Response IR-13:

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10 As stated in its evidence, NS Power supports continuing to assist under-served communities in
11 Nova Scotia such as low-income and First Nations customers through the 2020-2022 DSM
12 budget. Please refer to AEC IR-2.

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Request IR-14:

In NSPI's projections of program costs and funding models, please identify what level of funding has been allocated the First Nations Program:

(a) under NSPI's \$27 Million funding model?

(b) Under NSPI's \$34 Million funding model?

Response IR-14:

Please refer to AEC IR-11. The Company's scenarios have the funding by measure and do not identify what portion of each measure would specifically target First Nations customers. NS Power recommends that more funding be allocated based on income testing.

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1 **Request IR-15:**

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3 **The E1 application based on funding levels of \$43 million allocates \$1.5 Million for the**
4 **First Nations Program. Does NSPI agree that this the appropriate level of funding for this**
5 **program that should be maintained under NSPI's 2 funding level models. If not, please**
6 **state the reasons for reducing the commitment to the First Nations Program.**

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8 **Response IR-15:**

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10 Please refer to AEC IR-11 and 14. NS Power supports continuing to assist under-served
11 communities in Nova Scotia such as low-income and First Nations customers through the 2020-
12 2022 DSM budget.