2019 M09096

NOVA SCOTIA UTILITY AND REVIEW BOARD

IN THE MATTER OF: The Public Utilities Act

-and-

IN THE MATTER OF: An Application by EfficiencyOne for Approval Supply Agreement for Electricity Efficiency and Conservation Activities between EfficiencyOne and Nova Scotia Power Inc., the establishment of a final agreement between the parties, and approval of a 2020 - 2022 Demand Side Management ("DSM") Resource Plan

FINAL SUBMISSIONS ON BEHALF OF THE ECOLOGY ACTION CENTRE

Submitted: Jul 4, 2019

Emma Norton
Energy Conservation Coordinator
Ecology Action Centre
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The EAC appreciates the opportunity to intervene and make comments on the 2020 - 2022 Demand Side Management ("DSM") Resource Plan. EAC respectfully submits this document as Closing Statements.

The Ecology Action Centre (EAC) recommends that the Board refuse the Consensus Agreement provided by EfficiencyOne (E1) and Nova Scotia Power Inc. (NSPI) primarily because the DSM levels are much lower than the levels modeled to be most cost effective in both the 2014 Integrated Resource Plan and the 2018 Generational, Utilization, and Optimization report.

The EAC stands by the evidence of Philip Mosenthal of Optimal Energy Inc. Specifically, EAC supports Mr. Mosenthal's recommendation that the DSM plan ramp up to 2%/year energy efficiency, as was recognized to be most cost effective by the 2018 Generation, Utilization, and Optimization Report.[1] Mr. Mosenthal also stated that the Board should "make clear that rate impacts should not be the primary decision criteria for efficiency efforts, but rather whether efficiency provides overall greater benefits and a lower present value cost resource than other supply-side alternatives for all Nova Scotians."[2] Even considering immediate rate impacts, higher level investment in DSM than what is proposed in the Consensus Agreement will reduce cost of energy service for all customers.[3]

EAC also stands by Mr. Mosenthal's statement that Lifetime Energy Savings (LES) "is a common metric for energy efficiency programs and is well researched and understood".[4] The Consensus Agreement does not include Lifetime Energy Savings as a performance target, and while we look forward to participating in the conversation about including LES as a Performance Target through the DSM Advisory Group, we feel that there is already enough evidence provided as to why LES should be included as a performance target in the 2020-2022 DSM plan.

Further, we are disappointed that Consensus Agreement does not return the HST refund to E1 in order to provide efficiency services. As these funds were originally allocated to DSM, they should be re-allocated to E1's programs.

The EAC is supportive of the following clauses within the Consensus Agreement reached between E1 and NSPI: clause 2, clause 7, and clause 8. EAC also supports the inclusion of a representative from the Mi'kmaq community in the DSM Advisory Group.

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[1] Nova Scotia Power Inc. Thermal Generation Utilization and Optimization, Economic Analysis of Retention of Fossil-Fueled Thermal Fleet To and Beyond 2030 – M08059, May 1, 2018, Synapse Energy Economics Inc., Prepared for Board Counsel. Page 2, Major Finding Bullet #3. See also Table 9a, Page 36.
[2] Direct Testimony of Philip Mosenthal, p.20, lines 1-4.
[3] Evidence of Alice Napolean. Submitted May 28, 2019 to NSUARB hearing: M09096. Page 28, lines 8-10.
[4] Direct Testimony of Philip Mosenthal, p. 18 lines 13-14.

The EAC is primarily motivated by the urgency of the climate emergency and, given the scientific consensus about the need for immediate action, notes that increasing investments in DSM to meet the 2%/year target is a very reasonable action to substantially reduce greenhouse gas emissions cost effectively. Climate impacts aside, the evidence presented indicates that investing in E1's original Preferred Plan is reasonable as it will move the DSM levels and energy efficiency industry investment closer to the target of 2% efficiency/year, and "it will reduce electric bills in the short term, reduce electric bills and rates in the long term, ensure that all Nova-Scotians, and in particular low-income Nova Scotians, have access to efficiency opportunities, ensure that E1's programs are capturing significant energy efficiency above and beyond naturally occurring efficiency, mitigate inherent uncertainty in the electric forecast and reduce reliance on commodity market pricing, and produce significant additional unquantified economic, job creation, and health and comfort benefits".[5]

While none of the plans before the board achieve the levels of DSM required to meet the 2% DSM target, E1's Preferred Plan demonstrates savings and targets that move the industry and electricity system closer to this target. Further, Nova Scotia has, in recent years, been looked to as a leader for energy efficiency and DSM planning in Canada. The Consensus Agreement does not include the visionary investment required to maintain the leadership role – as Nova Scotia could be meeting DSM targets that are best in class.[6] The EAC humbly urges that the Board consider approving E1's Preferred Plan.

As the EAC is a charitable organization, the EAC respectfully submits a request to recover costs to the amount of $24,019.75. Details are appended below. Please note that the invoice from Optimal Energy is in Canadian Dollars.

We thank you for this opportunity.

Sincerely,

Emma Norton

Emma Norton
Energy Conservation Coordinator
Ecology Action Centre

[5] Direct Testimony of Philip Mosenthal, pg 19, lines 16-30.
[6] Direct Testimony of Philip Mosenthal, pgs 6-7.

Invoice

June 27, 2019

Project No: 7285

Invoice No: 6800

Integrated Energy Resources

10600 Route 116
Suite 3
Hinesburg, VT 05461

Emma Norton
Ecology Action Centre
2705 Fern Lane
Halifax, NS NS B3K 4L3
Canada

EAC Support on 2020-22 ENS Tri-Plan

Professional Services from April 1, 2019 to June 27, 2019

Optimal Staff

	Hours	**Rate**	**Amount**		
Chant, Elizabeth	1.50	306.00	459.00		
McDonald, Clifford	26.50	266.00	7,049.00		
Mosenthal, Philip	44.25	339.00	15,000.75		
Totals	72.25		22,508.75		
Total Labor				**22,508.75**	
		Total this Invoice			**$22,508.75**

Billings to Date

	Current	**Prior**	**Total**
Labor	22,508.75	0.00	22,508.75
Totals	**22,508.75**	**0.00**	**22,508.75**

Billing Backup

Optimal Energy Inc.

Project 7285: EAC Support on 2020-22 ENS Tri-Plan

Invoice: 6800 Dated 6/27/2019

Optimal Staff

		Date	Hours	Rate	Amount
Chant, Elizabeth	prep phone call with Phil and Cliff; phone call with Emma, Phil, Cliff	4/26/2019	1.50	306.00	459.00
McDonald, Clifford	Material Review	5/1/2019	1.50	266.00	399.00
McDonald, Clifford	Material Review	5/3/2019	1.00	266.00	266.00
McDonald, Clifford	Review material	5/9/2019	2.25	266.00	598.50
McDonald, Clifford	Discussion and Material Review	5/10/2019	3.00	266.00	798.00
McDonald, Clifford	IR reviews and outline	5/13/2019	2.00	266.00	532.00
McDonald, Clifford	Testimony Draft	5/14/2019	5.25	266.00	1,396.50
McDonald, Clifford	Testimony Draft	5/15/2019	4.50	266.00	1,197.00
McDonald, Clifford	Testimony Draft	5/16/2019	3.50	266.00	931.00
McDonald, Clifford	Testimony edits	5/21/2019	2.00	266.00	532.00
McDonald, Clifford	Finalize and send testimony	5/28/2019	1.50	266.00	399.00
Mosenthal, Philip	development of scope and strategy	4/19/2019	.50	339.00	169.50
Mosenthal, Philip	rev. scope of work and schedule	4/25/2019	.50	339.00	169.50
Mosenthal, Philip	conf. with EAC and review of documents	4/26/2019	2.00	339.00	678.00
Mosenthal, Philip	develop IRs	4/29/2019	1.75	339.00	593.25
Mosenthal, Philip	rev. E1 plan	5/7/2019	3.25	339.00	1,101.75
Mosenthal, Philip	rev. docket docs; conf/ w. EAC re same	5/10/2019	2.50	339.00	847.50
Mosenthal, Philip	discs. and emails, rev draft evidence	5/15/2019	1.50	339.00	508.50

Mosenthal, Philip	coord. and disc. re testimony	5/16/2019	1.00	339.00	339.00
Mosenthal, Philip	work on evidence	5/17/2019	1.50	339.00	508.50
Mosenthal, Philip	evidence and disc. re same	5/21/2019	2.50	339.00	847.50
Mosenthal, Philip	rev. docs. re evidence, plans; disc. w/ CM re evidence	5/23/2019	3.50	339.00	1,186.50
Mosenthal, Philip	work on testimony	5/28/2019	4.50	339.00	1,525.50
Mosenthal, Philip	emails re testimony prep	5/31/2019	.75	339.00	254.25
Mosenthal, Philip	rev. documents, prep for testimony	6/1/2019	4.50	339.00	1525.5
Mosenthal, Philip	coord. re evidence, travel, rev. docs re evidence and IRs, prep for testimony	6/3/2019	4.50	339.00	1525.5
Mosenthal, Philip	settlement conf.; testimony prep; ph w/ EAC and witensses re coord., travel	6/4/2019	6.50	339.00	2203.5
Mosenthal, Philip	coord. w/ EAC re travel, plans for hearings; emails re same and settlement position	6/5/2019	.50	339.00	169.5
Mosenthal, Philip		6/6/2019	1.50	339.00	508.5
Mosenthal, Philip	rev. and edit comments, emails and disc. re strategy, comments, hearings	6/6/2019	.50	339.00	169.5
Mosenthal, Philip	conf. w/ EAC re sched. and strategy	6/10/2019	.50	339.00	169.5
Totals			**72.25**		**22,508.75**

Ecology Action Centre
Costs Incurred for DSM Hearing 2019
February – June 2019

Salaries	
Emma Norton, Energy Conservation Coordinator	$1228.00
Subtotal Salaries	
Payroll Taxes & Employee Benefits	
EI, CPP	$86.00
Subtotal Salaries	
Overhead (1) Standard 15% EAC Administration Cost	$197.00
Total project/program Budget	$1511.00