BERWICK SUBMISSION **M09096**

NOVA SCOTIA UTILITY AND REVIEW BOARD

IN THE MATTER OF THE PUBLIC UTILITIES ACT

- and -

IN THE MATTER OF AN APPLICATION by **EfficiencyOne (E1)** to the Nova Scotia Utility and Review Board for Approval of Supply Agreement for Electricity Efficiency and Conservation Activities between E1 and Nova Scotia Power Inc. (NS Power), the establishment of a final agreement between the parties, and approval of a 2020-2022 Demand Side Management (DSM) Resource Plan

Please accept this submission on behalf of Berwick Electric and the AREA group, comprising the electric utilities of Antigonish, Berwick, Mahone Bay, and Riverport. .

The fact that the two primary parties to the DSM 2020-22 Resource Plan were able to reach agreement on proposed funding levels cannot be ignored. The spending limits contained in the Consensus proposal should be approved as requested. The NSP/EI agreement was signed by the Berwick Electric Commission and Assembly of Nova Scotia Mi'kmaq Chiefs . As well it was positively commented on by parties as follows;

SBA---"the SBA supports the investment levels set out in Clause 1 of the Consensus Agreement for the next three years" (Opening Remarks)

CA-----"the Consumer Advocate, on balance, is prepared to recommend that the Board adopt the levels of DSM investment agreed to in the Terms of Consensus" (Opening Remarks)

NSDME—"the Province respectfully submits that it is worthy of consideration" (Opening Remarks)

Ind Group—"the Industrial Group does not strongly object to the negotiated overall level of spending by year" (Opening Remarks)

this endorsement by all major customer representatives and government is significant.

Under questioning by the Ecology Action Centre regarding levels of DSM not being at the 2014 IRP levels Mr. MacDonald responded "that there has been evidence filed and positions put forth by other interveners that the 2014 IRP may not still be one that may be relied upon, I think that is important to note". (Audio file Direct Testimony minute 58)

The original plans filed were based on this unreliable 2014 IRP. It was only after evidence review that the consensus levels were found acceptable to the parties.

We would also note that the level of funding associated with Demand Response programs is minimal and primarily associated with research and development of the issues surrounding this item. As we proceed the knowledge of “demand reduction”, “demand response”, and how demand programs would work in real time and the need to reflect actual system conditions will no doubt become clearer. Issues such as peak versus critical load times; peak shifting; rebound; and interaction with Time Based Rates and interruptible loads should also be investigated. This work will no doubt be evidenced along with customer impacts and equipment capability as we move forward but should not deter the funding and programs supported by the proposed 2020-22 consensus plan.

We support making DSM part of FAM with the understanding that any needed cost allocation procedures will be developed, as necessary, to ensure appropriate assignment to customer classes where different from overall fuel allocation.

It was evidenced that The Heritage Gas Study, per their Settlement, does not form part of the Consensus Funding but rather will be conducted from 2019 levels and we would agree with this approach.

We would also welcome the addition of a First Nations representative to the DSM Advisory Group.

All of which is respectively submitted.

Al Dominie
For Berwick/AREA Group