

2022

M10473

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 a 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 2023-2025 Demand Side Management (DSM) Resource Plan

NON-CONFIDENTIAL INFORMATION REQUESTS

To: **E1**
James R. Gogan
EfficiencyOne Counsel

From: **The Municipal Utilities**

Responses Due: **April 29, 2022**

Contact Person: James MacDuff
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1
2 **IR-1**

3 **Reference: Evidence, page 3, lines 5-13. "E1 developed its Settlement Plan over the**
4 **course of a comprehensive and transparent stakeholder engagement process, ensuring**
5 **that all ratepayer classes were given the opportunity to participate and provide**
6 **meaningful input into various plan scenarios. Over the course of scenario development,**
7 **stakeholders were provided with initial model results and assumptions, technical tables,**
8 **and rate and bill impact analysis results, and given the opportunity to ask questions of**
9 **and provide comments to E1. Stakeholder input and advocacy were carefully considered**
10 **and, where appropriate, incorporated by E1 into subsequent modelling rounds The**
11 **result of this extensive stakeholder engagement is a Settlement Plan that will deliver**
12 **cost-effective energy savings that are in the best interest of ratepayers and reflective of**
13 **stakeholders' feedback."**

14
15 **Reference: Appendix A, Table 2: DSMAG Stakeholder Engagement Timelines in the 2023-**
16 **2025 Settlement Plan Development, pages 14-16 of 149.**

17
18
19 Questions:
20

21 (a) E1 refers to its Application as a "Settlement Plan". Please confirm that no Settlement
22 Agreement has been signed in relation to E1's Application with any party that would
23 preclude stakeholders from raising any issues with respect to the Application as part of
24 this proceeding. If not so confirmed, please explain in detail.

25
26 (b) Please identify all examples of the specific input and advocacy received from each of the
27 stakeholders that were (i) carefully considered, and (ii) specifically incorporated by E1
28 into subsequent modelling rounds.

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1 (c) Please identify and summarize any changes to the proposed DSM Portfolio Scenarios
2 and Model Results that were made following the filing of NS Power's 2022-2024 General
3 Rate Application on January 27, 2022 and prior to the filing of E1's Application on March
4 11, 2022.

5
6 (d) Table 2 in Appendix A shows kick-off meetings and multiple one-on-one meetings with a
7 number of stakeholders. Please indicate whether, prior to the filing of its March 11, 2022
8 Application, E1 had any one-on-one meetings with representatives from the municipal
9 utilities.

10
11 (e) Please provide copies of any minutes available from the meetings referenced in Table 2
12 in Appendix A.
13
14

1 IR-2

2 **Reference: Evidence, Table 1: 2023-2025 Settlement Plan, page 11 and Table 2: 2023-2025**
3 **Settlement Plan Cost-Effectiveness Results by Program, page 19**

4
5 **Reference: Evidence, page 16, lines 17-22. “Avoided energy and capacity costs have**
6 **been calculated by NS Power using the 2020 IRP Reference Plan 2.0C... The avoided**
7 **costs of carbon have been calculated by E1 by applying the Federal Carbon Pollution**
8 **Pricing Benchmark to the emissions intensity for Base DSM savings, which was**
9 **determined by comparing the 2020 IRP Reference Plan 2.0C emissions to the emissions**
10 **from scenario 2.0C model run that did not include any new DSM.”**

11
12 Questions:

13
14 (a) Please confirm that the Total Resource Cost Test (TRC) and Program Administrator
15 Cost Test (PAC) were conducted assuming that all energy and capacity savings were
16 calculated using the annual avoided costs of energy and capacity and annual avoided
17 CO2 emissions from NS Power.

18
19 (b) Please confirm that E1 is aware that the Berwick Electric Commission, the Riverport
20 Electric Light Commission, the Town of Antigonish, and the Town of Mahone Bay supply
21 their customers from the Ellershouse Wind Farm and imports from New Brunswick, as
22 opposed to from NS Power under Rate Class 24.

23
24 (c) For the proposed DSM spending in relation to the service territories of the Berwick
25 Electric Commission, the Riverport Electric Light Commission, the Town of Antigonish,
26 and the Town of Mahone Bay, did E1 consider any alternative approaches to reflect the
27 differential in costs and avoided emissions that would be applicable to any energy and
28 demand savings that occur in those service territories? If so, please explain. If not, why
29 not?

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1
2 **IR-3**

3 **Reference: Evidence, page 11, line 11. "Avoided costs of transmission and distribution**
4 **were provided by NS Power in 2021."**

5
6 Questions:

7
8 (a) Please provide the avoided costs of transmission and distribution as provided by NS
9 Power.

10
11 (b) Please indicate whether E1 is of the view that any specific transmission and/or
12 distribution projects have been avoided as a result of the DSM spending in the 2020-
13 2022 Plan. If so, please provide further information regarding these specific projects.

14
15 (c) Please indicate whether E1 is of the view that any specific transmission and/or
16 distribution projects will be avoided as a result of the DSM spending for the 2023-2025
17 Plan. If so, please provide further information regarding these specific projects.

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1 **IR-4**

2 **Reference: Evidence, page 59, lines 11-13. “As a new portfolio item that will introduce an**
3 **additional 17.9 MW of capacity to the grid by the end of 2025, DR will become an**
4 **important contributor toward the overall 96.7 MW of cumulative system-peak demand**
5 **savings projected under the 2023-2025 DSM Plan. Likewise, DR complements demand**
6 **reduction activities under the Settlement Plan that comprise the majority (approximately**
7 **81.5%) of the overall system-peak demand savings impact.”**

8
9 Questions:

10
11 (a) Please provide a breakdown of the 17.9 MW of capacity on account of Demand
12 Response and the overall 96.7 MW of cumulative system-peak demand savings
13 projected under the 2023-2025 DSM Plan by Rate Class and program.

14
15 (b) Please indicate whether the Municipal customers will be eligible to participate in Demand
16 Response programs as part of the proposed 2023-2025 DSM Plan. If so, please provide
17 further details. If not, why not?

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1 IR-5

2 **Reference: Appendix A, Table 8: 2023-2025 Settlement Plan Investment and Savings,**
3 **page 39 of 149.**

4
5 **Reference: Appendix A, Table 9: 2023-2025 Settlement Plan Investment and Savings, by**
6 **Program Component, page 40 of 149.**

7
8 **Reference: Appendix A, Table 10: 2023 Settlement Plan Investment and Savings, by**
9 **Program Component, page 41 of 149.**

10
11 **Reference: Appendix A, Table 11: 2024 Settlement Plan Investment and Savings, by**
12 **Program Component, page 42 of 149.**

13
14 **Reference: Appendix A, Table 12: 2025 Settlement Plan Investment and Savings, by**
15 **Program Component, page 43 of 149.**

16
17 Questions:

18
19 (a) Please reproduce each of these five tables using only the Investment for the Municipal
20 Rate Class (24) of \$1.0M in 2023, \$1.0M in 2024, and \$1.1M in 2025.

21
22 (b) Please provide the same five tables as in (a), but assuming the avoided energy costs
23 are 10% lower than the avoided energy and capacity costs from NS Power.

24
25 (c) Please provide the same five tables as in (a), but assuming the avoided energy,
26 demand, transmission, and distribution costs are 10% lower than the avoided costs from
27 NS Power.

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1 **IR-6**

2 **Reference: Appendix A, Table 13: Rate Class Expenditure by Year, page 44 of 149.**

3
4 Questions:

5
6 (a) Please reproduce this table for the Alternate Scenario.

7
8 (b) Please provide a breakdown of the proposed Settlement Plan Expenditures for the
9 Municipal Rate Class (24) of \$1.0M in 2023, \$1.0M in 2024, and \$1.1M in 2025 showing
10 the forecast expenditures for each of the five municipal public utilities (Berwick Electric
11 Commision, Riverport Electric Light Commission, Town of Antigonish, Town of Mahone
12 Bay, and the Town of Lunenburg.) If the specific breakdown is not available, please
13 explain why not, and provide an overall breakdown based on E1's understanding of the
14 relative forecast load for each of the five municipal public utilities for each of those years.

15
16 (c) Please explain in detail how E1 determined the Municipal Rate Class (24) proportion of
17 the total proposed Settlement Plan expenditures, and provide all analysis, workpapers,
18 and supporting materials used to determine this allocation of forecast expenditures.

19
20 (d) Please provide E1's assumptions with respect to the specific energy (MWh) and capacity
21 (MW) savings expected to be achieved in relation to the Municipal Rate Class (24) in
22 each of 2023, 2024, and 2025 as a result of approval of the 2023-2025 DSM Plan as
23 filed.

24
25 (e) Does E1 have any objection if the four municipal public utilities that participate in the
26 Wholesale Market (Berwick Electric Commision, Riverport Electric Light Commission,
27 Town of Antigonish, and the Town of Mahone Bay) pay all of their allocated and Board-
28 approved DSM costs directly to E1, rather than to NS Power through the Riders
29 proposed in NS Power's General Rate Application? If so, please explain.

1 IR-7

2 **Reference: Appendix A, Section 9.3, Mid-Course Adjustments & Flexibility, page . “E1**
3 **often makes limited adjustments to an approved DSM Resource Plan to reflect changes**
4 **in market conditions and updated insights from program and organizational evaluations**
5 **unknown at the time of DSM Resource Plan development. When setting 2023-2025 Mid-**
6 **Course Adjustments (MCAs), E1 will follow the same approach as was taken for the 2020-**
7 **2022 DSM Resource Plan MCAs. This approach includes the following:**

- 8
- 9 • **E1 will provide explanations of changes, that have a variance in energy savings,**
10 **demand savings, or investment that are 25 percent or more at a program level.**
 - 11 • **As per above, and dependent on approved cost allocation methodology, E1 will**
12 **undertake reasonable efforts to consider impacts to any customer rate class on**
13 **an annual basis that result from program changes.**
 - 14 • **E1 will provide written advance notice of its intent to implement mid-course**
15 **adjustments by program and their customer rate class impacts in the APRs for the**
16 **2023-2025 DSM Resource Plan period and will file the MCAs with the Quarterly**
17 **Report in Q1. It is E1’s position that it is not able to provide advance notice of**
18 **mid-course adjustments resulting from third-party evaluation reports, as these**
19 **adjustments are made after receipt of these reports.”**
- 20

21 Questions:

- 22
- 23 (a) Please indicate whether E1 would be willing to specifically engage with the Berwick
24 Electric Commission, the Riverport Electric Light Commission, the Town of Antigonish,
25 and the Town of Mahone Bay with respect to the DSM spending levels in relation to the
26 service territories of those public utilities as part of its 2023-2025 Settlement Plan
27 following the Board’s approval in this matter and prior to January 1, 2023. If not, please
28 indicate why not.

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1
2 (b) Please identify any constraints that E1 currently believes could limit its ability to
3 implement any adjustments that have been specifically agreed to between E1 and the
4 Berwick Electric Commission, the Riverport Electric Light Commission, the Town of
5 Antigonish, and the Town of Mahone Bay for the DSM programs in the 2023-2025
6 Settlement Plan in the service territories of those public utilities following the Board's
7 decision in this matter, either prior to January 1, 2023 or as part of E1's mid-course
8 corrections. If E1 identifies any constraints, please indicate how E1 suggests these
9 could be addressed as part of this proceeding.

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1 **IR-8**

2 **Reference: Appendix A, Attachment 4**

3

4 **Reference: Appendix A, Attachment 6**

5

6 **Reference: Appendix C, Attachment 1**

7

8 Question:

9

10 Please provide a copy of these three electronic spreadsheets with all formulas and references
11 intact.

12

1 **IR-9**

2 **Reference: Appendix B, Attachment 8, Tab M-1 Participants. In the Rate and Bill Impact**
3 **Modelling in this Attachment, each Municipal Utility is considered a single “participant”**
4 **for the entire portfolio. For the other rate classes, participant tabs provide a count of the**
5 **number of NS Power customers who are estimated to have participated or are forecasted**
6 **to participate in E1 programs.**

7
8 Question:
9

10 Does E1 have information with respect to the number of individual customer participants in E1
11 programs within each Municipal Utility, in the same manner that it has information on the
12 number of individual NS Power customer participants for other rate classes? If so, please
13 provide that information in a revised Attachment 8. If not, please explain why this information is
14 not available, and indicate whether E1 is willing to forecast and track this individual customer
15 participant information within the Municipal Utilities on a go forward basis.
16