June 29, 2022

VIA EMAIL
30611

Ms. Crystal Henwood
Regulatory Affairs Officer/Clerk of the Board
Nova Scotia Utility and Review Board
1601 Lower Water Street, 3rd Floor
Halifax, NS B3J 3S3

Dear Ms. Henwood:

Re: M10473 - EfficiencyOne 2023-2025 Demand Side Management (DSM) Plan Application

Please accept this letter as the closing submissions of the Consumer Advocate.

The Consumer Advocate wishes to comment on some issues raised in EfficiencyOne's Rebuttal Evidence.

Low-Income Savings Projections (Section 3.1)

The volatility in savings from the BNI sector seems to boil down to E1's participation in projects with Housing NS and some other unnamed LMI rental property projects. The Consumer Advocate urges E1 to continue to identify and develop additional low-income housing and apartment building projects and update reporting low-income savings accordingly.

Low-Income Performance Targets (Section 3.3)

The Consumer Advocate views the counterproposal from E1 to establish a low-income performance target as reasonable. Specifically, the Consumer Advocate supports that E1 must meet 90% of a cumulative goal of 15.8 GWh in savings from the following programs:

- The Affordable Single-family Homes
- Affordable Multi-family Housing
- Mi'kmaw Home Energy Efficiency Project programs

This will help ensure that E1 does not fall behind in its new, higher commitment to the low-income sector.

Avoided Costs (Section 5)

The Consumer Advocate maintains that it is vital to continue to account for the full value of DSM. Future plans should utilize avoided costs that more accurately reflect the reality in Nova Scotia.

Cost-effectiveness Testing Methodology (Section 6.2)

The Consumer Advocate supports the exploration, through the DSMAG, of cost-effectiveness testing methodologies. Identifying and implementing the appropriate test should be given a high priority.

New Home Construction (Section 9)

The Consumer Advocate intends to closely follow developments in this sector. It remains to be seen what E1's "enabling strategies" will do and how the new construction market evolves in the near term as electrification policy begins to take shape.

Behavioural Program Coordination (Section 11.1)

The Consumer advocate supports the continued collaboration between E1 and NSP, especially as it leads to reducing costs for ratepayers. The Consumer Advocate welcomes E1's offer to provide quarterly updates leading up to the establishment of its behavioral program.

Subject to the above comments, the Consumer Advocate supports the adoption of the Settlement Plan.

Yours truly,

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