



Blackburn Law

October 18, 2022

VIA EMAIL

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

Dear Ms. Henwood:

Re: M10473 – EfficiencyOne (“E1”) Application for Approval of a Supply Agreement for Electricity Efficiency and Conservation Activities between E1 and Nova Scotia Power Inc. (Demand Side Management (DSM) Plan 2023-2025)

The Small Business Advocate (SBA) has reviewed the E1 Compliance Filing 2023-2025 DSM Plan (the “Plan”) in matter M10473 and appreciates E1’s additional insight and increased visibility on the strategy and policy justification of measures that fail cost-effectiveness tests as directed by the NSUARB in paragraph 197(e) of the decision.

The SBA supports E1’s expressed intention to work with Nova Scotia Power and other stakeholders through the DSM Advisory Group on the variety of matters directed by the NSUARB, such as updated avoided costs, developing optimal DSM cost-effectiveness testing methodologies, and reviewing research initiatives.

The SBA also notes comments filed by the Industrial Group regarding the treatment of any underspend by E1 in 2023 and supports the request for clarification as to how it will be addressed.

Yours truly,

E. A. Nelson Blackburn, K.C.
Small Business Advocate