

Our File: 217173

October 25, 2022

Nova Scotia Utility & Review Board
3rd Floor, 1601 Lower Water Street
Halifax, Nova Scotia B3J 3S3

Attention: Crystal Henwood, Regulatory Affairs Officer / Clerk

Dear Ms. Henwood:

Re: M10473 – EfficiencyOne Application for Approval of Supply Agreement for Electricity Efficiency and Conservation Activities between E1 and Nova Scotia Power (NS Power), the establishment of a final agreement between the parties, and approval of a 2023 – 2025 Demand Side Management (DSM) Resource Plan

Enclosed please find the following to be filed on behalf of EfficiencyOne. These submissions are offered in response to the Industrial Group's letter to the Board, dated October 11th, 2022, and filed as Document No. 87552, which relates to both EfficiencyOne's Compliance Filing under the above matter and the frequency of variance account adjustments contemplated within Nova Scotia Power's (NS Power) 2022-2024 General Rate Application (GRA).

Industrial Group's Request for Clarification

In its letter to the Board, the Industrial Group is requesting that the frequency of variance adjustments to the Supply Agreement be clarified. That is, the Industrial Group wishes to confirm whether a variance adjustment will be performed annually such that it corresponds with NS Power's DSM Cost Recovery Rider (DCRR) applications or whether it will occur at the end of the DSM Plan period such that it is aligned with EfficiencyOne's current DSM Resource Plan periods.

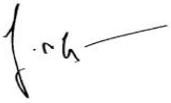
EfficiencyOne's Position

Consistent with the current Board-approved approach and past established practices, it is EfficiencyOne's position that rate class adjustments resulting from a difference between planned expenditures, which inform the payment schedule, and actual expenditure over the course of a DSM plan cycle be addressed by NS Power at the conclusion of the DSM Plan period.

Given the above position and consistent with current methodology, EfficiencyOne submits that rate class expenditures should continue to be treated in the aggregate across the DSM plan period. As such, EfficiencyOne views an amendment to the Supply Agreement as unnecessary at this time.

All of which is respectfully submitted.

Yours very truly,

A handwritten signature in black ink, appearing to read "J. Gogan", with a long horizontal line extending to the right.

James Gogan

cc. Bruce Outhouse, KC
M10473 Participants