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Our File: 217200

October 31, 2022

Nova Scotia Utility and Review Board
3rd Floor, 1601 Lower Water Street
Halifax, NS B3J 3P6

Attention: Crystal Henwood, Regulatory Affairs Officer / Clerk

Dear Ms. Henwood:

Re: **EfficiencyOne – 2022 Rate and Bill Impact Analysis**

Enclosed please find the 2022 Rate and Bill Impact Analysis ("RBIA") to be filed on behalf of EfficiencyOne. The following is included in this filing:

1. 2022 Rate and Bill Impact Analysis Report (includes appendices A through E);
2. Appendix F 2022 NS Power Historical Rate Model (Excel file); and
3. Attachment 1 2022 Rate and Bill Impact Analysis Model (Excel file).

EfficiencyOne respectfully requests permission to file Appendix A 2022 RBIA Summary Results, the 2022 Rate and Bill Impact Analysis Model and the 2022 NS Power Historical Rate Model, in electronic form only, given the nature of the excel spreadsheet file.

Future RBIA Filings

In its application for approval of the 2023-2025 DSM Resource Plan, E1 proposed to alter its annual filing of the historical RBIA. EfficiencyOne stated in its Application[1]:

> Currently, E1 files a historical RBIA on, or before, October 31 of each year. The historical RBIA estimates the high-level, long-term impact to rates and bills of all DSM activities up to and including those of the previous calendar year, as well as any future DSM investments that have been approved by the NSUARB. In addition, E1 files a forward looking RBIA in conjunction with each DSM Plan Application. The latter is used to provide guidance on the impact on future rates and bills associated with the DSM Plan activities proposed under the Application. Currently, the historical RBIA has been set as a Performance Indicator ("PI") under the terms of the Supply Agreements. PIs are generally used as guidance material within E1.

[1] M10473 Exhibit E1, 2023-2025 DSM Resource Plan, Evidence, page 61 of 65

The Supply Agreement defines them as:

> *…….. management tools that provide information to allow an organization to take action to help it deliver on performance targets.*

The preparation and development of the historical RBIA filed annually consumes considerable time and resources of the organization, and generally appears to have limited utility to stakeholders during a three-year Plan cycle. While the historical RBIA has been used to inform decision making by stakeholders during Plan Applications, it has generally been treated as an informational filing during each of the three years of a DSM Plan. E1 is proposing to alter its annual filings to eliminate the filing of the historical RBIA in any year other than a DSM Plan Application year. E1 submits that the elimination of the historical RBIA will have minimal impact on stakeholder assessment of ongoing DSM Plan performance and its elimination will result in internal cost savings to E1 which would otherwise be borne by ratepayers.

E1's proposed plan to file historical RBIA reports only in DSM Resource Plan application years was not opposed by intervenors. The Board approved the 2023-2025 DSM Resource Plan, which provided that the 2023-2025 historical-looking Rate and Bill Impact Analysis would be filed as part of the 2026-2028 DSM Resource Plan Application[2].

I trust you will find all in order. This filing is simultaneously provided to M10473 Participants.

Yours very truly,

James R. Gogan

cc. M10473 Participants

JRG/jmn

[2] M10473 Exhibit E1, 2023-2025 DSM Resource Plan, Appendix A, page 139 of 149