

Our File: 223853

VIA E-MAIL

April 8, 2024

Crystal Henwood
Clerk of the Nova Scotia Utility and Review Board
3rd Floor Summit Place
1601 Lower Water Street
Halifax NS B3J 3S3

Dear Ms. Henwood,

RE: EfficiencyOne - Behavioural Program Update - M10473

EfficiencyOne (“**EOne**”) writes to provide an update to the Nova Scotia Utility and Review Board (the “**Board**”) respecting collaborative efforts among EOne, Nova Scotia Power Incorporated (“**NS Power**”) and stakeholders on energy efficiency programs to be delivered by EOne pursuant to the Board approved 2023 – 2025 DSM Plan (**M10473**). In particular, this update relates to the operation of the EOne behavioural program and outlines the manner in which the agreement reached between EOne and NS Power (the “**Parties**”), and attached as **Schedule “A”**, meets the needs of both Parties respecting current and planned programs, accords with each Party’s legal and regulatory requirements, and ultimately serves the best interests of ratepayers.

Relevant Background

In its 2018 decision in M08349, the Board canvassed EOne’s concerns regarding the respective roles of EOne and NS Power in energy conservation programs enabled by advanced metering infrastructure (“**AMI**”). EOne submitted that “...*any utility-operated energy conservation program offered to the general public will materially interfere with the operation of the ENS franchise and is therefore not in the best interest of ratepayer*”. While the Board ultimately declined to direct that a specific, written agreement be put in place between EOne and NS Power outlining how energy efficiency and AMI services will be integrated, NS Power nevertheless confirmed its commitment,

as outlined in the decision, to work with EOne and stakeholders on an informal basis to ensure energy efficiency and AMI services are coordinated in a manner that best serves ratepayers.

In its Application for Approval of a Supply Agreement for Electricity Efficiency and Conservation Activities between EOne and NS Power (M10473), EOne noted its intention to re-introduce a residential behavioural program with similar features to those in the previously offered Home Energy Report. In their evidence, the Consumer Advocate's consultant and Synapse expressed concerns about the potential double counting of savings and missing of cost reductions in the event EOne and NS Power fail to coordinate regarding behavioural programs.

In its September 6, 2022, decision in M10473, the Board directed EOne to provide quarterly updates apprising the Board and stakeholders of ongoing collaborative efforts between EOne and NS Power leading up to the establishment and operation of the EOne behavioural program and the NS Power Customer Energy Management ("**CEM**") project. Given the timing of the current rollout of EOne's behavioural program and NS Power's CEM platform, EOne seeks to provide this update to the Board in addition to its quarterly report updates.

On April 28, 2023, NS Power submitted its first CEM Evaluation, Measurement and Verification (EM&V) Report to the Board, which was approved in M10164. Subsequent to the filing of this report, EOne has been working closely with NS Power with a view to enhancing efficiencies between the two entities in NS Power's rollout of its CEM platform and EOne's rollout of its behavioural program.

Agreement Reached Between the Parties

EOne and NS Power have reached agreement in principle respecting the transfer of CEM program data and have further agreed to share in the use of a single CEM platform – Bidgely. While both Parties will share in the use of the Bidgely CEM platform, both NS Power and EOne have entered into independent agreements with Bidgely. EOne's Home Energy Reports ("**HER**") Module is now being hosted within the Bidgely platform, and EOne will undertake independent control of the HER Module content. EOne will assume operational control of the content and branding of the "MyRecommendations" page on the Bidgely platform. This will enable a single set of recommendations to be provided to ratepayers from EOne and assist to reduce customer confusion.

EOne submits that the ongoing collaborative efforts and agreement reached between the two utilities respecting the CEM and EOne's behavioural program will result in a reduction in duplicative costs and efforts and is in the best interests of ratepayers.

Evaluation and Attribution of Energy Savings

Subject to the Board's approval, EOne and NS Power jointly propose that EOne assume ownership and responsibility for conducting all required CEM evaluation, measurement, and verification ("**EM&V**") of Load Impact related to EOne's behavioural program under its existing EM&V process. This would specifically include EOne's EM&V of load reduction analysis regarding total energy usage, load reduction analysis regarding total energy usage by CEM High/Low user groups that subscribe to alerts, and customer load shift comparative analysis pre-post CEM activation (Yearly Load profiles). EOne's EM&V responsibility would exclude any EM&V analysis of billing impact, energy usage, service cost efficiencies, and paperless billing, and NS Power would continue to have responsibility for these evaluations as directed in M10164.

The proposed delineation of EM&V responsibilities agreed to by the Parties is attached as **Schedule "B"**, with EOne undertaking responsibility for the portion demarcated in red, and NS Power continuing its responsibility for undertaking evaluation and measurement of the remainder.

With EOne's assumption of the above-noted EM&V responsibilities and associated work, NS Power would be relieved of its present EM&V obligations for Load Impact directed by the Board under M11109. EOne proposes, subject to approval of the Board, that all savings from the CEM, including but not limited to savings arising from the Home Energy Reports module and the "MyRecommendations" page, shall be solely attributed to EOne.

For greater clarity, the Parties jointly recommend that EOne undertake all Load Impact CEM evaluation of savings attributable to the HER module and the "My Recommendations" page of the CEM platform through its independent evaluation consultant, Econoler, to be further confirmed by the Board's verifier through a single process following the evaluation methodologies and reporting presently used by EOne. Further, EOne proposes that all savings generated through the Bidgely CEM platform be exclusively allocated and attributed to EOne in recognition of its operation and

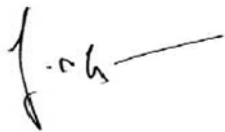
maintenance of its behavioural program through the platform, and its anticipated undertaking of all associated Load Impact EM&V costs and responsibilities.

In the event EOne is not credited with all savings associated with CEM, EOne and NS Power agree to bear the costs of the evaluation on a pro-rated basis, proportional to the savings credited to each party.

The agreement and proposed framework is in the best interests of ratepayers. It uses a single CEM platform that clearly designates EOne's behavioural programming as separate and apart from NS Power programs, reducing potential customer confusion associated with conflicting recommendations. It reduces the duplication of program costs through the operation of individual program delivery portals, and streamlines the EM&V process to safeguard against the duplication of savings.

We thank the Board for its consideration of the above and welcome any further direction regarding the CEM and its associated EM&V.

All of which is respectfully submitted,

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

James R. Gogan
JG/rl

SCHEDULE "A"

EfficiencyOne/NS Power - Behavioural Program Operating Agreement

EfficiencyOne

-AND-

Nova Scotia Power Inc.

EfficiencyOne ("**EfficiencyOne**") and Nova Scotia Power Inc. ("**NS Power**") (each a "**Party**" and together the "**Parties**") have reached an agreement and mutual understanding on the Parties' delineation of responsibility with regard to the various elements of CEM and its integration into the EfficiencyOne behavioural program and have identified areas for collaboration where it is in the best interest of ratepayers.

The Parties have considered and discussed how responsibility for different elements of a shared platform could be managed to:

- best serve ratepayers in Nova Scotia;
- meet the needs of both Parties in respect of their current and potential future programs; and
- not undermine the obligations or undertakings of either Party (including legal, regulatory, and contractual obligations).

Resulting from these discussions, the Parties have agreed on the delineation of responsibility regarding the various elements of CEM, including:

- 1) **CEM**: NS Power retains ownership of CEM and extends full access to EfficiencyOne (its employees and agents as necessary) as follows:
 - a) EfficiencyOne will control the EfficiencyOne content in a content calendar with Bidgely and the Parties will have joint sign-off on any NS Power or third-party content. EfficiencyOne will promote NS Power-relevant programs through the content provided to customers (such as e-billing).
 - b) Efficiency Nova Scotia ("**ENS**") branding will be included on My Energy Insights website such that the site is co-branded with NS Power. ENS will brand the My Recommendations section of the CEM. NS Power programs mentioned in the My Recommendations will retain NS Power branding as appropriate.
 - c) NS Power will transition the editorial control of My Recommendations to EfficiencyOne.

- d) All calls or other communications regarding the Home Energy Report shall be directed to EfficiencyOne's call centre.
- 2) **Bidgely:** EfficiencyOne will conclude a contract with Bidgely for the Home Energy Reports module with an anticipated roll-out in early 2024 of the HERS/eHERS. NS Power will host the home energy reporting module within the CEM system.
- 3) **Ongoing Cooperation and Collaboration:** The parties will cooperate on the roll-out of the HERS/eHERS program and with respect to future programs that could leverage the CEM platform.
- 4) **Incremental Costs:** EfficiencyOne will be responsible for all out of pocket, auditable costs payable to Bidgely that are directly and solely attributable to EfficiencyOne as a result of EfficiencyOne's use of the CEM platform whether addressed specifically in this agreement or not. If such costs are to be incurred, NS Power will seek EfficiencyOne's written consent in advance of incurring them.
- 5) **Cost Sharing:** NS Power will provide, at no upfront cost to EfficiencyOne, customer electricity usage data under rate codes 21, 22 and 23 (Small, Medium, and Large Industrial Tariff's, respectively) ("**AMI Data**") that is not otherwise included in the Professional Services and AMI Data Transfer Agreement as effective November 15, 2022 between the Parties. The transfer of this data will be scoped under a separate statement of work that will be governed by the AMI Data Transfer Agreement.
- 6) **Energy Savings:** EfficiencyOne shall file an update with the NSUARB outlining for approval, a simplified method of accounting for energy savings that minimizes the risk of double counting of energy savings or effort between the parties. The parties agree that energy savings from CEM and EfficiencyOne's Home Energy Report module, will be evaluated together by EfficiencyOne's evaluation consultant and verified by the NSUARBs verifier ("EM&V"), through a single process following the evaluation methodologies and reporting presently used by EfficiencyOne. Aggregated savings will be reported in a single EM&V report that accounts for savings attributable to both the CEM and Home Energy Report Module activities. EfficiencyOne's evaluator shall be responsible for evaluating energy savings. The parties agree to support the attribution of savings as proposed by the evaluator or as otherwise approved by the NSUARB.
- 7) **NSUARB Approval:** EfficiencyOne will provide an update to the NSUARB in February 2024 outlining the benefit to NS Power ratepayers of ensuring the avoidance of program and service duplication, and further proposing that EfficiencyOne assume operational responsibility for EM & V of the CEM. In its update, EfficiencyOne will outline its intent to work with the Board to obtain any required consent authorizations and amendments to existing orders and directions that may be required to avoid program and service

duplication respecting EM & V, including without limitation Matter M11109 – Nova Scotia Power Inc. – CI C0021839 – IT – CEM EM&V Report. This update will include:

- a) EfficiencyOne's intention to implement its approved DSM behavioural efficiency program through Bidgely;
- b) A request from NS Power to the Board that an amendment be made to the Decision Letter issued in M10460 on March 2022 approving NS Power's EM&V Plan. This amendment, if approved, would relieve NS Power from its obligation to conduct its own evaluation under its CEM, place responsibility for all CEM evaluations and verifications with EfficiencyOne under its existing EM&V process; and
- c) Any other directions, terms, or conditions that the NSUARB may advise before the Application is submitted.

EfficiencyOne

Per: Steve MacDonald

Date: February 9, 2024

NOVA SCOTIA POWER INCORPORATED

Per: Lia M. MacDonald

Lia MacDonald, VP Customer Experience & Innovation

February 2, 2024
Date: _____

SCHEDULE “B”

Summary of NSP’s Current Responsibilities for EM&V Under M10460

Note: EOne Proposes Responsibility for the Area Highlighted in Red below

CEM Effectiveness Category	Measurement Metric	Measurement Description	What is Measured	How it is Measured	Measurement Approach
Customer Load & Energy Usage	Billing Impact	Billing amount impact by bill period for CEM High / Low user groups against non user groups	Billed amount (CAN \$)	By Usage group	DID
		Billing amount impact by CEM High / Low user groups that subscribe to alerts	Billed amount (CAN \$)	By Usage group	DID
	Energy Usage	Customer usage analysis to determine shifts in usage for peak period related rates (TVP & TOD)	Peak Period Usage Kwh	By Usage group	DID
		Customer usage analysis to determine changes in peak demand usage for associated business rates	Demand usage kW	By Usage group	DID
	Load Impact	Load reduction analysis - reduction in total energy usage	Overall Kwh	By Usage group	DID
		Load reduction analysis - reduction in total energy usage by CEM High / Low user groups that subscribe to alerts	Overall Kwh	By Usage group	DID
		Customer load shift comparative analysis Pre-Post CEM activation (Yearly Load profiles)	Load Profile	By Rate Class	Comparative Analysis
Cost Effectiveness Measures	Service Cost Efficiencies	Changes in Customer Care Center call volumes (by measurable usage group TBD)	Call Volume (transaction cost savings)	By Usage group	DID
		Changes in Customer Care Center call length (by measurable usage group TBD)	Average Handle Time (transaction cost savings)	By Usage group	DID
	Paperless Billing	Paperless billing uptake pre/post CEM activation (paperless billing subscription rate)	Paper bill volume cost savings	By Usage group	DID