

# EfficiencyOne

**IN THE MATTER OF: The Public Utilities Act**

- and -

**IN THE MATTER OF:**  
EfficiencyOne Behavioural Program Update

**M11647**

**EfficiencyOne Responses to Information Requests (RIRs)**

E1 (SBA) RIRs 01-05

**FILED**  
June 19, 2024



**E1 Responses to Nova Scotia Small Business Advocate Information Requests**  
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**Request IR-01:**

Refer to Exhibit N-1 in this matter, being a letter dated April 8, 2024 entitled “EfficiencyOne - Behavioural Program Update - M10473” (the “Letter”) along with the accompanying Schedule A EfficiencyOne/NS Power - Behavioural Program Operating Agreement (“Schedule A”) and Schedule B, Summary of NSP’s Current Responsibilities for EM&V Under M10460 (“Schedule B”) and answer the following:

(a) Please refer to page 1 of the Letter and describe the difference in roles, responsibilities, and funding sources for EOne versus EfficiencyNS (ENS), where the latter is first referenced in Schedule A, paragraph 1.b.

(b) What is the meaning of the term “DID” that appears in Schedule B in the Load Impact section outlined in Red under the column Measurement Approach?

(c) What is the source for the data to be used to conduct the “load shift comparative analysis Pre - Post CEM activation” referenced in the Load Impact section of Schedule B?

**Response IR-01:**

(a) EfficiencyOne (E1) has filed this Application as the legal entity, and holder, of the exclusive franchise right to deliver demand-side management activities and programs to NS Power as provided for in s. 79C of the *Public Utilities Act* (Nova Scotia). Pursuant to the Grant of Franchise, these activities are branded and delivered utilizing the name “ENS” and/or Efficiency Nova Scotia. Funding is only provided to E1 as the legal entity, not Efficiency Nova Scotia.

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- 1 (b) The Difference-in-difference (DID) is a methodology used to estimate the value of metrics.  
2 This approach allows the evaluator to distinguish what is attributable to CEM versus other  
3 measures by comparing the treatment groups (High/Low Users) to control groups (Non-  
4 Users). DID analysis is a commonly used methodology in the evaluation of CEM  
5 effectiveness across jurisdictions.  
6  
7 (c) Upon approval by the Nova Scotia Utility and Review Board of the transfer of responsibility  
8 for the evaluation of the Load Impact Analysis to E1, it is E1's intention to work with the  
9 third-party evaluator to determine the appropriate source of data to be used.

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**Request IR-02:**

Refer to page 2 of the Letter where it states “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.”

(a) What is the status of this revised Home Energy Report and when will it be deployed?

(b) Is there a module corresponding to the Home Energy Report module that measures participation by Small General, General and Small Industrial rate classes?

(c) If so, please provide more details on the plans to develop this small business report module.

(d) If not, will NS Power be exclusively responsible for providing this service to the small business rate classes?

**Response IR-02:**

(a) EfficiencyOne’s (E1) Residential Behaviour program component, which includes the delivery of Home Energy Reports to residential participants, launched on April 30, 2024. A total of 261,000 eligible participants will receive four reports by mail and/or email in 2024, in sync with NS Power’s electricity usage summaries. Two of those four reports will include more seasonally-focused information around the primary heating and cooling months.

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- 1 (b) The initial launch of E1's Residential Behaviour program component is focused on  
2 residential customers only. E1 intends to assess the possibility of expanding this program  
3 to small business customers as part of the 2026-2030 DSM Plan development. This will be  
4 dependent on the vendor's ability to provide this support. E1 would expect to also be  
5 responsible for the delivery of this program to small businesses.  
6
- 7 (c) Please refer to EfficiencyOne's IR response to (b).  
8
- 9 (d) Please refer to EfficiencyOne's IR response to (b).

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**Request IR-03:**

**Refer to the Letter, bottom of page 3 through top of page 4, quoted below and answer the questions that follow.**

**“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.”**

**(a) What are the roles and responsibilities performed by Econoler versus the Board’s verifier?**

**(b) How will EOne distinguish the results obtained for “Customer Load Shift Pre - Post CEM activation (Yearly Load profiles)” from the load shift that NS Power plans to track and report on for its TVP / TOU program as a Year 4 pilot and once it transitions beyond the pilot stage?**

**Response IR-03:**

**(a) As outlined in the 2023-2025 DSM Plan, an annual third-party evaluation is required to determine the net electrical energy savings, net system-peak demand savings, and demand response available capacity achieved by EfficiencyOne’s (E1) Demand Side Management programs. The independent evaluator is selected by E1 through a request for proposal process and Econoler is the current successful proponent. Econoler conducts an impact evaluation for each program by measuring, modelling, and estimating the savings and**

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1 available capacity achieved. Process and market evaluations also take place when deemed  
2 necessary. The evaluator's findings are submitted in Evaluation Reports filed with the Nova  
3 Scotia Utility and Review Board (NSUARB) on March 31, alongside E1's Annual Progress  
4 Report filing.

5  
6 The Verification Consultant (Verifier) is engaged directly by the NSUARB annually to verify  
7 the third-party evaluation of electricity energy savings and demand reduction results for  
8 E1's programs. In addition to verifying the evaluator's findings, the verifier also reviews the  
9 evaluation and design and protocols, reviews calculation methods, and performs select site  
10 visits to check installation counts and quality of work. The Verifier submits a Verification  
11 Report to the NSUARB, which includes a recommendation on whether to accept or adjust  
12 the third party's evaluation reports and findings.

13  
14 (b) E1 would rely on the third-party evaluator to propose an appropriate approach if the  
15 transfer of the Load Impact metrics is approved by the NSUARB.

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**Request IR-04:**

**Refer to the Letter page 3 which states “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.”**

**(a) What is EOne’s current estimate of the amount of this reduction in costs?**

**(b) Who is responsible for reporting to the Board on the actual cost reduction?**

**(c) When will EOne file its estimated and actual reduction in costs to the Board?**

**(d) Does EOne plan to ask the Board for an increase in program costs to cover the assumption and transfer of these additional responsibilities from NS Power? If so, for which years of the current or future plan?**

**Response IR-04:**

(a) EfficiencyOne (E1) and NS Power agreed to share in the use of a single CEM platform with E1’s Home Energy Report module hosted within the platform. E1 anticipates an aggregate reduction in delivery costs of approximately \$100,000 per year through the use of a shared platform.

(b) E1 has reported, and will continue to report, in its quarterly and annual reports, the actual costs associated with the Residential Behaviour program component which is being delivered through the Home Energy Report module hosted on NS Power’s CEM platform.

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- 1 (c) Please refer to EfficiencyOne’s IR response in part (b).  
2  
3 (d) E1 does not intend to request additional funding to support the assumption and transfer  
4 of any incremental responsibilities related to the delivery of the Residential Behaviour  
5 program component.

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**Request IR-05:**

**Refer to the Letter page 3 which states: “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.”**

**(a) How will EOne reports account for the historical savings obtained by NS Power prior to the transfer of NS Power’s responsibilities to EOne?**

**(b) Does EOne plan to use the full series of historical savings, including yearly results generated by NS Power, to show how EOne’s performance has improved going forward?**

**(c) What is meant by the reference in the Letter, bottom of page 2, to “branding of the My Recommendations page on the Bidgely platform” and how this decision impacted the cost of the service contract with Bidgely?**

**Response IR-05:**

**(a) EfficiencyOne (E1) does not intend for energy savings previously reported by NS Power to transfer to or be included in E1’s 2023-2025 actual energy savings results.**

**(b) Please refer to EfficiencyOne’s IR response to (a).**

**(c) The “My Recommendations” page on NS Power’s CEM platform will be solely branded as Efficiency Nova Scotia to align with the agreement between the two utilities, that there**

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- 1 would be a single set of energy efficiency recommendations managed solely by E1. E1
- 2 understands this will not impact NS Power's service agreement with Bidgely.