Nova Scotia Utility and Review Board

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James R. Gogan
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Dear Mr. Gogan:

M11647 – EfficiencyOne Behavioural Program Update

On April 8, 2024, Efficiency One (EOne) filed an update on its behavioural program with the Nova Scotia Utility and Review Board. In the Board's decision in Matter M10473, EOne was directed to provide quarterly updates about ongoing collaborative efforts between EOne and Nova Scotia Power Inc. (NS Power) leading up to the establishment and operation of EOne's behavioural program and NS Power's Customer Energy Management (CEM) System. EOne advised that this update outlined how an agreement reached between EOne and NS Power met the needs of both parties respecting current and planned programs and accorded with each party's legal and regulatory requirements, while ultimately serving the best interests of ratepayers.

The update stated that EOne has been working with NS Power to align NS Power's CEM and EOne's behavioural program since April 2023. EOne stated that the parties reached an agreement in principle about transferring CEM program data and sharing in the use of a single CEM platform - Bidgely. Per the terms of the agreement, the CEM platform will begin hosting EOne's Home Energy Reports (HER) and each party will hold an independent contract with Bidgely Inc. Through this agreement, EOne anticipates there will be a reduction in costs for both utilities.

EOne said that, 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. EOne advised 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 said its 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.

Further, EOne proposes that savings generated through the 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. EOne said if it is not credited with all savings associated with CEM, EOne and NS Power agreed to bear the costs of the evaluation on a pro-rated basis, proportional to the savings credited to each party.

On May 14, 2024, the Board invited interested parties to submit Information Requests (IRs) to EOne by May 29, 2024. EOne responded to IRs from the Board and the Small Business Advocate (SBA) on June 19, 2024. Comments from the SBA and NS Power were filed on July 4, 2024, and EOne's reply comments were filed on July 18, 2024.

It was apparent from the comments filed by NS Power that it disagreed with EOne's characterization of the agreement between the parties. The area of disagreement appears to focus on whether EOne would be responsible for EM&V for the entire CEM under the agreement or just the Load Impact component. There may also not be full alignment on the allocation of savings either. EOne recognizes this and committed to pursuing further direct discussions with NS Power to align their positions on the CEM EM&V reporting and responsibilities.

In the circumstances, any requests for Board approval of the arrangements under the agreement are premature until EOne and NS Power are fully aligned. As such, the Board confirms that all existing reporting requirements and responsibilities remain unchanged. Considering the comments filed by the SBA in this proceeding, the Board reiterates in particular its direction to NS Power in Matter M11694 to continue reporting on its initiatives to increase the participation of its commercial customers in the CEM.

Given the potential for cost savings and the outstanding concerns about the duplication of program services and savings, the Board expects that EOne and NS Power will pursue further alignment in the best interests of ratepayers and the Board looks forward to details on a final agreement between the parties in EOne's next update.

Yours very truly,

Stephen T. McGrath, K.C.
Chair

Steven M. Murphy, MBA. P. Eng.
Member