

**BEFORE THE
NOVA SCOTIA ENERGY BOARD**

IN THE MATTER OF <i>The Public Utilities</i>	:	
<i>Act</i> , RSNS 1989, c 380, as amended	:	
- and –	:	
IN THE MATTER OF An Application by	:	Matter No. M12249
EfficiencyOne for Approval of the 2026	:	
DSM	:	
Extension for Demand-Side Management	:	
Activities between EfficiencyOne and	:	
Nova Scotia Power Inc., and for Approval of	:	
the Amendment to the 2023-2025	:	
Demand-Side Management Purchase	:	
Agreement between EfficiencyOne and	:	
Nova	:	
Scotia Power Inc.	:	

DIRECT TESTIMONY

OF

**THEODORE M. LOVE
GREEN ENERGY ECONOMICS GROUP, INC.**

On Behalf of

The Consumer Advocate

July 17, 2025

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1 **I. INTRODUCTION AND SUMMARY**

2 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.?**

3 A. My name is Theodore M. Love, and I am a partner at Green Energy Economics Group,
4 Inc. (“GEEG”), an energy consulting firm founded in 2005. My office address is 2534
5 Downingsville Rd, Lincoln, Vermont.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

7 A. My testimony is submitted on behalf of the Consumer Advocate (“CA”).

8 **Q. PLEASE BRIEFLY DESCRIBE YOUR QUALIFICATIONS?**

9 A. I have been involved in the review and preparation of natural gas and electric energy
10 efficiency plans, as well as potential studies and cost-effectiveness analyses, in nearly a
11 dozen states, three Canadian Provinces, and China, since I began working with GEEG in
12 2007. My educational background and relevant experience are set forth in my resume
13 attached as Exhibit TML-1 to my testimony.

14 **Q. PLEASE DESCRIBE YOUR WORK WITH ENERGY EFFICIENCY AND**
15 **CONSERVATION PLANS IN CANADA.**

16 A. I have represented the Consumer Advocate on the Demand Side Management Advisory
17 Group (“DSMAG”) and reviewed EfficiencyOne’s (“E1”) DSM plans and reports since
18 2019. I have also recently presented evidence before the Ontario Energy Board on
19 Enbridge Gas’ Energy Efficiency Plan (EB-2021-0002) on behalf of the Small Business
20 Utility Alliance.

21 Previously I have reviewed and analyzed a number of plans for electric and gas
22 efficiency programs in British Columbia since 2007. I supported preparation of testimony
23 regarding BC Hydro’s 2006, 2008, and 2012 Integrated Electricity Plan and Long-Term
24 Acquisition Plans; demand-side management (“DSM”) plans by Terasen Gas in October

1 2008, and, in November 2011, by its successor, Fortis Energy Utilities BC Gas. I also
2 worked on testimony regarding FortisBC Electric's DSM Plan in March 2012.

3 In 2013, GEEG prepared a report benchmarking BC Hydro's 2012 efficiency
4 investment plans based on updated industry experience and plans. I helped file evidence
5 in two separate proceedings regarding gas and electric energy efficiency plans for 2014-
6 15 submitted by both Fortis companies. All this work was done on behalf of the BC
7 Sustainable Energy Association.

8 I have also assisted Green Communities Canada in Ontario, with the development
9 and update of an energy efficiency savings calculation tool used by field staff in Ontario
10 Power Authority's low-income program.

11 **Q. HAVE YOU PRESENTED TESTIMONY IN PROCEEDINGS BEFORE THIS OR**
12 **OTHER REGULATORY BOARDS?**

13 A. Yes, I have previously provided evidence on EfficiencyOne's 2023 through 2025 DSM
14 Plan (Matter No. M10473) and its 2020 through 2022 DSM Plan (Matter No. M09096). I
15 have also provided expert evidence in Ontario, California, and Pennsylvania.

16 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

17 A. Yes, I am sponsoring the following exhibits:

18 1. Exhibit TML-1 –Resume of Theodore M. Love

19 **Q. PLEASE PROVIDE A SUMMARY OF YOUR TESTIMONY AND FINDINGS.**

20 A. Given the nature of this filing as an extension of an existing plan, I have limited my
21 testimony to a few issues. Overall, I recommend that the extension be granted with a few
22 modifications. I discuss my concern with increasing acquisition costs and lower savings. I
23 then highlight issues I see with the current approach to calculating low-income savings. I

then address some of the recommendations for the Energy Insights program raised by Mr. H. Gil Peach. Finally, I provide a summary of my recommendations.

II. INCREASING ACQUISITION COSTS

Q. WHAT HAS CHANGED SINCE THE LAST PLAN FOR ACQUISITION COSTS?

A. Since the start of the 2023 to 2025 plan, EfficiencyOne has seen a steady rise in the cost of acquiring savings in the residential sector. This trend has taken a sharp turn upwards as of 2025, and continues in the plan extension, as shown in the following figures.

Figure 1. Acquisition Cost Trends for First Year Savings

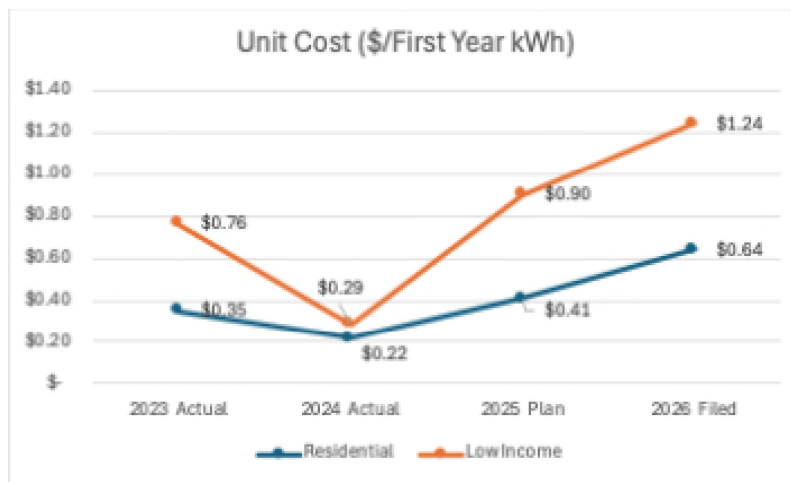
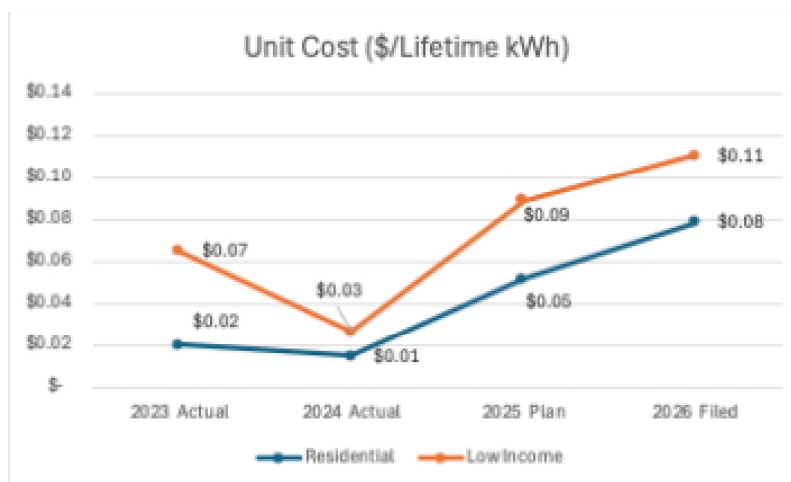


FIGURE 2. ACQUISITION COST TRENDS FOR LIFETIME SAVINGS



The following table shows the percentage change in acquisition costs from what was achieved in 2024 to the 2026 value in this extension filing.

Table 1. Percentage Change in Unit costs (2024 Actual to 2026 Planned)

Sector	\$/First Year kWh	\$/Lifetime kWh
Residential	192%	429%
Low-Income	332%	315%

Over three years, the residential sector will see unit costs for first year savings go up nearly three times higher, and lifetime savings unit costs rise over five times higher. In that same time span, low-income savings are projected to be over four times higher for both first year and lifetime savings. These are very large increases in a very short amount of time.

Q. ARE YOU CONCERNED ABOUT THIS SHARP INCREASE IN RESIDENTIAL SAVINGS ACQUISITION COSTS?

A. Yes. The primary goal of the portfolio is to acquire energy savings, with the main constraint coming from the budget available to do so. As costs to acquire increase, and budget levels stay the same or increase slightly, the acquired savings must fall in response. Such a dramatic increase in acquisition costs has led to a sharp decline in acquired savings as discussed in Section III. Not only do savings decrease, but the net benefits to Nova Scotia are also diminished. Under the current Total Resource Cost (“TRC”) test, the combined residential programs have a benefit-cost ratio (“BCR”) of 0.9.¹ This means that, under the current primary economic test², net benefits from residential programs are negative.

¹ EfficiencyOne 2026 DSM Extension, p. 23. Table 5 - 2026 Program Savings and Investment

² There is currently a proceeding to update the benefit cost test used for analysis of these programs under Matter No. 12282, which may show that benefits for these programs outweigh costs.

1 **Q. WHAT IS DRIVING THIS INCREASED COST TO ACQUIRE SAVINGS?**

2 A. There are many factors driving this change. One of the main drivers is the retiring of
3 LED savings from the residential sector, with the effects of this starting in 2025.

4 However, this is not the entire story. Costs are projected to increase across programs and
5 measures, and many programs are projecting decreased savings per participant. The
6 underlying assumptions, program design, and viability of these programs should be
7 examined more thoroughly as part of the next plan filing process.

8 **Q. SHOULD EFFICIENCYONE DISCONTINUE ANY OF THESE PROGRAMS?**

9 A. No, not at this time. There are many uncertainties surrounding the future direction of the
10 EfficiencyOne portfolio including new policy directives from the new Nova Scotia
11 Energy Board, the updated benefit cost test, a reevaluation of potential savings, and the
12 inclusion of new avenues of programing such as solar, storage, and beneficial
13 electrification. I believe the nature of a plan extension, such as this one, is to allow for the
14 continuations of services to customers while essential policy and framework question can
15 be settled and a more thorough planning process can be undertaken for the next phase of
16 the portfolio.

17 **Q. WHAT DO YOU RECOMMEND REGARDING THE RESIDENTIAL**
18 **PROGRAMS ?**

19 A. I recommend that the extension be approved with the modifications discussed further in
20 my testimony. However, a deep and detailed look should be taken at the residential
21 energy efficiency program offerings for the next phase of the portfolio to ensure that the
22 appropriate mix of programs and measures has been chosen to acquire a sufficient
23 quantity of cost-effective savings for residential ratepayers.

1 **III. RESIDENTIAL SAVINGS DECREASE**

2 **Q. HOW DOES THE RESIDENTIAL SECTOR 2026 PROPOSED KWH SAVINGS**
3 **COMPARE TO THE 2025 APPROVED PLAN GWH SAVINGS?**

4 A. Residential savings went down significantly as a portion of portfolio savings. Total
5 residential GWh savings went from 48% of the portfolio savings for the 2025 approved
6 plan to only 25% for the 2026 proposed extension.³ EfficiencyOne is saying this is
7 largely due to LEDs becoming baseline, but there needs to be a closer examination of the
8 actual potential savings versus a continuation of programs without LEDs.

9 **Q. WHAT OTHER FACTORS DO YOU THINK CONTRIBUTED TO THE**
10 **DECREASE IN RESIDENTIAL GWH SAVINGS?**

11 A. The 2026 budget for the residential sector declined by 12% as compared to the 2025
12 approved plan's budget. The residential percentage of the energy efficiency programs
13 budget also declined from 55% in the 2025 approved plan to 51% in 2026, as shown in
14 the following table.

15 **Table 2. Comparison of Residential Budget Allocations for 2025 to 2026**

Subtotal	Approved 2025 Plan	Filed 2026 Extension
Residential Budgets (\$M)	\$29.1	\$25.5
EE Program Budget (\$M)	\$52.9	\$50.2
Percentage Residential	55%	51%

16
17
18 **Q. WHAT IS ANOTHER REASON FOR THE DECREASE IN RESIDENTIAL GWH**
19 **SAVINGS?**

20 A. In EfficiencyOne's response to CA IR-02 they give the following for the reason for
21 decreasing the GWh savings for Affordable Multi-Family Housing program: "A decline

³ EfficiencyOne IR response to CA "CA IR-02 Attachment 1.xlsx

1 in energy savings and increase in unit cost is expected as a result of the provincial
2 government rebate top-up no longer being available in 2026.”⁴

3 **Q. WHAT ARE THE AFFORDABLE MULTI-FAMILY HOUSING SAVINGS IN**
4 **2026 COMPARED TO THE 2025 APPROVED PLAN?**

5 A. The savings decrease by 48.7% as compared to the 2025 approved plan kWh savings.
6 Though EfficiencyOne increased the funding by 36% as compared to the 2025 approved
7 budget, it’s not nearly enough to make up for the loss of Provincial government funding.
8 EfficiencyOne needs to explore other means of increasing the energy savings for the
9 Affordable Multi-Family program.

10 **Q. HOW MUCH OF THE RESIDENTIAL DECREASE IN SAVINGS IS FROM**
11 **LOW-INCOME CUSTOMERS?**

12 A. Though Low-income GWh savings is maintaining the same percentage of portfolio
13 savings, the absolute value of low-income GWh savings is declining by 23% as compared
14 to the 2025 approved plan savings. This will likely be even worse due to an overcounting
15 of projected low-income savings from incidental programs not dedicated to low-income
16 customers, which is discussed in the next section.

17 **Q. WHAT CHANGES DO YOU RECOMMEND THAT WOULD LESSEN THE**
18 **DECREASE IN RESIDENTIAL SAVINGS?**

19 A. I recommend that EfficiencyOne readjusts its budgets and allocates an additional \$2.1
20 million to the residential sector to make the residential sector budgets \$27.6 million and
21 maintain the 55% allocation of spending from the 2025 plan year.⁵ Some of this funding
22 should be used to offset the drop in provincial funding for the Affordable Multifamily

⁴ EfficiencyOne IR response to CA “CA IR-02 Attachment 1.xlsx cell F17”

⁵ 55% of \$50.2 million is \$27.6 million, which is \$2.1 million more than currently proposed \$25.5 million budget.

Housing program.⁶ Maintaining the same sector budget allocation would make sure that the 2026 year is actually an extension of the existing portfolio.

IV. LOW-INCOME SAVINGS ALLOCATIONS

Q. HOW IS EFFICIENCYONE ALLOCATING INCIDENTAL SAVINGS TO THE LOW-INCOME SECTOR FOR PROGRAMS NOT SOLELY DEDICATED TO LOW-INCOME CUSTOMERS?

A. Appendix A, Attachment 2 of EfficiencyOne’s 2026 Extension Application shows the allocation methods. The 2026 incidental low-income savings assumptions are based on the reported impacts from 2023 and 2024. But EfficiencyOne provides a different methodology for low-income attribution in future reported savings. The methodology in place in 2023 and 2024 was different than the methodology described for future reporting. Since the new methodology will typically result in lower allocation of savings to the low-income customers, the 2026 reported savings will likely be lower than projected.

Q. SHOULD EFFICIENCYONE REVISE THEIR PROJECTIONS FOR INCIDENTAL LOW-INCOME SAVINGS?

A. Yes. EfficiencyOne should make allocation estimates based on the new methodology.

Q. WHY DID EFFICIENCYONE CHANGE ITS METHODOLOGY FOR LOW-INCOME SAVINGS ALLOCATIONS FOR PROGRAMS NOT SOLELY DEDICATED TO LOW-INCOME CUSTOMERS?

A. GEEG on behalf of the Consumer Advocate had recommended revisions to the allocation methods to prevent double counting. EfficiencyOne agreed to make the changes.

⁶ EfficiencyOne IR response to CA “CA IR-03 Attachment 1.xlsx

1 **Q. ARE THERE FURTHER CHANGES THAT YOU RECOMMEND FOR FUTURE**
2 **ALLOCATIONS?**

3 A. Yes. I recommend that surveys should be conducted for each of the programs to get a
4 better assessment of the percentage of low-income customers participating in the
5 programs not dedicated to low-income customers. Whereas EfficiencyOne's original
6 allocation methodology may have overcounted low-income savings attribution, what
7 EfficiencyOne has proposed for the 2026 allocation of low-income savings may now be
8 overly conservative.

9 **Q. DO YOU HAVE ANY OTHER ISSUES WITH THE LOW INCOME SAVINGS**
10 **ALLOCATION METHODOLOGY PROPOSED FOR 2026 REPORTING?**

11 A. Yes. The Efficient Product Installation program methodology has the same double
12 counting issue that GEEG discussed with EfficiencyOne. It counts all of the known low-
13 income customers plus applies the overall low-income prevalence to the remainder. Until
14 a survey can be conducted, I recommend that EfficiencyOne only apply the overall low-
15 income prevalence to all participants, unless the number of known low-income
16 participants is greater, in which case that number should be used.

17 **V. 2024 SAVINGS VERIFICATION REPORT – EFFICIENCY INSIGHTS**

18 **Q. WHAT DOES MR. PEACH SAY ABOUT THE ABILITY OF EFFICIENCY**
19 **INSIGHTS TO ENCOURAGE PARTICIPATION IN OTHER PROGRAMS?**

20 A. On page 46 of the *Savings Verification Review of Efficiency Nova Scotia Program Year*
21 *2024 Evaluation Results* (6/4/2024) ("2024 Savings Verification Report"), Mr. Peach
22 states that the effects found by the evaluation of the Efficiency Insights programs is "so
23 small as not to warrant practical value; however, it can be claimed to be there". He goes
24 on to provide the following statement supporting this claim:

25 *"The three claims include for Green Heat (2 analyses out of 3), although the*
26 *magnitude of each is only 0.1% (a participation difference of one-tenth of one*

percent, which is far too small to be of practical importance). The other claim is for Efficient Products Installation (1 analysis out of 3), which is also tiny (0.4% or four-tenths of one percent). There is no claim for Home Energy Assessment program (0 out of 3).” (p. 46)

Q. DO YOU INTERPRET THE EVALUATION RESULTS IN THE SAME WAY AS MR. PEACH?

A. No. While I agree that there are observable results, I disagree that they are so small as to warrant no practical value. Mr. Peach’s description of the effects fails to consider the relative impact that the small absolute value has on program participation. Mr. Peach references Table 2 for the basis of his analysis.

Table 3. Evaluation Claimed Influence on Participation in Other Programs⁷

Measure-Based Program Encouragement Results (Difference of Means)				
Subgroup	Treatment	Control	(Size of) Difference	(Is There a) Claimed Effect
High Energy Use				
HEA	1.6%	1.7%	-0.1%	No
Green Heat	0.4%	0.3%	0.1%	Yes
EPI	2.0%	1.6%	0.4%	Yes
Medium Energy Use				
HEA	1.6%	1.7%	-0.1%	No
Green Heat	0.2%	0.1%	0.1%	Yes
EPI	2.1%	1.9%	0.2%	No
Low Energy Use				
HEA	1.0%	0.9%	0.1%	No
Green Heat	0.0%	0.0%	0.0%	No
EPI	1.3%	1.3%	0.9%	No

The following table provides the relative increase in participation for customers in the various programs that had observable effects. In the case of high energy users that received Efficiency Insights, there was a 33% increase in participation in the Green Heat

⁷ 2024 Savings Verification Report, page 47. Table 7.

Program and a 25% increase in participation in the EPI program. For medium energy users that received Efficiency Insights, the number of participants in the Green Heat program doubled.

Table 4. Relative Effect of Influence on Other Programs

Program	Cohort	Control	Treatment	% Difference
Green Heat	High Energy User	0.3%	0.4%	33%
Green Heat	Medium Energy Use	0.1%	0.2%	100%
EPI	High Energy Use	1.6%	2.0%	25%

When asked about these relative impacts, Mr. Peach continued to insist that the effect was still not a “practical” impact, since for every 1,000 customers that received the Efficiency Insights, that would only lead to an additional 1 customers participating if the effect was a difference of 0.1%.⁸ I agree with Mr. Peach’s calculation, but again, I disagree on the practical effect. This is where the large number of participants in the Residential Behavioral Program makes a difference. As shown in the following table, over 239,000 customers received Efficiency Insights, which means that 0.1% potentially represents 239 customers. Given that there were 1,409 participants in the Green Heat program, this would be 17% of the participants, an amount which I would consider to be of practical effect.

Table 5. Potential Impact of Residential Behavior Program on Green Heat Program⁹

	2024 Results
Residential Behavior Participants	239,309
0.1% of Behavior Participants	239
Homes in Green Heat	1,408
% Represented by 0.1% Increase	17%

⁸ See *response to IR-1 Consumer Advocate to H. Gil Peach*

⁹ *E1 2024 DSM Annual Progress Report*. p. 8. Table 2 – 2024 Participation

1 In addition, the Green Heat program was projected to reach 3,408 customers in its
2 original 2023 – 2025 Plan but only reached the 1,408 in 2024¹⁰, which gives additional
3 weight to the value provided by the Efficiency Insights program, which may have saved
4 the program from even higher under performance in reaching its participation goals.

5 **Q. HOW DOES MR. PEACH CHARACTERIZE THE SAVINGS AMOUNTS**
6 **FOUND IN THE EVALUATION OF THE EFFICIENCY INSIGHTS PROGRAM?**

7 A. On page 55 of the 2024 Savings Verification Report, Mr. Peach makes the following
8 statement:

9 *“For high users the evaluator reports the effect size per household at 0.132 kWh*
10 *per day, (0.34% of average daily consumption) for medium users at 0.135*
11 *kWh/day (0.62% of average daily consumption), and for low energy users at*
12 *0.062 kWh/day (0.57% of average daily consumption), all less than one-percent*
13 *per day. If we were interested in the effect per home, these effect sizes are far too*
14 *small to be meaningful, and it would be appropriate to avoid crediting energy*
15 *savings to the Efficiency Insights program at the household level.”*

16 A. Mr. Peach then goes on to make several statements regarding savings from the Efficiency
17 Insights program at the system level, including:

18 *“For The Efficiency Insights program, since there are no physical measures*
19 *installed, we have only the metered (AMI) based result, which is a black box, and*
20 *the countable result of 6.27 GWh is an artifact of sample size in that for*
21 *residential behaviour projects the very large sample sizes are necessary to detect*
22 *household energy savings.” (p. 52-53)*

23 A. As well as the following statement:

24 *“the effect is generated from practically meaningless savings per household and*
25 *without installation of any physical program measures.” (p. 53)*

¹⁰ Ibid.

1 **Q. DO YOU AGREE THAT IT WOULD BE “APPROPRIATE” TO AVOID**
2 **CREDITING ENERGY SAVINGS AT THE HOUSEHOLD LEVEL?**

3 A. No. I think it is unwise to discredit such savings at the household level based solely on an
4 average of a large group of customers. Mr. Peach admits in his response to CA IR-2-b
5 that he does “not believe that an average or mean value is fully representative of
6 participant outcomes”. In fact, an average provides limited information about the
7 dispersion of individual outcomes within a large population. There may be a cluster of
8 customers that save significant amounts of energy, while the rest of participants are
9 saving essentially nothing. This would still mean that a subset of customers derives
10 significant household level outcomes from the program, even though the average values
11 may be low.

12 **Q. DO YOU AGREE THAT THESE SAVINGS LACK VALUE BECAUSE THEY**
13 **ARE NOT TIED TO A PHYSICAL MEASURE?**

14 A. No. Electrons do not care whether they flow due to the installation of a widget or due to
15 someone’s behavior. Energy saved by manually turning off a light when leaving the room
16 is fungible with energy saved by installing an occupancy sensor to do the same thing.
17 That’s not to say that a behavior intervention does not lead to the installation of a
18 physical measure, which they often do.

19 One advantage that behavior program savings have over measure-based programs,
20 is that all savings are directly observed and measured in usage data, as pointed out by Mr.
21 Peach.¹¹ Most physical measure-based programs derive savings from engineering
22 assumptions and projections. In this sense, behavior program savings may be more “real”
23 than measure savings.

¹¹ Mr. Peach’s reference to “AMI Based savings” on p. 53 of the 2024 Savings Verification Report.

1 **Q. DO THE SAVINGS FOUND FOR THE EFFICIENCY INSIGHTS PROGRAM**
2 **HAVE VALUE AT THE SYSTEM LEVEL?**

3 A. Yes, and EfficiencyOne specifically calculates that value as part of its cost benefit
4 analysis. This is done by taking the load shape for savings generated by the program and
5 matching it to the avoided costs that have been agreed upon for the jurisdiction. These
6 avoided costs look not just at the benefits for avoided capacity associated with kW
7 savings, as Mr. Peach implies on page 53 of the 2024 Savings Verification Report, but
8 also at the avoided generation value as well as avoided emissions and other benefits from
9 lowering energy usage.

10 **Q. WHAT DOES MR. PEACH RECOMMEND REGARDING THE**
11 **CONTINUATION OF THE EFFICIENCY INSIGHTS PROGRAM?**

12 A. Recommendation SVR2024-Behaviour-5 on page 55 of the 2024 Savings Value Report
13 recommends that the program be continued, but that no savings should be counted for it
14 because “its independent contribution to energy savings at a household level is too small
15 to be credible as an energy saving program, and the same assertion is reasonable at the
16 utility system level.”

17 **Q. DO YOU AGREE WITH THIS RECOMMENDATION?**

18 A. No. The goal of the Efficiency Insights Program was never to achieve very significant
19 savings per household, but to achieve a smaller average amount of savings across a large
20 population. Mr. Peach’s insistence that these savings have no value is not supported by
21 the evidence as I have discussed previously.

22 **Q. DO YOU BELIEVE THAT THERE IS ROOM FOR IMPROVEMENT IN THE**
23 **OUTCOMES FOR THE EFFICIENCY INSIGHTS PROGRAM?**

24 A. Yes. Average savings are below the projected values assumed by EfficiencyOne, and
25 there should be effort put into improving average savings value and increasing

conversion rates to other programs. Mr. Peach's recommendation for additional examination of some of the root causes of energy savings (SVR2024-Behaviour-6) and to provide additional customer segmentation (SVR2024-Behaviour-7) could be helpful, but EfficiencyOne should continue to claim savings that occur as a result of the Efficiency Insights program.

VI. CONCLUSION

Q. PLEASE SUMMARIZE YOUR KEY FINDINGS AND OBSERVATIONS

A. In summary, I respectfully recommend that the Board should approve the extension filing with the following modifications:

- 1) EfficiencyOne should reallocate \$2.1 million from other sector budgets back to the residential sector to maintain the 55% spending allocation from the 2025 plan year
- 2) The additional funding should be used, in part, to offset the drop in provincial funding for the Affordable Multi-Family Housing program.
- 3) 2026 savings allocations for low-income customers should be based on the same allocations that they are planning on using for reporting.
- 4) For the Efficient Product Installation program, EfficiencyOne should apply the overall low-income prevalence to all participants, unless the number of known low-income participants is greater, in which case that number should be used
- 5) Surveys should be conducted for each of the programs to get a better assessment of the percentage of low-income customers participating in the programs not dedicated to low-income customers.
- 6) Residential acquisition costs and savings opportunities should be examined closely in the next phase filing.
- 7) The Board should not adopt recommendation SVR2024-Behaviour-5 from the 2024 Savings Verification Report to discontinue counting savings for the Efficiency Insights program.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.