

EfficiencyOne (E1) Responses to Industrial Group (IG) Information Requests
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Request IR-01:

Reference: E-2 Verification Report, page 26.

“The Evaluator recommends consideration of removing wood fireplace inserts and pellet fireplace inserts from Green Heats list of measures due to their low savings and demand.”

Please confirm that neither wood fireplace inserts nor pellet fireplace inserts are among the list of measures in the 2026 Extension Plan. If not confirmed, please explain and justify their inclusion in light of the evaluation.

Response IR-01:

Confirmed. Neither wood fireplace inserts, nor pellet fireplace inserts are included in the list of measures under the 2026 DSM Extension.

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Request IR-02:

Reference: E-2 Verification Report - Section E – Residential Efficient Production Installation (EPI).

- (a) How do E1 and its evaluator distinguish what is the electricity ratepayer portion of EPI?**
- (b) In light of E1’s proposed BCA and expanded mandate with quantified benefits extending to other fuel reductions, how will E1 and its evaluator distinguish between electricity ratepayer portion of upgrades and provincial and federal funded upgrades in the EPI program? Please discuss with specific examples.**

Response IR-02:

- (a) The following IR response has been provided by Econoler.**

Primary space heating and water heating sources declared by the participant are used to distinguish electrical energy savings (i.e., electricity ratepayer portion) from non-electrical energy savings for space heating measures (i.e., Smart thermostats (for MSHPs), Smart Thermostats (for electric baseboards or in-floor systems), Advanced Learning Thermostats (for central electric heating), building envelopes measures (i.e., Foam Gaskets, Door Sweeps, Window Air Sealing, Door Weather Stripping, Window Film Kits) and hot water measures (i.e., Faucet Aerators, Thermostatic Shower Valves, Low-flow Showerheads, Pipe Insulation, and Hot Water Tank Wraps). Electrical energy savings are claimed for all plug load measures (i.e., light-emitting diode [LED] Lamps and Nightlights, Solar Security Fixtures, Motion Sensors, Dimmer Switches, Smart Power Controllers for Audiovisual Equipment, Humidity Sensors). A list of Efficient Product Installation (EPI) eligible products

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1 with associated electrical and non-electrical savings is provided in the 2024 Existing
2 Residential Evaluation Report¹.

3
4 (b) The approach used by the Evaluator is not reliant on a cost effectiveness test and will not
5 change. Please refer to part (a) of this IR response. The purpose of cost effectiveness testing
6 is not intended to distinguish between electricity ratepayer portion of upgrades and other
7 funding sources.

¹ M12186, Exhibit 2, E1 2024 DSM Programs Evaluation Reports, Existing Residential Program Report, March 31, 2025, Table 25, page 73.

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Request IR-03:

Reference: E-2 Verification Report, Section I. Residential Behavioural Program (Efficiency Insights).

Preamble: In the Verification Report it determined that while the evaluation was well-constructed at a technical level it does not address the large sample sizes and extremely small effect nor adjust to consider practical effect size. It makes three recommendations at page 55.

(a) Does E1 agree with the findings of the Verification Report?

(b) Has E1 continued this program in the 2026 Extension Plan or modified it in any way? Please discuss quantitatively and provide an explanation if the program is continuing unchanged or if modified, explain what has changed and why.

Response IR-03:

(a) EfficiencyOne (E1) does not agree with Mr. Peach’s Recommendation SVR2024-Behaviour-5, where Mr. Peach recommends that the program be continued as a marketing and promotional program rather than a direct energy savings program. E1 also does not agree with Recommendation SVR2024-Behaviour-7. Notably, Mr. Peach determined that the evaluation of the Residential Behaviour program, which achieved 6.27 GWh of energy savings, was conducted correctly and followed the relevant protocols. E1 is considering Recommendation SVR2024-Behaviour-6 pending a decision on this matter by the Nova Scotia Energy Board (NSEB), where if the program does not continue as a direct energy savings program, a process evaluation would not be conducted.

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- 1 (b) E1 has proposed to continue the Residential Behaviour program in the 2026 DSM Extension
2 and has not modified it. Any modifications to the 2026 DSM Extension will be determined
3 by the NSEB’s decision on this matter. A decision of the NSEB to accept Mr. Peach's
4 recommendations to discontinue the Residential Behaviour program as a direct energy
5 savings initiative would have significant implications for E1’s program delivery and benefits
6 to customers. This would impact the performance targets proposed in the 2026 DSM
7 Extension for the 2023-2026 period, necessitating a complete redesign of the portfolio and
8 remodeling at the specified investment level.

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Request IR-04:

Reference: E-2 Verification Report, page 64.

The current methodology provides a picture and location of a leak, using a method of leak size measurement that is strictly avoided according to the Uniform Method Protocols. The result of this methodology produces estimates that are unverifiable in any way.

(a) Please explain how the methodology was established (i.e. the basis for it, including any jurisdictional cross-references) and whether it was modified in any way during the currency of the program.

(b) Is this program continuing as part of the 2026 DSM extension unchanged from 2024? Please explain and if modified, please discuss the changes qualitatively and quantitatively.

Response IR-04:

(a) The Uniform Methods Project (UMP)¹ states that “In many cases, a leak-down test is impractical, or critical users must have air at all times.” Recognizing this limitation and barrier of the UMP protocol, the methodology for both the program approach and evaluation approach are indicated below, which have been established by EfficiencyOne

¹ Benton, Nathanael; Patrick Burns, and Joel Zahlan, National Renewable Energy Laboratory, (2021). Chapter 22: Compressed Air Evaluation Protocol. The Uniform Methods Project: Methods for Determining Energy Efficiency Savings for Specific Measures, section 3.2.1 *Quantifying the Compressed-Air Leakage*, page 17.
<http://www.nrel.gov/docs/fy21osti/77820.pdf>

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1 (E1) and the Evaluator (Econoler) to allow industrial participants to identify leaks without
2 the need for a system leak-down test, as this is impractical for most facilities. A leak-down
3 test (defined in section 3.2.1 of UMP) requires that all production loads are turned off, the
4 compressor is shut off and the system is allowed to reach its normal operating system
5 pressure.

6
7 The Compressed Air Leak Audit Service methodology was established by E1 in 2013 after
8 consultation with leading national experts.² The methodology was developed and informed
9 by Compressed Air Best Practices³ and Compressed Air Challenge⁴ which encourage the
10 use of ultrasonic leak detectors. The approach was designed to ensure barriers to
11 participation were minimized (ease-of-entry program) for industrial customers by E1
12 offering a complimentary audit resulting in a low cost option, rather than expensive capital
13 investments. The Evaluator reviewed E1’s approach to the Compressed Air Leak Audit
14 Service approach in 2022. E1 uses a handheld advanced digital ultrasonic leak system
15 (Ultraprobe 3000) by UE systems that uses the gross defined method to detect turbulent
16 flows (high pressure to low pressure) via sound that pinpoints leak location and indicates a
17 decibel reading for the leak. In 2022, E1 also began utilizing the smart ultrasonic sensor
18 (OL1) that connects to a mobile device and is created by Prosaris, for some customers. This
19 device offers a different approach to leak detection (i.e., visual interface to translate the
20 detector's audio data into a visible source), but functions similarly to the Ultraprobe 3000.
21 For customers who invest in purchasing leak detection equipment, E1 began offering
22 training to their staff in 2022. Training dedicated staff ensures that ongoing leak detection
23 can be performed and reduces barriers for industrial sites that have visitor restrictions. The

² E1 consulted with Ron Marshall who is the owner of Marshall Compressed Air Consulting with over 30 years of experience in the industrial compressed air field. Ron Marshall is an active member of Compressed Air Challenge, an international expert trainer with experience with the United Nations Industrial Development Organization.

³ [About Us | Compressed Air Best Practices](#)

⁴ [About :: Compressed Air Challenge](#)

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1 following jurisdictions provide a similar approach as E1 for Compressed Air Leak Audits
2 utilizing ultrasonic leak detection:

- 3 • Minnesota utilizes ultrasonic leak detection and 0.19 kW/CFM for unknown
4 Compressor Efficiency⁵
- 5 • Wisconsin utilizes ultrasonic leak detection⁶
- 6 • Illinois utilizes ultrasonic leak detection and 0.19 kW/CFM⁷ for unknown Compressor
7 Efficiency
- 8 • Maryland utilizes ultrasonic leak detection and 0.19 kW/CFM⁸ for unknown Compressor
9 Efficiency (references Illinois Technical Reference Manual [TRM]).

10
11 For all compressed air projects, the savings calculation methodology is based on the
12 engineering calculations documented in Section 5.5.4 (1) of the 2024 DSM Measure
13 Assessment.⁹ These calculations were established based on a comprehensive review of
14 other Technical Reference Manuals by the Evaluator to validate the approach used by E1.

15 The evaluation approach for compressed air leak audit projects in 2024 is comprised of (1)
16 savings verification and (2) project file review combined with participant site visit and
17 follow-up phone interview for the two largest compressed air leak audit projects. For all
18 compressed air projects, the savings calculation methodology is based on the engineering
19 calculations documented in Section 5.5.4 (1) of the 2024 Measure Assessment and as noted
20 above is similar to those found in both the Wisconsin and Minnesota TRMs.

⁵ [MN TRM V4.2.pdf](#) page 573-575

⁶ [WI TRM 2025.pdf](#) page 130-133

⁷ [IL-TRM_2024_FINAL.pdf](#), page 882

⁸ [MD TRM v11.pdf](#) page 10-12

⁹ M12186, Exhibit 2, E1 2024 DSM Programs Evaluation Reports, March 31, 2025, 2024-2025 DSM Measure Assessment, page 205

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1 For the majority of compressed air projects claimed in 2024, a savings verification approach
2 was taken. For these projects, the Evaluator verified the savings by validating that the
3 correct input parameters and savings calculation methodology were used and applying a
4 previously established adjustment ratio to tracked savings for each file to determine gross
5 savings. Given the similarities between all compressed air projects and relative contribution
6 to Custom savings, the Evaluator has opted to conduct savings verification for these
7 projects annually using the methodology described above, and to complete comprehensive
8 impact evaluations for these projects at less frequent intervals (i.e., every 3-4 years). The
9 next comprehensive impact evaluation for compressed air leak audit projects is planned as
10 part of the 2025 evaluation.

11
12 In 2024, there were two large compressed air leak audit projects that did not go through
13 the savings verification approach described above in part because they were using a new
14 ultrasonic tool (Prosaris) which justified a more in-depth review. Given that both projects
15 were completed by the same participant and relied on the same type of documentation
16 and savings calculation methodology, the Evaluator considered an in-depth review of one
17 of these two projects to be appropriate. For this project, the Evaluator’s review included:

- 18 • A desktop review of the calculation sheets and leak detection platform
19 documentation;
- 20 • A phone interview with the E1 on-site energy manager who actively supported the
21 participant through the project to validate project parameters as well as the leak audit
22 and repair process; and
- 23 • An on-site demonstration to Econoler of the leak detection device performed by a
24 technician from the participating organization.

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1 This approach provided Econoler with sufficient information to verify that the leak
2 detection and repair process used by the participant was sound and reliable and that the
3 energy savings for these two projects were reasonable and accurate, including:

- 4 • Confirmation that the Prosaris ultrasonic leak detection equipment operates similarly
5 to known equipment which has been used in the program for multiple years;
- 6 • Confirmation that the protocols and best practices required by E1 were followed for
7 these two projects, including a complete survey of leaks before and after the leak
8 repairs are completed and repair of all identified leaks; and
- 9 • Confirmation that the savings calculations followed the approved methodology as
10 outlined in Section 5.5.4 (1) of the 2024 Measure Assessment.

11
12 (b) The Custom Program Component is continuing as part of the 2026 DSM Extension. The
13 Retrofit Service offered within the Custom Program Component offers various measures
14 (i.e., Compressed Air Leak Audits, Motors, HVAC, Refrigeration, Compressed Air Upgrades
15 and Industrial Processes). The compressed air leakage audit service, provides a low-cost
16 convenient option for industrial customers specifically, and has been successful at
17 removing barriers for these customers to participate in energy efficiency programs.

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Request IR-05:

Reference: E-2 Verification Report, page 71.

The Demand Response programs’ value has not been demonstrated, referring to the very small kW demand reduction at either the household or utility system level. Future evaluations should clarify the practical benefits of each program for households and the utility system, beyond being a learning experience. Specifically, detail how Residential DR and/or BNI DR responses impact utility operations for Nova Scotia Power. They appear much too weak to have a bottom-line effect. If these programs are merely pilots without significant demand reduction goals, explain their purpose and value. The Evaluator should justify the business case (bottom-line value) for these programs in the evaluation since, unlike measure-based programs, the weak demand reduction effect does not highlight its value.

- (a) Does E1 agree with the conclusion in the Verification Report that the DR Programs’ value “has not been demonstrated”? If not, please articulate the value.**
- (b) In light of the conclusion that the DR response is “much too weak to have a bottom-line effect”, does E1 agree that it should not invest increasing amounts into DR without a justified business case? If so, what is that business case? If E1 disagrees, please explain.**
- (c) Please compare the 2026 DR programs with the 2024 programs reviewed in the Verification Report (qualitatively and quantitatively).**
- (d) What steps is E1 taking to respond to the Recommendation regarding DR at p. 71?**

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Response IR-05:

(a) No. EfficiencyOne (E1) does not agree with Mr. Peach’s Recommendation SVR2024-Demand Response-13 that because there is “very small kW demand reduction” the value has not been demonstrated. E1 does not accept the premise of this recommendation, namely, that E1 does not already fully justify the business case of programs proposed to be implemented in DSM Plan filing. E1 comprehensively presents the evidence supporting a DSM plan that has been developed in accordance with the Board-approved Balanced Plan approach. E1’s demand response program does demonstrate through a ramp up delivery approach that there was capacity available to Nova Scotia Power Inc. (NS Power) when events were called, validating available capacity was achieved as a result of E1’s program. In 2023, the evaluation confirmed that E1 had achieved 2.4 MW of available capacity which was recommended by the verification consultant for acceptance. E1 would expect that the 8.1 MW of available capacity that the evaluator confirmed was achieved would also be accepted.

(b) Please refer to part (a) of this IR response.

(c)

Available Capacity (MW)

	2023 Approved	2023 Actual	2024 Approved	2024 Actual	2025 Approved	2025 Forecast	2026 DSM Extension as Filed
Residential	0.2	0.0	2.9	0.1	7.1	1.0	4.7
Business Non-Profit Institutional (BNI)	2.8	2.4	7.1	8.0	10.7	9.0	11.6
Total	3.0	2.4	10.0	8.1	17.9	10.0	16.3

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1 In 2024, E1 implemented three pathways for residential customers: domestic hot water
2 direct load control, smart thermostat direct load control, and electric vehicle (EV)
3 telematics and chargers. An additional pathway, battery control, has been added in the
4 2026 DSM Extension for the 2025/2026 season.

5
6 In 2024 for business, non-profit and institutional (BNI) customers, E1 continued with the
7 Commercial and Industrial Aggregator and introduced domestic hot water direct load
8 control, smart thermostat direct load control, and EV telematics and chargers through the
9 Small Business Energy Solutions and Business Energy Rebates program components. In
10 addition to the 2024 BNI programs, E1 is planning to introduce an additional pathway for
11 BNI customers for commercial batteries.

12
13 (d) Part of Mr. Peach’s Recommendation SVG2024-Demand Response-13 extends to NS
14 Power and their respective responsibilities for demand response events. As such NS
15 Power will need to be consulted before E1 provides a full response to the
16 recommendation in the next quarterly report to be filed August 25, 2025.

17
18 E1 proposes to continue the demand response programs in the 2026 DSM Extension and
19 has not modified them. Any modifications to the 2026 DSM Extension will be subject to
20 the Nova Scotia Energy Board’s (NSEB) decision on this matter. The NSEB’s acceptance of
21 Recommendation SVG24-G-1, where the Mr. Peach is not recommending acceptance of
22 the evaluated 2024 Demand Response available capacity (demand reduction) due to the
23 *“the practical size of the savings and demand reduction is not large enough to be of*
24 *practical value at either the household level or at the utility system level”* [emphasis
25 added] has significant implications for E1’s demand response program. For the 2026 DSM
26 Extension, this would result in the elimination of the demand response programs from
27 the 2026 DSM portfolio limiting any support E1 could provide to NS Power to manage the

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- 1 system peak. The removal of demand response would require a full redesign of the
- 2 portfolio and remodeling at the specified investment amount.

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1 **Request IR-06:**

2
3 **Reference: E-2 Verification Report, page 72.**

4
5 ***SVR24-G-1. The Savings Verification study recommends acceptance of the***
6 ***2024 evaluation estimates for energy savings and demand reduction except***
7 ***for four programs. These are the Residential Behavior program (6.270 GWh;***
8 ***no demand reduction), the Residential Demand Response program (no energy***
9 ***savings, 0.057 MW), the BNI Demand Response program, (no energy savings,***
10 ***8.034 MW) and the compressed air part of the BNI Custom Incentive Program***
11 ***(Custom).***

12
13 **If the recommendations of the Savings Verification Study are accepted by the Board:**

14
15 **(a) Please restate E1’s energy and demand savings for 2024, for the cumulative 2023-2024**
16 **period and forecasted to end of 2025.**

17
18 **(b) Please discuss and restate how, if at all, this affects E1’s performance targets.**

19
20 **(c) Please restate the overall unit cost per KW and KWh saved for 2024 and for the**
21 **cumulative 2023-2024 period.**

22
23 **(d) Does this affect E1’s approach to its program delivery in 2025 and in its applied-for 2026**
24 **Plan? Please explain why or why not and provide specific examples if the approach is**
25 **changed.**

26
27 **Response IR-06:**

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(a) EfficiencyOne’s (E1) energy and demand savings with the removal of the Residential Behavior program component (6.270 GWh; no demand reduction), the Residential Demand Response program component (no energy savings, 0.057 MW), the BNI Demand Response program component, (no energy savings, 8.034 MW) and the compressed air leakage audits in the Custom program component (E1 has assumed the two 2024 large compressed air leak audit projects referenced in the 2024 Savings Verification Review report which total 8.789 GWh and 1.01 MW) are presented in Table 1, Table 2, and Table 3, below.

Table 1: 2024 Evaluation Period with Verifier Suggested Adjustment

	2024 Evaluated Savings ¹	Verifier Suggested Adjustments	2024 Adjusted Savings
Net Electrical Energy Savings (GWh)	172.8	-15.1	157.7
Net Peak Demand Savings (MW)	30.7	-1.0	29.7
Net Available Capacity (MW)	8.1	-8.1	0.0

Table 2: Cumulative 2023-2024 period

	Evaluated 2023 Savings ²	2024 Adjusted Savings	Total 2023-2024 Savings
Net Electrical Energy Savings (GWh)	131.6	157.7	289.3
Net Peak Demand Savings (MW)	27.6	29.7	57.3
Net Available Capacity (MW)	2.4	0	2.4

Table 3: 2023-2025 (with adjusted 2025 forecast)

	Evaluated 2023 Savings ³	2024 Adjusted Savings	2025 Forecast Savings with Adjustments ⁴	2023-2025 Savings
Net Electrical Energy Savings (GWh)	131.6	157.7	108.6	397.9
Net Peak Demand Savings (MW)	27.6	29.7	17.2	74.5
Net Available Capacity (MW)	2.4	0	0	2.4

¹ M12186, Exhibit 2, 2024 DSM Programs Evaluation Reports, Overall Executive Summary Report, March 31, 2025, Table 5 and 6, pages 16-17.

² M11630, Exhibit 2, 2023 DSM Programs Evaluation Reports, Overall Executive Summary Report, March 31, 2024, Table 5 and 6, pages 16-17.

³ Ibid.

⁴ M12186, Exhibit 1, 2024 DSM Annual Progress Report, March 31, 2025, page 18, Table 5, adjusted to remove 15 GWh for Residential Behaviour, 10 MW Available Capacity for Demand Response and 5.1 GWh for compressed air leak projects that were used in the 2025 forecast that would no longer be applicable if the Savings Verification Review report recommendations were accepted.

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- (b) E1’s results for 2023 to 2025 have been restated in Table 4, below. These reflect E1’s 2023-2024 evaluated savings and the 2025 forecast reflecting no adjustments; the 2023-2025 savings with Mr. Peach’s recommended adjustments; and the 2023-2025 DSM Plan approved performance targets. Mr. Peach’s recommendations do not impact the dedicated low income and equity programs.

Table 4: Restated 2023-2025 results without and with Mr. Peach’s adjustments as compared to the Approved 2023-2025 Performance Targets

	2023-2025 Savings Without Adjustments	2023-2025 Savings With Adjustments	2023- 2025 UARB Approved Target	Variance to Approved Target without Adjustment	Variance to Approved Target with Adjustment
Net Electrical Energy Savings (GWh)	433.0	397.9	412.7	105%	96%
Net Peak Demand Savings (MW)	75.5	74.5	78.8	96%	95%
Net Available Capacity (MW)	10.0	2.4	17.9	56%	13%

If the recommendations of the Savings Verification Review report are accepted by the Nova Scotia Energy Board (NSEB), it would impact the performance targets proposed in the 2026 DSM Extension for the 2023-2026 period.

- (c) The revised overall unit cost per kWh for 2024 and for the cumulative 2023-2024 period, assuming NSEB’s acceptance of Mr. Peach’s recommendations in the Savings Verification Review report, are presented in Table 5, below.

M12249 –2024 Savings Verification Review Report, In the Matter of EfficiencyOne’s (E1)
Application for Approval of the 2026 DSM Extension

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Table 5: Energy Efficiency Overall Unit Cost In 2023, 2024 and the 2023-2024 Cumulative Period

2023 First-Year Unit Cost		2024 First-Year Unit Cost			2023-2024 Cumulative First-Year Unit Cost		
2023 Plan as Approved (\$/kWh)	2023 Results (\$/kWh)	2024 Plan as Approved (\$/kWh)	2024 Results (\$/kWh)	2024 Revised Results Assuming Savings Verification Review Recommendations are Accepted by the NSEB (\$/kWh)	2023-2024 Plan as Approved (\$/kWh)	2023-2024 Results (\$/kWh)	2023-2024 Revised Results Assuming Savings Verification Review Recommendations are Accepted by the NSEB (\$/kWh)
0.43	0.33	0.38	0.36	0.40	0.40	0.35	0.37

(d) No this does not affect the delivery of E1’s 2025 programs, since E1 is already half way through the year and does not expect a decision from the NSEB until the fall of 2025. The NSEB’s acceptance of Mr. Peach’s recommendations to discontinue the Residential Behaviour program component as a direct energy savings program, not accept the compressed air audit savings, and the recommendation to not accept the Demand Response program available capacity has significant implications on the performance targets proposed in the 2026 DSM Extension for the 2023-2026 period, which would require a full redesign of the portfolio and remodelling at the specified investment amount.

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Request IR-07:

Reference: E-2 Verification Report Program-Specific Recommendations pages 73-75.

Please discuss qualitatively and quantitatively, what actions E1 is taking to reflect and respond to each of these recommendations:

(a) in 2025; and

(b) in respect of E1’s proposed 2026 Plan.

Response IR-07:

(a) For Program Specific Recommendations, SVR2024-Behaviour-5, SVR2024-Behaviour-6 and SVR2024-Behaviour-7, please refer to EfficiencyOne’s (E1) IR response to IG-03.

For Program Specific Recommendations, SVR2024-BNI Efficient Products-8, please refer to E1’s IR response to SBA-IR-05 (a). E1 is considering Recommendation SVR2024-BNI Efficient Products-9, however, E1 will need to assess the resources required to complete the document review or commissioning of a lighting study as compared to the total energy savings associated with these measures to ensure it provides appropriate value to ratepayers.

For Program Specific Recommendations, SVR2024-Compressed Air-10, please refer to E1’s IR Response to IG IR-04. E1 agrees with Recommendation SVR2024-Compressed Air-11 and will include in the 2025 evaluation. Recommendation SVR2024-Compressed Air-12, E1

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- 1 requires clarification from Mr. Peach and has requested additional information related to
2 the clients who have not provided site access. Please refer to E1’s IR-14 (a) to Mr. Peach.
3
4 For Program Specific Recommendations SVR2024-Demand Response-13, please refer to
5 E1’s IR Response to IG-05. E1 agrees with Recommendation SVR2024-Demand Response-
6 14 and will include in the 2025 evaluation.
7
8 (b) Please refer to part (a) of this IR Response.