

NOVA SCOTIA ENERGY BOARD**IN THE MATTER OF: THE PUBLIC UTILITIES ACT****- and -**

IN THE MATTER OF: AN APPLICATION by **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.

NON-CONFIDENTIAL INFORMATION REQUESTS

1 **To:** **EfficiencyOne**
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McInnes Cooper
By email: james.gogan@mcinnescooper.com

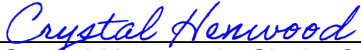
From: Synapse Energy Economics, Inc.
Board Counsel Consultant

Responses Due: **Wednesday, June 25, 2025**

Copies: 1 electronic copy – pdf searchable
4 hard copies

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Issued at Halifax, Nova Scotia, this 4th day of June, 2025



Crystal Henwood, Clerk of the Board

Request IR-1: Page 1 of the Evidence of EfficiencyOne ("the Evidence") states, "2023 and 2024 together saw energy savings of 304.3 GWh and demand savings of 58.3 GWh."

- a. Should the demand savings be GW?
- b. Does the demand savings include the demand savings from energy efficiency measures and the available capacity from demand response measures?

Request IR-2: Please refer to Table 1: 2023-2026 DSM Extension Insights on page 3 of 25 of the Evidence. Please provide a new version of this table with the following columns: 1) Insights, 2) 2023 Actuals, 3) 2024 Actuals, 4) 2025 Forecast, 5) 2026 Plan Extension, and 6) 2023-2026 Total (summing the prior four columns).

Request IR-3: Pages 6 and 7 of the Evidence states, "To implement this commitment, commencing with the 2025 forecast as reported in the 2024 Annual Progress Report, E1 will provide current year forecast by rate class in quarterly reports and Plan-period forecast by rate class in the Annual Progress Report, and enhanced discussion on variances to the approved Plan and rate class spending to date in both quarterly and annual reports."

- a. Please provide the 2024 Annual Progress Report.
- b. Please also provide the 2023 Annual Progress Report.

Request IR-4: Page 8 of the Evidence has a section titled DSMAG ENGAGEMENT which states, "The DSMAG consultation timeline in relation to the 2026 DSM Extension has been condensed as a result of the legislation being first introduced in February 2025 and brought into force March 26, 2025. Despite this shortened consultation period, E1 has engaged with the DSMAG in advance of filing in the following ways:

- In March and April 2025, E1 engaged in two rounds of one-on-one meetings to discuss the 2026 DSM Extension (first with key DSMAG members, and then key DSMAG members joined by their consultants); and
 - On April 22, 2025, E1 hosted a DSMAG Technical Briefing for the 2026 DSM Extension."
- a. Please provide the dates of the one-on-one meetings and a list of the stakeholders who participated each meeting.
 - b. Please provide the agenda, presentation, and any other materials referenced during the Technical Briefing.

Request IR-5: Page 15 of the Evidence states, "In its decision approving the 2023-2025 DSM Plan, the NSUARB (as it then was) made note of the fact that updates to NS Power Integrated Resource Planning process will have an impact on the avoided cost calculations used by E1 in relation to its DSM planning. In their decision, they directed that E1 update its avoided cost calculation to reflect the most updated Integrated Resource Plan (IRP) information:

The Board understands that recently legislated climate change reduction goals are not addressed in IRP Reference Plan 2.0C, nor are they fully addressed in Reference

1 *Plan 3.1C. The Board agrees that these factors need to be incorporated in updated*
2 *avoided costs; however, there is no immediate urgency and directs that this issue be*
3 *tasked to the DSMAG to be resolved in time for use during preparation of the 2026-*
4 *2028 DSM Plan.*
5

6 In keeping with this directive, E1 has incorporated the latest IRP results from the 2022 IRP
7 evergreen process into its avoided cost calculation for the 2026 DSM Extension. Specifically, E1
8 has used the avoided costs provided by NS Power from the 2022 Evergreen IRP process
9 (provided to the DSMAG in August 2024). One notable difference between the avoided costs
10 used for the 2023-2025 DSM Plan and the calculation used for the 2026 DSM Extension is that
11 the avoided costs of carbon are now embedded in the avoided costs of energy for the 2026 DSM
12 year. The avoided cost of carbon has not been provided by NS Power as a separate input.”

- 13 a. Please provide the avoided cost values from the 2022 Evergreen IRP.
- 14 b. Please provide a comparison of the avoided costs used in the 2023-2025 Plan with the
15 avoided costs used in the 2026 Plan Extension. Please ensure that the comparison
16 includes the avoided cost of carbon applied in the 2023-2025 Plan. Please show the
17 breakout of the avoided cost of carbon and the other avoided energy and capacity costs
18 for 2023-2025.
- 19 c. Please confirm that the source of the avoided costs used to calculate Lifetime Benefits
20 (TRC and PAC), TRC ratios, and PAC ratios provided for 2023, 2024, and 2025 in the 2026
21 Plan Extension is not the avoided costs from the 2022 Evergreen IRP and is the avoided
22 costs from the prior IRP.
- 23 d. Did the 2022 Evergreen IRP provide an avoided transmission and distribution capacity
24 value for constrained parts of the grid, as provided in previous years? If not, why not?
25

26 **Request IR-6:** Page 17 of the Evidence states, “Starting in 2025, the program component transitioned
27 to year-round set rebates on all qualifying products in place of seasonal campaign due to the
28 adoption of a LED baseline in early 2025. E1 discontinued point-of sale rebates on LED lamps and
29 most LED lighting fixtures at the end of 2024 due to the change in baseline.” Please also see Table 4:
30 Program Component Comparison of 2025 Forecast and 2026 DSM Extension Year on page 20 of the
31 Evidence which states, “Further reduction in energy savings and increase in unit cost is expected as a
32 result of the removal of LED lighting from the program component. Due to the timing of data
33 submission from retailers there remains LED lighting savings from the 2024 fall campaign that will be
34 claimed in 2025. This has been factored into the 2025 forecast and will not occur in 2026.”

- 35 a. Please provide the Investment, Lifetime Benefits (TRC), Lifetime Benefits (PAC), First
36 Year Energy Savings, Lifetime Energy Savings, Peak EE Demand Savings, Total Resource
37 Cost Test (TRC), and Program Administrator Cost Test (PAC) for lighting measures in the
38 Instant Savings program component over time. Please include 2023 Actuals, 2024
39 Actuals, 2025 Forecast, and 2026 Plan Extension.
- 40 b. Please provide the Investment, Lifetime Benefits (TRC), Lifetime Benefits (PAC), First
41 Year Energy Savings, Lifetime Energy Savings, Peak EE Demand Savings, Total Resource
42 Cost Test (TRC), and Program Administrator Cost Test (PAC) for lighting measures in the

Efficiency Product Installation program component over time. Please include 2023 Actuals, 2024 Actuals, 2025 Forecast, and 2026 Plan Extension.

- c. Please identify other program components affected by the phase out of lighting measures and provide the Investment, Lifetime Benefits (TRC), Lifetime Benefits (PAC), First Year Energy Savings, Lifetime Energy Savings, Peak EE Demand Savings, Total Resource Cost Test (TRC), and Program Administrator Cost Test (PAC) for lighting measures in each affected program component. Please include 2023 Actuals, 2024 Actuals, 2025 Forecast, and 2026 Plan Extension.

Request IR-7: Page 21 of the Evidence states, “Additionally, the commercial direct install offer is anticipated to grow in 2026 which has a higher unit cost compared to the main SBES stream.”

- a. What is the “commercial direct install offer”?
- b. What is the “main SBES stream”?
- c. Why does the commercial direct install offer have a higher unit cost as compared to the main SBES stream?

Request IR-8: Please refer to Table 5: Program Savings & Investments on page 23 of the Evidence. Please provide an Excel workbook that reproduces Table 5 in five separate worksheets, with one worksheet for each of the following:

- a. 2023 Actuals
- b. 2024 Actuals
- c. 2025 Forecast
- d. 2026 Plan Extension
- e. 2023-2026 Total (sum of the previous four tables)

In each of the five worksheets, please keep all the row headings and column headings the same and in the same order as in Table 5. For example, if a program component was active in 2023 and is discontinued in 2026, please keep the row for the program component in both tables and include values of zero for the year(s) in which it is not active.

Request IR-9: Please refer to Table 5: 2026 Program Savings and Investment on page 23 of the Evidence. Footnote f states, “Reflects planned participation by low-income & equity customers. Numbers are a subset of Existing Residential, BNI Efficient Product Rebates, Custom Incentives, and Direct Installation.”

- a. Please provide a table showing the breakout of the Residential Low-Income & Equity subtotal by program component.
- b. Please provide a table showing the breakout of the BNI Low-Income & Equity subtotal by program component.

Request IR-10: Please refer to Table 5: 2026 Program Savings and Investment on page 23 of the Evidence.

- a. Under the Demand Response (DR) Program subheading, Investment, Available Capacity, TRC, and PAC values are provided separately for the Residential Demand Response and BNI Demand Response program components. Lifetime Benefits are only provided for DR Program Total. Please provide an updated version of Table 5 including the breakout of Lifetime Benefits for the Residential Demand Response and BNI Demand Response program components.
- b. Please confirm that the Lifetime Benefits are the net present value of the total benefits associated with the TRC.

Request IR-11: Page 24 of the Evidence states, "Given that the Extension application was not known at the time of the 2023-2025 DSM Plan Board decision, and having regard to the legislative intention of the extension, E1 respectfully proposes that certain directives be dealt with, and included, in the 2027-2031 DSM Plan application, including:

(e) to provide specific justification, on an individual basis, for each measure that fails cost effectiveness testing in future resource plan applications; and

(f) to include payback information in its measure level tables in future applications for the approval of resource plans and provide additional information about the other factors that E1 has considered in concluding that the proposed incentive level for the measure is appropriate for measures where the payback period is three years or less."

- a. Please provide a list of measures by program component in the 2026 Plan Extension that fail cost-effectiveness testing (with a TRC of less than 1.0).
- b. Please provide the Investment, Lifetime Benefits (TRC), Lifetime Benefits (PAC), First Year Energy Savings, Lifetime Energy Savings, Peak EE Demand Savings, Available Capacity, Total Resource Cost Test (TRC), Program Administrator Cost Test (PAC), and payback period for those measures that fail cost-effectiveness testing, by measure, by program component, and in total.
- c. Please provide additional information about the other factors that E1 has considered in concluding that this level of investment in measures that fail cost-effectiveness testing is reasonable.
- d. Please provide a list of measures by program component in the 2026 Plan Extension that have a payback of 3 years or less.
- e. Please provide the Investment, Lifetime Benefits (TRC), Lifetime Benefits (PAC), First Year Energy Savings, Lifetime Energy Savings, Peak EE Demand Savings, Available Capacity, Total Resource Cost Test (TRC), Program Administrator Cost Test (PAC), and payback period for measures with a payback of 3 years or less, by measure, by program component, and in total.
- f. Please provide additional information about the other factors that E1 has considered in concluding that the proposed incentive levels for the measures that have a payback of 3 years or less and level of investment in these measures are reasonable.

Request IR-12: Please refer to Table 1: Approved 2023-2025 Plan and 2023 and 2024 Results on Page 4 of Appendix A.

- a. Please provide, in Excel, a breakout of Table 1 into three tables: one for energy efficiency, one for demand response, and one for energy efficiency and demand response combined. All three tables should include the following (please specify units):
 - add a column on the right with a calculation of the Lifetime Benefits (TRC)/Investment
 - include the 2025 forecast in the 2025 results row
 - update the 2023-2025 results row to include the 2025 forecast
 - update the % Progress row to include the 2025 forecast
 - add 2023-2025 average rows to the Plan as Approved and Results section with averages calculated over the three years
- b. For the table that focuses on energy efficiency as requested in part (a) of this question, please add columns on the right with the following:
 - Investment/First-Year Energy Savings
 - Investment/Lifetime Energy Savings
 - First-Year CO₂e Savings (kt)
 - Lifetime CO₂e Savings (kt)
 - Investment/Lifetime CO₂e Savings
- c. For the table that focuses on demand response as requested in part (a) of this question, please add columns on the right with the following:
 - Investment/Available Capacity
 - First-Year CO₂e Savings (kt)
 - Lifetime CO₂e Savings (kt)
 - Investment/Lifetime CO₂e Savings
- d. Do the 2023 and 2024 actuals and 2025 forecasted Investment/First-Year Energy Savings, Investment/Lifetime Energy Savings, Investment/Available Capacity, and Lifetime Benefits (TRC)/Investment differ from the planned values? If so, for each value that differs, please explain the cause of the difference.
- e. If there were differences between these actuals or forecasts versus planned values for EE, were the actuals and forecasted values considered and accounted for in the development of EE portion of the 2026 Plan Extension? If so, please explain how that difference was considered and accounted for in the 2026 Plan Extension.
- f. If there were differences between these actuals or forecasts versus planned values for DR, were the actuals and forecasted values considered and accounted for in the development of the DR portion of 2026 Plan Extension? If so, please explain how that difference was considered and accounted for in the 2026 Plan Extension.
- g. By dividing the Investment by the First-Year Energy Savings, the actual values appear to be lower than the plan in 2023 and 2024 and significantly lower than the 2026 Plan Extension. Why is the Investment/First-Year Energy Savings for the 2026 Plan Extension

so much higher than the actual values from 2023 and 2024? Do the 2026 Plan Extension assumptions correct for the historical over-projections of Investment/First-Year Energy Savings in the 2023 and 2024 plans?

- h. By dividing the Investment by the Lifetime Energy Savings, the actual values appear to be lower than the plan in 2023 and 2024 and significantly lower than the 2026 Plan Extension. Why is the Investment/Lifetime Energy Savings for the 2026 Plan Extension so much higher than the actual values from 2023 and 2024? Do the 2026 Plan Extension assumptions correct for the historical over-projections of Investment/Lifetime Energy Savings in the 2023 and 2024 plans?

Request IR-13: Page 5 of Appendix A states, “For demand response, E1 has seen a shortfall in its 2023 and 2024 available capacity targets, attributable to challenges in launching a new DSM resource including customer awareness, customer retention from one season to the next, and quality concerns with domestic hot water direct load controllers. After completion of the third and final Demand Response season within the 2023-2025 Plan (i.e., December 2024-February 2025), E1 expects to fall short of the Performance Target of 17.9 MW. Initial indications for the 2024/25 season (December 2024-February 2025) show that there was lower adoption of certain demand response devices, particularly batteries, than originally modelled in the 2023-2025 DSM Plan.”

- a. Please describe the challenges with customer awareness in more detail.
- b. Please describe the challenges with customer retention from one season to the next in more detail.
- c. Please describe the challenges with quality concerns with domestic hot water direct load controllers in more detail.
- d. Please list the demand response devices with lower adoption than projected, by measure, by program component, and in total.
- e. Please provide a table comparing planned 2023-2025 adoption to 2023 Actual, 2024 Actual, and 2025 Forecast adoption, by measure, by program component, and in total.
- f. Please add to this table the breakout of the proposed participation in the 2026 Plan Extension for DR, by measure, by program component, and in total.

Request IR-14: Page 7 of Appendix A states, “There will be minimal savings from Green Heat in 2025. E1 will close Green Heat in 2025 due to the continuing decline in savings and participation over the last three years. The participation decline in Green Heat is attributed to participants choosing Home Energy Assessment over Green Heat due to the higher incentives offered by Greener Homes for heat pump measures. In addition, the 2024 DSM evaluation included a billing analysis in Green Heat for those participants that are fully electrically heated and those that are mainly electrically heated (i.e., they have a secondary heating system) to update unitary savings for heat pumps and wood/pellet burning equipment. The billing analysis resulted in significantly lower unitary savings for these measures for both types of participants.”

- a. Please provide a comparison of the Investment, Lifetime Benefits (TRC), Lifetime Benefits (PAC), TRC, and PAC for heat pump measures in the Green Heat program

1 component to the heat pump measures in the Home Energy Assessment program
2 component over time. Please include 2023 Actuals, 2024 Actuals, 2025 Forecast, and
3 2026 Plan Extension.

- 4 b. Please provide the 2024 DSM evaluation and billing analysis of the Green Heat program
5 component.
- 6 c. Is it reasonable to conclude that a billing analysis of Home Energy Assessment for those
7 participants that are fully electrically heated and those that are mainly electrically
8 heated (i.e., they have a secondary heating system) would also result in an update to
9 the unitary savings for heat pumps and wood/pellet burning equipment? If not, please
10 explain why.
- 11 d. Has a similar evaluation been conducted for the Home Energy Assessment program
12 component? If so, did the evaluation find similar results? If so, does the 2026 Plan
13 Extension reflect the results of this evaluation?
- 14 e. If a similar evaluation has not been conducted for the Home Energy Assessment
15 program component, will a similar evaluation be conducted for this program
16 component? If so, when? If not, why not?
17

18 **Request IR-15:** Page 7 of Appendix A states, "In 2025, the Custom program component is expected to
19 achieve results that align with 2024 as the New Construction service continues to see growth in
20 terms of customer participation. As compared to 2024, Custom will see an increase in unit cost. This
21 is reflective of the mix of measures generating the savings. For example, in Custom, the New
22 Construction service has a higher unit cost than Retrofit and New Construction and is expected to
23 generate a significant portion of 2025 savings." Please explain this statement in more detail.

- 24 a. Why aren't the Custom program component results growing, given that the
25 performance of the New Construction service continues to see growth in customer
26 participation?
- 27 b. Why is New Construction service customer participation growing?
28

29 **Request IR-16:** Page 9 of Appendix A states, "As in the 2023-2025 approved Plan, E1 also followed the
30 Balanced Plan principles from the Standardized Filing Framework that articulates that DSM Plans
31 must balance multiple aspects of DSM for the benefit of customers as follows:

- 32 • short- and long-term energy and capacity avoidance;
33 • program delivery costs;
34 • avoided energy and capacity investments;
35 • non-electric and non-energy benefits;
36 • diversity of program delivery;
37 • business relationships and maintenance of market presence;
38 • access to programs by all market sectors and rate classes by addressing
39 barriers to participation; and
40 • rate impacts."

1 E1 circulated its *2026-2030 Demand Side Management Resource Plan: Round 1 Model Input*
2 *Assumptions and Results* to the Demand Side Management Advisory Group (DSMAG) in July 2024.
3 Appendix F of this document described E1's proposed updates to the Standardized Filing
4 Framework.

- 5 a. Did E1 apply any of these proposed updates to the 2026 Plan Extension?
6 b. If so, which ones?
7 c. If E1 did not apply these updates, please explain why not.
8

9 **Request IR-17:** Pages 9 and 10 of Appendix A state, "In the approved 2023-2025 Plan, the following
10 design objectives were applied, influenced by the Balanced Plan approach:

- 11 • investment in low-income and equity: 17% to 22% of total energy efficiency
12 portfolio investment
13 • investment split: 50% Residential and 50% BNI programs; and
14 • energy savings split: 40% Residential and 60% BNI programs.

15 In the 2026 DSM Extension, the following design objectives were applied:

- 16 • investment in low-income and equity: 15% to 20% of total energy efficiency
17 portfolio investment;
18 • investment split: 50% Residential and 50% BNI programs; and
19 • energy savings split: 40% Residential and 60% BNI programs."

20 Please also refer to page 22 of the Evidence which states, "For example, in 2026, where the energy
21 efficiency investment represents a 51%/49% split between the Residential and BNI sectors, the
22 energy savings split is 35%/65% respectively."

- 23 a. Does E1 assume that the energy savings split does not include demand savings? If not,
24 why not?
25 b. Does E1 assert that a 51%/49% investment split between the Residential and BNI
26 sectors and a 35%/65% energy savings split between the Residential and BNI sectors
27 (considering energy efficiency program components only) meets the design objectives?
28 Please explain why.
29 c. Did E1 prioritize meeting the investment split design objective over the energy savings
30 split design objective? If so, why?
31 d. Please discuss if investments are funded solely by ratepayers or if investments include
32 funding from any other source.
33

34 **Request IR-18:** Page 10 of Appendix A states, "E1 modified the investment in low-income and equity
35 communities objective for the 2026 DSM Extension as compared to the approved 2023-2025 Plan to
36 reflect the updated Statistics Canada Census Profile, 2021 Census of Population for Nova Scotia
37 prevalence of low-income in Nova Scotia (%) based on the Low- Income Measure, After Tax (LIM-
38 AT). The updated 2021 Census identified a low-income prevalence of 14.9%, a change from the
39 2023-2025 Plan where E1 used a 17.2% low-income prevalence from 2016 Census Profile data (the

1 most recently available Census data at the time of Plan development).” How did E1 use this
2 information to modify its investment in low-income and equity communities?

3
4 **Request IR-19:** Pages 22 and 23 of Appendix A states, “E1 will incorporate a streamlined offering for
5 residential customers seeking heating system upgrades exclusively, with the ending of the Green
6 Heat program component. This may include remote energy assessments with heating system
7 upgrade recommendation reports.”

- 8 a. Please describe this streamlined offering in more detail.
9 b. Please confirm if remote energy assessments with heating system upgrade
10 recommendation reports will be a component of this streamlined offering.
11

12 **Request IR-20:** Page 26 of Appendix A states, “The Home Energy Assessment program component does
13 not pass TRC. This is attributable to avoided costs updated in the 2026 DSM Extension, lower energy
14 savings for Home Energy Assessment as a result of the 2024 evaluation billing analysis, and higher
15 incremental costs. Home Energy Assessment, compared to Affordable Single-Family Homes and
16 Mi’kmaw Home Energy Efficiency Project does not assume government funding top ups in 2026,
17 assumes larger heating systems being installed based on recent trends which have a higher cost, and
18 a lower net-to-gross ratio, all of which contribute to the lower TRC result.” Why do larger heating
19 systems have a lower net-to-gross-ratio?
20

21 **Request IR-21:** Page 28 of Appendix A states, “In the 2026 DSM Extension, E1 updated its assumptions
22 on how it estimates low-income and equity impacts, provided in Attachment 2.”

- 23 a. Was the update to include 2024 actuals in the attribution factors, or were there other
24 updates?
25 b. If there were other updates, please identify the updates.
26

27 **Request IR-22:** Page 36 of Appendix A states, “Eligibility was extended to support Mi’kmaw
28 homeowners in 2024, in addition to Band owned homes, in Mi’kmaw communities.”

- 29 a. To what extent has the inclusion of homeowners increased demand?
30 b. Please explain if and how the proposed 2026 Plan Extension accommodates this
31 increased demand.
32

33 **Request IR-23:** Page 42 of Appendix A states, “Note: E1’s Performance Target for demand response is
34 defined as the available capacity E1 achieves during NS Power’s utility peak period. E1’s 2026 target
35 for demand response would be achieved during the December 2025 – February 2026 utility peak
36 period. This differs from E1’s energy efficiency savings targets which are achieved during the full
37 calendar year period of January-December 2026.”

- 38 a. Does the term ‘energy efficiency savings targets’ mean Demand Savings in GW? If not,
39 please explain the meaning of this term in this context.
40 b. Please describe the difference between the definitions of Demand Savings for EE and
41 Available Capacity for DR.

Request IR-24: Table 20: 2026 Summary of the Residential Demand Response Program Component and Table 21: 2026 Summary of the BNI Demand Response Program Component on pages 43 and 44 of Appendix A respectively include New Capacity and Available Capacity demand savings. Footnote a for New Capacity at the bottom of page 43 states, “2026 New Capacity (MW) is based on E1’s 2025 Residential DR forecast.” Footnote a for New Capacity at the bottom of page 44 states, “2026 New Capacity (MW) is based on E1’s 2025 BNI DR forecast.”

- a. Please define the terms New Capacity and Available Capacity.
- b. Please describe how the New Capacity demand savings for Residential and BNI relate to E1’s 2025 Residential and BNI DR forecasts. Are the demand savings the same for Residential? Are the demand savings the same for BNI? If not, why not?

Request IR-25: Page 44 of Appendix A states, “Enrollments will begin in 2025/2026.” Please identify the month and year in which enrollments are proposed to begin.

Request IR-26: Page 44 of Appendix A states, “The 2026 marketing strategy is data-driven using AMI data to identify high potential customers.” Page 29 of Appendix A states, “2026 marketing strategies will also be data-driven. Leveraging data analytics tools including segmentation data, website user behaviour insights, and advanced metering infrastructure (AMI) data, 2026 marketing campaigns will include personalized messaging for differentiated customer types and potential customers. For the Residential and BNI sector, this may include personalized email messaging, customized website offers, geo-targeted emails based on customer proximity to retailers, automated co-program marketing techniques (e.g., Instant Savings smart thermostat re-promoted to enroll in E1’s Demand Response program), and targeted BNI email campaigns based on electricity use patterns using AMI data.”

- a. How will E1 leverage data analytics tools including segmentation data, website user behaviour insights, and advanced metering infrastructure (AMI) data?
- b. How will E1’s 2026 marketing campaigns include personalized messaging for differentiated customer types and potential customers?
- c. Please describe how E1 proposes to use AMI data to identify high potential customers.
- d. Why doesn’t E1 propose to use AMI data to identify high potential Residential customers as well (AMI data is not mentioned in the description of marketing strategies for Residential programs on page 43 of Appendix A)?

Request IR-27: Page 45 of Appendix A states, “Investment for Development and Research has increased in 2026 compared to 2023-2025 to support the continuation of E1’s heat pump water heater market transformation pilot, launched in 2024.”

- a. When will results from this pilot be available?
- b. How does E1 intend to measure the success of this pilot?

Request IR-28: Page 45 of Appendix A states, “Investment in this category has been increased in 2026 as compared to 2023-2025 to support the development of the 2027-2031 DSM Resource Plan and initiation of an updated Potential Study to inform the new Independent Energy System Operator’s first IRP.”

- a. Please break out the proposed \$3.0 million budget for the 2026 Plan Extension by the proposed 2026 activities, including: development of the 2027-2031 DSM Resource Plan; engagement with the DSMAG on development of the 2027-2031 DSM Resource Plan; participate and contribute to the integrated resource planning process under the new Independent Energy System Operator as under Bill 404, including an updated Potential Study; 2026 DSM Extension reporting activities including Quarterly Reports, Evaluation Reports, Annual Progress Report, Audited Financial Statements; and Respond to directives from the 2026 DSM Extension regulatory process.
- b. Please provide a table comparing the proposed investment in this category by activity for the 2026 Plan Extension to 2023 Actuals, 2024 Actuals, and the 2025 Forecast, also broken out by activity.

Request IR-29: Page 47 of Appendix A states, “E1 is deemed to be in substantial compliance with the approved 2023-2026 Performance Targets if ninety percent (90%) or greater achievement is reached on each of the four Performance Targets at the end of the four-year Plan period (2023-2026).” Pages 4 to 5 of Appendix A state, “Savings achieved in 2023 and 2024 mark continued progress towards the achievement of E1’s approved Performance Targets for the 2023-2025 Plan. As outlined in Table 1 above, at the end of 2024, E1 has achieved the following results towards its Performance Targets:

- 74% of the energy savings target;
- 74% of the peak demand savings target;
- 45% of the available capacity target; and
- 55% of the low-income and equity target.”

Is E1 currently at risk of not achieving any of the 2023-2026 Performance Targets? If so, which one(s)? For each one, please explain why.

Request IR-30: Please refer to Table 25: 2026 Low-income and Equity Performance Indicators - Non-1 Targeted Program Components on Page 50 of Appendix A. Please also see Table 2: 2026 DSM Extension - Low-Income & Equity: Assumptions & Calculations for Incidental Impacts for Non-Targeted Program Components on page 4 of Attachment 2 of Appendix A, which states the following for the Residential Behavior program component: “Estimates were scaled based on the reported 2024 incidental low-income & equity impacts. In 2024, low-income & equity participation in RB represented:

- 14.9% of energy savings
- 0% of demand savings
- 14.9% of expenditures”

- a. Please provide the actuals broken out for 2023 versus 2024 by program component.

- 1 b. Please explain why 2023 actuals are not included in the scaling factors for the
2 Residential Behavior program component.
3 c. For program components in which the actuals are not relatively consistent from 2023 to
4 2024, please discuss why E1 decided to use an average of these two years as the scaling
5 factor.
6

7 **Request IR-31:** Please refer to Table 3: DSM Reporting: Incidental Low-Income Impacts for Non-
8 Targeted Program Components on pages 5 to 7 of Attachment 2 of Appendix A. The text in the
9 column titled 'Calculation for DSM Reporting' refers to savings throughout.

- 10 a. Does the savings description apply to both energy and demand savings?
11 b. Where are the calculations of expenditures described?
12 c. The text under the column titled 'Calculation for DSM Reporting' for the Business Energy
13 Rebates – Application Rebates (BER-AR) and Instant Rebates (BER-IR) program
14 component states, "BER-AR: Incidental low-income & equity savings = (total savings
15 from residential dedicated low-income & affordable housing projects "Housing*")."
16 Please discuss this methodology for attributing expenditures, energy savings, and
17 demand savings to low-income customers in more detail. Please highlight any aspects of
18 this methodology that are specific to this program component.
19 d. The text under the column titled 'Calculation for DSM Reporting' for the Custom
20 program component states, "Incidental low-income & equity savings = (total savings
21 from residential dedicated low-income & affordable housing projects "Housing*")."
22 Please discuss this methodology for attributing expenditures, energy savings, and
23 demand savings to low-income customers in more detail. Please highlight any aspects of
24 this methodology that are specific to this program component.
25 e. The text under the column titled 'Calculation for DSM Reporting' for the Small Business
26 Energy Solutions program component states, "Incidental low-income & equity savings =
27 (total savings from residential dedicated low-income & affordable housing projects
28 "Housing*")." Please discuss this methodology for attributing expenditures, energy
29 savings, and demand savings to low-income customers in more detail. Please highlight
30 any aspects of this methodology that are specific to this program component.
31

32 **Request IR-32:** Does the 2026 Plan Extension lay the groundwork for E1's 2027-2031 Plan, particularly
33 regarding potential new offerings such as solar and strategic electrification? Please explain.
34

35 **Request IR-33:** Please compare the 2026 Extension with the IRP Reference Plan in terms of
36 energy and demand savings.

37 **Request IR-34:** Please provide an evaluation plan for the 2023-2025, 2026 Extension, and 2027
38 and onward (to the extent known), including all types of studies other than impact
39 evaluations (e.g., process evaluation, saturation/baseline, participation, benchmarking,
40 potential), schedule for conducting it, focus (e.g., sector, program, end use), need for the
41 study, and rationale for the proposed timing.

1 **Request IR-35:** Please provide any agreements with NSPI regarding access to or transfer of AMI
2 data.

3 **Request IR-36:** Please provide the marketing and outreach strategy plan and quality assurance
4 frameworks for the demand response programs.