M12249

NOVA SCOTIA UTILITY AND REVIEW BOARD

IN THE MATTER OF: The *Public Utilities Act*, R.S.N.S. 1989, c.380, as amended

- 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.

INFORMATION REQUESTS

To: EfficiencyOne (EOne)
James Gogan, Counsel
McInnes Cooper
James.gogan@mcinnescooper.com

From: Small Business Advocate

Responses Due: Wednesday June 25th, 2025

Copies: 1 electronic copy (PDF searchable)

Contact Person:
Melissa P. MacAdam
Blackburn Law Inc.
Small Business Advocate
Phone (902) 835-8544
mmacadam@blackburnlaw.ca

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

Request IR-1:

Refer to Exhibit E-1 EfficiencyOne 2026 DSM Extension Application ("Application"), Appendix B, Figure 1, *Average Rate and Bill Impacts (2026-2041) as a Result of DSM Activities in 2026*, page 4 of 24, line 1. EfficiencyOne explains Figure 1 as follows, at lines 2-8:

> "The forward-looking RBIA is an analysis of the rate and bill impacts associated with the proposed DSM investment only. The forward-looking rate and bill impact analysis associated with a DSM Plan or Extension Application compares the impacts of the proposed DSM investment to a scenario where there is no DSM investment during the DSM Application period. It does not assess the rate pressure of the incremental investment amount proposed, compared to what is currently being collected by ratepayers for DSM."

a) Does this explanation mean that the average rate and total customer bill impacts will be much higher or less negative when the incremental investment amount proposed is included?

b) Is Figure 2 *Average Rate Impacts (2026-2041 as a Result of 2026 DSM Activities*, found in the Application, Appendix B, on page 8 of 24, the equivalent of Figure 1 with the impact of the proposed incremental investment included?

c) Please confirm that Figure 2, *Average Rate Impacts (2026-2041 as a Result of 2026 DSM Activities,* shows that the Small General and Small Industrial rate classes are expected to have the highest average rate impact over the 2026-2041 period, of all the rate classes shown.

d) Please confirm that the results shown in Figure 2, *Average Rate Impacts (2026-2041 as a Result of 2026 DSM Activities,* are consistent with those shown in Table 1, Application, Appendix B, page 10 of 24, *Average Rate Impact compared to No-DSM Scenario, 2023-2025 Plan to 2026 DSM Extension Results Comparison*, which include the highest percentage increases for the Small General and the Small Industrial classes.

e) If confirmed, please explain EOne's justification for the impact on these two SBA rate classes given that the DSM program is supposed to provide benefits to all classes, including small businesses?

f) Please explain how this expected increased average rate impact will affect EOne's ability to obtain greater participation of the SBA classes in its DSM programs?

Request IR-2:

Refer to the Application, Appendix B, Figure 5: *Average Bill Impact (2026-2041 as a Result of 2026 DSM Extension Activities* on page 12 of 24, line 13.

a) Please confirm that Figure 5 shows that the SBA classes Small General, General and Small Industrial are expected to have the largest percentage decrease in Average Bill Impact over 2026 -2041.

b) How will EOne confirm that it will achieve the expected investment spend and participation rates among Small General and Small Industrial customers to be able to achieve the estimated percentage decrease in average bill impacts over 2026-2041?

c) Please proved a version of Figure 5 that shows these same metrics but for 2025 and 2026 separately.

d) Please explain how much of the expected decrease in average bill impact, shown in Figure 5, is due to assumed non-energy benefits and describe the different types of those non-energy benefits.

Request IR-3:

a) Is the Benefit Cost Ratio for the Application evaluated at the total DSM Plan level only?

b) How many of the constituent programs, within the DSM Plan, have a Benefit Cost Ratio of 1.0 or lower?

c) What percentage of the total DSM Plan cost do these programs represent?

d) Please identify the programs that have a benefit cost ratio less than 1.0 and whether they are directed towards Residential or BNI customers.

Request IR-4:

Refer to the Application, Appendix B, Section 7. Conclusion, page 23 of 24 at line 21, where EOne states that "Maximizing customer participation in DSM programs mitigates rate impacts by increasing the number of customers who experience net bill reductions."

a) Given the results shown in Figure 1 and Figure 2, how confident is EOne that it will be able to maximize small business customer participation? What marketing plans will be used to achieve this goal?

b) Does reducing the rate impact on small business customers depend solely on participation rates or is EOne pursuing other means to reduce the cost of the DSM Plan, aside from including estimates of non-energy benefits in the calculation of rate impact?