

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: H. Gil Peach & Associates LLC
Peach, H. Gil

From: Small Business Advocate

Responses Due: Wednesday July 3rd, 2025

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Melissa P. MacAdam**
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 Small Business Advocate
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Issued at Bedford, Nova Scotia on this 19th day of June, 2025

1 **Request IR-1:**

2
3 Refer to M12249, Exhibit E-2, *Savings Verification Review of Program Year 2024 Evaluation Results, Report for the Nova Scotia Energy Board* (2024 Peach Report), June 4, 2025, authored by
4 H. Gil Peach & Associates, (Peach).
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6

7 Section IX. General Recommendations includes the following, at pages 16-17:
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9 SVR24-G-1. The Savings Verification study recommends acceptance of the 2024
10 evaluation estimates for energy savings and demand reduction *except for four programs*.
11 These are the Residential Behavior program (6.270 GWh; no demand reduction), the
12 Residential Demand Response program (no energy savings, 0.057 MW demand reduction),
13 the BNI Demand Response program, (no energy savings, 8.034 MW demand reduction)
14 and the compressed air part of the BNI Custom Incentive Program (Custom). [Emphasis in
15 original]
16

17 And the second bullet, under SVR24-G-1, which references the Demand Response programs as
18 follows, at page 17:

19 For the Residential Behavior Program and the two Demand Response programs, the
20 Evaluator conducted independent evaluations and correctly followed the relevant
21 protocols. However, for these programs *the practical size of the savings and demand*
22 *reduction is not large enough to be of practical value at either the household level or*
23 *at the utility system level*. The Evaluator correctly followed the relevant protocols, but
24 a problem with the protocols is that they do not take into account the very large sample
25 size problem. **For very large sample sizes statistical significance loses meaning and**
26 **it is necessary to, instead, gauge performance using practical significance.** The
27 Evaluator correctly notes that these programs look OK from the perspective of
28 statistical significance, however, the Evaluator should have flagged these programs for
29 not producing practical energy savings or demand reduction. [Emphasis in original
30 except for underline, which was added]
31

- 32 a) Please confirm that Peach's role is one of "verifier" as opposed to the role of Evaluator,
33 which was performed by Econoler
34 b) Does the role of the verifier include defining the practical value of savings and demand
35 reduction?
36 c) What is the definition of practical value, used by Peach in the underlined statement above
37 arguing that the Evaluator should have flagged certain programs and please identify the
38 programs that Peach concluded should have been flagged by the Evaluator?
39 d) Are any of the programs in question included among BNI programs?
40 e) If so, what percentage of the total DSM Plan cost do these BNI programs represent?
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42
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44

1 **Request IR-2:**

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3 Refer to M12249, Exhibit E-2, 2024 Peach Report, Section IX, General Recommendations,
4 including Recommendation SVR24-G-2, which states, at page 17:

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6 SVR24-G-2. The Evaluator should flag programs which the evaluation demonstrates to
7 produce only tiny savings (savings that may be statistically significant and are too small to
8 have a practical significance). For these programs, the Evaluator should either recommend
9 closing the program in order to spend available energy efficiency dollars more effectively,
10 or provide an explanation for the program, making the business case explaining its value.
11

- 12 a) Which programs should the Evaluator have recommended for closing?
13 b) What percentage of the total DSM Plan cost do these programs represent?
14 c) How much of the EfficiencyOne plan spend would closing these programs free up to be
15 used more effectively?
16 d) What does Peach mean by the phrase in the quote above “in order to spend available energy
17 efficiency dollars more effectively”?
18
19

20 **Request IR-3:**

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22 Refer to M12249, Exhibit E-2, 2024 Peach Report, Section IX, General Recommendations,
23 including Recommendation SVR24-G-4, which states at page 18:

24
25 SVR24-G-4. The Evaluator should include full worksheets or computer printout
26 information for all significance tests, specifying for each test, whether the comparison is
27 one-tailed or two-tailed, the p-value of the test, the power of the test, the number of cases
28 in each group, and the significance level criterion used in the analysis.
29

- 30 a) Did Peach confirm with the Evaluator and EfficiencyOne that the requested worksheets
31 and information on significance tests were not provided?
32 i) If not provided, did Peach request such information during its review or request that it
33 be provided at a later date?
34
35 b) Please provide an example of what the requested worksheet and significance test
36 information should look like, taken from another report that Peach has reviewed.
37
38

1 **Request IR-4:**

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3 Refer to M12249, Exhibit E-2, 2024 Peach Report, Section X, Individual Program Component
4 Review, subsection B. Instant Savings (IS), pages 21-22, under Evaluator Findings which includes
5 the following 5 bullets, at page 22:

6
7 **Evaluator Findings.** The Evaluator reported the following key Instant Savings findings:

- 8 • Instant Savings exceeded both 2024 planned net electrical energy and peak demand
9 savings of 12.544 GWh and 1.680 MW, respectively.
- 10 • 2024 net electrical energy savings was 22.252 GWh and net peak demand savings was
11 2.428 MW savings at the generator resulting in 77% and 45% respectively above
12 planned targets. ENERGY STAR certified LED fixtures and lamp products generated
13 69% of the savings.
- 14 • achieved a 17% increase in savings from non-lighting products in 2024 compared to
15 2023.
- 16 • Achieved a decrease in free ridership for LED lamps and fixtures in 2024 from 59% in
17 2023 to 39% in 2024.
- 18 • Evaluated net energy and peak demand savings were 16% and 10% respectively higher
19 than values tracked by Efficiency Nova Scotia.

- 20
21 a) The second bullet above references “savings at the generator” which does not appear to
22 have been defined in the Report (nor in M11249, Exhibit E-1, the EfficiencyOne DSM
23 Application).
 - 24 i) If “savings at the generator” has been defined, please provide the page reference where
25 it appears.
 - 26 ii) If it has not been defined, please provide a definition and explain how “savings at the
27 generator” is different from savings on a customer’s bill.
- 28
29 b) Referring to the fifth bullet, please explain:
 - 30 i) How did the difference in net energy and peak demand savings arise?
 - 31 ii) What are Peach’s recommendations to adjust the plan to take advantage of these results
32 to improve the cost benefit of the DSM Plan?

33
34 **Request IR-5:**

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36 Refer to M12249, Exhibit E-2, 2024 Peach Report, Section X, Individual Program Component
37 Review, subsection J. BNI Efficient Products Rebates (BER), pages 58-60, which states, at pages
38 58-59:

39
40 Point-of-sale rebate evaluated savings declined 7.7% in 2024 compared to 2023 levels with
41 177,358 individual measures sold compared to 240,886 in 2023. The largest decline in
42 measure incentives was for LED Linear Lamps, which experienced a 41% decline.
43 However, since these measures have below average savings per measure, the average
44 savings per measure declined only moderately. In addition, the 2024 comprehensive

1 evaluation of this program component slightly raised the total Net to Gross Ratio (NTGR)
2 for instant rebates from 81% in 2023 to 84% in 2024 which also helped to reduce the level
3 of year-on-year declines in evaluated savings.
4

5 Despite observing a decline in BER evaluated savings from 2023 to 2024 and earlier observations
6 that the cost for some programs could be redeployed more effectively elsewhere within the plan,
7 Peach includes only one recommendation related to the BER rebates program component, at page
8 59, and concludes that no further study is necessary:
9

10 SVR2024-BNI Efficient Products – 8. Change baselines for BER and IR rebates to reflect
11 current market practices that have indoor DesignLights Consortium-Standard products as
12 the new baseline with incentives offered for comparable DesignLights Consortium-
13 Premium products, where available as a suitable option. No further study is necessary.
14

- 15 a) Are the BER program results observed more statistically significant compared to the two
16 BNI Demand Response results discussed earlier in the 2024 Peach Report?
17 i) If so, please explain why.
18 b) If the increase in the NTGR for the BNI instant rebates was not sufficient to fully offset
19 the decline in year-on-year decline in evaluated savings, how will the recommendation to
20 change the BER and IR rebate baselines address this decline?