

2 NOVA SCOTIA ENERGY BOARD

3 IN THE MATTER OF: The *Public Utilities Act*, RSNS 1989, c.380, as amended

4 IN THE MATTER OF: An Application by EfficiencyOne for approval of the 2026 DSM
5 Extension for Demand-Side Management Activities between
6 EfficiencyOne and Nova Scotia Power Inc., and for approval of
7 the amendment to the 2023-2025 Demand-Side Management
8 Purchase Agreement between EfficiencyOne and Nova Scotia
9 Power Inc.

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11 INFORMATION REQUESTS
12 on E-2, Verification Report

To: EfficiencyOne ("E1")

From: The Industrial Group

Responses Due: July 3, 2025

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14 Issued at Halifax, Nova Scotia, this 19th day of June 2025.

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16 Request IR-1:

17 Reference: E-2 Verification Report, page 26.

18 *"The Evaluator recommends consideration of removing wood fireplace*
19 *inserts and pellet fireplace inserts from Green Heats list of measures due to*
20 *their low savings and demand."*

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

1 **Request IR-2:**

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

4 (a) How do E1 and its evaluator distinguish what is the electricity ratepayer
5 portion of EPI?

6 (b) In light of E1's proposed BCA and expanded mandate with quantified
7 benefits extending to other fuel reductions, how will E1 and its evaluator
8 distinguish between electricity ratepayer portion of upgrades and provincial
9 and federal funded upgrades in the EPI program? Please discuss with
10 specific examples.

11 **Request IR-3:**

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

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

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

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

23 **Request IR-4:**

24 **Reference: E-2 Verification Report, page 64.**

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

29

(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.

Request IR-5:

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?

1 **Request IR-6:**

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

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

10 If the recommendations of the Savings Verification Study are accepted by the Board:

11 (a) Please restate E1's energy and demand savings for 2024, for the
12 cumulative 2023-2024 period and forecasted to end of 2025.

13 (b) Please discuss and restate how, if at all, this affects E1's performance
14 targets.

15 (c) Please restate the overall unit cost per KW and KWh saved for 2024 and
16 for the cumulative 2023-2024 period.

17 (d) Does this affect E1's approach to its program delivery in 2025 and in its
18 applied-for 2026 Plan? Please explain why or why not and provide specific
19 examples if the approach is changed.

20 **Request IR-7:**

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

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

24 (a) in 2025; and

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

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