

EfficiencyOne Information Requests to H. Gil Peach & Associates LLC (Peach)
2024 Savings Verification Review Report
In the Matter of EfficiencyOne's (E1) Application for Approval of the 2026 DSM Extension
(M12249)

IN THE MATTER OF: ***THE PUBLIC UTILITIES ACT***

- and -

IN THE MATTER OF: M12249, EfficiencyOne (E1) Application for Approval of the 2026
DSM Extension

NON-CONFIDENTIAL INFORMATION REQUESTS TO H. GIL PEACH & ASSOCIATES LLC

To: **H. Gil Peach & Associates LLC**
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From: **EfficiencyOne**
c/o McInnes Cooper

Responses Due: **Thursday, July 3, 2025**

Copies: **1 electronic copy (PDF searchable)**

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

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Request IR-01:

Please provide a copy of the scope of work for which Gil Peach & Associates LLC ("Verifier") was retained in relation to its preparation of the 2024 Verification Report.

Request IR-02:

Please confirm whether the Verifier's scope included planning and/or policy-related work.

Request IR-03:

At page 2 of the 2024 Verification Report, the following statement is made:

"For this report we call attention to only two steps in the cycle: Independent Evaluation and Verify Savings & Review."

The other three centres of focus are noted as "Plan", "Implement", and "Policy". On page 3, the scope of the Verify Savings & Review centre of focus is described to include "[suggested] *modifications in the Evaluation data, methods, and reported results, and in future Implementation.*" The scope of the Independent Evaluation centre of focus is also described.

- (a) Please identify, and provide reference to source materials, establishing the five "centres of focus" related to the DSM cycle, as set out in the Report.
- (b) Please describe the scopes of the other three centres of focus in the DSM cycle, which are described in Figure 1 as "Policy", "Plan", and "Implement".
- (c) Please explain why "[suggested] *modifications in the Evaluation data, methods, and reported results*" falls under the "Verify Savings & Review" centre of focus in the DSM cycle.
- (d) Please explain why "[suggested] *modifications....in 'future [i]mplementation'*" falls under the Verify Savings & Review centre of focus in the DSM cycle.

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Request IR-04:

From pages 3 to 6 of the 2024 Verification Report the Report makes certain recommendations in relation to "Market Transformation", "Climate Change", and "Energy Sufficiency". Please detail how these recommendations fall within the existing scope of work in relation to the 2024 Verification Report.

Request IR-05:

Please confirm that Figure 3, page 11 of the 2024 Verification Report, demonstrates that all program components achieve net lifetime energy savings.

Request IR-06:

Please confirm whether the methodology used in quantifying net lifetime energy savings was consistent with current methodological guidance for evaluating energy efficiency programs.

Request IR-07:

Please confirm what is meant by the terms, "*meaningful energy savings*" and "*tiny savings*", from both a qualitative and quantitative perspective, and explain how the use of these terms are consistent with current methodological guidance for evaluating energy efficiency programs.

Request IR-08:

Please confirm what is meant by the term "*practical energy savings or demand reduction*", from both a qualitative and quantitative perspective, and explain how the use of this term is consistent with current methodological guidance for evaluating energy efficiency and demand response programs.

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Request IR-09:

Please confirm what is meant by the term “*practical value*”, from both a qualitative and quantitative perspective, and explain how the use of this term is consistent with current methodological guidance for evaluating energy efficiency programs.

Request IR-10:

Reference: page 52 of the 2024 Verification Report: (Section I. Residential Behavioral Program (Efficiency Insights):

Because significance and confidence are driven by number of cases and the cases are joined physically by environmental and weather conditions, and so are not really independent, statisticians may question reliance on the use of statistical significance testing for very large samples. This is particularly true when the values of individual household energy savings are too small to be meaningful to the individual household, as they are in the current study, but the level of significance is high as an artifact of sample size.

(a) Please confirm what methodology the Verifier relies upon in reaching the determination that system-level savings of 6.27 GWh is “*likely meaningless at the system level.*”

Request IR-11:

Reference: page 54 of the 2024 Verification Report (Section I. Residential Behavioral Program (Efficiency Insights):

Currently, behavioural RCTs, of which the current program is an example, are black boxes. There is no coherent specification of mechanism or warrant, either of specific behaviors that would save energy or of how much energy would be saved through these (unknown) behaviours. A more robust approach to RCTs has been specified by Cartwright and Hardie.

(a) Please provide examples of jurisdictions where the proposed approach specified by Cartwright and Hardie was used to measure energy savings for a similar program.

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Request IR-12:

Reference: page 64-65 of the 2024 Verification Report (Section X.-K., Evaluation Issue 3-a), the following was stated:

"Observations of total claimed savings for the two locations showed that the cumulative annual claimed savings over the previous four years were a substantial portion of total energy demand for compressed air at the facility. This is contrary to observations and evaluations of other sites that often have no or little leak detection activity after many years of operation. The leakage rate appears far too high. We expect the leakage rate to decrease, and here it does not."

- (a) Please provide the source for the referenced customer data supporting the Verifier's findings.
- (b) Please provide calculations along with relevant data used to establish the leak rate at these locations, and to support the statement that savings at these locations were a substantial portion of total energy demand for compressed air.
- (c) Please provide an explanation to support the statement that the leakage rate at the two facilities appears far too high (e.g., reference points from similar facilities and a range of expected leak rates for such facilities). Please provide the source for referenced data.
- (d) Please provide an explanation to support the expectation that the leakage rate should decrease.
- (e) In reference to the above statement – what constitutes "substantial", and upon what methodological basis does the Verifier base its understanding of this term?

Request IR-13:

Reference: page 65 (Evaluation Issue 3-b), the following was stated:

"Leakage rate has increased. There has been an unexplained recent surge in claimed savings at these two locations, as compared to prior years."

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- 1 (a) Please provide leakage rates and claimed savings for the relevant years to support this
2 statement.

3
4 **Request IR-14:**

5 Reference: page 65-66 2024 Verification Report: **SVR2024-Compressed Air-12**

6 ***"Proprietary data issue.** It is not unusual for some organizations to try to keep*
7 *operational data proprietary and confidential, as a strategic policy. This is*
8 *customary for some organizations. However, in contrast, evaluation requires*
9 *both site access for direct measurement and access to usage data, and records*
10 *of interventions to improve energy efficiency. If an organization will not permit*
11 *the Evaluator to conduct an independent evaluation by restricting access to the*
12 *site or by withholding necessary data, or by providing data but not permitting its*
13 *use in public reports, the Evaluator should report this in its evaluation.*
14

- 15 (a) Please provide details and identification of client(s) that did not permit "access to the
16 independent Evaluator for direct on-site measurement and/or [did] not permit access to
17 necessary energy usage data - in relation to the 2024 independent evaluation.