

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: THE *PUBLIC UTILITIES ACT*

-and -

**IN THE MATTER OF: AN APPLICATION by EFFICIENCYONE for approval of a
New Benefit-Cost Analysis Test for Evaluating Demand Side
Management Plans**

OPENING STATEMENT OF THE CONSUMER ADVOCATE

September 11, 2025

This is the opening statement of the Consumer Advocate regarding the Application filed by EfficiencyOne (“E1”) for approval of a New Benefit-Cost Analysis (“BCA”) Test for Evaluating Demand Side Management Plans.

As noted in the Application, E1’s new proposed Benefit-Cost Analysis Test was developed by E1 and its consultant, Energy Futures Group (“EFG”), through consultation with the DSM Advisory Group (“DSMAG”). These consultations were informed by recent legislative amendments to the *Public Utilities Act*, which created a newly constituted Energy Board and expanded the scope of the mandate of the Board to consider factors such as sustainable development, sustainable prosperity, and the goals articulated in the *Environmental Goals and Climate Change Reduction Act*. These factors were relied upon and informed the development of the BCA test that E1 has filed with the Board.

The Consumer Advocate has filed evidence from its consultant, Francis Wyatt of Green Energy Economics Group, who expressed overall support for the new test as a “more balanced test.” Mr. Wyatt has recommended that the “new benefit values in the proposed text should be vetted and include stakeholders in the process.” Mr. Wyatt also supports the addition of “externalized cost of carbon in the new text,” but recommends that “the internalized cost of carbon be kept separate from the externalized cost of carbon for use with the Program Administrator Cost (PAC) test.”

The Consumer Advocate supports Mr. Wyatt’s testimony in this regard, and understands E1 agrees with these recommendations.

The Consumer Advocate has also reviewed the evidence filed by Board Counsel Consultants and other intervenors, including the Small Business Advocate, the Industrial Group, and Eastward Energy.

1 It is apparent that the Board will need to address several issues raised in the evidence, including
2 whether the test as a whole is appropriate; whether it is appropriate for E1 to rely upon proxy
3 values for certain non-energy benefits; and whether the proxy values that E1 has used have been
4 sufficiently justified, among other concerns that have been raised by the parties.

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6 On review of the evidence filed to date, the Consumer Advocate maintains its support for E1's
7 proposal, and Mr. Wyatt's recommendations.

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9 We thank the Board for the opportunity to make this opening statement, and look forward to further
10 exploring the relevant issues raised by E1 and the intervenors in this proceeding.