

December 12, 2025

Via email

Crystal Henwood
Regulatory Affairs Officer/Clerk of the Board
Nova Scotia Energy Board
3rd Floor Summit Place
1601 Lower Water Street
Halifax NS B3J 3S3

Dear Ms. Henwood:

Re: NSPI application for 2026 DSM Cost Recovery Rider (DCRR) – M12521

The Consumer Advocate has the following comments regarding Nova Scotia Power's application for the 2026 DSM Cost Recovery Rider (DCRR).

General Comments

As Nova Scotia Power notes in the application, the DCRR is intended to compensate the utility for costs associated with DSM programs that are developed and delivered by Efficiency One. It has two parts, the Program Cost Recovery (PCR) that aims to recover costs for the upcoming DSM period and a true up adjustment to correct balance variances from previous PCR collections: Application, page 3 of 10.

The Consumer Advocate agrees that the DCRR charges for 2026 reflect an agreement reached by Customer Representatives during discussions concerning Nova Scotia Power's 2026-2027 General Rate Application. Under that agreement, which remains subject to Board approval in that proceeding, all DSM costs will be allocated to customer classes based on the program spending for the classes: Application, page 5 of 10.

The actual tariffs for the 2026 PCR and Balance Adjustment are set out in figure 1 and Appendix A-1 of the application. There does not appear to be any reason to dispute the figures contained in these tables.

Financing Costs

In accordance with the direction of the Board, financing costs have been excluded from the DCRR for 2026. They are being held in abeyance pending a “generic proceeding” of the Board to deal with the application of Section 64AB of the *Public Utilities Act* to deferral and variance accounts: Nova Scotia Power, 2025 DCRR application, M11912, paragraph 45.

The Board suggested in its decision in the 2025 DCRR application that it may establish a formal rule for the assessment of interest in these circumstances. The Consumer Advocate looks forward to this proceeding and the guidance that will be provided by the Board on this important matter.

Conclusion

The Consumer Advocate thanks the Board for the opportunity to make these brief comments.

Yours truly,

PINK LARKIN



David Roberts
DJR/aw