

E1 Responses to Solar Nova Scotia (SNS) Information Requests
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Request IR-01: Smart Thermostats and Air Purifiers

Reference: 2027-2031 DSM Plan; 2027-2031 Technical Tables.

The 2027-2031 Technical Tables appear to show air purifiers and smart thermostats accounting for approximately 65.9 GWh of first-year savings, or approximately 52.2% of Residential energy efficiency savings.

Measure / Channel	Units	First-Year Savings	Total Incentive	\$/kWh	Share of Residential EE
Air purifiers - Instant Savings	39,000	21.3 GWh	\$1.34M	\$0.063	16.9%
Smart thermostats - Instant Savings	52,500	21.1 GWh	\$1.35M	\$0.064	16.7%
Smart thermostats - Efficient Product Installation	68,539	23.5 GWh	\$13.43M	\$0.572	18.6%
Total	160,039	65.9 GWh	\$16.12M	\$0.245	52.2%

(a) Confirm or correct the totals shown above.

(b) Provide the per-unit savings assumptions for air purifiers and smart thermostats.

(c) Explain the difference in unit cost between smart thermostats delivered through Instant Savings (\$0.064/kWh) and Efficient Product Installation (\$0.572/kWh) and provide the rationale for using the higher-cost channel rather than relying primarily on the lower-cost Instant Savings channel.

(d) Provide the Efficient Product Installation PAC result with smart thermostats removed.

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1 **(e) Confirm whether smart thermostats delivered through DSM are required or encouraged**
2 **to enroll in EcoShift where technically eligible. If not, explain why not.**

3
4 Response IR-01:

5
6 (a) EfficiencyOne (E1) confirms that the totals are correct. However, it is important to note
7 that these figures represent aggregated values across multiple smart thermostat measures
8 within both the Efficient Product Installation and Instant Savings program components.
9 Details for each individual measure, including per unit assumptions, can be found in
10 Appendix A – Attachment 3 – 2027–2031 Energy Efficiency & Solar-PV Technical Tables.¹

11
12 (b) Please refer to Solar Nova Scotia IR-01, part (a).

13
14 (c) The difference in unit cost for smart thermostats delivered through Instant Savings and
15 Efficient Product Installation program components reflects the distinct delivery models and
16 customer barriers addressed by each channel. While Instant Savings provides point-of-sale
17 incentives across participating retailers, uptake is influenced by factors such as retailer
18 promotion, additional in-store offers, product availability and affordability, home
19 ownership status, and installation requirements.

20
21 Many customers face barriers that limit participation through retail channels. Renters may
22 lack the authority to install equipment, while other customers may be unable to afford
23 upfront costs or arrange installation, or may be unwilling to undertake installation
24 themselves. The Efficient Product Installation (EPI) program component addresses these

¹ M12780, EfficiencyOne 2027-2031 DSM Plan Application, E-1-(ii), March 31, 2026.

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barriers by providing direct, no-cost installation, including coordinated upgrades in rental properties (e.g., working with landlords to serve multiple units in a single visit).

Accordingly, the higher-cost Efficient Product Installation channel reaches customer segments underserved by retail incentives and to ensure equitable access to energy efficiency measures. Participation assumptions in the proposed 2027–2031 DSM Plan are based on observed historical uptake across delivery channels.

- (d) Table 1 of this IR response provides an estimate of the EPI Program Administrator Cost (PAC) results with smart thermostats removed. These results were not generated by the Guidehouse Process model; rather, they were produced through a manual calculation performed by E1 outside the model, using the same underlying participation data as the DSM Plan, but removing smart thermostat. While this approach provides a reasonable estimate, it should be understood as an approximation.

Table 1: Estimated PAC Results for Efficiency Product Installation with Smart Thermostats Removed

	2027	2028	2029	2030	2031
Efficient Product Installation without smart thermostats	0.6	0.6	0.6	0.7	0.7

- (e) Smart thermostats delivered through DSM are not currently required or actively encouraged to enroll in Eco Shift, even where technically eligible. At present, the program is prioritizing cost-effectiveness and overall performance rather than expanding enrollment. This includes maintaining the current program size, removing non-participating devices, and improving realized capacity values from actively participating devices. Previous efforts to increase enrollment resulted in a high proportion of inactive or non-participating devices, reducing program effectiveness. Accordingly, the current approach focuses on improving the performance and reliability of the existing participant base before pursuing further enrollment growth.

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Request IR-02: Water Heating: Heat Pump Water Heaters and DR Readiness

Reference: 2027-2031 DSM Plan; 2027-2031 Technical Tables; NRCan residential electric water heater stock data.

NRCan data indicate approximately 246,000 residential electric water heaters in Nova Scotia in 2023. Assuming a 10- to 15-year replacement cycle, approximately 80,000 to 120,000 residential electric water heaters could be replaced during the 2027-2031 DSM Plan period.

(a) Confirm whether this estimate aligns with EfficiencyOne’s planning assumptions. If not, provide EfficiencyOne’s revised assumptions or state that they are unavailable.

(b) The Technical Tables appear to show 1,838 cumulative residential heat pump water heater installations from 2027 to 2031 across multiple programs. Confirm or correct this figure.

(c) Confirm whether EfficiencyOne considered incentives for new standard electric water heaters with integrated controls, and whether the risk of missing lower-cost DR opportunities from such water heaters was assessed. If neither was considered, explain why not.

(d) Confirm whether water heater incentives are, or could be, linked to DR-ready capability or DR enrollment.

Response IR-02:

(a) EfficiencyOne’s (E1) 2026 Potential Study is currently underway and as such the specific measure assumptions have not been finalized.

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- 1 (b) E1 has estimated heat pump water heater participation at 1,840 units over the duration of
2 the Preferred Plan.
3
- 4 (c) E1 considered incentives specifically for new standard electric water heaters with
5 integrated controls. Ultimately, E1 decided to concentrate support for water heating
6 equipment through its energy efficiency programs, and its market transformation pilot on
7 heat pump water heaters given their higher energy savings. The focus of demand response
8 in the proposed 2027–2031 DSM Plan is cost-effectiveness and achievability and as a result
9 the proposed Plan maintains the existing residential demand response program
10 component (Eco Shift) and grows the BNI offer.
11
- 12 (d) Water heater incentive eligibility (for the purchase and installation of a new water heater)
13 could be made contingent on customers enrolling in demand response programs. To date
14 E1 has not included incentives for the purchase and installation of new heating equipment
15 (space or water) as part of its demand response program and has relied on controlling
16 existing heating to minimize program costs.

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Request IR-03: EcoShift and Residential Demand Response

Reference: 2027-2031 DSM Plan; Residential Demand Response / EcoShift.

The Plan appears to maintain Residential DR at 2026 Extension levels with no new enrollments during the 2027-2031 Plan period.

(a) Provide the basis for expecting Residential DR to become cost-effective in the future under the current program design scenario.

(b) Identify the main cost-effectiveness barriers for Residential DR and the assumptions that would need to change for the program to become cost-effective.

(c) Confirm whether EfficiencyOne has considered using DSM product measures, including smart thermostats and water heaters, to reduce incremental customer acquisition costs for EcoShift.

Response IR-03:

(a) EfficiencyOne (E1) expects Residential Demand Response (DR) cost-effectiveness to improve through operational learning, improved device performance, vendor/platform refinement around costs and contracting, and continued use of the existing installed base. E1 understands that early-stage demand response (DR) programs require time to mature.¹ As noted in Appendix A – Preferred Plan, pages 76–77, E1 is maintaining Residential DR at

¹ The basis is described in Section 3.3 of the 2027–2031 DSM Plan Evidence.

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2026 DSM Extension levels with no new enrollments, limiting incremental acquisition costs while preserving the value of existing assets in order to optimize for performance.

(b) The main cost-effectiveness barrier for Residential DR is that program component costs have scaled faster than evaluated benefits. In earlier stages, the program component focus was primarily on enrollment and deployment. As a result, E1 incurred delivery and platform costs before realizing proportional benefits from optimized device performance and consistent event participation.

To improve cost-effectiveness, E1 will focus on both sides of the cost-benefit ratio. On the cost side, E1 will work through contracting and delivery refinements to reduce program delivery costs. On the benefit side, E1 will focus on the existing device base by removing non-participating devices, improving participation rates, reducing opt-out rates, improving connectivity, and increasing unitary available capacity by device type.

(c) Yes. Eco Shift has previously leveraged existing DSM product and delivery channels, including the Efficient Product Installation program component and the Instant Savings program component, to reduce incremental customer acquisition and deployment costs.

However, even with those lower-cost delivery pathways, Residential DR continued to face cost-effectiveness challenges. As a result, E1's proposed 2027–2031 DSM Plan approach is not focused on further enrollment growth, but on improving the cost-effectiveness of the existing installed device base.

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Request IR-04: Home Energy Assessment

Reference: 2027-2031 DSM Plan; Home Energy Assessment program; 2023 DSM Plan results.

The following figures appear to show a significant increase in Home Energy Assessment unit costs between the 2023 DSM Plan year and the 2031 DSM Plan year.

Year	Investment	First-Year Savings	Unit Cost
2023	~\$3.9M	~8.6 GWh	~\$0.45/kWh
2031	~\$6.1M	~2.0 GWh	~\$3.05/kWh

(a) Confirm whether the figures above are correct. If correct, confirm that they imply an approximate 588% increase in unit cost between 2023 and 2031. If not, provide corrected figures and calculations.

(b) For 2023 and for each year from 2027 to 2031, provide the number of participating homes, total first-year electricity savings, and first-year savings broken down by lighting, heat pumps, insulation, and any other material end uses or measures.

(c) For 2023 and for each year from 2027 to 2031, provide the total cost of audit or assessment delivery, separate from incentives, administration, marketing, quality assurance, and other delivery costs.

(d) Explain how changes in federal and provincial funding between the 2023-2025 DSM Plan and the 2027-2031 DSM Plan have affected program costs, incentives, participation, savings, and unit costs. Provide federal and provincial funding amounts for each year of the 2023-2025 Plan period and the 2027-2031 Plan period to the extent readily available.

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- (e) Confirm whether alternative or lower-cost delivery models were considered, including a navigator service providing ongoing support rather than a single point-in-time audit. Provide any comparative analysis or explain why not considered.

Response IR-04:

- (a) The figures are not correct. The Home Energy Assessment (HEA) program component's fully allocated unit cost was \$0.14/kWh in 2023 and \$3.10/kWh in 2031 DSM Plan.

- (b) In 2023, the HEA program component achieved 26.0 GWh of first year energy savings and had 4,085 participants. EfficiencyOne's (E1) 2023 Existing Residential Program DSM evaluation report does not break out the measures since HEA homes are modelled in HOT2000, where the savings would include all lighting and insulation measures. Please refer to E1's 2027–2031 DSM Application, Appendix A – Attachment 3 – Technical Tables for Energy Efficiency and Solar-PV. This provides a list of all measures that were modelled by program component. The number of participants and energy savings are included.

- (c)

In thousands of dollars

	2023	2027	2028	2029	2030	2031
Energy Audit Costs	\$ 3,376	\$ 1,337	\$ 1,390	\$ 2,224	\$ 2,313	\$ 2,313
Recovery of Assessment Costs from Canada Greener Homes Grant	- 1,916					
Total Assessment Costs	\$ 1,460	\$ 1,337	\$ 1,390	\$ 2,224	\$ 2,313	\$ 2,313

- (d) Over 2023–2025, E1 administered a provincially funded portion of HEA for customers who primarily heat their homes with non-electric fuels, along with a moderate-income rebate top up for eligible customers. Many homes use a mix of electric and non-electric heating sources, and E1 uses these other program funds to cover a portion of program costs and

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1 attributes a proportionate amount of the savings. This approach is noted in E1's response
2 to Synapse IR-47 and applies to HEA. E1 also co-administered the federally funded Canada
3 Greener Homes Grant over this timespan which provided substantial top up incentives for
4 all homes and covered a portion of energy evaluation costs.

5
6 E1 does not currently have a longer-term funding agreement with the provincial
7 government and the Canada Greener Homes Grant closed on March 31, 2026. The ways in
8 which these other sources of program funding have affected program participation,
9 incentives, and costs are detailed in E1's response to Synapse IR-37. The impacts to
10 program savings are documented in E1's 2025 Existing Residential Program DSM Evaluation
11 report, which shows substantial growth in program participation and gross savings per
12 participant since these government programs were launched in 2021.

13
14 DSM's portion of recovery from Canada Greener Homes between 2023–2025 was \$3.2
15 million. No additional recoveries are expected for 2027–2031.

16
17 (e) Please refer to E1's responses to Synapse IR-37 and Solar NS IR-12.

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Request IR-05: HomeWarming and Low-Income Single-Family Support

Reference: 2027-2031 DSM Plan; HomeWarming; Affordable Single-Family Homes.

For each year from 2020 to 2031, please provide the following information for HomeWarming/Affordable Single-Family Homes. Where data prior to 2023 are not available in comparable format, EfficiencyOne is invited to provide at the highest comparable granularity available and identify any limitation.

(a) The number of unique low-income single-family homes supported, broken down by program, and an explanation of how repeat participation or multiple measures at the same home are treated.

(b) Annual electricity savings, non-electric fuel savings where applicable, and total program cost.

(c) Annual funding broken down by source, including DSM funding, Provincial funding, Federal/NRCan/OHPA funding, and other funding sources. For each amount, indicate whether it is an annual financial-statement figure, a multi-year contribution agreement total, or a planned investment amount.

(d) Any analysis comparing the cost-effectiveness, bill impacts, savings, and non-electric benefits of solar PV, strategic electrification, insulation, and heat pumps for low-income single-family homes, including the criteria used to determine whether each measure is offered, prioritized, limited, or excluded.

Response IR-05:

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- (a) The 2027–2031 DSM Plan application pertains to funding, energy savings, demand savings, and participation for DSM only. Affordable Single-family Homes launched as a new DSM program component offering in 2023, so actual results from 2023–2025, the 2026 DSM Extension as approved, and the 2027–2031 Preferred Plan investment, energy savings, demand savings, and participation are provided in Table 1.

Table 1: Affordable Single-family Homes Actual Results and Plan numbers (2023–2031)

Actual Results, Plan as Approved, or Preferred Plan	Investment (\$M)	First-year Energy Savings (GWh)	Demand savings (MW)	Participation (homes)
2023 (Actual results)	3.0	1.4	0.6	242
2024 (Actual results)	8.4	3.7	2.1	1,193
2025 (Actual results)	10.5	6.1	2.3	1,920*
2026 (DSM Extension as approved)	7.7	2.7	1.4	800
2027 (Preferred Plan)	9.0	1.8	1.3	600
2028 (Preferred Plan)	8.6	1.7	1.2	550
2029 (Preferred Plan)	9.0	1.7	1.2	550
2030 (Preferred Plan)	8.6	1.6	1.1	500
2031 (Preferred Plan)	8.6	1.5	1.1	475

*In Q2 2025 participants with both building envelope upgrades and heating system installations began being treated as separate projects in order to move participants through the program component more quickly and efficiently. Participants with both types of projects who complete both projects in the same calendar year are counted as one participant; however, participants with both types of projects who complete one project in one calendar year and the second project in another calendar year are counted as a participant in both years.

- (b) Please refer to part (a) of this IR response.

- (c) Please refer to part (a) of this IR response.

- (d) All the measurements (cost-effectiveness, bill impacts, savings) and benefits of the various resources and measures were considered and analyzed throughout the 2027–2031 DSM Plan development process for all applicable program components. However, an analysis as specifically described in question (d), was not conducted.

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Request IR-06: Residential New Construction and DR Readiness

Reference: 2027-2031 DSM Plan; residential new construction activities.

(a) Confirm whether the Plan includes no general residential new construction program for single-family homes beyond Mi'kmaw New Home Construction. If confirmed, explain why a broader DSM-funded offering was not included.

(b) Confirm whether DR-ready measures are included in eligibility, incentives, technical guidance, design support, or participant requirements for any EfficiencyOne-administered residential new construction activity, whether DSM-funded or externally funded.

(c) Provide any analysis of the cost and feasibility of incorporating DR readiness at the time of new construction compared with retrofitting after occupancy. If none exists, confirm and indicate whether EfficiencyOne intends to revisit this during the 2027-2031 Plan period.

Response IR-06:

(a) Confirmed. The New Residential program was designed to build upon an existing provincially funded program, EnergyForward New Homes, that is administered by EfficiencyOne (E1) and is available to all Nova Scotians. Given the existence of this provincially funded program, a separate DSM program component targeting the broader population was not considered necessary to avoid program overlap and duplication with ratepayer-funded investment.

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1 (b) E1's DSM and non-DSM funded residential new construction activities support participants
2 in exploring various technologies and design parameters that can allow them to achieve
3 the program performance criteria. E1 does not explicitly promote demand response (DR)-
4 ready measures in these programs, but customers and consultants can decide to include
5 them in their building plans.

6
7 (c) E1 confirms that no formal analysis of the cost and feasibility of incorporating DR readiness
8 at the time of new construction compared with retrofitting after occupancy has been
9 conducted to date. E1 acknowledges that new construction presents a potentially cost-
10 advantaged opportunity for DR integration relative to post-occupancy retrofit. Consistent
11 with E1's commitment under the 2027–2031 DSM Plan to grow its DR portfolio and advance
12 the cost-effectiveness of the Eco Shift pathway, E1 intends to revisit this question during
13 the Plan period and will consider whether such analysis should be incorporated into its
14 program planning and evaluation activities. If warranted, findings will inform future
15 program design and any recommended amendments to the Plan.

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Request IR-07: Small Business Energy Solutions (SBES)

Reference: 2027-2031 DSM Plan; SBES; 2027-2031 Technical Tables.

(a) For each year from 2027 to 2031, provide the forecast number of unique participating small business customers or premises, separate from the number of measures installed. Please also provide EfficiencyOne’s estimate of the total eligible small business customers or premises in Nova Scotia, including eligibility criteria and data sources.

(b) For SBES heat pump measures, including measures listed as “mini-split” and any heat pumps included within “HVAC” in the Technical Tables, provide by year: forecast units, first-year savings, assumed unit capacity, total cost per unit, incentive per unit, savings per unit, \$/kWh, and PAC results.

(c) Confirm whether federal incentives for qualifying SBES heat pump projects, including the 30% Clean Technology Investment Tax Credit and 100% first-year accelerated depreciation, were considered in program design, incentive levels, participant cost assumptions, uptake assumptions, and cost-effectiveness screening. If not, explain why not.

(d) Confirm whether alternative delivery models were considered, such as free roving energy manager support to help small businesses with project identification, federal incentive access, project development, procurement, contractor coordination, and other non-financial barriers. Provide any analysis or explain why not considered.

(e) Explain the drivers of the increase in SBES unit costs from approximately \$0.43/kWh in 2020 to approximately \$1.64/kWh in 2031.

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Response IR-07:

- (a) Please refer to Table 42 of Appendix A – Preferred Plan for the forecasted number of projects which has been assumed to equate to the number of unique participating small business customers by year. EfficiencyOne (E1) performed an internal review of Nova Scotia Power customer data combined with other insights E1 has collected about customers over its years of DSM administration. E1 estimates that there are over 30,000 eligible small business customers in Nova Scotia based on the eligibility criteria of annual electrical energy consumption of less than 600,000 kWh (approx. \$6,000/month in electricity costs).
- (b) Please refer to Appendix A – Attachment 3 – 2027–2031 Energy Efficiency & Solar-PV Technical Tables for forecasted units, first-year savings, savings per unit, incentives per unit, first-year unit cost, and PAC results by year. Please see below for the additional details requested.

Measure	Assumed Unit Capacity	Total Cost Per Unit				
		2027	2028	2029	2030	2031
SBES – HVAC	1.5 ton	\$26,601	\$27,136	\$27,681	\$28,238	\$28,805
SBES – Packaged Terminal Heat Pump	0.8 ton	\$2,751	\$2,861	\$2,976	\$3,095	\$3,219
SBES – Ductless Mini-Split Heat Pump	1 ton	\$6,749	\$7,019	\$7,299	\$7,591	\$7,895

- (c) E1 does not factor in impacts of external financial supports that customers could leverage when preparing DSM Plans unless E1 has a contract to deliver said supports over the longer-term. Designing DSM programs around alternative funding introduces extra risk, as such funding and program parameters could change or be eliminated during the Plan period. In regard to cost effectiveness testing, the approved PAC test does not include host customer impacts as it takes the perspective of the utility. In practice, E1 encourages and helps customers leverage external non-DSM incentives in many instances and may reposition

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1 DSM offerings based on existing program commitment levels and targets to further extend
2 benefits.

3
4 (d) Alternative delivery models were considered, including a Roving Energy Manager. E1 has a
5 small business Energy Auditor and Energy Care Representatives who assist with project
6 identification, technical reviews, program navigation, and sharing resources about
7 supplementary funding opportunities. The Efficiency Preferred Partner network also
8 contains several highly engaged contractors who are recruiting customers to the program
9 and supporting project development in substantial ways. It was determined that program
10 investment should remain focused on customer incentives as opposed to hiring additional
11 technical support staff.

12
13 (e) The Small Business Energy Solutions (SBES) program component has gone through several
14 design changes since 2020 in response to customer feedback. The Preferred Plan focuses
15 on reducing barriers to participation by providing higher incentives to customers in
16 response to rising upgrade installation and labour costs, as well as broader economic
17 pressures on small businesses that limit their ability to invest in energy efficiency. E1 is also
18 responding to ensure there remains access and equity across the program since the
19 customer base SBES serves is diverse. As a result the Preferred Plan is including higher
20 incentives for micro businesses and businesses in equity deserving communities to help
21 overcome persistent financial barriers that are contributing to their exclusion from the
22 program today. For a unit cost analysis comparing the 2026 DSM Extension to the 2027–
23 2031 Preferred Plan, please refer to E1’s response to IG IR-10 Attachment 1.

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Request IR-08: Custom Program

Reference: 2027-2031 DSM Plan; Custom Program; Existing Buildings; New Construction.

(a) For each year from 2027 to 2031, provide first-year savings and number of projects broken down by Existing Buildings and New Construction.

(b) Confirm or correct the following: Custom Program savings decline from approximately 73.2 GWh from 191 projects in 2027 to approximately 27.7 GWh from 72 projects in 2031.

(c) Explain why forecast Custom savings and project volumes are significantly higher in 2027 than in later years, including the drivers of the decline in savings and project volumes through 2031.

(d) Provide details of the planned enhancement to support BNI Demand Response for New Construction.

(e) For 2024 and 2025, provide the percentage of Existing Buildings Custom savings from Energy Manager-supported accounts. To the extent forecast at this level of granularity, provide the equivalent expected percentage for the 2027-2031 Plan period.

Response IR-08:

(a) Please refer to EfficiencyOne's (E1) response to IG IR-19.

(b) Confirmed.

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1 (c) Please refer to E1's response to IG IR-19.

2
3 (d) E1 has proposed to incorporate demand response-compatible equipment and controls into
4 Custom New Construction criteria. The objective would be to promote grid-interactive
5 efficient buildings and enable future participation in demand response events, supporting
6 system reliability and demand-side capacity.

7
8 E1 also intends to promote demand response program participation opportunities through
9 Custom and encourage enrollment where new construction projects are strong matches
10 based on anticipated needs.

11
12 (e) In 2024, 94 percent of the Custom program component savings were achieved through
13 energy manager supported projects under existing buildings. In 2025 this was 90 percent.
14 E1 has many projects currently enrolled with expected completion dates in 2027 and 2028.
15 Of these projects, 66 percent of these are supported by energy managers.

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Request IR-09: Energy Managers and Navigators in Integrated DSM Delivery

Reference: 2027-2031 DSM Plan; energy managers; delivery model; integrated DSM resources.

Recent amendments to the Public Utilities Act expanded the scope of DSM to include DR, strategic electrification, DERs, and other non-traditional resources. Individual customer projects may increasingly span multiple DSM resource categories, such as an oil-to-hybrid heat pump conversion with DR controls, or a new construction project combining efficiency, solar PV, storage, EV charging, and DR-ready controls.

(a) Confirm whether EfficiencyOne has considered a coordinated delivery platform – including energy managers for C&I and small business customers, and navigators for residential customers – to deliver integrated DSM across efficiency, DR, strategic electrification, DERs, and external funding. If considered, provide any analysis of the platform’s potential to:

- i) reduce customer acquisition costs, administrative duplication, delivery risk, and lost opportunities compared with program-by-program delivery;**
- ii) improve uptake of DR-ready controls, hybrid heating, solar-plus-storage readiness, and EV charging readiness at equipment replacement, renovation, or new construction;**
- iii) help customers access external funding, including federal tax incentives, financing, NRCan funding, or other sources, and improve ratepayer-perspective cost-effectiveness.**

(b) Identify any regulatory, budget, reporting, staffing, or cost-effectiveness barriers to using energy managers, roving energy managers, or navigators as an integrated delivery platform during the 2027-2031 Plan period.

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1 **(c) Provide the current FTE count of on-site energy managers and roving energy managers**
2 **(including host organizations, segments served, and whether each role is embedded,**
3 **sector-based, or roving), and the current dollar amount and percentage of energy**
4 **manager funding from DSM, plus all other funding sources.**

5
6 **(d) For 2024 and 2025, provide a table of energy-manager-supported outcomes, including**
7 **annual electricity savings with DSM attribution, solar projects by count and kW, strategic**
8 **electrification projects by count, fossil fuel savings and electricity impacts, DR capacity**
9 **enrolled, external funding leveraged, and associated DSM project value or customer**
10 **investment enabled. Where a category is not tracked, please indicate that.**

11
12 Response IR-09:
13

14 (a) EfficiencyOne (E1) intends to integrate the resources listed in its Preferred Plan where
15 practical. Energy Managers, Business Development Managers, Efficiency Care
16 Representatives, Program Navigators, and the Efficiency Preferred Partner team support
17 engagements with customers and program partners to achieve the DSM Plan performance
18 targets. Energy Managers provide a range of services to their customer accounts that help
19 address common barriers to DSM program participation. These services include:

- 20 • Providing the technical expertise needed to identify energy management
21 opportunities across DSM resources within customer facilities;
- 22 • Managing the development of energy management opportunities into
23 implemented projects with their existing in-house resources;
- 24 • Helping customers access non-DSM funding to strengthen project business cases;
25 and
- 26 • Providing other supports needed to recruit and retain customers in DSM
27 programs.

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1 E1 will continue to offer these services in this plan, in accordance with program acquisition
2 needs. The Preferred Plan remains centered around energy efficiency and those targets are
3 declining over the plan period, so E1 anticipates that less recruitment effort may be needed
4 to achieve targets in 2029-2031.

5
6 E1 has considered shifting Demand-Side Management (DSM) spending from customer
7 incentives toward additional staff roles focused on customer recruitment. Overall, the
8 approach included in the proposed 2027–2031 DSM Plan prioritizes maximizing the share
9 of DSM investment that is directed to customer incentives and services. This approach will
10 be assessed over the five-year plan to ensure it remains balanced against any risk of not
11 achieving approved DSM performance targets as market conditions evolve.

12
13 (b) Please refer to part (a) of this IR response.

14
15 (c) At the end of Q1 2026, E1 had four Energy Managers positions partially funded by DSM.
16 The salary costs for these four Energy Manager roles are included in the total DSM salaries
17 and benefits as reported by E1. E1 does not disclose individual compensation publicly.
18 Currently, of the four partially DSM-funded positions, three are roving within the industrial
19 sector and one is embedded with an institution; however, the allocation of DSM funding
20 for energy manager placements can vary depending on program priorities, funding
21 availability, and the specific needs of participating organizations.

22
23 (d) E1 does not disclose individual staff or department performance targets or outcomes
24 publicly. It is E1's responsibility to ensure that overall performance targets for the DSM Plan
25 are met and as such manages internal requirements accordingly.

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Request IR-10: Smart Synergy

Reference: 2027-2031 DSM Plan; Smart Synergy; batteries and generators.

(a) Provide the number of batteries, gas generators, and diesel generators enrolled in Smart Synergy in 2025 and forecasted totals from 2027-2031, including total enrolled or available capacity by technology type.

(b) Comment on whether the DSM Plan duration or funding approval period creates a barrier to supporting capital-intensive DERs where customer investment depends on longer-term incentive certainty.

Response IR-10:

(a) In program year 2025, there were no batteries, gas generators, or diesel generators enrolled in Smart Synergy.

E1 has not forecasted technology-specific totals for Smart Synergy in the proposed 2027–2031 DSM Plan. The Smart Synergy portfolio is developed based on customer-specific opportunities and the curtailable load each participant can reliably provide. E1 is actively exploring technologies that can provide cost-effective curtailment in the Business, Non-profit and Institutional (BNI) sector, including discussions with customers regarding batteries and natural gas back-up generation for upcoming program seasons.

(b) The DSM Plan duration does not prevent E1 from supporting capital-intensive distributed energy resources (DERs), but customer investment decisions may depend on economics that extend beyond the five-year approval period.

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1 At this stage of the program component’s lifecycle, Smart Synergy incentives are intended
2 to help customers begin interacting with the grid and demonstrate that there is value in
3 being an active participant rather than a passive electricity customer. For some customers,
4 the incentive may support the use of existing assets or operational flexibility. For larger
5 capital investments, such as batteries or other DERs, the incentive alone may not be
6 sufficient to drive investment without a broader business case.
7
8 E1 will continue to work with customers to identify cost-effective opportunities and to build
9 participation models that provide value to both customers and ratepayers within the
10 approved DSM Plan framework.

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Request IR-11: Strategic Electrification, Heat Pumps, Electric Vehicles, and Managed Charging

Reference: 2027-2031 DSM Plan; Strategic Electrification; modified PAC screening; electric vehicles; managed charging; 2023 E3 Strategic Electrification report commissioned by Nova Scotia Power.

A 2023 E3 report commissioned by Nova Scotia Power concluded that managed-charging light-duty electric vehicles provide approximately \$3,400 net present value per vehicle to utility ratepayers and noted that a portion of these ratepayer benefits could be used to support up-front vehicle or charging infrastructure incentives. The same report also found that electrification of homes currently using fuel oil can provide net benefits to homeowners, ratepayers, and Nova Scotia, including for best-in-class heat pumps and dual-fuel mini-splits.

(a) Provide all strategic electrification measures and scenarios considered for the 2027-2031 Plan.

(b) For each measure or scenario for which analysis was prepared, provide the modified PAC inputs and outputs and the unit cost assumptions.

(c) Confirm whether lower-cost delivery approaches were considered, including delivery through energy managers or navigators, or focusing on end-of-life replacement where electrification may represent an incremental cost rather than a full replacement cost. Provide supporting analysis.

(d) Confirm whether federal incentives were considered in unit cost and cost-effectiveness scenarios, including the 30% refundable Clean Technology Investment Tax Credit, 100%

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1 first-year accelerated depreciation for eligible commercial heat pumps, and the \$5,000
2 federal EV incentive. If not, explain why not.

3
4 (e) Confirm whether including measures that fail the modified PAC on a stand-alone basis
5 was considered as part of an overall cost-effective portfolio. Describe the framework for
6 portfolio-level versus measure-level assessment.

7
8 (f) Confirm whether EfficiencyOne assessed the differing short- and long-term rate impact
9 characteristics of strategic electrification, which may increase short-term utility
10 revenues, versus efficiency, which may reduce long-term capacity and energy costs.
11 Confirm whether a combined portfolio could provide a more balanced rate impact profile
12 than one weighted toward a single resource. If no analysis was completed, confirm and
13 explain why.

14
15 (g) Confirm whether electric vehicle purchase incentives, managed charging incentives, EV
16 charger incentives, or EV charging control measures were considered for the 2027-2031
17 DSM Plan, including any analysis of linking such incentives to managed charging
18 participation or DR enrollment. If considered, provide the cost-effectiveness and
19 ratepayer-impact analysis, including how the E3 findings were incorporated. If not,
20 explain why not.

21
22 Response IR-11:

23
24 (a) Please refer to EfficiencyOne's (E1) response to part (a) of SBA IR-05.

25
26 (b) Please refer to E1's response to part (a) of SBA IR-05.

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1 (c) Lower-cost delivery approaches (e.g., through energy managers) were indirectly
2 considered, as some of the strategic electrification measures analyzed were intended for
3 delivery through the Custom program component, which is often utilized by energy
4 managers.

5
6 Strategic electrification measures were evaluated using the modified-PAC cost-
7 effectiveness test, which focuses on utility system costs and revenues and does not
8 consider customer incremental costs. As a result, the analysis primarily reflects program
9 costs, system cost impacts, and electricity consumption, rather than alternative delivery
10 models.

11
12 (d) Federal incentives were not considered in the development of unit cost or cost-
13 effectiveness for strategic electrification measures. This reflects uncertainty regarding the
14 availability, duration, and customer eligibility of federal programs over the 2027–2031 DSM
15 Plan period. Including such funding could introduce variability into the analysis, whereas
16 the Plan is intended to reflect stable and predictable program conditions.

17
18 (e) Please refer to E1’s response to part (a) of Synapse IR-07.

19
20 (f) Please refer to E1’s response to part (a) of Synapse IR-07.

21
22 (g) Please refer to E1’s response to part (a) of SBA IR-05.

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Request IR-12: Portfolio Design, Rebate Effectiveness, and Unit Cost Discipline

Reference: 2027-2031 DSM Plan; portfolio design; measure saturation; incentive setting; portfolio management; unit cost control; performance incentive framework.

As low-cost, short-payback measures saturate, remaining opportunities may be higher-cost and longer-payback. This may reduce the ability to bundle short-payback measures with deeper savings and may reduce rebate effectiveness where incentives become a smaller share of total project cost.

(a) Confirm whether EfficiencyOne has assessed how saturation of low-cost measures, including lighting, affects the economics of deeper retrofit projects.

(b) Confirm whether rebate elasticity has been evaluated by segment or measure type, including whether higher incentives produce proportional increases in participation or savings.

(c) Identify any segments or measures where rebates are becoming less effective due to declining share of total project cost or significant non-financial barriers.

(d) Confirm whether alternatives to higher rebates and lower-cost delivery approaches were considered, including technical assistance, energy managers, navigators, financing support, measure bundling, and external funding leverage.

(e) Explain whether higher PAC-ratio measures or programs are prioritized over measures or programs that pass cost-effectiveness with a smaller margin. Identify any safeguards against designing programs at the highest unit cost that still passes the cost-effectiveness test.

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1 **(f) Explain what mechanisms in the proposed Plan, budget framework, reporting**
2 **framework, mid-course adjustment process, or performance incentive framework**
3 **encourage EfficiencyOne to reduce actual unit costs below forecast while still achieving**
4 **savings targets.**

5
6 Response IR-12:
7

8 (a) EfficiencyOne (E1) has not performed a formal analysis of how saturation of low-cost
9 measures, including lighting, affect the economics of deeper retrofit projects. Such
10 measures offer lower paybacks and are often packaged with more comprehensive and
11 expensive retrofits to build a more attractive business case for energy efficiency. E1 expects
12 that higher saturation of low-cost measures and changes to baselines that diminish savings
13 for measures will continue over the 2027–2031 Plan period. For these reasons, E1 has
14 proposed higher incentives on various deeper retrofit product categories to help alleviate
15 associated pressures.
16

17 (b) As part of Preferred Plan preparations, E1 did not formally evaluate rebate elasticity by
18 segment or measure type. However, E1 has much experience delivering energy efficiency
19 programs and has witnessed how alternations to incentive levels can impact participation
20 and savings. For instance, E1 increased incentives on eligible residential lighting products
21 from up to 65 percent off the product retail price in its fall 2023 campaign to up to 80
22 percent off the product retail price in its fall 2024 campaign, leading to a 200 percent
23 increase in participation. In this example, there were also external factors at play that are
24 difficult to capture, including the role of retailers in promoting products, fluctuating stock
25 availability, and additional incentives that retailers and manufacturers may have offered to
26 customers. External influences are common and make this type of elasticity analysis
27 difficult, as changes to product and labour availability and costs, financing rates, savings

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assumptions by E1's independent third-party Evaluator, and non-DSM supports can lead to disproportionate impacts between DSM incentives, participation, and savings. E1 applied its experience and learnings when developing the proposed program portfolio.

(c) Please refer to Appendix A – Preferred Plan, Section 4.3 for a summary of what is new in the 2027–2031 DSM Plan, including examples of incentive level changes and explanations. E1 has specifically noted that residential heat pump rebates have become less effective in recent years due to rising installation and labour costs. E1 is proposing a staged approach to incentive increases over the duration of the Plan, as further explained in Synapse IR-37.

(d) E1 considered alternatives to higher rebates and lower-cost delivery approaches. For example, as highlighted in Appendix A – Preferred Plan, Section 4.3, E1 plans to introduce heating system incentives in the Instant Savings program component as a lower barrier and lower cost alternative to Home Energy Assessment when homeowners do not want or need a full home evaluation. E1 also looked at different delivery approaches that are not proposed in the Preferred Plan, including the use of Roving Energy Managers to support the Small Business Energy Solutions program component, as explained in Solar NS IR-07. E1 is continually considering these types of process improvements and expects further delivery changes could occur during the 2027–2031 Plan as industry and economic conditions continue to evolve.

(e) E1's proposed 2027–2031 DSM Plan does not establish a requirement to prioritize measures or programs based solely on the magnitude of their Program Administrator Cost (PAC) ratios. While the PAC test is applied as the primary screening test, it is used principally to determine whether measures and the overall portfolio are cost-effective, rather than to rank or select measures based on how far they exceed the threshold. Cost-effectiveness is assessed at the portfolio level, with measure-, program-, and sector-level results provided

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1 for informational purposes. In addition, the Plan is explicitly developed using a balanced
2 plan approach, which considers a range of factors beyond cost-effectiveness, including
3 program delivery costs, long-term energy and capacity savings, participation across
4 customer groups, and rate impacts. This indicates that higher PAC-ratio measures are not
5 inherently prioritized over those with smaller margins, as portfolio design reflects multiple
6 objectives rather than a single optimization of the PAC metric.

7
8 At the same time, several safeguards exist against designing programs at the highest
9 possible unit cost that still pass the cost-effectiveness test. First, the requirement to
10 demonstrate portfolio-level cost-effectiveness constrains overall program design, meaning
11 higher-cost measures must be balanced within a portfolio that remains cost-effective in
12 aggregate. Second, measures that fail the cost-effectiveness test require explicit
13 justification, reinforcing scrutiny of marginal or high-cost offerings.

- 14
15 (f) The 2027–2031 DSM Plan establishes a set of complementary mechanisms that collectively
16 encourage E1 to reduce actual unit costs below forecast while still achieving approved
17 savings targets. First, E1’s Nova Scotia Energy Board (NSEB) approved performance targets
18 are not adjusted through the mid-course adjustment (MCA) process, which is explicitly
19 designed to maintain—not revise—approved savings levels. This creates a core incentive
20 for E1 to manage delivery efficiently: since savings obligations remain unchanged, lowering
21 the cost per unit of savings improves the likelihood of meeting targets within planned
22 expenditures.

23
24 Second, the Plan tightly links spending to savings outcomes, particularly through customer
25 incentives, which represent the majority of program expenditures and are directly tied to
26 achieving DSM targets. Unit cost is a function of both costs and achieved savings, meaning
27 E1 can improve cost performance by either reducing costs or increasing savings for a given

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1 level of investment. In addition, the MCA process provides flexibility to reallocate budgets
2 and savings across programs in response to observed performance, market conditions, or
3 evaluation results, enabling E1 to shift resources toward more cost-effective opportunities
4 while maintaining overall savings commitments.

5
6 Finally, ongoing reporting, variance thresholds, and regulatory oversight reinforce
7 accountability for cost performance. E1 must monitor spending against plan, explain
8 material variances, and disclose results through regular reporting to the NSEB and the DSM
9 Advisory Group. Taken together, these mechanisms ensure that while E1 is obligated to
10 meet fixed savings targets, it has both the flexibility and the incentive to optimize program
11 delivery and pursue lower-cost savings opportunities over the course of the plan.

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Request IR-13: IRP Benchmark, Preferred Plan, and Affordability Trade-off

Reference: 2027-2031 DSM Plan; Preferred Plan; IRP-aligned savings scenario.

(a) Provide the analysis supporting the conclusion that 435.4 GWh in the Preferred Plan, rather than 683.1 GWh in an IRP-aligned scenario, represents the appropriate balance of short-term affordability and long-term ratepayer value.

(b) Explain which programs, measures, segments, or delivery channels were reduced, removed, or constrained in moving from an IRP-aligned scenario to the Preferred Plan.

(c) Provide any analysis of the short-term bill impacts and long-term avoided-cost impacts associated with the Preferred Plan compared with an IRP-aligned scenario.

(d) Confirm whether any lower-cost delivery models or external funding leverage strategies were considered to reduce the affordability impact of achieving higher savings.

Response IR-13:

(a) Please refer to EfficiencyOne's (E1) response to Synapse IR-10.

(b) Please refer to E1's response to CA IR-02 for detail on the energy efficiency IRP scenario modelled by E1 as part of the 2027–2031 DSM Plan development.

(c) Please refer to E1's response to part (a) of NSEB IR-03.

(d) Confirmed.

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Request IR-14: Research, Innovation, and Enabling Strategies

Reference: 2027-2031 DSM Plan; Research and Innovation; Enabling Strategies.

- (a) Provide details of research, innovation, market transformation, and enabling-strategy projects completed in 2025.**
- (b) Break down the \$29.1 million Enabling Strategies budget according to which activities are discretionary and which are required for compliance or core delivery.**
- (c) Provide planned 2027-2031 research, innovation, market transformation, and enabling-strategy projects.**
- (d) Identify the expected benefits of each planned project.**
- (e) Explain how research and innovation results will be incorporated into program design during the Plan period, including whether successful projects can be scaled within the Plan period and what approvals or budget transfers would be required.**

Response IR-14:

- (a) The following examples reflect DSM Innovation projects (exclusive of Market Transformation) completed in 2025 and are not a complete list of all Innovation projects underway during that year:**
 - i) Residential use of generator backup for heat pumps** – assessment on the reliability of backup generators as a power source for heat pump heating during outages. This work builds on prior research into market and technology barriers to transitioning

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Nova Scotia homes away from oil heating, which identified contractors and homeowner concerns about whether backup generators can adequately support the energy needs of heat pump systems.

ii) **Natural gas and diesel generators for demand response** – Research and pilot evaluating the feasibility of using natural gas and diesel generators in multi-unit residential buildings and municipal buildings for demand response.

iii) **Central electrically heated hot water for demand response** – Assessment of the feasibility of using central electrically heated hot water systems in schools and multi-unit residential buildings (MURBs) for demand response.

iv) **Duct flow sizing and workshops** – Coordinate with partners (Natural Resources Canada Local Energy Efficiency Partnerships [LEEP] and Efficiency Preferred Partners team) to deliver duct flow testing and proper heating equipment sizing through Efficiency Nova Scotia and contractor training workshops.

Milestones relevant to Market Transformation completed in 2025 include:

v) Completed a significant market study to establish baselines for all Market Progress Indicators.

vi) Partnered with two equipment manufacturers to offer in-person heat pump water heater (HPWH) training sessions, primarily for installers, with over 80 attendees. Additional in-person training session for Energy Advisors (EAs), as well as a webinar for EAs with over 30 attendees.

vii) Executed supply chain and consumer awareness campaigns, including a case study video of a homeowner speaking about the benefits of their HPWH and dispelling myths that are barriers to adoption for this technology.

(b) In the development of the 2027–2031 Preferred Plan and the various rounds of modelling, EfficiencyOne (E1) reduced discretionary costs where possible, including, for example,

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eliminating some Education and Outreach activities. The Other Enabling Strategies category represents the costs of E1 complying with its regulatory requirements over the course of the five-year plan. Activities in the Education and Outreach category support core program delivery by creating the awareness needed to drive participation in E1 programs and to ensure a strong Efficiency Preferred Partner network is in place to deliver E1 programs. Research activities in the Development and Research category provide important insights for the organization to adapt its programs where necessary over the course of the Plan period, while innovation activities are designed to address long-term market and technological barriers to DSM and are considered critical for planning for future DSM Plans, and new programs. Market Transformation is a new category in the 2027–2031 Preferred Plan (previously it was an activity under the Development and Research category) as a core delivery service that will deliver the heat pump water heater market transformation pilot over the five years of the Plan.

(c) Innovation projects are scoped, planned, and approved annually through E1’s Executive Leadership Team as part of the business planning process. Appendix A – Attachment 5 outlines the structured decision-making process used to set priorities, planned investment by focus area, and the approach for selecting and delivering innovation projects.

(d) Benefits of research and innovation projects contribute to Innovation goals which are included in the 2027–2031 DSM Plan application, Appendix A – Attachment 5. For convenience they are summarized as:

- Improving cost effectiveness;
- Advancing readiness of new DSM measures and programs;
- Leveraging system and distribution and planning insights to identify and evaluate new DSM programs and services; and
- Leveraging other funding sources to support emerging DSM activities.

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- 1 (e) The outcomes of the innovation projects are considered against the goals and objectives of
2 the project. This informs appropriate next steps which could include further research and
3 analysis, implementation of modifications to existing programs, and future DSM plan input
4 development.

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Request IR-15: Preferred Partner Engagement

Reference: 2027–2031 DSM Plan; program delivery; Preferred Partner Network.

EfficiencyOne’s website lists approximately 438 Efficiency Preferred Partners. Given proposed changes to the DSM portfolio, including measure saturation, rising unit costs, and expanded DSM scope to include demand response, strategic electrification, and DERs:

(a) Please describe any engagement undertaken with the broader Efficiency Preferred Partner network in developing the 2027–2031 DSM Plan.

(b) Please summarize any feedback received regarding measure availability, customer demand, workforce capacity, delivery barriers, lighting saturation, rebate effectiveness, or new DSM opportunities.

(c) Please explain how this feedback was reflected in the proposed Plan.

(d) If broad Preferred Partner engagement was not undertaken, please explain why not.

Response IR-15:

(a) Efficiency Preferred Partner (EPP) engagements are a source of ongoing feedback. While not specifically intended to solicit information or feedback regarding the DSM plan, EfficiencyOne (E1) takes into consideration member feedback, suggestions and requests to better inform existing and future operations and programs. The EPP network provides several opportunities to gather feedback through annual surveys, focus groups, conference attendance, industry and partner networking events, and one-to-one meetings. The intent

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1 of these engagements is to provide partners with updated information on the programs
2 and goals of E1's activities and to elicit feedback from our partners and industry
3 stakeholders to ensure that offerings are pertinent and to identify and address potential
4 issues early.

5
6 (b) The core role of the EPP network is to facilitate delivery of E1 programs and support and
7 upskill partners to ensure that delivery occurs in an efficient and cost-effective manner.
8 Topics that have been identified through partner feedback include areas of opportunity for
9 program delivery optimizations, rebate structures and values, and active risks in the
10 market. Addressing such issues serves to improve continuity and efficiency in the
11 subsequent DSM plan. For example:

12 a. Partner and customer feedback highlighted issues with business practices of
13 certain heat pump contractors that put customers at unnecessary financial risk.
14 As a result, E1 ran a public service announcement campaign informing Nova
15 Scotians about these issues and how to protect themselves.

16 b. Based on direct partner feedback, in 2025 modifications were made to the
17 HomeWarming program processes to reduce project backlog. Through this effort
18 the number of projects initiated in 2024 aging in the pipe decreased by 47 percent
19 and the number of projects from 2023 and older decreased by 63 percent. This
20 was accomplished over a 6-month timeframe. These actions contributed to an
21 improved experience for both customers and contractors, and more efficient
22 program delivery.

23 c. Feedback from outreach and engagement with wholesalers and suppliers led to
24 modifications to heat pump water heater rebates to ensure contractors could
25 access those rebates and pass them on to their customers, easing access to the
26 technology.

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- 1 (c) As described in part (a) above, EPP feedback is captured on an ongoing basis. This process
2 leads to continuous assessment and relevant updates and improvements to programs and
3 measures throughout the DSM process, as indicated in (b) above.
4
5 (d) Please refer to parts (a) and (b) of this IR response.