

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 **Request IR-1:**

2 **Reference: E-23, Page 8, lines 6-11.**

3 ***E1 also:***

4 ***• interpreted the NSEB's Order on E1's Application for Approval of a New***
5 ***Benefit-Cost Analysis Test for Evaluating Demand Side Management Plans***
6 ***and section 79A(iv) of the Public Utilities Act and applied its interpretation***
7 ***of these regulations to its screening of cost-effectiveness and of strategic***
8 ***electrification***

9 **Preamble: Synapse's evidence goes on to provide alternative ways in which the Board**
10 **decision can be interpreted, at page 23-24.**

11 (a) Please confirm that Synapse is referring to section 79A(b)(iv), the definition
12 of demand-side management.

13 (b) Does Synapse take the position that E1 has misinterpreted the Board's
14 decision and corresponding Order from Matter M12282?

15 (c) What, if any, legal training and expertise does Ms. Napoleon have that she
16 relies upon in making recommendations about legal interpretation of the
17 Board Decision, Order, and governing statute?

18 (d) Please confirm that Courtney Lane, from Synapse, filed evidence on behalf
19 of Board Counsel recommending that the Board approve E1's proposed
20 broad Nova Scotia BCA test, including host customer non-energy benefits,
21 which the Board did not accept, and outline whether Synapse's
22 recommended approach in M12282 now differs within this proceeding, or
23 whether it advances a similar interpretation of the cost-effectiveness
24 framework.

25 (e) In reaching her conclusions regarding the Board Order and Decision from
26 Matter M12282, has Ms. Napoleon reviewed the evidence of Courtney

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 Lane at Synapse, or conferred or consulted with Ms. Lane in any way? If
2 so, please describe the nature of those discussions.

3 Response IR-1:

4 (a) Confirmed.

5 (b) I do not take the position that E1 misinterpreted the Board's decision; I contend that
6 E1 took one position but that another interpretation is possible.

7 (c) I am not a lawyer and did not intend to offer a legal opinion. I offered a possible
8 interpretation given my understanding of how demand side management (DSM) is
9 regulated in the province and based on my review of the Public Utilities Act and the Board
10 Order in M12282.

11 (d) Yes, Courtney Lane, from Synapse, filed evidence on behalf of Board Counsel
12 recommending that the Board approve E1's proposed broad Nova Scotia BCA test,
13 including host customer non-energy benefits, which the Board did not accept. No, I am not
14 proposing to change the Nova Scotia cost-effectiveness framework as adopted in
15 M12282.

16 (e) Yes, I reviewed this evidence from Courtney Lane at Synapse. Yes, I conferred or
17 consulted with Ms. Lane once on May 4, 2026. We discussed strategic electrification and
18 E1's 2027-2031 DSM Plan.

19

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 **Request IR-2:**

2 **Reference: E-23, Pages 11-13.**

3 **Preamble: Synapse concludes E1's Preferred Plan will deliver approximately 215 GWh**
4 **less in annual energy efficiency savings than the IRP assumes by 2031, and approximately**
5 **9 MW less in peak demand savings by 2031. Synapse's Table 1 (page 14) shows a**
6 **cumulative energy efficiency savings gap of 214.7 GWh between the combined E1 and**
7 **NSPI DSM efforts and the 2022 Evergreen IRP over the 2027-2031 period.**

8 (a) Does Synapse consider the IRP's DSM savings assumptions to be a
9 binding target or a directional planning assumption for the purposes of
10 evaluating E1's Preferred Plan? Please explain.

11 (b) Please confirm whether Synapse conducted a Rate and Bill Impact
12 Analysis (**RBIA**) for any scenario in which the energy efficiency savings
13 gap identified in Table 1 is closed. If so, please provide the results of that
14 analysis, disaggregated by rate class.

15 (c) If no RBIA was conducted, please explain:

16 (i) what incremental investment level Synapse considers
17 necessary to align E1's energy efficiency savings with the
18 IRP assumptions; and

19 (ii) what rate class allocation methodology Synapse would
20 apply to any such incremental investment.

21 (d) With respect to Table 1 on page 14, please confirm whether Synapse has
22 included the combined DR comparison against the IRP and not included
23 NSPI's energy efficiency contribution to the EE comparison. If correct, why
24 are NSPI's EE contributions excluded, and would this change the reported
25 214.7 GWh gap?

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 (e) Where an updated IRP is currently underway by IESO-NS, please explain
2 how Synapse proposes that any changes to the IRP's DSM savings
3 assumptions during the 2027–2031 Plan period should be addressed,
4 including whether those changes would warrant a Plan amendment, a mid-
5 course adjustment, or no adjustment?

6 Response IR-2:

7 (a) I do not consider the IRP's DSM savings assumptions to be a binding target. Rather, I
8 point to the GWh and MW savings gaps as problematic because other, likely more
9 expensive resources may need to be deployed to close those gaps.

10 (b) Synapse did not conduct a Rate and Bill Impact Analysis (RBIA) for any scenario in which
11 the energy efficiency savings gap identified in Table 1 is closed.

12 (c)

13 (i) I have not conducted analysis to determine the incremental investment level needed to
14 align E1's DSM savings with the IRP assumptions. To clarify, my evidence did not
15 recommend that E1 expand its portfolio to fill the gap referenced in this IR. I provided the
16 information on the gaps as background for other considerations, including whether E1's
17 proposed mid-course adjustment process provides enough flexibility to address needs that
18 may arise over the course of five years.

19 (ii) I have not considered a specific rate class allocation, because I did not propose to
20 close the gaps mentioned in this IR.

21 (d) Table 1 does not include any NS Power-administered energy efficiency (EE). I am
22 not aware of any EE programs administered by NS Power. If there are any NS
23 Power-administered EE programs, the reported gap would be smaller. Table 1
24 does include projected NS Power-administered demand response consistent with
25 the forecast in NS Power's May 15, 2026 redacted 2026 Load Forecast Report.
26 (See Figure 69: Demand Response Year Direct pg. 93 of 105). If this IR is asking

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 about DR, please see Synapse's response to E1 IR-3.

2 (e) I do not propose specific gap thresholds that would make a mid-course adjustment

3 appropriate. However, should the IRP currently underway call for a greater share of DSM

4 savings than the 2022 IRP did, I argue that it would be appropriate to have a mid-course

5 adjustment that considers cost-effective ways to fill or reduce that gap.

6

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 **Request IR-3:**

2 **Reference: E-23, Page 17, lines 18-20.**

3 ***Over time, lower spending on DSM will increase electricity costs for***
4 ***ratepayers—i.e., make electricity less affordable—because the cost of***
5 ***supply is higher than the cost of DSM.***

6 (a) Please confirm the annual DSM investment level Synapse recommends for
7 the 2027-2031 Plan, expressed in both nominal and inflation-adjusted
8 terms.

9 (b) Has Synapse independently calculated the quantified impact on electricity
10 costs for ratepayers attributable to E1's proposed spending level over the
11 five-year Plan period? If so, please provide. If not, please explain the basis
12 on which Synapse is confident in its conclusion that electricity costs for
13 ratepayers will increase.

14 (c) Please provide Synapse's estimate of the RBIA to each rate class of any
15 investment level Synapse recommends above E1's proposed \$63.75
16 million per year.

17 **Response IR-3:**

18 (a) I provide two options for consideration in my testimony:

19 (i) Addition of SE Round 2 Modelling to E1's Preferred Plan:
20 The table below provides the estimates requested for this
21 option. For the purpose of this exercise, I assume that the
22 \$12.2 million for SE in the Round 2 modelling is in nominal
23 dollars and allocated equally across the five plan years. I
24 assume a 2 percent inflation rate in my estimates of
25 investments in inflation-adjusted \$2027.

26

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

Years	E1 2027-2031 DSM Application - Nominal \$	E1 2027-2031 DSM Application (estimated by Synapse) - Inflation-Adjusted \$2027	SE from Round 2 Modelling - Nominal \$ (assumption by Synapse)	SE Round 2 Modelling (estimated by Synapse) - Inflation-Adjusted \$2027	Total - Nominal \$	Total Inflation-Adjusted \$2027
2027	\$63.75	\$63.75	\$2.44	\$2.44	\$66.19	\$66.19
2028	\$63.75	\$62.50	\$2.44	\$2.39	\$66.19	\$64.89
2029	\$63.75	\$61.27	\$2.44	\$2.35	\$66.19	\$63.62
2030	\$63.75	\$60.07	\$2.44	\$2.30	\$66.19	\$62.37
2031	\$63.75	\$58.90	\$2.44	\$2.25	\$66.19	\$61.15
2027-2031	\$318.75	\$306.49	\$12.20	\$11.73	\$330.95	\$318.22

(ii) Addition of SE for low-income customers who heat with oil to E1's Preferred Plan: I did not recommend or estimate annual investment levels for this option.

(b) I have not independently calculated the quantified impact on electricity costs for ratepayers attributable to E1's proposed spending level over the five-year Plan period. I rely on E1's BCA calculations and NS Power's avoided cost inputs into those BCA calculations for my finding that electricity costs for ratepayers will increase.

(c) I did not estimate the RBIA for each rate class of any investment level above E1's proposed \$63.75 million per year.

(i) Addition of SE Round 2 Modelling to E1's Preferred Plan: E1 estimated the RBIA to each rate class of the \$12.2 million for SE in the Round 2 modelling. Please see my response

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

- 1 to IG IR-5 for these results.
- 2 (ii) Addition of SE for low-income customers who heat with oil
- 3 to E1's Preferred Plan: I did not recommend or estimate
- 4 annual investment levels for this option and therefore did not
- 5 estimate the RBIA of any investment level associated with
- 6 this option.
- 7

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

Request IR-4:

Reference: E-23, Pages 23–26.

Preamble: Synapse provides its proposed interpretation of the Board decision in Matter M12282, and suggests that the inclusion of strategic electrification programming within the 2027-2031 DSM Plan is in compliance with the governing statute, stating specifically that:

I conclude that it would be reasonable for E1 to pursue an amount of electrification in its 2027-2031 Plan that does not increase electricity costs at the portfolio level. ... E1 could include all the strategic electrification it included in its Round 2 modeling without causing electricity costs to increase at the portfolio level as the modified PAC remains substantially higher than 1.0.

(a) Please confirm that s. 79A(b)(iv) of the *Public Utilities Act* requires that strategic electrification be pursued in a manner that reduces overall GHG and electricity costs, not merely that it “not increase electricity costs” at the portfolio level and explain the basis on which Synapse considers those two standards to be equivalent.

(b) Please confirm that the Board Decision in M12282 states explicitly that “both requirements for strategic electrification must be met”, that is, strategic electrification must reduce both GHG emissions and electricity costs for customers and this is grounded in the statutory language of s.79A(b)(iv) of the *Public Utilities Act*. If not, please explain.

(c) Does Synapse take the position that this conjunctive requirement does not apply at the resource level?

(d) Synapse's evidence presents Table 3 at page 26, which shows that including the Round 2 SE scenario in the portfolio produces a combined modified-PAC of 2.3. Please confirm that this result does not mean that the SE resource itself satisfies the statutory requirement to reduce electricity

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

costs for customers; it means only that the portfolio, which is dominated by cost-effective EE and BNI DR, absorbs the SE deficit. If not, please explain.

(e) Does Synapse agree that including SE at the portfolio level on this basis would, in effect, use ratepayer-funded EE and BNI DR surpluses to cross-subsidize a resource that fails the applicable statutory test on its own?

(f) The Board Decision in M12282 noted that the IG's consultant's recommended methodology, the modified PAC, should be used to assess SE specifically to incorporate the statutory requirement that SE reduce electricity costs. Does Synapse agree that using the portfolio-level PAC to absorb a failed modified-PAC result would render the modified PAC test effectively meaningless as a screening tool for SE? If not, please explain.

Response IR-4:

(a) I am not a lawyer. As this IR asks for a legal opinion, I am unable to provide a response.

(b) I am not a lawyer. As this IR asks for a legal opinion, I am unable to provide a response..

(c) I take the position that it is not clear whether the conjunctive requirement applies at the resource level, in light of the statutory requirement to assess cost effectiveness at the portfolio level.

(d) The cost-effectiveness test result that includes SE, 2.3, means that the portfolio as a whole is cost effective. It does not indicate that the SE resource is cost-effective by itself. The portfolio is comprised of measures with different levels of cost-effectiveness, some of which are not cost effective on their own but that are included if there is a compelling reason for their inclusion and so long as the portfolio as a whole remains cost effective.

(e) I am not a lawyer. As this IR asks for a legal opinion, I am unable to provide a response.

(f) No. The use of the modified PAC test to assess SE by itself would provide information regarding the contribution of this resource to the portfolio's cost effectiveness. See also

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 part (e).

2

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 **Request IR-5:**

2 (a) Did Synapse conduct a RBIA for the Round 2 SE results? If so, please
3 provide the disaggregated rate class impacts. If not, please explain why
4 not.

5 (b) Please confirm whether the Round 2 SE modelling used hourly load-shape
6 data or annual averages when estimating peak-hour capacity costs and
7 explain how any reliance on annual averages affects the modified PAC
8 calculation for SE.

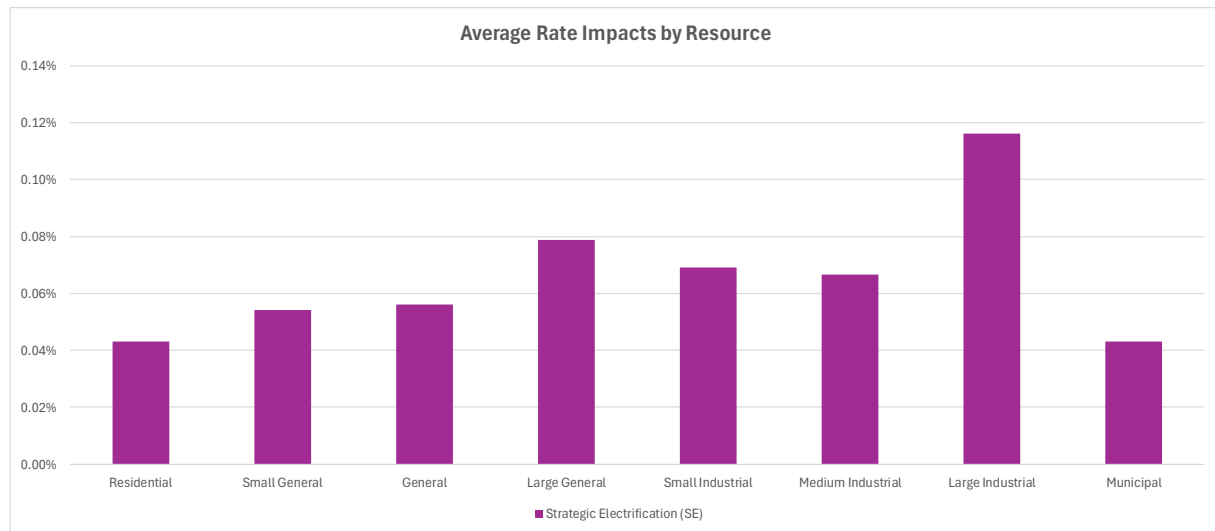
9 **Response IR-5:**

10 (a) Synapse did not conduct a RBIA for the Round 2 SE results. However, E1
11 conducted a RBIA for the Round 2 SE results and provided this RBIA in
12 response to Synapse IR-02 as Attachment 2, Appendix K: RBIA Round 2
13 – Scenario Comparisons. I provide a snapshot of the disaggregated
14 average rate impacts by rate class from this workbook in the table and
15 figure below.

NON-CONFIDENTIAL

**M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application**

Average Rate Impacts								
	Residential	Small General	General	Large General	Small Industrial	Medium Industrial	Large Industrial	Municipal
Strategic Electrification (SE)	0.04%	0.05%	0.06%	0.08%	0.07%	0.07%	0.12%	0.04%



1

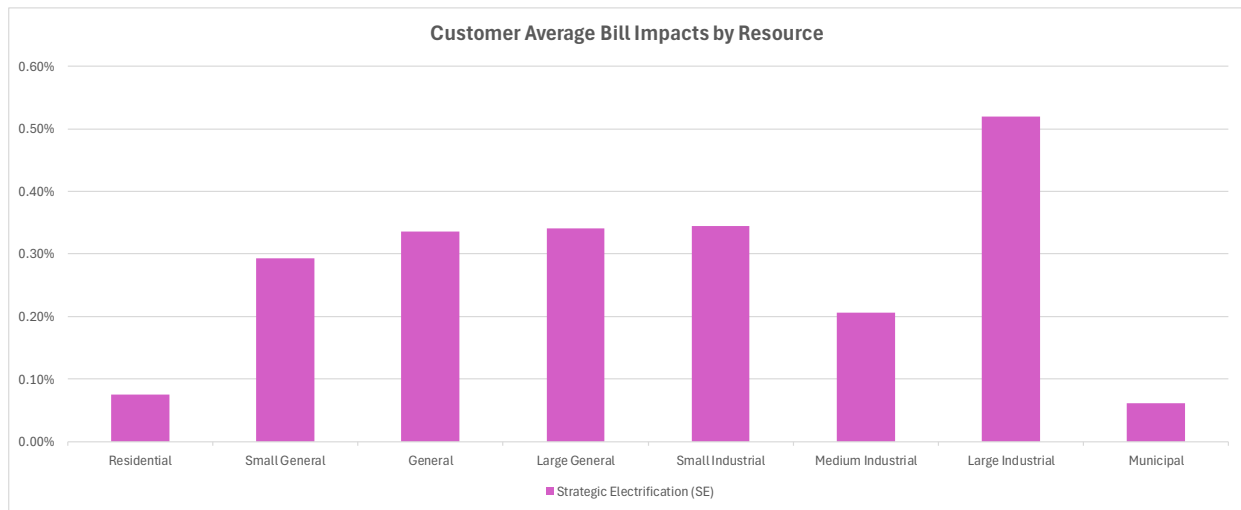
2 I provide a snapshot of the disaggregated customer average bill impacts by rate

3 class from this workbook in the table and figure below.

NON-CONFIDENTIAL

**M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application**

Customer Average Bill Impacts								
	Residential	Small General	General	Large General	Small Industrial	Medium Industrial	Large Industrial	Municipal
Strategic Electrification (SE)	0.08%	0.29%	0.34%	0.34%	0.35%	0.21%	0.52%	0.06%



1
2 E1 provided the modified-PAC for SE in response to Synapse IR-02 as Attachment
3 2, Appendix A, Round 2 Modelling Assumptions and Attachment 2, Appendix G,
4 Round 2 Measure Level Technical Tables 1SE-Base3.

- 5 (b) These files do not indicate whether the Round 2 SE modified-PAC
6 modelling used hourly load-shape data or annual averages when
7 estimating peak-hour capacity costs or show how the peak-hour capacity
8 costs are calculated. As a result, I cannot determine how any reliance on
9 annual averages affects the modified-PAC calculation for SE.

10

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 **Request IR-6:**

2 **Reference: E-23, Pages 27–28.**

3 ***As an alternative to including the strategic electrification from the Round 2***
4 ***modeling, E1 could develop strategic electrification offerings for low- and***
5 ***moderate-income customers who heat with oil. ... I estimate that 17,600 low-***
6 ***income homes heat with oil in Nova Scotia.***

7 (a) Please confirm whether Synapse's recommended SE offerings would be
8 structured as a dedicated residential program component (residential-only
9 allocation) or as part of the broader Enabling Strategies envelope (all-class
10 allocation).

11 (b) Please provide Synapse's estimate of the total program investment
12 required to offer meaningful SE to low- and moderate-income oil-heated
13 customers over the 2027-2031 Plan period and the expected rate class
14 allocation of those costs.

15 (c) Synapse's evidence identifies five rationales for targeting electrification at
16 low-income customers who heat with oil, including energy poverty,
17 affordability, and the lapse of federal Oil to Heat Pump Affordability (**OHPA**)
18 funding. Please confirm whether any of these rationales, individually or
19 collectively, constitutes a basis for including SE in a DSM Plan that does
20 not satisfy the statutory requirement to reduce electricity costs for
21 customers. If yes, please identify the statutory or regulatory provision that
22 permits the Board to include SE on equity or poverty grounds without
23 satisfying the conjunctive cost test.

24 (d) Please explain why DSM electricity ratepayer funding is the appropriate
25 mechanism to address the gap left by the expiry of the federal OHPA
26 program in 2027, rather than a provincial or federal replacement program.

27 **Response IR-6:**

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

- 1 a) I do not make specific recommendations as to how the SE offerings should be structured.
2 I note that E1's SE Round 2 modelling included offerings for both Residential and BNI
3 customers.
- 4 b) I did not estimate the investment levels to offer meaningful SE to low- and moderate-
5 income oil-heated customers over the 2027-2031 Plan period and the expected rate class
6 allocation of those costs.
- 7 c) The statute is silent on the combined application of the statutory requirement to reduce
8 electricity costs for customers and equity or poverty considerations. This is another aspect
9 of implementation of the statute in DSM planning that is subject to interpretation.
- 10 d) I do not dispute that other funding sources, such as provincial or federal funding, could
11 address the gap left by the expiry of the federal OHPA program in 2027.

12

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 **Request IR-7:**

2 **Reference:** E-23, page 43.

3 **Preamble:** Synapse's evidence identifies that E1's performance measurement
4 for DR events is weighted toward the first two hours, even though events
5 consistently run four hours and residential curtailment degrades by roughly half
6 between the first and fourth hours.

7 (a) Please confirm whether BNI DR curtailment performance data by event-
8 hour is available for the Plan period, and whether Synapse recommends
9 that equal-hour weighting be applied to BNI DR performance measurement
10 as well as residential.

11 (b) If equal weighting were applied to BNI DR, please explain whether Synapse
12 has assessed whether BNI PAC BCRs would improve or deteriorate.

13 **Response IR-7:**

14 (a) Correct, BNI hourly curtailment data are not available; please refer to E1
15 response to Synapse IR-18(c)ii. Yes, I recommend that performance is
16 weighted equally across all event hours, for both the residential and BNI
17 programs.

18 (b) I have not assessed the impact on the BNI demand-response PAC of
19 switching to a uniform hourly performance methodology and cannot do so
20 in the absence of both hourly performance data and the existing weights.
21 However, it is likely that the BNI DR portfolio suffers less performance
22 degradation over the course of events than the residential portfolio, and
23 thus would be less impacted from my proposed methodology change.
24 Please refer to Evidence of Alice Napoleon, pg. 44, lines 5-7, where I state
25 that the non-uniform weighting “methodology overstates the performance
26 of pathways for which the curtailment degrades over the event, most

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 notably the thermostat and water-heater pathways.” 87% of the 2025
2 Residential DR capacity was provided by thermostats alone (Synapse
3 Analysis of E1 Response to IR-90, Attachment 1). In contrast, E1 states
4 that the majority of BNI DR capacity is provided by large commercial and
5 industrial customers (E1 response to Synapse IR-49(b)), and large C&I
6 curtailment strategies often rely on non-HVAC measures that don’t degrade
7 during events (e.g., scheduled maintenance and production-line
8 shutdowns per E1 response to Synapse IR 18(c)iii).

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 **Request IR-8:**

2 **Reference: E-23, Page 45, lines 2-5.**

3 ***To address these local air-quality impacts and to fill a gap in E1's offerings (E1 has***
4 ***no BNI pathway dedicated to batteries) I recommend that E1 develop a higher***
5 ***incentive for battery-based BNI standby resources than for fossil-fueled generators.***

6 (a) Please provide Synapse's recommended incentive level for battery-based
7 BNI standby resources, expressed in \$/kW of available seasonal capacity,
8 and the analytical basis for that figure.

9 (b) Please provide Synapse's estimate of the additional cost to the portfolio
10 over the 2027-2031 Plan period arising from a differentiated BNI Back Up
11 Generator ("BUG") incentive structure, and the expected rate class
12 allocation of those costs.

13 (c) Does Synapse propose that this recommended increased incentive be
14 available to all medium and large industrial customers who participate in
15 the BNI DR programming? If not, please explain who would be eligible for
16 these increased incentives, and the basis for any customer exclusions.

17 (d) E1 projects 11 BUG participants providing approximately 6.6 MW of BNI
18 DR capacity in 2027. Please explain how a higher battery incentive would
19 affect the achievability of E1's overall DR capacity targets, given the small
20 number of current BUG participants and provide the resulting BNI DR
21 targets or savings results if the recommended incentive were applied.

22 **Response IR-8:**

23 (a) I have not developed a recommended incentive level for battery-based BNI
24 backup generation. Please refer to Evidence of Alice Napoleon, pg. 45,
25 lines 3-5, where I recommend that "E1 develop a higher incentive for
26 battery-based BNI standby resources than for fossil-fueled generators."

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 (b) Please refer to my response to part (a) above, where I state that I have not
2 developed an incentive level for BNI battery BUGs. Additionally, please
3 refer to E1 response to Synapse IR-90, attachment 1, where E1 implies
4 nearly identical 2027 incentive levels for BNI curtailment and load shift to
5 BUGs (both roughly \$108/kW). While I recommend that the incentive for
6 battery BUGs be higher than that for fossil-fuel BUGs, the fossil-fuel BUGs
7 incentive could be reduced below the planned value to both reflect the
8 societal cost of PM2.5 pollution and eliminate any increase in the BUGs
9 total budget. Please refer also to Synapse response to SBA IR-3.

10 (c) I recommend that all BNI customers who are eligible for the fossil-fuel
11 BUGs offering be allowed to participate in the battery BUGs offering.

12 (d) Nonetheless, E1 offering different incentives for fossil vs battery BUGs
13 participants would not necessarily result in changes to savings targets or
14 their achievability (please refer to my response to part (b) above). I
15 recommend that E1 set participation and savings targets for the BNI battery
16 BUGs offering based on its best assessment of the realistic achievable
17 potential during the planning period, assuming an incentive value based on
18 my response to part b above. E1 could set the sum of fossil-fuel and battery
19 targets to match the currently planned total BUGs targets, resulting in no
20 change to planned savings..

21

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

Request IR-9:

Reference: E-23, Page 46, lines 15-16.

Five years is a long DSM planning period relative to other provinces.⁸³

Please provide a copy of the table of comparable DSM plans, as referred to in Footnote 83, and summarize any additional information contained in that report that Synapse considers relevant for the Board to consider in rendering a decision in this matter.

Response IR-9:

The table of comparable plans, as referenced to in Footnote 83, is pasted below. This table shows that 6 of 9 utilities have plan periods of less than five years, with an average plan period among these utilities of three years.

Table 1. Current utility DSM plans

Utility	Plan start	Plan period (years)	Total plan budget (\$M)	Total plan incremental energy savings
Electricity				GWh
BC Hydro†	April 2025	2	539.8	1,435.0
Efficiency Manitoba*†~	April 2020	6	296.7	2,023.0
Efficiency Nova Scotia*§	January 2023	4	236.8	488.5
efficiencyPEI	March 2023	3	24.5	34.5
FortisBC	January 2023	5	82.6	143.4
Hydro-Québec	January 2023	3	1,037.6	2,596.0
IESO	January 2025	3	1,800.0	4,636.0
NB Power‡¶	April 2024	3	96.4	243.0
NL utilities	January 2021	5	75.1	181.5
Subtotal			4,189.5	11,780.9

This is the information in this report that I consider to be most relevant to rendering a decision on mid-term check ins and mid-cycle adjustments. There may be additional

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 information in the report that may helpful related to the decision on mid-term check ins
2 and mid-cycle adjustments.

3 In preparing this response, I noticed that Footnote 83 in my testimony is inaccurate.
4 Footnote 83 in my testimony should read, as follows, omitting the text with a second and
5 incorrect page number:

6 See Table 1. Current utility DSM plans on page 13 of Gaede, J., Nippard, A., Turner, K.
7 2026. *The 2025 Energy Efficiency Programs Report*. Efficiency Canada, Carleton
8 University, Ottawa, ON. ~~Page 54.~~ Available at: [https://www.efficiencycanada.org/2025-
programs-report/](https://www.efficiencycanada.org/2025-
9 programs-report/). Accessed 5/31/26.

10

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 **Request IR-10:**

2 **Reference: E-23, Page 47.**

3 ***I recommend that the NSEB establish several thresholds that would trigger***
4 ***a requirement for E1 to propose and file a mid-cycle adjustment:***

- 5 • ***If spending is anticipated to decrease or increase by more than a***
6 ***specified percent of plan, such as 10 or 15 percent.***
- 7 • ***if E1 seeks to terminate any program or implement a new program.***

8 (a) When Synapse refers to a “mid-cycle adjustment”, is that used
9 synonymously with the “mid-course adjustments” referred to in E1’s DSM
10 Plan Evidence filed? If not, what is the difference?

11 (b) Please confirm whether Synapse’s recommended mandatory filing
12 threshold is 10 percent or 15 percent and explain the basis for that specific
13 figure as distinct from E1’s proposed 20 percent explanation threshold.
14 Please also confirm whether the threshold would apply on an annual or a
15 cumulative basis over the Plan period.

16 (c) Please confirm whether Synapse’s threshold would apply at the portfolio
17 level, program level, the sector level, and/or the rate class level.

18 (d) Does Synapse agree that to be effective as a rate-class protection
19 mechanism, an MCA trigger should be defined at the rate-class level
20 regardless of whether the portfolio-level variance remains within bounds?
21 If not, please explain.

22 (e) Please define what constitutes a “program addition” for the purposes of
23 Synapse’s mandatory mid-cycle adjustment trigger, including whether:

- 24 (i) adding a new measure category within an existing program
25 component would qualify; and

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 (ii) phasing out an existing pathway within a program
2 component (such as the EV or battery pathways within Eco
3 Shift) would constitute a program termination requiring a
4 mandatory MCA.

5 (f) Please describe the Board approval process Synapse recommends for
6 mid-cycle adjustments filed under the mandatory trigger, including the
7 expected timeframe from filing to decision, and whether written
8 submissions or an oral process is contemplated.

9 (g) Please confirm whether Synapse's recommended mid-cycle adjustment
10 process would allow E1 to introduce SE programming during the Plan
11 period via that process if SE became cost-effective, without a full Plan
12 amendment proceeding and identify the regulatory basis for that position.

13 **Response IR-10:**

14 (a) I use "mid-cycle adjustment" synonymously with the "mid-course
15 adjustments" referred to in E1's DSM Plan Evidence filed. I did not intend
16 to use misleading terminology and there is no difference between the two
17 terms. However, as discussed in my evidence on p. 45-47, I find that a
18 more expansive mid-course adjustment process that allows consideration
19 of spending changes over a threshold to be defined by the Board with input
20 from E1 and stakeholders and of E1-proposed program terminations or
21 additions may be appropriate.

22 (b) I do not make a specific recommendation as to the precise filing threshold.
23 In my opinion, the precise filing threshold would be best established by the
24 Board, with input from E1 and stakeholders.

25 (c) I do not make a specific recommendation as to the application of a filing
26 threshold at the portfolio level, program level, the sector level, and/or the

NON-CONFIDENTIAL

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management
(DSM) Resource Plan Application

1 rate class level. In my opinion, this would be best established by the Board,
2 with input from E1 and stakeholders.

3 (d) I do not make a determination regarding whether an MCA trigger should be
4 defined at the rate-class level regardless of whether the portfolio-level
5 variance remains within bounds. In my opinion, this would be best
6 established by the Board, with input from E1 and stakeholders

7 (e) I do not define what constitutes a “program addition” for the purposes of
8 Synapse’s mandatory mid-cycle adjustment trigger. In my opinion, this
9 would be best established by the Board, with input from E1 and
10 stakeholders.

11 (f) I do not define a Board approval process for mid-cycle adjustments filed
12 under the mandatory trigger, however I maintain that Board approval of a
13 proposed MCA should be required. In my opinion, the specifics of this
14 process would be best established by the Board, with input from E1 and
15 stakeholders.

16 (g) See the responses to part (e).