BEFORE THE NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: *The Public Utilities Act, as amended.*

and

IN THE MATTER OF: An Application by EfficiencyOne for Approval of the 2027–2031 Demand-Side Management (DSM) Purchase Agreement between EfficiencyOne and Nova Scotia Power Incorporated, the establishment of a final agreement between the parties, and approval of a 2027–2031 Demand Side Management (DSM) Resource Plan.

OPENING STATEMENT
OF
THE SMALL BUSINESS ADVOCATE

Mr. Chair and Board members, please accept this opening statement on behalf of the Small Business Advocate (SBA).

This application by EfficiencyOne is for a 5-year Demand Side Management (DSM) Resource Plan, which is two years longer than previous plans, and covers a period of time where Nova Scotia is expected to experience significant changes in its electricity system, including the ramping up of renewable resources as we reduce or eliminate carbon emissions. That transition is expected to cost ratepayers a significant amount of money, alongside growing investment in reliability programs, and the newly created Independent Energy System Operator – Nova Scotia. These increasing costs pressures must be kept in mind when considering EfficiencyOne's application.

The SBA understands and appreciates the value that EfficiencyOne's programs provide to the individual customers within the rate classes it represents, as well as the benefits that are accrued to the system as a whole and that benefit all participants. However, those benefits to individual customers come with a cost, which is shared by both participants and non-participants. While some of those costs may be offset by overall system savings, it is not a complete counterbalance.

The SBA had the opportunity to review EfficiencyOne's opening statement and the Schedule "A" that was attached[1]. The SBA acknowledges the work that EfficiencyOne put into discussing the proposed 2027-2031 DSM plan with stakeholders, and considers many of the proposed adjustments to the application, as set out in Schedule "A", to be reasonable and beneficial.

The proposed changes to the renamed Annual Adjustment Process, specifically with respect to the variance thresholds, approval pathway, and enhanced reporting, appear to be reasonable changes that provide clarity and accountability, while ensuring that EfficiencyOne has the flexibility to carry out their work. Similarly, EfficiencyOne's explanation regarding the event-based triggers for a Mid-Term Check-In are of assistance in understanding the types of events that may be significant enough to require a review of the current plan.

Strategic Electrification has been a long-standing topic before this Board, on many different occasions. The underlying concept, which is understood to mean the encouragement of electrification in a manner that benefits the system, has great potential. However, it must be done in a way that does not create additional strain on either the system or ratepayers through the imposition of additional costs. The SBA supports the inclusion of strategic electrification as soon as possible, on the condition that it satisfies both the regulatory requirements and EfficiencyOne's PAC test.

The SBA supports EfficiencyOne's commitment, as referenced at paragraph 6 of Schedule "A, to provide enhanced reporting on both innovation-framework activities and the allocation of Enabling Strategies.

The SBA thanks the Board for the opportunity to provide this opening statement and looks forward to hearing from EfficiencyOne on the issues in its Application that have not been specifically addressed in Schedule "A" and/or that remain unresolved.

[1] M12780 – Exhibit E-42, EfficiencyOne Opening Statement.

Dated at Bedford, Nova Scotia, this 29th day of July, 2026.

Melissa P. MacAdam
Small Business Advocate