# Affordable Energy Coalition Opening Statement

*July 29, 2026 for delivery August 4, 2026*

Regarding the Application by EfficiencyOne for approval of the 2027–2031 Demand-Side Management (DSM) Purchase Agreement between EfficiencyOne and Nova Scotia Power Inc.

***Introduction***

Chair and members of the Energy Board and representatives of EfficiencyOne and Nova Scotia Power and other intervenors: I represent the Affordable Energy Coalition as past Chair from 2012 to 2025. The Affordable Energy Coalition (AEC) is a coalition of social justice, anti-poverty and environmental organizations dedicated to ensuring universal access to a reasonable amount of energy services for all Nova Scotians.

Affordability and energy security are at the heart of the energy transition alongside the climate crisis. Energy affordability is central to the larger question of affordability in Nova Scotia. We have one of the highest rates of energy poverty in the country, ranging between 30% and 43%. Energy costs create real world impacts on all Nova Scotians but especially those with low and modest incomes.

1. **The Affordable Energy Coalition opposes the cut in EfficiencyOne spending and the shift of savings and therefore spending from residential to business.**

   The spending and savings modelled in the earlier IRP based plan were much more beneficial to Nova Scotians than in the current plan, as outlined in Section 3.2.1 of E1's proposal. EfficiencyOne's argument for changing to the current proposal is that short term affordability concerns must have priority. They argue that short term costs for non participants were too high in the IRP based plan.

   We don't agree with this argument. The monthly bill increase that the IRP plan would have led to is about $1.77/month higher than the monthly increase this plan creates in the first year, for a household using 810 MWh of electricity per month, which is fairly typical. This difference rises to $4.48 /month in the 5$^{th}$ year.

   The cost to non participants of adopting the IRP based proposal would have been small compared to the overall gains. Efficiency and other demand side management measures have always been and continue to be the best ways to ensure affordability by reducing the use of energy.

The AEC also opposes the cuts in spending and savings because they will lead to a drop in savings for low income and equity groups. The plan implies increased savings for these groups from 10.5% of all residential savings to 11%. However, a slightly higher % of smaller overall savings will mean lower real savings.

Evidence that points to such a decrease includes:

- A large drop in savings for Low Income and Equity groups from 2025 as shown in the 2025 DSM Annual Progress Report from 7.8 GWh to an average of 2.8 GWh/year in the 2027-31 plan. 2025 was not typical but we could not find a figure for the full 2023-2026 period for a better comparison.
- Overall savings are slashed by 20% from 1% of NSP load to 0.8% of NSP load between the last plan and this one
- The residential savings target is reduced from 40% to 29% of overall savings

Residential spending of $32.6 Million per year over the four year span of the 2023-2026 plan is reduced to $29 Million per year in 2027-31. This does not include the cut in real spending due to inflation.

The overall loss in savings from this reduced plan is short sighted. We will never make up that lost ground. The resulting cut in savings for low income and equity groups is not acceptable.

2. **The Affordable Energy Coalition supports including substantial strategic electrification in the E1 contract, especially for low and modest income households.**

We oppose E1's decision to omit strategic electrification except through enabling strategies. We are in the throes of the biggest transition in our energy system in over 100 years.

Electric equipment provides energy-enabled services much more efficiently and cheaply. Renewable energy is now cheaper and more stable in the face of world fossil fuel volatility. The oil and gasoline consumer is the same as the electricity consumer in Nova Scotia. To treat them separately does not make sense in the real world that Nova Scotians live in.

Our regulatory system should not prevent E1 and NSP from using their contract to encourage and facilitate strategic electrification. We understand the interpretations of the law by the Energy Board and E1 but we also note the interpretation by Synapse. We vigorously support a holistic approach to the impact of programming on energy affordability. Increasing use of electricity for much more efficient heating systems like heat pumps while stopping the use of inefficient, expensive fossil fuel heating saves Nova Scotians money. This is especially important for low and modest income customers.

We hope and trust that the NS Energy Board will find a way to support Strategic Electrification measures in this E1 contract with NSPI. We support the evidence provided by Synapse arguing that the Plan should at the very least support electrification for low and moderate income Nova Scotians.

3. **The AEC supports the Low income and equity energy savings programs included in the E1 proposal: Affordable Multifamily Housing, Affordable Single-family Homes, Mi'kmaw Home Energy Efficiency Project, Mi'kmaw New Home Construction.**

   We support the modest increase in relative projected savings from these programs from 10.5% to 11% of residential savings. However as already argued, we expect a decrease in overall real savings for Low Income and Equity groups as part of the overall decrease in savings. We note that the savings shown in the Plan for Low Income and Equity groups decline every year from 2028 to 2031. Additional savings for low income customers outlined in our next two comments are essential.

4. **The AEC supports the free installation of deep energy retrofits in buildings with tenants who pay both heating and electricity bills.**

   In our view, this is equivalent to the existing free installation of deep energy retrofits in the Affordable Single-family Homes program. The current level of actual subsidy as a percent of the total cost of energy retrofits in the Affordable Multi-family Housing program is about 20% *(E1 RIR 06 to AEC )*. The subsidy in the Affordable Single-family Homes program is 100%.

   About 50% of low income households live in apartments. In the current plan 3.9 times as much money is budgeted for the Affordable Single Family Homes program as for the Affordable Multi-family Housing Program. Savings are twice as high. Savings per homeowner household are far higher than savings for each participant tenant household. Free deep energy retrofits in buildings with tenants who pay for both heating and electricity bills would go some way in rebalancing program spending and savings. EfficiencyOne says 100% subsidies would be too expensive *(E1 RIR 06 to AEC)*. However it appears they did not seriously consider such a program restricted to buildings where tenants pay 100% of their energy bills, a smaller subset of all tenants.

5. **The AEC supports a balcony solar program for low and modest income tenants**.

   E1 states that they have no plans to expand solar programs beyond the Mi'kmaw New Home Construction program. Cheap behind the meter balcony solar with built in micro inverters have been installed in over 1 million homes in Germany and they are helping to transform electricity reliability and cost in Pakistan and other countries. They should be actively supported in Nova Scotia, in keeping with the province's "consumer choice" approach. Balcony solar is one of the few technologies available to reduce energy costs for tenants directly. A program focussed on low income tenants would help to improve the balance between spending on low income tenants and low income homeowners. It would also reduce demand for NSPI electricity.

In conclusion, we hope to see expanded programming and savings for low income tenants in the E1-NSP contract. We believe this is essential as part of the dramatic transformation occurring in our energy system.

Thank you.

Yours respectfully,

Brian Gifford
Past Chair, Affordable Energy Coalition.