

E1 Responses to Affordable Energy Coalition (AEC) Information Requests
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Request IR-01:

On pages 16-17 of Appendix A (pages 104-5) of the application, in section 3.2.1, Resource Scenario Design, you state that you changed the design objective regarding low income and equity from

- 15–20 percent investment in low-income and equity as a percentage of total investment.

To

- dedicated low-income and equity savings are aligned with the 2026 DSM Extension, representing approximately 11 percent of residential savings;

Similar wording occurs elsewhere in the application.

Please explain what practical difference this reframing makes in the amount of investment and savings related to low income and equity households and programming.

Response IR-01:

Please refer to EfficiencyOne’s response to part (a) of CA IR-16.

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Request IR-02:

Please explain how the savings for the low income and equity programs as a percentage of residential savings is calculated, pointing to the appropriate tables and figures.

Please explain how to calculate the investment for the low income and equity programs as a % of residential program investment, pointing to the appropriate tables and figures.

Response IR-02:

In Appendix A, Section 4.5.1 of the 2027–2031 DSM Resource Plan Application, EfficiencyOne (E1) states that the 2027–2031 DSM Preferred Plan includes four dedicated program components that exclusively serve low-income and equity communities: Affordable Multifamily Housing, Affordable Single-family Homes, the Mi'kmaw Home Energy Efficiency Project, and Mi'kmaw New Home Construction.

The percentage of residential energy savings attributable to these dedicated low-income and equity program components is calculated using values reported in Appendix A, Table 8: 2027–2031 DSM Preferred Plan Savings and Investment by Program Component.¹

Specifically, the first-year energy savings for the four dedicated program components are summed and divided by the **Residential Energy Efficiency Programs Subtotal** first-year energy savings. Similarly, the investment for the four dedicated program components is summed and divided by the Residential Energy Efficiency Programs Subtotal investment.

¹ M12780, E1 2027–2031 DSM Resource Plan Application, Appendix A, March 31, 2026, page 28.

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- 1 Table 1 below presents this calculation using values from Table 8 of Appendix A. As shown in
 2 Table 1, these dedicated program components account for 11 percent of total residential first-
 3 year energy savings and 42 percent of total residential program investment.

4

- 5 Table 1: Dedicated Low-income and Equity as Percentage of Residential Investment and Savings

2027-2031	Investment (\$million)	First-Year Energy Savings (GWh)
Affordable Multifamily Housing	11.3	4.6
Affordable Single-family Homes	43.7	8.3
Mi'kmaw Home Energy Efficiency Project	0.6	0.1
Mi'kmaw New Home Construction	5.0	1.1
Residential Dedicated Low-Income & Equity Total	60.5	14.0
Residential Energy Efficiency Programs Subtotal	144.9	126.1
Percentage Dedicated Low-Income & Equity of Residential Energy Efficiency Programs (%)	42%	11%

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Request IR-03:

In Table 14 of Appendix A, Solar PV generation of 1.7 GWH is shown.

Is this first year or lifetime generation?

Please report both first year and lifetime generation, to be comparable to first year and lifetime savings for other programs?

Response IR-03:

The 1.7 GWh of Solar-PV generation reported in Table 14, Appendix A of EfficiencyOne’s 2027–2031 DSM Resource Plan Application is first-year generation. Table 51 of Appendix A provides both first-year Solar-PV generation and lifetime Solar-PV generation annually and for the 2027-2031 Plan period. Table 51 is structured to be directly comparable to the first-year and lifetime savings reported for other DSM programs as set out in the program performance indicator tables in Appendix A.

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Request IR-04:

The New Residential program described on pages 59-62 of Appendix A (pp 147-150) in Section 6.3 is delivered to and with Mi'kmaw communities. Its stated purpose is that it "offers subsidized energy efficiency assessments, home design support, and post-construction rebates to offset the incremental costs of building homes that operate at close to net zero energy performance levels."

The 3 measures are:

- high performing building envelopes (air tightness, insulation, ventilation, windows/doors)**
- high efficiency space and water heating systems (heat pumps and heat pump water heaters)**
- solar-PV systems (via the residential Solar-PV program component)**

A New Residential program with these measures would be just as beneficial to the broader low income population by offering it to new publicly funded affordable nonmarket housing serving low-income households.

Please explain why the New Residential program was not considered for all publicly funded affordable nonmarket housing serving low income households?

Response IR-04:

The New Residential program was designed to build upon an existing provincially funded program, EnergyForward New Homes, that is administered by EfficiencyOne (E1), is available to all Nova Scotians, and is supporting affordable housing development. New affordable housing for

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1 low-income households is also supported through the provincially funded Affordable Rental
2 Construction pilot, which promotes most of the same measures in larger buildings. Given the
3 existence of these provincially funded programs that are broadly available to all publicly funded
4 affordable nonmarket housing serving low-income households, a separate DSM program
5 component targeting that population was not considered necessary to avoid program overlap
6 and duplication of ratepayer-funded investment.

7
8 With the planned conclusion of the Mi'kmaw Home Energy Efficiency Project in 2027, the
9 proposed New Residential program is focused on continuing support to Mi'kmaw communities.
10 The dedicated focus on Mi'kmaw communities reflects E1's commitment to ensuring that
11 communities previously supported under the Mi'kmaw Home Energy Efficiency Project are not
12 left without program support following its wind-up, while the broader affordable housing market
13 continues to be served through the existing provincially funded programs described above.

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Request IR-05:

Efficiency One produced a report titled “Energy Poverty and an Equitable Transition to a Net-Zero Carbon Future in Nova Scotia” December 8, 2023.

Please provide the % of Nova Scotia households that this report concluded were in Energy Poverty and any other conclusions from that report that indicate what proportion of the Nova Scotia population struggles with energy poverty, defined as paying 6% of income on home energy.

Response IR-05:

EfficiencyOne’s (E1) report [Energy Poverty and an Equitable Transition to a Net-Zero Carbon Future in Nova Scotia](#) concluded that as of early December 2023, an estimated 43 percent of households in Nova Scotia were experiencing energy poverty (defined as paying 6 percent of income on home energy).

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Request IR-06:

The Affordable Single Family Homes program supplies free upgrades to building envelope of Single Family Homes for qualifying homeowners, with EfficiencyOne arranging the contractors to do the work. This is an excellent program with an excellent track record.

There is compelling reason for the Affordable Multi Family Housing Program to provide free upgrades to landlords housing low income tenants who pay their own heat and electricity bills in the same way that they do for low income homeowners. The tenant costs and the reduction in costs for low income households are directly equivalent. This change has been recommended to EfficiencyOne by the Affordable Energy Coalition but it is our understanding that there has been no change in the AMHP to this effect.

Why has EfficiencyOne not created a program of free installation of building envelope upgrades or other upgrades that would reduce energy costs in a similarly substantial way for tenants who pay their own heat and electricity bills, similar to the Affordable Single Family Homes program? Will EfficiencyOne consider this change in the proposed 5 year plan?

Response IR-06:

The Affordable Multifamily Housing program component provides incentives to landlords for building envelope and other energy upgrades, regardless of who pays the energy bills. Landlords must sign agreements to maintain affordable rents, ensuring tenants benefit directly. While incentives are available for up to 80 percent of eligible costs, they typically represent 20 percent of total project costs. As such, EfficiencyOne (E1) has proposed higher demand side management incentives in its Preferred Plan to increase support through the current offering. E1 remains committed to evaluating opportunities to enhance support for tenants. A fully subsidized model

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- 1 like the Affordable Single-family Homes program component has been considered; however, the
- 2 required investment and operational complexity has been prohibitive.

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Request IR-07:

Plug in solar has become a widely popular technology that reduces electricity use and costs for smaller households such as apartment dwellers. Roughly 50% of low income households are apartment dwellers. Both spending and savings in the Affordable Multi Family Housing Program have been substantially lower than for the Single Family Program. This technology has the potential to close that gap somewhat.

Does EfficiencyOne have any intention to explore this relatively new technology in the proposed 5 year plan, for use as part of the Affordable Multi Family Housing Program?

Response IR-07:

Please refer to EfficiencyOne’s (E1) response to NS Power IR-03.

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Request IR-08:

EfficiencyOne created an excellent Energy Poverty Visualization Tool which provides the most reliable and up to date estimates of Energy Poverty in Nova Scotia, as the energy prices and incomes change over time.

Please provide an explanation of how the Energy Poverty Visualization Tool provides a reasonably accurate estimate of Energy Poverty in Nova Scotia as energy prices and incomes change.

Please provide a table showing the level of energy poverty in Nova Scotian, as calculated from periodically by the Energy Poverty Visualization Tool over the last few years since it was created, showing how energy poverty has changed, for the record.

Response IR-08:

The cost of energy, amount of energy used, and household income (or available funds) are the three main factors that influence whether a household experiences energy poverty as outlined in EfficiencyOne's (E1) report [Energy Poverty and an Equitable Transition to a Net-Zero Carbon Future in Nova Scotia](#) (December 8, 2023).

To estimate energy poverty rates in Nova Scotia, E1 developed an energy poverty dashboard, described in Appendix 1 of E1's report. The dashboard combines a variety of data sets to calculate the rate of energy poverty at a community (postal code) level. At this level it is possible to review data such as median and average wages, home counts, ownership percentage, age of households, electric and non-electric sources of heating, and other variables related to energy poverty.

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1 The dashboard can calculate how energy poverty rates change in the wake of fluctuating energy
2 costs, median wage increases/decreases, and with the completion of energy efficiency upgrades.

3 The dashboard uses an intelligent mix of datasets including:

- 4 • Environics DemoStats provide an accurate description of household incomes across the
5 province as well as many other detailed geographical statistics.
- 6 • Nova Scotia Power energy consumption data (the raw bills and energy usage patterns as
7 measured at each residential meter by Nova Scotia Power). This data allows for tracking
8 direct electrical energy consumption for almost every residential household and
9 apartment across the province as well as predicting whether the household is heated
10 through electrical or non-electrical means.
- 11 • EnerGuide home assessment data (extracted from Home Energy Assessment and
12 HomeWarming program pre-upgrade and post-upgrade assessments via Hot 2000 files).
13 The EnerGuide Home Energy Assessment participants provides a dataset that allows for
14 predicting the consumption of non-electrical energy sources (such as oil, wood, propane,
15 natural gas) for non-electrically heated households.
- 16 • Property Valuation Services Corporation (PVSC) data. This gives high-level details, such as
17 size and age, of residential buildings across Nova Scotia.

18
19 Accessing these datasets (along with some simple machine learning techniques and other
20 statistical analytics) provides an overall view of energy poverty across the province at a granular
21 level.

22
23 E1 has periodically estimated energy poverty rates from the dashboard, over time. In most cases
24 updates were only made to the cost of energy at the time. This is the most simple update the
25 user can make to the tool, with results shown immediately. A more notable behind-the-scenes
26 update was made to the tool in January 2025, where income data was updated, housing count
27 numbers updated, and updates accounting for the homes which have switched to electricity.

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1 Table 1 below provides an estimate of energy poverty rates in Nova Scotia, since January 2022.

2

3 Table 1: Estimate of Energy Poverty Rates in Nova Scotia since January 2022

	January 2022	October 2022	June 2023	December 2023	July 2024	January 2025	April 2025	June 2025	January 2026	April 2026
Energy Poverty Rates	35%	48%	40%	43%	41%	34%	34%	31%	33%	40%
Energy Poverty Rates (# homes)	151,495	209,735	173,560	185,024	178,867	163,847	163,307	150,329	162,033	191,886
Homes not in Energy Poverty	n/a	n/a	n/a	n/a	256,169	321,560	322,100	335,078	323,374	293,521

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1 **Request IR-09:**

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3 **Did E1 assess non-utility benefits from strategic electrification?**

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5 Response IR-09:

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7 Please refer to EfficiencyOne’s response to part (d) of NSEB IR-34.

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1 **Request IR-10:**

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3 **Did E1 consider if strategic electrification measures could be included as a component of a cost-**
4 **effective portfolio?**

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6 Response IR-10:

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8 Please refer to EfficiencyOne’s response to part (d) of NSEB IR-34.

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1 **Request IR-11:**

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3 **Did E1 consider a scenario where the government changes legislative direction to better enable**
4 **strategic electrification and what the current DSM plan should do in anticipate of that scenario?**

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6 **Response IR-11:**

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8 Please refer to EfficiencyOne’s response to part (d) of NSEB IR-34.