

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: THE PUBLIC UTILITIES ACT

- 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

NON-CONFIDENTIAL INFORMATION REQUESTS

To: **EfficiencyOne**
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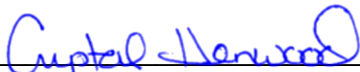
From: **Nova Scotia Energy Board**
Board Staff

Responses Due: **Thursday, May 28, 2026**

Copies: 1 electronic copy (PDF searchable)

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Issued at Halifax, Nova Scotia, this 7th day of May, 2026.



Crystal Henwood, Clerk of the Board

Evidence – Exhibit E-1, pp.1-71 (pdf pp. 8-78)

Request IR-1:

Pdf pg. 9 outlines that the Preferred Plan will save 14 GWh of energy through low income and equity programs; 85 MW a cumulative peak demand; 29.3 MW of capacity through demand response; and 1.7 GWh through customers' solar installations.

- a. Please explain how E1 determined these estimated savings for the three categories.
 - i. Please outline what was involved in selecting these areas of E1's programming and services.

Request IR-2:

Approval of Purchase Agreement with NS Power: Pdf pg. 9 of the Application states: "E1 also requests the NSEB's approval of its Purchase Agreement with NS Power, together with the associated Performance Targets, which is attached in redline form as Appendix "D" and in clean form as Appendix "E" (clean)."

- a. Please confirm that NS Power is in agreement with the proposed changes noted in Appendix D.
- b. With regard to Appendix D of the Application:
 - i. In Schedule A (pdf pg. 360 of the Application), please explain why "Annual" performance targets have been removed from the agreement in favour of "Total Net" over the term of the proposed DSM plan.

Request IR-3:

Pdf pg. 16 of the Application states: "Given the affordability concerns raised by DSM Advisory Group (DSMAG) members, as discussed in Sections 3.1.1 and 4.1, the Preferred Plan constrains investment to 2026 levels with no annual inflationary increases to the investment, while maintaining a portfolio that delivers long term benefits to ratepayers, consistent with the NSEB's direction to consider both affordability and long-term cost reduction. This approach satisfies the NSEB's interpretation of "cost-effective" DSM as that which is "affordable" and results in the "lowest long-term cost of electricity," while also responding to the *ERBA* section 6(2) requirement to ensure the provision of economical energy supply."

- a. Please explain specifically why E1 believes that its proposed annual \$63.75M investment is "affordable" for ratepayers.

- 1 b. For the average NS Power residential customer, what percentage of the customer's
2 annual 2026 NS Power bill (exclusive of any other riders) and what dollar amount does
3 the annual DSM Rider represent (if E1 does not know the annual electricity use of NS
4 Power's average customer, please provide this analysis for two separate customers:
5 a) one who uses 6,000 kW/hr of electricity per year, and b) one who uses 12,000 kW/hr
6 of electricity per year).

7
8 **Request IR-4:**

9 With regards to Section 2.2.1.1 "Compliance with the 2023-2025 DSM Plan Decision":

- 10 a. Reference Exhibit E-1, page 14 of 71 (pdf pg. 21), E1 notes that for the 2027-2031
11 DSM Plan, avoided costs for capacity have generally increased and avoided cost for
12 energy have generally decreased in the early years of analysis.
- 13 i. Please explain the reasons for these trends.
- 14 b. Pdf pg. 21 states: "... E1 incorporated updated avoided costs from NS Power, from
15 the 2022 Evergreen IRP in the 2026 DSM Extension and subsequently for the 2027–
16 2031 DSM Plan as well. Specifically, E1 has used the avoided costs provided by NS
17 Power from the 2022 Evergreen IRP process (provided to the DSMAG on January 8,
18 2026)."
- 19 i. In line with the new legislative requirement to develop a five-year plan, does
20 E1 consider the emissions impacts calculated using NS Power's 2022 IRP
21 remain accurate over the plan term?
- 22 ii. Does E1 have any plan or mechanism to adjust the calculation when IESO-NS
23 provides an updated IRP?
- 24 • Are there any evaluation or review processes in place for these types
25 of changes?
 - 26 • Is there a process to incorporate updated values into the Preferred
27 Plan?
- 28 c. Pdf pg. 22 states: "In response to the directive to provide justification for individual
29 measures that fail cost effectiveness testing, E1 notes that only nine of the 341
30 measures included in the Preferred Plan do not, on an individual basis pass the cost-
31 effectiveness test in any year of the 2027–2031 DSM Plan. E1 has provided specific
32 justification for each measure that fails cost-effectiveness testing, as set out in
33 Appendix A, Attachment 3."
- 34 i. Regarding Appendix A, Attachment 3:

- 1 • For the “HW – Heat Pump Cleanings” measure under the “Affordable
2 Single-Family Homes” program:
 - 3 a) Please explain why the “Measure Life” is only 2 years.
 - 4 b) Please provide background information to support the \$600
5 incentive per unit in 2027. Please ensure that this information
6 includes actual typical costs for heat pump cleaning in Nova
7 Scotia for 2025 and 2026, broken down by single unit cleaning,
8 two-head cleaning, three-head cleaning, and four-head
9 cleaning.
 - 10 A. Please confirm how the \$600 incentive per unit is
11 determined (i.e., is it for \$600/per mini split head?)
 - 12 c) What is the average number of mini-split heads cleaned per
13 customer that has been assumed under this measure?
 - 14 d) Please identify the PAC score for each of 2027 to 2031 if the
15 2027 incentive was \$200/unit instead of \$600/unit.
- 16 • For the “MHEEP – Heat Pump Cleanings” measure under the
17 “Affordable Single-Family Homes” program:
 - 18 a) Please explain why the “Measure Life” is only 2 years.
 - 19 b) Please provide background information to support the \$600
20 incentive per unit in 2027. Please ensure that this information
21 includes actual typical costs for heat pump cleaning in Nova
22 Scotia for 2025 and 2026, broken down by single unit cleaning,
23 two-head cleaning, three-head cleaning, and four-head
24 cleaning.
 - 25 A. Please confirm how the \$600 incentive per unit is
26 determined (i.e., is it for \$600/per mini split head?)
 - 27 c) What is the average number of mini-split heads cleaned per
28 customer that has been assumed under this measure?
 - 29 d) Please identify the PAC score for each of 2027 to 2031 if the
30 2027 incentive was \$200/unit instead of \$600/unit.
- 31 • For the “IR – Griddle – Electric” measure under the “Business Energy
32 Rebates” program:
 - 33 a) Please explain what E1 means in the “PAC Review” tab by: “In
34 fact, the application rebates variation is on the cusp of passing

PAC in 2027 and 2028, and passes from 2029-2031.” In providing this response, please clarify what is meant by “the application rebates variation” and explain why this is relevant.

b) Please provide background information to support the \$1,500 incentive per unit in 2027. Please ensure that this information includes actual typical costs for commercial kitchen electric griddles for 2025 and 2026.

c) Please identify the PAC score for each of 2027 to 2031 if the 2027 incentive was \$1,000/unit instead of \$1,500/unit.

- For the “Solar Security Fixture” measure under the “Efficient Products Installation” program:

a) In the “PAC Review” tab, in stating: “This is a complimentary measure in Efficient Product Installation that allows installers to do more during home appointments, which are offered to customers at no-cost.”, please describe the additional items that installers would complete during a related home appointment under this measure.

A. Please explain how a customer would confirm that it qualified for the incentive under this measure.

b) Please explain why the “Measure Life” is only 2.5 years.

c) Please provide background information to support the \$184.83 incentive per unit in 2027.

d) Please identify the PAC score for each of 2027 to 2031 if the 2027 incentive was \$20/unit instead of \$184.83/unit.

- For the “Outdoor Motion Sensor” measure under the “Efficient Products Installation” program:

a) In the “PAC Review” tab, in stating: “This is a complimentary measure in Efficient Product Installation that allows installers to do more during home appointments, which are offered to customers at no-cost.”, please describe the additional items that installers would complete during a related home appointment under this measure.

A. Please explain how a customer would confirm that it qualified for the incentive under this measure.

- 1 b) Please provide background information to support the \$92.41
2 incentive per unit in 2027.
- 3 c) Please identify the PAC score for each of 2027 to 2031 if the
4 2027 incentive was \$15/unit instead of \$92.41/unit.
- 5 • For the “Indoor Motion Sensor” measure under the “Efficient Products
6 Installation” program:
- 7 a) In the “PAC Review” tab, in stating: “This is a complimentary
8 measure in Efficient Product Installation that allows installers to
9 do more during home appointments, which are offered to
10 customers at no-cost.”, please describe the additional items that
11 installers would complete during a related home appointment
12 under this measure.
- 13 A. Please explain how a customer would confirm that it
14 qualified for the incentive under this measure.
- 15 b) Please provide background information to support the \$59.36
16 incentive per unit in 2027.
- 17 c) Please identify the PAC score for each of 2027 to 2031 if the
18 2027 incentive was \$5/unit instead of \$59.36/unit.
- 19 • For the “Energy Star Certified Combination Washer/Dryer Units”
20 measure under the “Instant Savings” program:
- 21 a) Please explain how a customer would confirm that it qualified
22 for the incentive under this measure.
- 23 b) Please provide background information to support the \$129
24 incentive per unit in 2027.
- 25 c) Please identify the PAC score for each of 2027 to 2031 if the
26 2027 incentive was \$100/unit instead of \$129/unit.
- 27 d. Pdf pg. 22 states: “In response to the directive to provide payback information for
28 measures with a payback period of three years or less, E1 has provided the incentive
29 level analysis for measures in Appendix A, Attachment 3.”
- 30 i. Regarding Appendix A Attachment 3:
- 31 • For the “Energy Star certified Room Air Purifiers (RAP)” measure under
32 the “Instant Savings” program, it appears that E1 has budgeted
33 between \$240,800 to \$309,600 for each year for the 2027-2031 DSM
34 plan. The payback period for this measure without incentives is 1.24

1 years. The justification for the measure is: "This is a measure that many
2 retailers can offer so it helps us provide a more robust offering. This
3 measure also has added health benefits, as it helps improve indoor air
4 quality."

5 a) Please provide more detailed justification for this measure given
6 its payback period without incentives is relatively short at just
7 over one year.

8 b) Please identify the estimated annual improvement in air quality
9 as a result of implementing this measure, and explain how this
10 would be measured.

11 A. Please explain how this aligns with the legislative
12 framework which the Board must consider when
13 evaluating the proposed DSM plan.

- 14 • For the "Custom - Strategic Energy Management" measure under the
15 "SEM" program, it appears that E1 has budgeted between \$180,000 to
16 \$240,000 for each year for the 2027-2031 DSM plan. The payback
17 period for this measure without incentives is 1.04 years. The
18 justification for the measure is: "This is a program component aimed at
19 establishing a structured, continuous approach to helping customers
20 improve energy performance, reduce costs, and achieve long-term
21 operational efficiency. It is intended to have a very short payback to
22 keep customers engaged and focused on longer term savings. Its
23 inclusion in the Plan is consistent with prior Board approvals."

24 a) Please provide more detailed justification for this measure given
25 its payback period without incentives is relatively short at just
26 over one year.

27 b) Please explain specifically how this measure helps establish a
28 structured, continuous approach to helping customers improve
29 energy performance, reduce costs, and achieve long-term
30 operational efficiency.

31 c) Board staff notes that Table 37 of Appendix A of Exhibit E-1 (pdf
32 pg. 158), shows proposed annual investment for the Strategic
33 Energy Management Program Component ranging from \$1.0M
34 to \$1.1M from 2027 to 2031, for a total investment of \$5.4M over

1 this period. However, Appendix A, Attachment 3 shows
2 “Custom - Strategic Energy Management” as the only measure
3 under this program with annual PAC costs ranging from
4 \$180,000 to \$240,000 for each year for the 2027-2031 DSM
5 plan. Please explain and reconcile Table 37 with Appendix A,
6 Attachment 3.

7 A. If required, please recalculate the Attachment 3
8 annual PAC score and payback period for this
9 measure for each year from 2027 to 2031, and provide
10 a revised Appendix A Attachment 3 in Excel format
11 with all formulae intact and unaltered.
12

13 **Request IR-5:**

14 With regards to Section 2.2.2.1 “Compliance with the 2025 BCA Decision”:

15 a. Pdf pg. 24 states: “E1 further notes that long-run marginal emissions rates have not
16 been provided by NS Power, despite requests in December 2025 and February 2026.
17 E1 understands that NS Power is consulting with the NSIESO on methodology and
18 that this work is ongoing. E1 has calculated emissions impacts using the best available
19 emissions information from NS Power's IRP, consistent with the approach taken in the
20 2023–2026 DSM Plan.”

21 i. Has E1 had any discussions with the NSIESO and/or NS Power since February
22 2026 regarding long-run marginal emissions rates?

- 23 • If so, please provide a summary of these discussions.

24 ii. Please briefly summarize the approach taken in the 2027–2031 DSM Plan to
25 calculate emissions impacts.

- 26 • Please briefly summarize how the use of long-run marginal emissions
27 rates would likely impact the results 2027–2031 DSM Plan emissions
28 impacts calculations.

29 a) Please confirm whether this would affect the PAC scores for any
30 measures proposed in the 2027-2031 DSM Plan.

31 A. If confirmed: Please identify the affected measures
32 and impact on the related PAC scores.
33
34

Request IR-6:

With regards to Section 2.2.3.1 “Compliance with the 2026 DSM Extension Decision”:

- a. Reference E-1, page 18 of 71 (pdf pg. 25) and Appendix A page 79 of 112 (pdf pg. 167), E1 states there is currently no double counting of savings between its demand response programs and NS Power’s rate signals.
 - i. Please explain why E1 is confident that there is no double counting between its demand response program and NS Power’s rate signals.
 - ii. E1 notes that it excludes customers enrolled in NS Power’s Time-Varying Pricing pilot to maintain program clarity but does not refer to any other time differentiated rates, such as NS Power’s time of day rate for customers with electric thermal storage units. Please explain whether these customers are excluded and if not, how program clarity is maintained.
- b. Pdf pg. 26 states: “In response to the concerns regarding Residential Behaviour, E1 has not included Residential Behaviour in its Preferred Plan.”
 - i. Please identify the budgeted cost for the Residential Behaviour program for each year in E1’s 2023-2025 DSM plan and 2026 Extension.

Request IR-7:

Regarding Section 2.3 “Standardized Filing Framework” of the Application:

- a. Section 2.3.1 “The 2022 Integrated Resource Plan”, pdf pgs. 28-29 state: “The Standardized Filing Framework directs that the Resource Plan identified in NS Power’s Integrated Resource Plan (“IRP”) will serve to inform the development of a Preferred DSM Plan by E1. The current Resource Plan is NS Power’s 2022 Evergreen IRP, which includes 683.1 GWh of energy savings and 123.9 MW of demand savings from energy efficiency during the 2027–2031 period and 44.3 MW of demand response available capacity (excluding NS Power delivered demand response activities through rate design). However, as will be discussed further, while E1 considers the IRP scenario to represent the current assessment of the optimal level of DSM that is in the best interest of ratepayers for the long term, E1 must also consider short term affordability which is influenced by current economic landscape for Nova Scotia residents and businesses.”

- 1 i. Please confirm that resource plan used to inform the development of E1's
2 2027-2031 DSM Plan incorporates the findings and conclusions from NS
3 Power's 2025 IRP Action Plan Update.
- 4 • If not confirmed, please explain.
- 5 ii. Please describe how E1 has addressed the "Hybrid Peak Electrification
6 Scenario" from NS Power's 2025 IRP Action Plan Update in its 2027-2031
7 DSM plan.
- 8 iii. Board staff notes that Table 8 of Exhibit E-1 (pdf pg. 64) shows that the E1's
9 Preferred 2027-2031 DSM Plan allows for 435.4 GWh of first-year energy
10 savings, 85 MW of peak demand savings, and 29.3 MW of demand response
11 available capacity. These numbers are lower than those identified on pdf pg.
12 28-29 from the 2022 Evergreen IRP. Further, on pdf pg. 34 of Exhibit E-1, E1
13 states: "E1 also modelled a third scenario that reflected energy savings levels
14 consistent with the IRP."
- 15 • Please identify the estimated DSM investment over 2027-2031 that
16 would be required to meet the targets noted from the 2022 Evergreen
17 IRP.
- 18 b. Regarding "Appendix F – Proposed Updated Standardized Filing Framework" of the
19 Application:
- 20 i. Page 7 of 13 of Appendix F (pdf pg. 413 of the application) states: "E1 will work
21 with the NSIESO on IRP activities, which may include commissioning a DSM
22 baseline study in advance of each DSM Potential Study to identify current
23 stocks of electricity consuming devices in all market sectors." Please describe
24 any work E1 and the NSIESO have completed to date related to commissioning
25 of a DSM baseline study.
- 26 ii. Page 7 of 13 of Appendix F (pdf pg. 413 of the application) states: "E1 will work
27 with the NSIESO on IRP activities, including the commission of a DSM
28 Potential study in advance of each IRP exercise. The DSM Potential study
29 identifies DSM resources that are achievable over the planning horizon, and
30 will inform the development of Candidate Resource Plans for the IRP." Please
31 describe any work E1 and the NSIESO have completed to date related to
32 commissioning of a DSM Potential study.
- 33 iii. Page 7 of 13 of Appendix F (pdf pg. 413 of the application) states: "NSIESO
34 will work with the DSM franchise holder to develop avoided cost calculations

1 for demand side management resources.” Please describe any work E1 and
2 the NSIESO have completed to date related to developing avoided cost
3 calculations for DSM resources.
4

5 **Request IR-8:**

6 Regarding Section 3.2 “Energy Efficiency: Setting Appropriate Level of Energy Savings” of the
7 Application:

- 8 a. Please provide a copy of the jurisdictional scan completed by APEX, as referenced on
9 pdf pg. 32 of the application.
- 10 b. Please explain how the proposed increase in incentive percentage from 66% to 71%
11 aligns with the activities the Demand-side management definition set out in s. 79A(b)
12 of the Public Utilities Act and with the requirement to prioritize short-term
13 affordability?
14

15 **Request IR-9:**

- 16 a. Pdf pg. 32 states that 71% of the Preferred Plan is for customer incentives. Please
17 confirm, or explain otherwise, that it is approximately \$239.1 million for customer
18 incentives.
19

20 **Request IR-10:**

21 Pdf pg. 32 states that the Preferred Plan’s energy savings will reduce 0.8% of NS Power’s load.
22 Please confirm, or explain otherwise, that the 0.8% is the expected total cumulative energy
23 savings to be achieved from 2027-2031 rather than 0.8% per year.

- 24 a. Is the 0.8% of NS Power’s load, the total cumulative load NS Power forecasts for 2027-
25 2031 or is it NS Power’s load for 2025?
26

27 **Request IR-11:**

28 Reference to Exhibit E-1, page 27 of 71 (pdf pg. 34):

29 E1 notes that its preferred plan maintains a trajectory towards the IRP’s long-term savings levels
30 while prioritizing short-term affordability considerations for the period 2027-2031 given the current
31 economic context.

- 32 a. Does E1 anticipate a need for “catch-up” following the 2027-2031 period to maintain
33 this trajectory?
34

Request IR-12:

Regarding Section 3.3 “Demand Response” of the Application:

- a. Pdf pg. 34 states: “The demand response design in the 2027–2031 DSM Plan was informed by a combination of observed implementation experience, updated modelling assumptions, evaluation insights, DSMAG member feedback, and alignment with system planning objectives.”
 - i. Please describe the updated modelling assumptions related to demand response design in the 2027-2031 DSM Plan compared to those used in the 2023-2025 DSM Plan and 2026 DSM Extension.
 - As it relates to E1 Administrative Costs, under the “Key Model Assumptions” tab in Exhibit E-1(i) Appendix A – Attachment 1, E1 states: “Demand Response administrative costs have been updated from the 2023-2025 Plan model with information from E1 experience delivering demand response.”
 - a) Please describe E1’s experience delivering demand response.
 - b) Please describe specifically how the demand response administrative costs have been updated from the 2023-2026 DSM Plan.
 - c) Please identify the amount by which demand response administrative costs have changed from the 2023-2026 DSM Plan.
- b. Pdf pg. 35 states: “DSMAG member feedback, played a significant role in shaping the demand response portfolio. In prior planning rounds, members raised concerns regarding the scale, achievability, and cost-effectiveness of proposed demand response investments. The 2027–2031 Plan responds to these concerns by moderating demand response investment levels relative to earlier scenarios, adopting more conservative ramp-ups, and ensuring that proposed capacity targets remain within a range consistent with system needs identified through integrated resource planning.”
 - i. Please provide a detailed summary of DSMAG member feedback related to demand response design in the 2027-2031 DSM Plan.
- c. Please explain why the Demand Response “Investment” amounts in 2027-2031 from Tables 9 to 13 in Appendix A of the application (pdf pgs. 117-121) and in Table 47 (pdf

- pg. 170) do not match the 2027-2031 PAC costs noted in tab “19c. BC Ratios by Year Avg” of Exhibit N-1(iii) Appendix A, Attachment 4.
- d. Pdf pg. 35 states: “E1’s Preferred Plan does include the Residential program component. Although it is not required that the program component itself is cost effective, E1 does understand that a justification for inclusion of measures that do not pass must be provided. While the Residential Demand Response (Eco Shift) program component does not yet meet the standard cost-effectiveness threshold, there have been noted improvements.”
- i. Please provide the PAC score for the Residential Demand Response program component for each year from 2027 to 2031.
 - ii. Please provide the PAC score for the BNI Demand Response program component for each year from 2027 to 2031.
- e. Pdf pg. 36 states: “Experience in peer jurisdictions suggests Nova Scotia is at an earlier stage of market development but following a similar trajectory. Cost-effectiveness is expected to improve over time as participation grows, technologies mature, operational processes are refined, and program design evolves alongside system needs.”
- i. As it relates to Residential Demand Response, please provide documentation to support E1’s claim that “Experience in peer jurisdictions suggests Nova Scotia is at an earlier stage of market development but following a similar trajectory”.
- f. As it relates the number of Demand Response participants noted in tab “8. Participants” of Exhibit N-1(iii) Appendix A, Attachment 4:
- i. Please confirm whether the number of participants per year represents the number of new participants in the program each year, or the cumulative number of participants in the program at the end of each year.
 - ii. Please provide a breakdown of the number of participants for each year from 2027 to 2031 showing the number of residential and BNI participants.
 - iii. Please provide a breakdown of the number of participants for both 2024 and 2025 showing the number of residential and BNI participants.
- g. As it relates to Exhibit N-1(iii) Appendix A, Attachment 4:
- i. Regarding tab “19a. BC Ratios Cost Cat Avg”, please provide the Demand Response program PAC score with the costs and benefits associated with the “DLC – Thermostats” program component excluded.

1 ii. Regarding tab “19a. BC Ratios Cost Cat Avg”, please provide the Demand
2 Response program PAC score with the costs and benefits associated with both
3 the “DLC – Thermostats” and “DLC – Water Heating” programs component
4 excluded.

5 iii. Based on Board staff’s review of tab “3a. Achiev Pot_Opt_Meter Avg” and tab
6 “4a. Achiev Pot_Opt_Gen Avg”, it would appear that most of the MW savings
7 derived from the Demand Response program are a result of “C&I Curtailment”
8 and “C&I Loadshift to BUGs”. Please confirm.

9 • If not confirmed, please explain in the context of the Figures contained
10 in the tabs.

11 • If confirmed:

12 a) Please describe the specific reasons for the disproportionate
13 amount of spending on “DLC – Thermostats” and “DLC – Water
14 Heating” programs components in each of 2027 to 2031
15 compared to “C&I Curtailment” and “C&I Loadshift to BUGs”
16 spending.

17 b) For each of 2027 to 2031, please provide the \$ spent/MW saved
18 for each of the “DLC – Thermostats”, “DLC – Water Heating”,
19 “C&I Curtailment” and “C&I Loadshift to BUGs” program
20 components.

21 h. In the Board’s decision for E1’s 2026 DSM Extension (Matter M12249), the Board
22 stated: “That said, the Board notes that E1 should be fully prepared to address the
23 questions raised in this proceeding about potential overlap with NS Power’s Critical
24 Peak Pricing Program and the targeting of constrained areas of the transmission and
25 distribution system in its application. If it fails to adequately address these issues, this
26 may complicate the approval of its DSM Plan. The Board expects NS Power to
27 cooperate fully with E1 in exploring these issues.” On pdf pg. 167 of Exhibit E-1 of the
28 current application, E1 states: “E1 has initiated discussions with NS Power to further
29 collaborate on both locational demand response and the stacking of E1’s demand
30 response with rate signals. While there is not currently double counting of savings
31 between E1’s demand response program and NS Power’s rate signals, E1 and NS
32 Power recognize this requires ongoing efforts to determine if and how these two
33 programs should work together. E1 expects these discussions to continue with the
34 outcome being a proposed resolution agreed upon by both organizations. E1 is

1 committed to continue to work through a solution that remains in the best interest of
2 ratepayers. To support work on both locational demand response and the interplay
3 between E1's demand response program and NS Power's TVP, E1 has included these
4 areas of exploration and collaboration in its Innovation Framework, Process and Plan
5 for 2027–2031, provided as Attachment 5 to Appendix A.”

6 i. Please confirm that any NS Power customers participating in NS Power's TVP
7 and CPP programs are excluded from participation in E1's Demand Response
8 program.

- 9 • If not confirmed, please explain how “double counting” between the
10 programs is prevented.

11 ii. Please identify the timeline for when E1 intends to have these issues resolved.

12 i. As it relates to E1's collaborative efforts with NS Power on locational demand response
13 and stacking of E1's demand response with NS Power's rate signals, pdf pg. 26 of
14 Exhibit E-1 states: “E1 has included both of these topics for development and research
15 efforts under innovation as highlighted in both Appendix A, section 9.4 and in the
16 Innovation Framework, Process and Plan for 2027–2031 included as Attachment 5 to
17 Appendix A.”

18 i. Are the total costs for these “development and research efforts under
19 innovation” as noted in the “Demand Response” line and the “Locational DSM”
20 line of “Table 1: Projected Direct Expenditures by Focus Area” in Appendix A
21 Attachment 5 (pdf pf. 221)?

- 22 • If not:

23 a) Please identify the forecast annual costs for these efforts for
24 each year from 2027 to 2031.

25 b) Please identify the other issues that Table 1 “Demand
26 Response” and “Locational DSM” efforts will address.

27
28 **Request IR-13:**

29 Regarding Section 3.4 “Solar-PV”:

30 a. Pdf pg. 40 and 41 discusses solar-PV installations exclusively for residents of Mi'kmaw
31 communities and that the program will add 200 installations for the DSM 2027-2031
32 years. Please confirm or explain otherwise that this solar-PV offering has an estimated
33 total cost of about \$2.9 million.

1 b. Reference to Exhibit E-1, page 34 of 71 (pdf pg. 41), E1 notes that any expansion of
2 its Solar-PV program to other customer segments in future DSM plans would be
3 subject to cost-effectiveness analysis and Board approval.

4 i. Given the information that E1 provided in its application suggesting that the
5 Solar-PV program is cost-effective, what is the basis for E1's suggestion that
6 the program may be not be cost-effective in the future if rolled out to other
7 customer segments?
8

9 **Request IR-14:**

10 Please provide a breakdown in 5-year increments from 2027 to the end of the forecast benefits
11 period of the anticipated preferred plan lifetime benefits of \$682.5 million.
12

13 **Request IR-15:**

14 Regarding Section 3.5 "Strategic Electrification" of the Application:

15 a. Pdf pg. 42 states: "E1 understands from DSMAG members that strategic electrification
16 remains an important area for exploration to determine how it can cost effectively be
17 included in future DSM Plans. To support this objective, E1 has allocated investment
18 within its Enabling Strategies budget specifically for strategic electrification
19 development and research. This investment will support: (1) market research and
20 technology assessment to identify emerging strategic electrification opportunities with
21 improved economics; (2) pilot programs to test delivery approaches and gather real-
22 world performance data; (3) collaboration with the NSIESO on future IRP development
23 to better quantify system benefits; and (4) ongoing evaluation of how changes to
24 avoided costs, particularly capacity values, may improve the cost-effectiveness of
25 strategic electrification in future plan periods."

26 i. Please provide a detailed summary of the feedback received from DSMAG
27 members related to strategic electrification.

28 ii. Please identify the specific cost allocated in the Enabling Strategies budget for
29 strategic electrification development and research for each year from 2027 to
30 2031.
31

32 **Request IR-16:**

33 Regarding Section 3.6 "Enabling Strategies" of the Application:

1 a. Pdf pg. 43 states: "In addition to reducing total investment through prioritization, E1
2 has responded to DSMAG member comments regarding Enabling Strategies."

3 i. Please provide a detailed summary of the feedback received from DSMAG
4 members related to enabling strategies.
5

6 **Request IR-17:**

7 Regarding Section 4 "Affordability" of the Application:

8 a. Figures 2 and 3 on pdf pg. 46 illustrate the expenditures for the Preferred 2027-2031
9 DSM Plan and the 2026 DSM Extension.

10 i. Please provide the data for the development for Figure 2, broken down by
11 program year.

12 ii. Please provide a breakdown of the salaries, benefits and training expenditure
13 by component for Figure 2.

14 iii. Please provide a breakdown of full-time equivalent employees (FTEs) by
15 program year and explain the reason for any changes.

16 iv. Please provide the current FTE count for E1 and explain any changes between
17 the existing count and the FTEs contemplated for the preferred plan.

18 v. Please describe what is included in "program support".

19 vi. Please identify each of the following as of December 31, 2023, 2024 and 2025,
20 and describe the reasons for any year over year increases:

- 21 • E1's total full-time equivalent (FTE) staff complement
- 22 • E1's total salary burden (exclusive of costs related to employee
- 23 benefits)
- 24 • E1's total employee benefits burden
- 25 • The total spent on E1 staff training in 2023, 2024, and 2025.

26 vii. Please identify each of the following forecasts as of December 31, 2026, 2027,
27 2028, 2029, 2030 and 2031, and describe the reasons for any forecast year
28 over year increases:

- 29 • E1's total FTE staff complement
- 30 • E1's total salary burden (exclusive of costs related to employee
- 31 benefits)
- 32 • E1's total employee benefits burden
- 33 • The total forecast spending on E1 staff training in 2026, 2027, 2028,
- 34 2029, 2030 and 2031.

- 1 viii. On pdf pg. 56, E1 states: “To manage overall investment levels in the Preferred
2 Plan, E1 has reduced full-time equivalent (FTE) staffing in the 2027–2031
3 Preferred Plan to 106.7 as compared to 114.3 in the 2026 DSM
4 Extension.” Figure 2 show an average “Salaries, benefits and training”
5 expense in the 2027-2031 DSM plan of \$12.7M, while Figure 3 shows \$11.9M
6 for “Salaries, benefits and training” in the 2026 DSM extension. Given the
7 statement from pdf pg. 56, please explain the increase in “Salaries, benefits
8 and training” expense from the 2026 DSM extension.
- 9 ix. On pdf pg. 55 of Exhibit N-1, E1 states: “Benchmarking – E1 ensures its costs
10 are aligned with those of other similar industries, organizations, and DSM
11 administrators, where appropriate, through market research and market
12 comparisons prepared by independent third parties. E1 worked closely with
13 subject matter experts to examine current market conditions when considering
14 annual employee compensation changes.”
- 15 • Please provide a copy of these benchmarking studies comparing E1’s
16 total forecast staffing complement, salary burden, employee benefits
17 burden, and staff training budgets for 2027 to 2031 to those of other
18 DSM administrators.
 - 19 • Please provide a copy of the subject matter expert reports related to
20 proposed annual compensation changes in the 2027-2031 Preferred
21 DSM plan.
- 22 x. Please identify the types of expenditures that are included in the “Program
23 Support” category noted in Figures 2 and 3.
- 24 b. Regarding Section 4.3 “DSM Continues to Provide Lasting Benefits with a Short
25 Payback Period”: Pdf pg. 48 states: “A short payback period that provides fully funded
26 DSM benefits no later than the end of 2032 is in the best interests of ratepayers as it
27 leverages the lower costs associated with present-day investment prices and mitigates
28 the long-term effects of inflation and rising costs – as illustrated in Figure 4.”
- 29 i. Please provide the spreadsheet model used to produce Figure 4 complete with
30 all formulae intact.
- 31 c. Regarding Section 4.4 “DSM Continues to be the Least Risk Option”: Pdf pg. 48 states:
32 “DSM is a low-risk energy investment as there is: Certainty with respect to the level in
33 investment; No unexpected costs associated with an investment in DSM; and No
34 variability in the cost of DSM during each Plan term.”

- 1 i. Does E1 agree that there are risks associated with the proposed 2027-2031
2 DSM Plan related to the plan not achieving its forecast benefits?
- 3 • If not, please explain.
4 • If so, please characterize these risks.
- 5 d. Regarding Section 4.5 “Rate and Bill Considerations & Rate and Bill Impact Analysis
6 (RBIA) for 2027-2031”:
- 7 i. Pdf pg. 49 states: “E1’s RBIA for the Preferred Plan demonstrates that
8 participants in DSM benefit from bill savings. The reductions in energy use and
9 demand achieved by participants more than outweigh any rate impacts
10 associated with DSM.”
- 11 • Please confirm whether the Table and Figures in this section show rate
12 and bill impacts for only DSM participants or for all NS Power
13 customers.
- 14 a) If “for only DSM participants”:
- 15 i. Please provide a revised Table 6 and revised Figures 5
16 and 6 to show average rate and customer bill impacts
17 for non-DSM participants.
- 18 o For the average NS Power residential non-DSM
19 participant customer, what dollar amount does
20 the 2027-2031 DSM Plan average bill impact
21 represent? (if E1 does not know the annual
22 electricity use of NS Power’s average non-DSM
23 participant customer, please provide this
24 analysis for two separate customers: a) one who
25 uses 6,000 kW/hr of electricity per year, and v)
26 one who uses 12,000 kW/hr of electricity per
27 year).
- 28 b) If “for all NS Power customers”:
- 29 i. Please provide a revised Table 6 and revised Figures 5
30 and 6 to show average rate and customer bill impacts
31 for only DSM participants.
- 32 ii. Please provide a revised Table 6 and revised Figures 5
33 and 6 to show average rate and customer bill impacts
34 for non-DSM participants.

- Does the \$2.5 billion represent the Net Present Value of the aggregate bill savings?
 - a) If not, what is Net Present Value of the aggregate bill savings?
- Does the \$2.5 billion represent aggregate bill savings for only DSM participants or for all NS Power customers? Please explain.

Request IR-18:

Reference to Exhibit E-1, page 44 of 71 (pdf pg. 51), Figure 6: Average Rate and Total Customer Bill Impacts as a Result of DSM Activities in 2027-2031 (Preferred Plan):

- a. Please explain why there are no total customer bill impacts showing in Figure 6 for the Municipal Rate Class.

Request IR-19:

Regarding Section 5 “The Balanced Plan Approach” of the Application:

- a. Regarding Section 5.2 “Program Delivery Costs”:

- i. Pdf pg. 53 states: “E1 has heard some concerns from stakeholders that program delivery costs have increased unreasonably since the last plan.” Please provide a detailed summary of the feedback received from stakeholders related to increases in program delivery costs.
- ii. Pdf pg. 54 states: “The 2024 DSM Evaluation results for residential heat pumps, established through a billing analysis, reduced savings for this measure by approximately 50 percent.”
 - Please confirm that this lower savings result for this measure has been incorporated into the 2027-2031 DSM plan modeling.
 - a) If not confirmed, please explain.
- iii. Pdf pg. 54 states: “...incentive top ups for the Affordable Multifamily Housing program component are no longer provided by the Province. E1 has increased incentive levels to maintain participation following the end of this funding, directly increasing per-unit delivery costs attributable to the DSM Plan.”
 - Please explain the rationale for E1’s decision to increase incentive levels for the program following the discontinuation of government funding.
- iv. Pdf pg. 54 states: “...shifted the portfolio toward deeper, more complex measures such as building envelope upgrades, heat pump installations, and

1 custom commercial projects. These measures deliver greater long-term
2 savings and higher lifetime value per dollar invested, but at a higher first-year
3 unit cost.”

- 4 • Please explain whether the proposed higher first-year unit cost
5 measures are expected to affect electricity rates, and how they align
6 with DSMAG’s recommendations on short-term benefits.
- 7 • Please explain how E1 balances between short-term and long-term
8 benefits when planning projects.

9 v. Reference to Exhibit E-1, page 48 of 71(pdf pg. 55),

- 10 • “Benchmarking”:
 - 11 a) Please provide the market research and market comparisons
12 prepared by independent third parties that were used by E1 to
13 ensure that its costs during the Preferred Plan Period are
14 aligned with other similar industries, organizations and DSM
15 administrators.
 - 16 b) Please provide the market conditions used to consider annual
17 employee compensation changes and explain in detail how
18 market conditions are used to set employee compensation
19 levels.
 - 20 c) Please describe E1’s incentive program in detail and provide a
21 copy of the review of the assumptions from the development of
22 the methodology in 2017.
- 23 • “Independent Reviews”
 - 24 a) Please provide a copy of E1’s most recent third-party
25 independent audits and reviews to ensure that its key controls
26 are operating effectively and that the reporting of financial and
27 savings results are accurate (not including the evaluation
28 report filed as Exhibit E-3 in this proceeding).

29 iv. Pdf pg. 55 states: “E1 has conducted third-party independent audits and
30 reviews to ensure that the organization’s key controls are operating effectively
31 and that the reporting of financial and energy savings results are
32 accurate.” Please provide copies of these reviews and audits.

33 b. Regarding Section 5.5 “Diversity of Program Delivery”, pdf pg. 57 states: “Diversity in
34 program delivery is a key way to minimize risk and involves the diversification of

measures, markets and strategies. The Preferred Plan includes a full suite of programs and strategies that seek to address a broad range of opportunities across all residential, and BNI sectors. E1 has developed a diversified portfolio to account for risk from future world changes and to provide a broad program base to maximize equitable participation, which explains why certain of the included opportunities present a higher unit cost, or a lower benefit/cost ratio.”

- i. Please describe any changes in the diversity of the 2027-2031 DSM plan compared to E1’s 2023-26 DSM plan.

Request IR-20:

Regarding Section 6 “Preferred Plan Details” of the Application:

- a. Pdf pg. 62 states: “The Preferred Plan’s energy efficiency resource has a first-year unit cost of \$0.66/kWh and a weighted average measure life of 12.3 years, resulting in a lifetime unit cost of \$0.05/kWh which is significantly lower than NS Power’s average cost of fuel at the end of 2025 of \$0.093/kWh.”
 - i. Please provide a reference in the evidence filed to date showing where these numbers have been calculated.
 - If no such supporting calculations have been filed to date, please provide the calculations in spreadsheet format with all formulae intact and unaltered.
- b. Regarding Tables 7, 8 and 9 on pdf pgs. 63, 64 and 65: Please provide a reference in the evidence filed to date showing where the numbers in the Tables have been calculated.
 - i. If no such supporting calculations have been filed to date, please provide the calculations in spreadsheet format with all formulae intact and unaltered.

Request IR-21:

Pdf pg. 55 states that when E1 created its Preferred Plan, it took cost-efficiencies into consideration and a full accounting value to minimize the cost of savings. Please describe the cost-efficiencies pursued and those that were not.

Request IR-22:

Please provide the annual cost savings that the Preferred Plan will achieve through the selected cost-efficiencies and those that were not pursued for each year of the Plan.

Request IR-23:

Pdf pg. 62 states that: "...investment level of \$318.75 million for three DSM resources — energy efficiency, demand response, solar-PV - as well as for enabling strategies;"

- a. Please explain why solar-PV, instead of other renewable generation has been included as a specific DSM resource.
- b. Please indicate whether E1 has explored other renewable energy generation resources and
 - i. if so, please provide details.
 - ii. If not, please explain the rationale.

Request IR-24:

Exhibit E-1, page 56 of 71(pdf pg. 63), Table 7: 2027-2031 Plan – Portfolio Level Insights:

- a) E1 notes that dedicated low-income and energy savings as a percentage of total residential energy savings is 11%. What is the percentage of dedicated low-income and equity program costs to total residential energy efficiency program costs?

Request IR-25:

Exhibit E-1, page 57 of 71(pdf pg.64), Table 8: 2027-2031 DSM Preferred Plan Portfolio Savings and Investment:

- a. Please explain why there are progressively downward trends in "Lifetime Benefits", "First-Year Energy Savings", "Peak Demand Savings" and "Lifetime Energy Savings" in each year of the plan period?

Request IR-26:

Exhibit E-1, page 58 of 71 (pdf pg.65), Table 9: 2027-2031 DSM Preferred Plan Savings and Investment by Program Component:

- a. Please provide a breakdown by program for the amounts attributed to "Residential Total (Incidental + Dedicated) Low Income & Equity Impacts".

Request IR-27:

Table 9, pdf pg. 65: 2027-2031 DSM Preferred Plan Savings and Investment by Program Component - The table identifies three program components under Existing Residential, one under New Residential and one under Demand Response that are expected to provide lifetime benefits less than the 2027-2031 DSM Plan spending for the program component.

- 1 a. Table 10, pdf pg. 66, outlines modifications to the programs. Have these programs
2 been changed in order to maximize the lifetime benefits?
3 i. For the programs that have not been changed, please explain why it is
4 acceptable for the lifetime benefits to be lower than the 5-year investment.
5 b. How much more or less would E1 need to invest in these programs so that the value
6 of the lifetime benefits is greater than the investment?
7

8 **Request IR-28:**

9 How did E1 arrive at the minimum 90% as the threshold for achievement of the performance
10 targets?

- 11 a. What are the industry standard thresholds for achieving a DSM performance target?
12

13 **Request IR-29:**

14 Table 11: Proposed 2027-2031 DSM Preferred Plan Performance Targets provides the expected
15 energy savings. Please provide the number of customers by rate class that E1 forecasts
16 participating in programs under each demand resource area to achieve these savings over the
17 2027-2031 period.
18

19 **Request IR-30:**

20 Regarding Section 8.1 "Mid-Course Adjustment Process" of the Application:

- 21 a. Pdf pg. 69 states: "E1 has acknowledged the concerns raised by members of the
22 DSMAG and engaged in discussions on these matters..."
23 i. Please provide a detailed summary of the feedback received from DSMAG
24 members related to the mid-course adjustment process.
25 b. Reference to Exhibit E-1, page 62 of 71 (pdf pg. 69), E1 states that the issues identified
26 by members of the DSMAG were not created by actual mid-course adjustments but
27 rather by actual rate class spending compared to the rate spending projected in the
28 DSM plan. Please explain the difference and why E1 felt it was significant enough to
29 provide this clarification.
30 c. Pdf pg. 70 notes that E1 is proposing the following enhancements to its mid-course
31 adjustment process: "Reducing the threshold from 25 percent to 20 percent for
32 program changes both spending and savings that require explanations", and
33 "Introducing a spending threshold of 15 percent for rate class spending changes that
34 require explanations."

- 1 i. Please confirm whether these proposed enhancements have the support of
2 all members of DSMAG.

3
4 **Request IR-31:**

5 Regarding Section 8.2 “Mid-Term Check-in” of the Application:

- 6 a. With regards to the Mid-Term Check-in process described at lines 13 to 21 of pdf pg.
7 72: Does E1 intend to file a “Mid-term Check-in Report” with the Board following
8 completion of the Mid-Term Check-in?
9 i. If not, why not?

10
11 **Request IR-32:**

12 Regarding Section 9 “Alternate Scenario” of the Application:

- 13 a. Pdf pg. 74 states: “The Alternate Scenario represents a total investment in energy
14 efficiency, demand response and solar PV of \$308.4 million over the 2027–2031 DSM
15 Plan. The design approach maintained the levels of energy efficiency savings and
16 investment for low-income and equity customers and solar-PV contained in the
17 Preferred Plan and reduced demand response through the elimination of the Eco Shift
18 program component.”
19 i. Did the alternate scenario consider the removal of any DSM measures that
20 did not meet the PAC test?
21 • If not, why not?
22 • If so, please explain specifically why the alternate scenario does not
23 include the removal of these measures.

24
25 **Request IR-33:**

26 Regarding Section 10 “Conclusion” of the Application:

- 27 a. Pdf pg. 75 notes: “The Preferred Plan delivers 435.4 GWh of incremental cumulative
28 net energy savings, 85.0 MW of cumulative peak demand savings, 14.0 GWh of
29 incremental cumulative net energy savings from dedicated low-income and equity
30 programs, 29.3 MW of available capacity from demand response, and 1.7 GWh of
31 energy reductions from customer-sited solar-PV generation”.
32 i. Please explain the rationale for selecting 435.4 GWh of net energy savings
33 as the target.

- 1 ii. When determining the target values for the Preferred Plan, please explain
2 whether E1 prioritizes available budget or planned net energy savings and
3 why.
4

5 **Request IR-34:**

6 Pdf pg. 87 defines Strategic Electrification as activities that shift end-uses from fossil fuels to
7 electricity, while reducing both GHG emissions and electricity costs for customers.

- 8 a. Please discuss how E1 considers “strategic” to play a role in these activities.
9 b. Please describe end-uses that may be associated with these activities.
10 c. Does E1 regard activities that shift end-uses from operating at peak as a means of
11 reducing GHG emissions from fossil fuels based generation?
12 d. Has E1 considered meeting the legislative requirements of Strategic Electrification
13 through a two-part strategy, where one set of activities focuses on reducing GHG
14 emissions and the other part focuses on reducing electricity costs for customers?
15

16 **Request IR-35:**

17 As the system operator, IESO-NS is responsible for ensuring an adequate electricity supply is
18 available to serve the provincial demand and energy requirements.

- 19 a. Please explain what consultations were held with the IESO regarding the level of
20 demand and energy reduction being incorporated into the DSM Plan.
21 b. Did the IESO provide a target MW or MWh reduction for the DSM Plan?
22 c. If no such discussions were held with the IESO, please explain why not.
23

24 **Request IR-36:**

25 NS Power’s IRP and Evergreen Update identified additional supply-side resources needed to
26 serve projected demand and energy requirements.

- 27 a) Did NS Power provide a target MW or MWh reduction for the DSM Plan?
28 i. If not, please explain why not.
29 ii. If yes, are the estimated demand and energy reductions in the DSM Plan
30 consistent with reductions specified by NS Power?
31 b) Please explain whether the DSM Plan is targeting any specific geographic problem
32 area identified by NS Power. Was this issue discussed during development of the DSM
33 Plan?
34

1
2
3
4 **Request IR-37:**

5 Absent any specific demand or energy reduction targets requested by NS Power or IESO-NS,
6 please explain how E1 determined that the quantities and associated expenditures in its DSM
7 Plan are the correct amounts that are necessary to be pursued at this time.
8

9 **Appendix A - Preferred Plan pp. 1-112 (Attach. 1-5)**

10 **Request IR-38:**

11 Please provide the unprotected spreadsheet with all cells intact for all Appendix A and Appendix
12 B spreadsheet attachments.
13

14 **Request IR-39:**

15 a. Regarding Section 2.2.2 “Residential Behaviour Program”:

16 i. Pdf pg. 93 states: “In 2023, E1 collaborated with NS Power to address program
17 overlap between E1’s Residential Behaviour program component and NS
18 Power’s Customer Energy Management program.”

- 19 • Please explain whether E1 has a program development strategy or
20 process to avoid potential conflicts with the programs already
21 introduced by NS Power or other similar entities.
22 • Please explain whether, and if so how, E1 communicated with NS
23 Power about the Residential Behaviour program during planning stage.

24 b. Regarding Section 3.2.1 “Resource Scenario Design”:

25 i. Pdf pg. 104 states: “Accordingly, energy savings in the 2027–2031 Preferred
26 Plan, as a percentage of load, are 0.8 percent of NS Power’s load forecast.”

- 27 • Please explain how E1 allocates the 0.8 percent of NS Power load
28 saving across different rate classes when developing Preferred Plans
29 and the rationale for this allocation approach.

30 c. Regarding Section 4.4 “Portfolio Savings and Investment:

31 i. In comparing Table 7 on pdf pg. 115 of the application to Table 8 from Appendix
32 A of E1’s 2023-2025 DSM application (M10374, pdf pg. 137), Board staff notes
33 that annual spending is increasing in the proposed 2027-2031 DSM plan
34 compared to the 2023-2025 DSM plan, but energy savings and peak demand

- 1 savings are decreasing. In this context, when does E1 expect that further DSM
2 spending will no longer be economic? Please explain.
- 3 d. Pdf pg. 123 states: "Investment levels in Residential sector programs represent
4 approximately 56 percent of the energy efficiency portfolio and BNI sector programs
5 at 44 percent. At the same time, residential sector programs will generate
6 approximately 29 percent of the portfolio savings and BNI sector programs providing
7 71 percent of the energy efficiency portfolio savings." In this context, please explain
8 why E1 has not opted for more energy efficiency investment in the BNI sector and less
9 investment in the Residential sector.
- 10 e. With regards to proposed Rate Class Coat Allocations: pdf pg. 128 states: "Planned
11 rate class savings and expenditures for the 2027–2031 DSM Preferred Plan are
12 provided in Table 15, below. E1 has also provided rate class expenditures and savings
13 by program in Attachment 2."
- 14 i. Please provide a reference in the evidence filed to date showing where the
15 numbers in Table 15 have been calculated.
- 16 • If no such supporting calculations have been filed to date, please
17 provide the calculations in spreadsheet format with all formulae intact
18 and unaltered.
- 19 ii. Please provide a reference in the evidence filed to date showing where the
20 numbers in Attachment 2 have been calculated.
- 21 • If no such supporting calculations have been filed to date, please
22 provide the calculations in spreadsheet format with all formulae intact
23 and unaltered.
- 24 f. Board staff notes that Table 17 of Appendix A of Exhibit E-1 (pdf pg. 135), shows
25 proposed annual investment for the Residential Instant Savings Component ranging
26 from \$2.2M to \$5.2M from 2027 to 2031, for a total investment of \$20.6M over this
27 period. However, Appendix A, Attachment 3 shows total annual PAC costs for the
28 Instant Savings Program ranging from \$1.2M to \$4.0M for each year for the 2027-2031
29 DSM plan. Please explain and reconcile Table 17 with Appendix A, Attachment 3.
- 30 i. If required, please recalculate the Attachment 3 annual PAC score and
31 payback period for each measure in the Residential Instant Savings program
32 for each year from 2027 to 2031, and provide a revised Appendix A,
33 Attachment 3 in Excel format with all formulae intact and unaltered.

1 g. Board staff notes that that the same comment as noted in f. above for the Residential
2 Instant Savings Program also applies to Appendix A Tables 20, 21, 22, 23, 24, 29, 32,
3 36, 37 and 41 in that annual investment for the related programs for 2027-2031 shown
4 in the Tables appears to differ from the total annual investment amounts shown in
5 Appendix A, Attachment 3. Please explain and reconcile the Tables with Appendix A,
6 Attachment 3.

7 i. If required, please recalculate the Attachment 3 annual PAC score and
8 payback period for each measure within each program for each year from 2027
9 to 2031, and provide a revised Appendix A, Attachment 3 in Excel format with
10 all formulae intact and unaltered.

11 ii. Board Staff notes that the “Incentives only” PAC scores in Appendix A
12 Attachment 3 appear to pass the PAC test for all programs, while Tables 9 to
13 13 in Appendix A of Exhibit E-1 (pdf pgs. 117-121) show that some programs
14 fail the PAC test. For the programs that fail the PAC test in Appendix A of
15 Exhibit E-1 (pdf pgs. 117-121), has E1 considered reducing “non-incentive”
16 related costs to the extent that the program would pass the PAC test? Please
17 explain.

- 18 • For the programs that fail the PAC test in Appendix A of Exhibit E-1
19 (pdf pgs. 117-121), please identify the reduction in “non-incentive”
20 related costs that would be required for the program to pass the PAC
21 test.

22 h. Table 21, Pdf pg. 141 states: “...heat pumps including no-cost heat pump cleanings
23 (heat pump cleanings new for 2027–2031)”.

24 i. Please provide additional details about the heat pump cleaning program.

25 ii. Please explain the rationale for including heat pump cleanings as a DSM
26 measure, including how the measure could eventually pass the cost benefit
27 analysis test.

28
29 **Request IR-40:**

30 Exhibit E-1, Appendix A, page 19 of 112 (pdf pg. 107):

31 E1 notes that, for existing measures, measure-level inputs were developed using the most
32 recently available program and evaluation data, but some inputs were modified to reflect known or
33 expected differences over the 2027-2031 period. Please identify the inputs that were modified,

1 the known or expected differences that warranted the modifications, and how the precise
2 modification was determined.

3
4
5 **Request IR-41:**

6 Appendix A, page 92 of 112 (pdf pg.180), Table 54: 2027-2031 Outreach Activities:

- 7 a. E1 notes that continual improvement of the tools and content on its website and social
8 media platforms is critical for educating and engaging with Nova Scotians. Please
9 explain how the tools and content are measured to determine whether changes are
10 improvements.
- 11 b. What is a “total awareness score”?
- 12 c. E1 notes that one of its measures of success is that its preferred partner membership
13 remains steady or grows. Given that there were 451 members in its preferred partner
14 network at the end of 2025 [Exhibit E-2, page 41 of 47], please explain why it is a
15 measure of success that it perpetually grows its preferred partner membership. Has
16 E1 done any analysis to assess the optimal number of preferred partners and the point
17 at which further investment in growing the number of preferred partners results in
18 diminished returns? If so, please provide this analysis.

19
20 **Request IR-42:**

21 Exhibit E-1, Appendix A, page 99 of 112 (pdf pg.187), Table 62: 2027-2031 DSM Preferred Plan
22 Performance Indicators:

- 23 a. For each performance indicator identified, please discuss why the indicator should not
24 be developed as a performance target.

25
26 **Request IR-43:**

27 Exhibit E-1, Appendix A, page 103 of 112 (pdf pg. 191):

28 E1 notes that the demand response program evaluation is aimed at verifying and quantifying the
29 available capacity to the utility over the winter peak period, which differs from peak demand
30 savings.

- 31 a. Given the importance of peak demand savings, please explain why the program’s
32 actual reduction of peak demand should not be assessed, notwithstanding that E1
33 does not control the calling of demand response events.

Request IR-44:

Exhibit E-1, Appendix A, page 108 of 112 (pdf pg. 196):

E1 discusses enhancements it agreed to make in the 2026 DSM Extension matter.

- a. Should estimation accuracy be established as a performance target? If not, why not?
- b. Should variances in program spending against the DSM plan be established as a performance target? If not, why not?
- c. How does enhanced reporting address the concerns raised by Industrial Group if they do not have an opportunity to dispute a mid-course adjustment that E1 intends to make?

Request IR-45:

Exhibit E-1, Appendix A, page 108 of 112 (pdf pg. 196):

E1 discusses further mid-course adjustment enhancements it proposes, including reducing thresholds for requiring explanations for program spending and savings and rate class spending.

- a. Should E1 be required to seek Board approval for changes exceeding these thresholds rather than simply providing explanations for doing so?

Request IR-46:

Regarding Appendix A, Attachment 1: worksheet PAC Assumptions:

- a. Do the costs provided by NS Power for energy, capacity, transmission and distribution align with the recently approved Cost of Service Study approved by the Board in NS Power's General Rate Application M12451?
- b. Have the Program Administration cost profiles from the last four years, 2021-2024 been adjusted to account for inflation?
- c. Will NS Power's weighted average cost of capital be updated annually?

Request IR-47:

Regarding Appendix A, Attachment 1: worksheet AVC Energy Seasonal:

- a. Please explain the source for the values 467,024 and 2,265 used to estimate levelized AVE Energy under Table 1.
 - i. Why do all the estimates under each table not match the values in the table?
 - ii. Why does the table for levelized costs use the NPV of annual avoided energy costs and the NPV of Nominal WACC?
- b. Why are there no values in Table 1, Table 2 or Table 3 for Real WACC?

- c. Please explain the values under Nominal WACC and how they are estimated.
- d. Please explain why WACC is used to estimate the change to energy.

Request IR-48:

Regarding Appendix A, Attachment 1: worksheet AVC Energy & Capacity: please describe how the Capacity Adjustment for Planning Reserve Margin was derived.

Request IR-49:

Reference Appendix A, Attachment 3 (Exhibit E-1-(ii)):

E1 provides justification for measures that do not pass the program administrator cost (PAC) test.

- a. If ongoing support is required to maintain heat pumps, please indicate whether ongoing maintenance costs were included in E1's cost benefit assessments for heat pump measures when they were originally approved. If not, please explain in detail why not.
- b. Please quantify the degradation in E1's investment in heat pumps if heat pump cleanings for past participants is not provided.
- c. The "IR-Griddle-Electric" measure shows an overall PAC result of 0.62 for the plan, and PAC results ranging from 0.53 to 0.68 between 2027 and 2031. Please explain the following statement in the justification for this measure: "In fact, the application rebates variation is on the cusp of passing PAC in 2027 and 2028, and passes from 2029 and 2031."
- d. The "Solar Security Fixture", "Outdoor Motion Sensor" and "Indoor Motion Sensor" measures appear to cost 5-10 times more than the benefits provided. Please provide a more comprehensive justification for including these measures, and discuss in detail how providing measures that cost so much more than the benefits they provide are necessary to maintain delivery costs and keep contractors engaged as alleged in the justification provided in Appendix A-3.

Request IR-50:

Regarding Appendix A, Attachment 5 of Exhibit E-1 – "Innovation Framework, Process and Plan for 2027-2031":

- 1 a. Pdf pg. 21 of the application: "E1 engaged with the DSMAG throughout the
2 development of these plans and is filing the Innovation Framework, Process and Plan
3 for 2027–2031 as part of this Application in Appendix A, Attachment 5." Provide any
4 feedback/comments for DSMAG parties about the Framework, Process and Plan for
5 2027-2031.
- 6 b. Pdf pg. 217 states: "E1's Innovation team uses established Innovation Goals to define
7 the long-term outcomes of all projects from concept, planning to close." Provide an
8 org chart of this team and identify how many E1 personnel make up the innovation
9 team.

10
11 **Request IR-51:**

12 Exhibit E-1, Appendix A, Attachment 5 - Innovation Framework, page 1 of 14 (pdf pg. 216):
13 E1 refers to its innovation activities but notes that this overview focused on innovation activities
14 of strategic importance to the DSM mandate.

- 15 a. What non-DSM innovation activities are being undertaken by E1 and how are they
16 funded?

17
18 **Request IR-52:**

19 Exhibit E-1, Appendix A, Attachment 5 - Innovation Framework, page 2 of 14 (pdf pg. 217):
20 Annual Innovation Plan

- 21 a. Please provide E1's innovation plan for 2027 or its most recently completed innovation
22 plan.

23
24 **Request IR-53:**

25 Exhibit E-1, Appendix A, Attachment 5 - Innovation Framework, page 6 of 14: Table 1: Projected
26 Direct Expenditures by Focus Area:

- 27 a. How are the budget amounts for each focus area determined?
- 28 b. Please provide a breakdown of the expenditure amounts for approved vs unapproved
29 projects. For each approved project included in the expenditures, please provide a
30 copy of the project proposal submitted to the executive leadership team for approval,
31 and the record of the approval. If there are less than five approved projects included
32 within the scope of the expenditures shown for 2027-2031, please provide copies of
33 the project proposals and records of approval for the most recent five projects that
34 were approved by the executive leadership team.

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4 **Request IR-54:**

5 Exhibit E-1, Appendix A, Attachment 5 - Table 4, 5, and Figure 2, pages 11-13 of 14:

- 6 a. Figure 2 notes that market, performance and program readiness are assessed at the
7 concept stage. For each of these items in Tables 4 and 5, please explain what levels
8 are needed for a project to move past the concept stage into the planning stage.
9 Please explain how the various levels identified in Tables 4 and 5 are used as
10 thresholds for determining progression or success in any part of the pilot lifecycle
11 shown in Figure 2.
- 12 b. Figure 2 notes that cost effectiveness threshold is determined at the concept stage.
13 Please explain how the cost effectiveness threshold is determined.
14

15 **Request IR-55:**

16 Board staff notes that in Appendix A Attachment 4 from E1's 2023-2025 DSM application
17 (M10473), E1 included columns identifying the following: "Gross Per Unit One-Time Incremental
18 Measure Cost (\$)", "Per Unit Program Administrative Cost (inclusive of DI costs) (\$)", "Per Unit
19 DSM Administrator Cost (Incentive + Administrative) (\$)", "Per Unit DSM Customer Cost
20 (Incremental Measure Cost - Incentive) (\$)", and "Total Per Unit DSM Cost (\$)". Board staff also
21 notes that these columns do not appear to be included in Appendix A Attachment 3 in the current
22 matter. Please explain.
23

24 **Appendix B - Rate and Bill Impact Analysis, 2027-31 DSM Resource Plan and 2026**
25 **Historical, pp. 1-23 (Attach. 1-10)**
26

27 **Request IR-56:**

28 Please provide the growth assumptions used in NS Power's projected energy and demand sales
29 from 2011-2055 and where available by rate class.
30

31 **Request IR-57:**

32 Pdf page 290 states that program costs for the 2027-2031 DSM Plan will be completely recovered
33 from 2027-2031 and 2011-2026. Please confirm, or explain otherwise, that the cost recovery for
34 program costs in 2027-2031 will be recovered in the same period.

- 1 a. Please explain how E1 expects to recover costs in 2031 that are incurred in 2031.
2 b. What are the outstanding program costs from 2011-2026
3
4
5

6 **Request IR-58:**

7 Exhibit E-1, Appendix B, Attachment 6 – NS Power Pricing Methodology, page 8 of 16 (pdf
8 pg.310):

9 It is noted that DSM-related costs are apportioned to rate classes based on the “25/75 rule”.

- 10 a. Please confirm whether the rate and bill impact assessment information provided in
11 this application is based on the allocation of 75% of the cost to the related rate class
12 or 100%, as recently approved in NS Power’s recent general rate application.
13 b. If the rate and bill impact assessment information in the application is not based on a
14 100% allocation to customer classes, please provide an update to Table 1 [Exhibit E-
15 1, Appendix B, page 12 of 23] based on a 100% allocation.
16

17 **Request IR-59:**

18 In reference to Appendix B, Attachment 1, the worksheet Preferred Plan, the table and the graph
19 Rate Impacts by Resource show an increase in rate impacts associated with solar pv. In column
20 AQ, please explain why there will be no rate impact in 2027 and why the rate impact diminishes
21 but remains positive from 2028 to 2046.
22

23 **Request IR-60:**

24 In reference to Appendix B, Attachment 1, the worksheet Preferred Plan, the table and the graph
25 for Total Customer Bill Impacts by Resource, please explain the solar pv program will have a
26 positive effect on customer bills from 2028 to 2031.
27

28 **Request IR-61:**

29 Please explain why the Average Participant Bill Impact for solar pv is 0% in 2027.
30

31 **Exhibits E-2 - 2025 DSM Annual Progress Report**

32
33 **Request IR-62:**

34 Please provide a table with the free ridership levels used in the 2025 DSM Evaluation.

Request IR-63:

Please describe the Nova Scotia specific GHG emissions factor used in the evaluation.

a. Did E1 modify the factor to provide a better fit for their programs and services?

i. If so, please explain the adjustments.

ii. If not, why not?

Request IR-64:

In reference to Table 5: Comparison of 2025 Evaluated and Tracked Electrical Energy Savings at the Generator:

a. Please explain the Net Realization Rate of 101% for Affordable Single-family Homes.

b. How were the Lifetime Net Electrical Energy Savings calculated?

c. Why are there entries under Difference in Net Savings for five Residential programs?

Request IR-65:

With respect to the 2025 setting targets for the net peak demand savings within Custom Incentives, does E1 do an assessment of the customers to determine the customer's energy usage during peak demand before the customer qualifies for the incentive or any other form of screening to ensure that the custom incentive will reduce net peak demand?

Request IR-66:

Please provide the NTGR Calculations in excel format with cells and formula intact and protections removed.