

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 Inc., 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**
c/o James R. Gogan
McInnes Cooper
By email: james.gogan@mcinnescooper.com

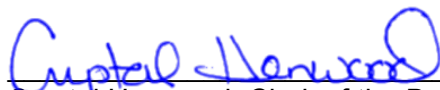
From: Synapse Energy Economics, Inc.
Board Counsel Consultant

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

Request IR-1: Please provide Appendix A - Attachment 3: 2027–2031 Preferred Plan Measure-level Energy Efficiency and Solar-PV Technical Tables and Appendix A – Attachment 4: 2027–2031 Preferred Plan Demand Response Technical Tables in Excel, including all supporting data and calculations (intact and unprotected) with sources and assumptions clearly identified.

Request IR-2: Please provide E1’s Round 1 and Round 2 modeling leading up to the proposed 2027-2031 DSM Plan, including presentations to the DSMAG, reports summarizing inputs and results, and all associated attachments in Excel including but not limited to supporting data and calculations (intact and unprotected) with sources and assumptions clearly identified. Please also provide any BCA workbooks associated with this modeling.

Request IR-3: Regarding E1’s Round 1 and Round 2 modeling, please provide the resource-level and portfolio-level cost-effectiveness of those potential Plans using the PAC and the WACC applied in the 2027-2031 DSM Plan filing. Please provide the utility costs, utility benefits, utility net benefits, and PAC ratio in the response. Please also provide the increased GHG emissions, the GHG emissions reductions, and the net of the increases and decreases. Regarding the portfolio-level results, provide portfolio-level results including a base or high scenario for each modeled resource. For example, if E1 modeled base and high scenarios for energy efficiency and demand response and base scenarios only for solar PV and strategic electrification, please provide results for all the possible combinations of resources:

- a. EE – Base & DR – Base & Solar PV - Base & Strategic Electrification - Base
- b. EE – High & DR – Base & Solar PV - Base & Strategic Electrification - Base
- c. EE – Base & DR – High & Solar PV - Base & Strategic Electrification - Base
- d. EE – High & DR – High & Solar PV - Base & Strategic Electrification – Base

Request IR-4: Regarding E1’s Round 1 and Round 2 modeling, please provide the resource-level and portfolio-level cost-effectiveness of those potential Plans using a modified PAC, in alignment with the BCA proposed by the Industrial Group’s consultant in *E1’s Application for approval of a New Benefit-Cost Analysis Test for Evaluating DSM Plans* in Matter 12282. Please use the WACC applied in the 2027-2031 DSM Plan filing. Please provide the resource and portfolio-level modified utility costs, modified utility benefits, modified utility net benefits, and modified PAC ratio in the response. Please also provide the increased GHG emissions, the GHG emissions reductions, and the net of the increases and decreases. Regarding the portfolio-level results, provide portfolio-level results including a base or high scenario for each modeled resource. For example, if E1 modeled base and high scenarios for energy efficiency and demand response and base scenarios only for solar PV and strategic electrification, please provide results for all the possible combinations of resources:

- a. EE – Base & DR – Base & Solar PV - Base & Strategic Electrification - Base
- b. EE – High & DR – Base & Solar PV - Base & Strategic Electrification - Base
- c. EE – Base & DR – High & Solar PV - Base & Strategic Electrification - Base
- d. EE – High & DR – High & Solar PV - Base & Strategic Electrification – Base

Request IR-5: Regarding the application of a modified PAC in E1's Round 1 and Round 2 modeling, please provide an explanation of the costs and benefits included in the modified PAC, as proposed by the Industrial Group's consultant in *E1's Application for approval of a New Benefit-Cost Analysis Test for Evaluating DSM Plans* in Matter 12282.

Request IR-6: Please refer to Table 6 on page 10 of the 2027-2031 Demand Side Management Resource Plan - Round 2 Model Input Assumptions and Results. Please explain why batteries, EV telematics, and EV charger devices are not included in the Round 2 modeling results.

Request IR-7: Page 3 of the Evidence states, "Section 79C(1) of the PUA gives the Minister of Energy ('Minister') the authority to grant an electricity efficiency and conservation franchise ('Franchise'). Pursuant to section 79C(2)(a), the Franchise holder has the exclusive right to supply NS Power with 'reasonably available, cost-effective demand-side management for the purpose of this Act'. Demand-side management is defined in section 79A of the Act, for the purposes of sections 79B through 79V, as follows:

...

(iv) strategic electrification of energy end uses currently powered by fossil fuels in a manner that reduces overall greenhouse gas emissions and electricity costs,"

Please answer the following questions regarding the quote above:

- a. Did E1 interpret this language to mean that the strategic electrification resource, in isolation and not in combination with other resources, needs to reduce overall greenhouse gas emissions and electricity costs?
- b. Does E1's response to (a) reflect E1's own interpretation of the regulation or did E1 ask for clarification regarding how this regulation should be interpreted and/or implemented in its 2027-2031 DSM Plan? Please explain.

Request IR-8: Page 5 of the Evidence states, "Pursuant to section 79H(1), its responsibilities include determining 'the cost-effective demand-side management that must be undertaken for the purpose of this Act', which in 79H(2) is to be evaluated at the portfolio level. In its decision on the BCA test, the Energy Board confirmed that DSM Plan applications must be evaluated at the portfolio level 'that would be the aggregate amount of demand-side management programs,' which also includes strategic electrification. The Energy Board noted at paragraph 168 that the requirement to evaluate the proposed cost-effective demand-side management at the portfolio level implies that, provided the overall portfolio passes the cost-effectiveness test, it is not a contravention of the statute if measures or programs themselves fail. Justification for including such measures and programs could be provided a number of ways, including based on the factors the Energy Board is required to consider under s. 6(2) of the *Energy and Regulatory Boards 1 Act*. E1's 2027–2031 DSM Plan passes the Program Administrator Cost ('PAC') test at the portfolio level with a benefit-cost ratio of 2.4, satisfying this requirement. For the limited number of individual programs and measures that do not

1 independently pass the cost-effectiveness test, E1 has responded to this specifically under Board
2 Directives section 2.2.2.1.”

3 Please answer the following questions regarding the quote above:
4

- 5 a. If one or more of the portfolio-level assessments of this Plan passed the PAC and/or
6 modified PAC tests, please explain why this portfolio does not comply with the direction
7 in the NSEB Decision in Matter 12282 (E1 Application for approval of a New Benefit-Cost
8 Analysis Test for Evaluating DSM Plans).
9 b. Does E1’s response to (b) reflect E1’s own interpretation of NSEB’s Decision or did E1
10 ask anyone for clarification regarding how this Decision should be interpreted or
11 implemented in its 2027-2031 DSM Plan? Please explain.
12

13 **Request IR-9:** Page 9 of the Evidence states “Given the affordability concerns raised by DSM Advisory
14 Group (DSMAG) members, as discussed in Sections 3.1.1 and 4.1, the Preferred Plan constrains
15 investment to 2026 levels with no annual inflationary increases to the investment, while maintaining
16 a portfolio that delivers long term benefits to ratepayers, consistent with the NSEB's direction to
17 consider both affordability and long-term cost reduction.” Page 11 of the Evidence states that “the
18 Preferred Plan is demonstrably in the best interests of NS Power's customers because it: balances
19 near-term affordability with long-term value by constraining investment to 2026 levels.”

- 20 a. Please discuss why E1 decided to constrain investment to 2026 levels with no annual
21 inflationary increases.
22 b. Please discuss if E1 considered constraining investment to 2026 levels with annual
23 inflationary increases. If so, please explain why this approach was not proposed in this
24 plan.
25

26 **Request IR-10:** Pages 9-10 of the Evidence state, “E1’s decision to hold investment at current levels
27 reflects a deliberate and evidence-based judgment that near-term rate restraint, in the current
28 economic environment, serves the best interests of ratepayers without compromising the long term
29 trajectory toward NS Power’s Integrated Resource Plan (‘IRP’)-identified energy savings levels.”

- 30 a. Please compare the 2023-2026 DSM Plan with the IRP Reference Plan by year for similar
31 years and across years, in terms of:
32 a. Energy efficiency: energy savings and peak demand savings (GWh and MW,
33 respectively)
34 b. Demand response: available capacity (MW)
35 b. Please estimate the gap between the 2023-2026 DSM Plan and the IRP Reference Plan
36 in 2023, 2024, 2025, 2026, and accumulated across all these years.
37 c. Please compare the proposed 2027-2031 DSM Plan with the IRP Reference Plan, by year
38 for similar years and across years, in terms of:
39 a. Energy efficiency: energy and demand savings (GWh and MW)
40 b. Demand response: available capacity (MW)
41 c. Solar PV: generation (GWh)

- 1 d. Please estimate the gap between the proposed 2027-2031 DSM Plan and the IRP
2 Reference Plan in 2027, 2028, 2029, 2030, 2031, and accumulated across all these years.
3 e. Does E1 agree that holding investment at current levels in nominal dollars is the same as
4 decreasing investment in constant dollars? If not, why not?
5 f. If E1 agrees that it is decreasing investment in constant dollars, please explain how a
6 decrease in investment in DSM “serves the best interests of ratepayers”.
7 g. Does E1 agree that a gap between the proposed 2027-2031 DSM Plan and the IRP
8 Reference Plan in 2027, 2028, 2029, 2030, 2031, and accumulated across all these years
9 is not consistent with “the long term trajectory toward NS Power’s Integrated Resource
10 Plan (‘IRP’)-identified energy savings levels”. If not, why not?
11

12 **Request IR-11:** Pages 14-15 of the Evidence state, “E1 notes that section 11(1) of the More Access to
13 Energy Act requires that the Nova Scotia Independent Energy System Operator (‘NSIESO’)
14 commence its first integrated resource planning exercise within one year of the coming into force of
15 that section. E1 looks forward to working with the new NSIESO in relation to their IRP process
16 generally, and in particular, its statutory mandate as franchise holder to cooperate with the NSIESO
17 to:

- 18 (i) develop avoided cost calculations for demand-side management resources.
19 (ii) co-operate with the franchise holder in pursuit of its duties under this Act, including its duty
20 to conduct integrated resource planning exercises, and
21 (iii) co-operate with the franchise holder respecting the integrated resource planning to develop
22 avoided cost calculations for demand-side management resources and undertake reasonable
23 cost-effective demand-side management;”

24 Please answer the following questions regarding the quote above:

- 25 a. Does E1 anticipate an updated IRP between 2027 and 2031? If so, when would this
26 process begin and when would it conclude?
27 b. Does E1 anticipate updated avoided costs between 2027 and 2031? If so, when would
28 these updated avoided costs be available for application in DSM Planning?
29 c. Does E1 anticipate updating the avoided costs in its 2027-2031 DSM Plan as a result of
30 the updated avoided costs from NSIESO? If so, when would E1 make these updates?
31

32 **Request IR-12:** Page 17 of the Evidence states, “Fourth, with respect to the analytical requirements in
33 section 4 of the BCA Test Order, E1 notes that it has not applied a social discount rate in any tests
34 and accordingly no WACC comparison has been provided.”

- 35 a. Please provide costs, benefits, net benefits, and a BCA ratio for the 2027-2031 DSM Plan
36 using the NS Test as proposed in E1’s Application for approval of a New Benefit-Cost
37 Analysis Test for Evaluating DSM Plans in Matter 12282, and use the WACC applied in
38 the PAC BCA.
39 b. Please provide costs, benefits, net benefits, and a BCA ratio for the 2027-2031 DSM Plan
40 using the NS Test as proposed in E1’s Application for approval of a New Benefit-Cost

1 Analysis Test for Evaluating DSM Plans in Matter 12282, and use a societal discount rate
2 of 2%.

3
4 **Request IR-13:** Page 17 of the Evidence states, “E1 further notes that long-run marginal emissions rates
5 have not been provided by NS Power, despite requests in December 2025 and February 2026. E1
6 understands that NS Power is consulting with the NSIESO on methodology and that this work is
7 ongoing. E1 has calculated emissions impacts using the best available emissions information from
8 NS Power's IRP, consistent with the approach taken in the 2023– 2026 DSM Plan.”

- 9 a. When does E1 anticipate that NS Power will provide long-run marginal emissions rates?
10 b. Does E1 anticipate any updates to the proposed 2027-2031 DSM Plan once it receives
11 the long-run marginal emissions rates from NS Power? If so, when would these updates
12 take place? If not, why not?
13

14 **Request IR-14:** Pages 18-19 of the Evidence state, “E1 has initiated discussions with NS Power to further
15 collaborate on both locational demand response and the stacking of E1’s demand response with
16 rate signals. While there is not currently double counting of savings between E1’s Demand Response
17 program and NS Power’s rate signals, E1 and NS Power recognize this requires ongoing efforts to
18 determine if and how these two programs should work together. E1 expects these discussions to
19 continue with the outcome being a proposed resolution agreed upon by both organizations. E1 is
20 committed to continue to work through a solution that remains in the best interest of ratepayers. E1
21 has included both of these topics for development and research efforts under innovation as
22 highlighted in both Appendix A, section 9.4 and in the Innovation Framework, Process and Plan for
23 2027–2031 included as Attachment 5 to Appendix A. Further discussion is also provided in Appendix
24 A at sections 7.1 and 7.2.”

- 25 a. When does E1 anticipate that it will have a proposed resolution that is agreed upon by
26 E1 and NS Power?
27 b. Does E1 anticipate any updates to the proposed 2027-2031 DSM Plan with this
28 proposed resolution in place? If so, when would these updates take place? If not, why
29 not?
30

31 **Request IR-15:** Page 25 of the Evidence states, “The Preferred Plan energy savings achieves 0.8 percent
32 of NS Power’s load which E1 considers appropriate based on a review of other jurisdictions, the
33 2023-2026 DSM Plan, and the current affordability focus. A jurisdictional scan conducted by APEX, a
34 third-party expert, helped inform the percentage of load that E1 considers appropriate. The
35 jurisdictional scan compared both U.S. and Canadian utilities, with similar climate and program mix.
36 APEX has recommended 0.8 percent to 1.0 percent of load would be reasonable and aligned with
37 comparable utilities. This is also aligned with E1’s 2023-2025 DSM Plan at 1.0 percent of load and
38 0.87 percent of load in the 2026 DSM Extension (adjusted to reflect the removal of the Residential
39 Behaviour program).” Also, page 26 of the Evidence states, “The Preferred Plan allocation of energy
40 savings is split 29 percent/71 percent between residential and BNI sectors which E1 considers
41 appropriate. In addition to providing insights for the total energy savings as a percent of load, APEX

1 also provided E1 with jurisdictional information on allocation between sectors. Based on their
2 review APEX has recommended a 30 percent/70 percent split for these sectors as reasonable and
3 aligned with comparable utilities. Dedicated low income and equity programs' energy savings as a
4 percentage of total residential energy savings are 11 percent in the Preferred Plan. This is aligned
5 with 2023–2026 at 10.5 percent.”

- 6 a. Please provide the APEX jurisdictional scan results and all supporting workbooks and
7 analyses.
- 8 b. Which U.S. and Canadian utilities were included in the jurisdictional scan?
- 9 c. Please compare the systems for the utilities identified in (b) with Nova Scotia’s in terms
10 of climate (including heating degree days and system peak) and DSM program mix.
- 11 d. Given the mentioned affordability challenges, is there any expectation that the number
12 of low-income customers will rise between now and 2031 in Nova Scotia? If so, what
13 source(s) support this trend and what do they project? If not, why not?
14

15 **Request IR-16:** Please refer to pages 28-29 of the Evidence, where E1 states that “Early-stage demand
16 response programs typically require time to mature before their full value is realized.” Please refer
17 also to page 31 of the Evidence, where E1 states “technologies that deliver the strongest
18 performance and program economics” include “existing behind-the-meter battery systems.” Please
19 refer also to page 34 of the 2025 Progress Report, where E1 states that enrollment in EV and battery
20 pathways was lower than expected.

- 21 a. Please explain all major reasons contributing to the “lower-than-expected” enrollment
22 in EV and battery pathways.
- 23 b. Does E1 intend to terminate existing EV and battery Eco Shift enrollments? If so, please
24 describe the reasons for termination, the schedule for terminating existing EV and
25 battery EcoShift enrollments, and how participants would be notified?
- 26 c. How do the early-stage enrollment challenges observed for EV and battery devices
27 compare to those experienced by residential HVAC pathways at the inception of Eco
28 Shift, and would E1 expect similar growth trajectories if these device categories were
29 continued?
30

31 **Request IR-17:** Page 29 of the Evidence states, “Experience in peer jurisdictions suggests Nova Scotia is
32 at an earlier stage of market development but following a similar trajectory. Cost-effectiveness is
33 expected to improve over time as participation grows, technologies mature, operational processes
34 are refined, and program design evolves alongside system needs. Beyond cost-effectiveness metrics,
35 Eco Shift contributes to electricity system resilience during cold weather events by enabling
36 demand-side flexibility that complements supply-side resources and rate design. Residential
37 demand response is widely used across North America as part of a balanced approach to grid
38 management. As the electricity system continues to evolve in response to electrification,
39 environmental compliance requirements, and changing market conditions, flexible demand-side
40 programs such as Eco Shift are expected to play an increasingly important role.”

- 41 a. Please identify the peer jurisdictions that E1 used for this comparison.

- b. Please describe the experience and lessons learned through these peer jurisdictions.
- c. Please provide the supporting sources and evidence for the statement: "Residential demand response is widely used across North America as part of a balanced approach to grid management."
- d. How are leading jurisdictions that are focused on winter-peak reductions reaching and engaging residential and commercial customers in demand response?
- e. Please explain whether there are any approaches used in other jurisdictions that E1 considered but did not propose in this plan. If so, please describe the approaches and explain why each was not proposed.

Request IR-18: Please refer to pages 30-31 of the Evidence, where E1 states that the cost effectiveness of PG&E's Smart Thermostat Control Pilot "improved materially once ... snapback was better managed." Please refer also to page 35 of the 2025 Progress Report, where E1 states that "E1 continues to work toward optimizing performance of installed devices by refining thermostat pre-heating strategies."

- a. Please describe the extent to which snapback occurs under both Eco Shift and BNI DR programs, and if it occurs, please describe existing or planned strategies to reduce it.
- b. Please explain the existing pre-heating strategies employed in the Eco Shift thermostat and domestic hot water pathways.
- c. For all 2024/2025 and 2025/2026 season event days, please provide in Excel format, disaggregated by the Eco Shift and Smart Synergy pathways:
 - i. Event times and durations;
 - ii. Hourly demand response performance during event windows; and
 - iii. Hourly deviation from baseline for the four hours prior and two hours after event windows.

Request IR-19: Pages 35-36 of the Evidence state, "E1 understands from DSMAG members that strategic electrification remains an important area for exploration to determine how it can cost effectively be included in future DSM Plans. To support this objective, E1 has allocated investment within its Enabling Strategies budget specifically for strategic electrification development and research. This investment will support: (1) market research and technology assessment to identify emerging strategic electrification opportunities with improved economics; (2) pilot programs to test delivery approaches and gather real-world performance data; (3) collaboration with the NSIESO on future IRP development to better quantify system benefits; and (4) ongoing evaluation of how changes to avoided costs, particularly capacity values, may improve the cost-effectiveness of strategic electrification in future plan periods. E1 will report annually on strategic electrification research activities and findings as part of its Annual Progress Reports."

- a. How much budget has E1 allocated for this purpose in each year of the plan and cross all years of the plan? Please provide a breakout of this budget for: (1) market research and technology assessment to identify emerging strategic electrification opportunities with improved economics; (2) pilot programs to test delivery approaches and gather real-

1 world performance data; (3) collaboration with the NSIESO on future IRP development
2 to better quantify system benefits; and (4) ongoing evaluation of how changes to
3 avoided costs, particularly capacity values, may improve the cost-effectiveness of
4 strategic electrification in future plan periods.

- 5 i. How many market research and technology assessments does the budget for
6 (1) support and what are those market research and technology assessments?
- 7 ii. How many pilot programs does the budget for (2) support and what are those
8 pilot programs?
- 9 iii. How E1 would develop, propose, and launch pilots? Would E1 use the same
10 criteria that NSPI is required to use (Innovation Justification Criteria)? If not,
11 what criteria would E1 use, and why?
- 12 iv. Is budget allocated for collaboration with the NSIESO on future IRP
13 development during this plan, more generally? If so, what is the budget
14 amount and in which line item(s) can it be found?
- 15 v. Regarding (3), does better quantification of system benefits overcome the
16 primary constraint that any strategic electrification measure included in the
17 plan must reduce GHG emissions *and* electricity costs? If not, please explain
18 how this investment can result in the inclusion of strategic electrification
19 measures in future plans.
- 20 vi. Does improving the Is budget allocated for collaboration with the NSIESO on
21 future IRP development during this plan, more generally? If so, what is the
22 budget amount and in which line item(s) can it be found?
- 23 vii. Regarding (4), do changes to avoided costs, particularly capacity values, that
24 may improve the cost-effectiveness of strategic electrification in future plan
25 periods overcome the primary constraint that any strategic electrification
26 measure included in the plan must reduce GHG emissions *and* electricity
27 costs? Please describe a scenario in which changes in avoided costs would
28 result in strategic electrification not increasing electricity costs. If not, please
29 explain how this investment can result in the inclusion of strategic
30 electrification measures in future plans.
- 31 b. How likely is it that E1 and other DSMAG members will find any strategic electrification
32 measure that reduces GHG emissions *and* electricity costs? What measure(s) can meet
33 this requirement?
- 34 c. If NSEB's decision on the BCA matter effectively means that strategic electrification
35 measures cannot be implemented using electric ratepayer funds, how could E1 best
36 support implementation of strategic electrification using other sources of funds?

37
38 **Request IR-20:** Page 40 of the Evidence states, "Based on the cost of fuel as reported in NS Power's
39 2025 Management's Discussion & Analysis (MD&A) of \$0.09/kWh, the cost of DSM at \$0.05/kWh is
40 less than the average cost of fuel by \$0.04/kWh. Since 2015, the cost of fuel in \$/kWh has fluctuated
41 each year as compared to the cost of DSM with the lowest being 166 percent in 2024 and increasing
42 to as high as 343 percent in 2022. In no one year has \$/kWh for DSM been higher than the cost of

1 fuel (Table 5). The ability to avoid fuel costs through the use of a more cost-effective DSM
2 alternative is always in the ratepayers' best interests, even in the short-term. These benefits are
3 then amplified in the long-term. In lowering overall fuel costs for the utility, DSM applies a
4 downward pressure on the fuel adjustment mechanism (FAM), which, in turn, benefits all
5 ratepayers."

- 6 a. Please provide NS Power's 2025 Management's Discussion & Analysis (MD&A).
- 7 b. Is a 2026 version of the MD&A available? If so, please provide it. If not, when will it be
8 available?
- 9 c. Regarding Table 5. Cost Difference of DSM and Fuel, does E1 have projected values for
10 2026-2031? If so, please provide these values.

11
12 **Request IR-21:** Page 47 of the Evidence states, "Several factors have contributed to changes in unit
13 delivery costs between the 2023–2026 and 2027–2031 Plan periods: (b) The transition away from
14 low-cost, high-volume lighting measures (LEDs), which historically provided significant savings at
15 very low unit costs, has shifted the portfolio toward deeper, more complex measures such as
16 building envelope upgrades, heat pump installations, and custom commercial projects. These
17 measures deliver greater long-term savings and higher lifetime value per dollar invested, but at a
18 higher first-year unit cost."

- 19 a. Please provide the Number of Measures, Investment, First Year Energy Savings (GWh),
20 Lifetime Energy Savings (GWh), Peak EE Demand Savings (MW), TRC Costs, TRC Lifetime
21 Benefits, TRC Ratio, PAC Costs, PAC Lifetime Benefits, and PAC Ratio for lighting
22 measures in the Instant Savings program component, in total and by measure. Please
23 add a column to categorize each measure by its type (fixture, lamp, control, LED-
24 relamping, roadway lighting, etc.). Please include the data by plan year (2027, 2028,
25 2029, 2030, 2031) and in total across the plan years (2027-2031).
- 26 b. Please provide the Number of Measures, Investment, First Year Energy Savings (GWh),
27 Lifetime Energy Savings (GWh), Peak EE Demand Savings (MW), TRC Costs, TRC Lifetime
28 Benefits, TRC Ratio, PAC Costs, PAC Lifetime Benefits, and PAC Ratio for lighting
29 measures in the Efficiency Product Installation program component, in total and by
30 measure. Please add a column to categorize each measure by its type (fixture, lamp,
31 control, LED-relamping, roadway lighting, etc.). Please include the data by plan year
32 (2027, 2028, 2029, 2030, 2031) and in total across the plan years (2027-2031).
- 33 c. Please identify other program components affected by the phase out of lighting
34 measures and provide the NNumber of Measures, Investment, First Year Energy Savings
35 (GWh), Lifetime Energy Savings (GWh), Peak EE Demand Savings (MW), TRC Costs, TRC
36 Lifetime Benefits, TRC Ratio, PAC Costs, PAC Lifetime Benefits, and PAC Ratio for lighting
37 measures, in total for each program component and by measure within each program
38 component. Please add a column to categorize each measure by its type (fixture, lamp,
39 control, LED-relamping, roadway lighting, etc.). Please include the data by plan year
40 (2027, 2028, 2029, 2030, 2031) and in total across the plan years (2027-2031).

- d. Please provide a complete list of key dates in the transition of the Residential lighting market and adoption of baselines for various measure types in building codes. Please discuss how E1's investments in lighting measures in 2027-2031 complies with these dates.
- e. Please provide a complete list of key dates in the transition of the BNI lighting market and adoption of baselines for various measure types in building codes. Please discuss how E1's investments in lighting measures in 2027-2031 complies with these dates.

Request IR-22: Page 48 of the Evidence states, "E1 commits to controlling costs on an ongoing basis with the continuation of its cost management strategies, which consist of: Benchmarking – E1 ensures its costs are aligned with those of other similar industries, organizations, and DSM administrators, where appropriate, through market research and market comparisons prepared by independent third parties. E1 worked closely with subject matter experts to examine current market conditions when considering annual employee compensation changes. E1 also worked with a third-party consultant to review the assumptions in E1's incentive setting methodology that was developed in 2017 to ensure these assumptions remained aligned with other DSM administrators."

- a. Please provide the results of E1's benchmarking analyses performed by third-parties that informed the 2027-2031 DSM Plan.
- b. Please describe how these results informed the 2027-2031 DSM Plan.

Request IR-23: Page 48 of the Evidence states, "E1 commits to controlling costs on an ongoing basis with the continuation of its cost management strategies, which consist of: Competitive Procurement – E1 follows rigorous procurement practices to achieve best value by acquiring goods and services through competitive processes. All material contracts for program delivery services, evaluation services, and enabling activities are subject to competitive procurement requirements. E1's procurement framework includes clear evaluation criteria, cost benefit analysis, and periodic contract reviews to ensure ongoing value. E1 has also leveraged multi-year procurement arrangements where appropriate to secure favourable pricing and reduce transaction costs.

- a. Please identify all contracts that will be up for competitive procurement during the plan, the program(s) associated with each of these contracts, and timing of the competitive procurements.
- b. Please identify all the existing multi-year procurement arrangements that E1 leveraged in its 2027-2031 DSM Plan to secure favourable pricing and reduce transaction costs.
- c. Please identify all the new multi-year procurement arrangements that E1 will leverage in its 2027-2031 DSM Plan to secure favourable pricing and reduce transaction costs.

Request IR-24: Please refer to Table 8: 2027–2031 DSM Preferred Plan Portfolio Savings and Investment on page 57 of the Evidence.

- a. Please provide a version of this table with investments and benefits by year and in total, in 2027 dollars.

- b. Please provide the assumed rate of inflation by year.
- c. The last footnote states “PAC is a benefit/cost ratio comparing lifetime benefits to DSM investment. For Demand Response, upfront costs are levelized over ten years.” Please explain why upfront costs of Demand Response were levelized over ten years.

Request IR-25: Pages 63-64 of the Evidence state, “E1 is also proposing further enhancements including: Reducing the threshold from 25 percent to 20 percent for program changes both spending and savings that require explanations.”

- a. Please confirm if this should read: Reducing the threshold from 25 percent to 20 percent for changes *to either program-level budgets or program-level savings* that requires explanations.
- b. Please provide the list of programs that are subject to this requirement.
- c. Please confirm if the term ‘savings’ can be described in a more detailed way as follows. If not, please provide corrections and explain the corrections.
 - i. Annual energy savings and peak demand savings for energy efficiency, in GWh and MW respectively
 - ii. Available capacity for demand response, in MW
 - iii. Annual generation for solar, in GWh
- d. Please provide a calculation of:
 - i. a 20 percent increase/decrease to annual budgets by program.
 - ii. a 20 percent increase/decrease to annual savings (including all relevant savings metrics) by program.

Request IR-26: Page 66 of the Evidence states, “The mid-term check-in process described above is designed to enhance transparency and stakeholder engagement but does not constitute a plan amendment proceeding or create any obligation for E1 to seek plan amendments. Should circumstances arise during plan implementation that, in E1's reasonable assessment, may necessitate changes to approved investment levels, performance targets, or other material plan elements requiring NSEB approval, E1 will provide advance notice to the DSMAG and file an appropriate application with the NSEB in accordance with the PUA. Such circumstances might include, for example, significant and unforeseen changes in avoided costs, material shifts in market conditions or technology availability, legislative or regulatory changes affecting DSM delivery, or other extraordinary events materially impacting plan feasibility or ratepayer value. E1 does not anticipate the need for such amendments. Nothing in this section limits the NSEB's existing statutory authority under the PUA to review E1's activities, to establish or modify performance requirements under section 79M, or to initiate modifications to approved plans where circumstances warrant such action in the public interest.”

- a. When is the potential for a plan amendment assessed? Is it on an annual basis? If so, when during each year?

- 1 b. How many times, from 2020 to present, did E1 experience significant and unforeseen
2 changes in avoided costs? Please describe each instance identified and its impacts on
3 investments and/or E1's ability to achieve one or more of the performance targets.
4 c. How many times, from 2020 to present, did E1 experience material shifts in market
5 conditions or technology availability? Please describe each instance identified and its
6 impacts on investments and/or E1's ability to achieve one or more of the performance
7 targets.
8 d. How many times, from 2020 to present, did E1 experience legislative or regulatory
9 changes affecting DSM delivery? Please describe each instance identified and its impacts
10 on investments and/or E1's ability to achieve one or more of the performance targets.
11 e. How many times, from 2020 to present, did E1 experience other extraordinary events
12 materially impacting plan feasibility or ratepayer value? Please describe each instance
13 identified and its impacts on investments and/or E1's ability to achieve one or more of
14 the performance targets.
15 f. Would E1 file a plan amendment if:
16 i. it anticipated an increase or decrease of 20 percent or more to the annual
17 budget for one or more programs? If not, please explain the circumstances
18 relevant to this situation under which E1 would file a plan amendment.
19 ii. it anticipated an increase or decrease of 20 percent or more to the annual
20 savings (including all relevant savings metrics) for one or more programs? If not,
21 please explain the circumstances relevant to this situation under which E1
22 would file a plan amendment.
23

24 **Request IR-27:** Page 6 of Appendix A – Preferred Plan states, “In the 2026 DSM Extension Decision, the
25 NSEB directed E1 to determine whether the program could be improved as a marketing or
26 promotional program. E1 has determined that the program faces several challenges in that role,
27 including vendor and platform constraints and reporting limitations. As a result, E1 has removed
28 Residential Behaviour as an energy savings program and will not be continuing it as a marketing or
29 promotional program in the proposed 2027–2031 DSM Preferred Plan.”

- 30 a. Did E1 assume in its 2027-2031 DSM Plan that the absence of a Residential Behavioral
31 Program would reduce the energy savings achieved by other programs? If so, which
32 programs and how? If not, why not?
33 b. Did E1 make any effort to offset any lost opportunity for energy savings due to the
34 termination of the Residential Behavioral Program? If so, how much of the lost
35 opportunity for energy savings does E1 estimate it offset and how did it offset these
36 energy savings? Please explain in detail how E1 estimated the offset of energy savings.
37 For example, what year of historical Residential Behavioral Program performance did E1
38 use as a baseline for achievable annual savings reductions?
39 c. Were any other marketing and promotional efforts emphasized, given the limitations of
40 the Residential Behavioral Program in contributing to marketing or promotional efforts?
41 If so, which ones and how?

Request IR-28: Please refer to page 9 of Appendix A – Preferred Plan, where E1 describes the “program design and delivery changes [implemented] ahead of the 2026 season” including “ensuring installed devices were event-ready” and “enhanced customer engagement strategies including improved advance notice of events from NS Power (48 hours versus 16 hours).”

- a. Please indicate the share of residential devices deemed “event-ready” in both the 2025 and 2026 seasons.
- b. Please discuss the efficacy of giving BNI customers additional advance notice (48 hours) and indicate whether E1 plans to continue this practice in the 2027 season.

Request IR-29: Please refer to the statement on page 9 of Appendix A – Preferred Plan which states: “Throughout 2023–2025, several pathways modelled in the 2023–2026 DSM Plan were not pursued, including behavioural demand response in the Residential Demand Response program component, and direct load control smart thermostats, domestic hot water direct load control, battery control, and dynamic pricing with enabling technologies within the BNI Demand Response program component, as E1 focused on the pathways with the most available capacity potential.” Please explain in detail why each of the following demand response pathways was not pursued during the 2023–2026 period:

- a. Behavioural demand response in the Residential Demand Response program component;
- b. Direct load control smart thermostats;
- c. Domestic hot water direct load control;
- d. Battery control; and
- e. Dynamic pricing with enabling technologies within the BNI Demand Response program component.

Request IR-30: Please refer to Table 2: 2023–2026 Approved Rate Class Expenditures and Results on Page 11 of Appendix A – Preferred Plan.

- a. Please provide a calculation of the % Results to 2023-2026 Approved Plan for 2023, 2024, and 2025.
- b. Please identify all instances where the % Results to 2023-2026 Approved Plan for 2023, 2024, and 2025 exceed 15 percent.
- c. Please identify if E1 would request a Mid Course Adjustment for each instance identified in (b).

Request IR-31: Pages 16-17 of Appendix A – Preferred Plan state, “In developing the Plan’s design approach, E1 considered feedback from the DSMAG indicating limited support for the three design objectives historically used to guide recent DSM Plans: a 50/50 investment split between the residential and BNI sectors; a 40/60 energy savings split between the residential and BNI sectors; and 15–20 percent investment in low-income and equity as a percentage of total investment.”

- a. Please provide estimates of low-income customers as a percent of all customers and as a percent of Residential customers in 2027, 2028, 2029, 2030, and 2031.
- b. Please clarify if any DSMAG stakeholder indicated a lack of support for the 15–20 percent investment in low-income and equity as a percentage of total investment.
- c. Please estimate the percentage of spending on low-income and equity in each year of the proposed Plan, included dedicated and incidental efforts.

Request IR-32: Page 17 of Appendix A – Preferred Plan states, “the residential solar-PV program is linked to Mi’kmaw New Home Construction energy efficiency program through aligned launch timing and participation assumptions.” Does the proposed plan assume that all Mi’kmaw New Home Construction energy efficiency program participants receive solar PV? If not, please clarify the participation assumptions for the residential solar-PV program as it relates to Mi’kmaw New Home Construction energy efficiency program participation.

Request IR-33: Page 19 of Appendix A – Preferred Plan states, “For new measures, measure level inputs were developed, with support from Guidehouse, using a combination of engineering assumptions, evaluation results from comparable programs, and data from other jurisdictions.” What new measures (i.e., measures that do not appear in any previous DSM Plan) are included in this plan and what program(s) offer these measures?

Request IR-34: Please refer to Table 6: Summary of Changes and Enhancements in the 2027–2031 DSM Preferred Plan on page 25 of Appendix A – Preferred Plan which states, “Incentive Level Changes: Increased incentives across residential and BNI energy efficiency programs, for example:

- Increased incentives for Affordable Multifamily Housing
- Increased incentives for Home Energy Assessment and elimination of the customer co-pay for ‘D’ audits
- Increased incentives for Small Business Energy Solutions.”

Please answer the following questions regarding the quote above:

- a. Please provide the total increase in incentives associated with each of these proposed changes in dollars, by year and across all years of the plan.
- b. Please provide the total increase in incentives associated with each of these proposed changes as a percent of the total incentives, by year and across all years of the plan.

Request IR-35: Please refer to Tables 9, 10, 11, 12, and 13: DSM Preferred Plan Savings and Investment by Program Component for 2027, 2028, 2029, 2030, and 2031 respectively starting on page 29 of Appendix A – Preferred Plan.

- a. The Residential Demand Response PAC is 0.9 for 2027, 0.5 for 2028, 0.8 for 2029, 0.7 for 2030, and 0.6 for 2031. Please explain the change in these PAC values over time.
- b. The BNI Demand Response PAC is 2.9 for 2027, 1.6 for 2028, 2.7 for 2029, 2.3 for 2030, and 2.4 for 2031. Please explain the change in these PAC values over time.

- 1 c. From 2027 to 2031, two of the only programs that are growing in terms of investment
2 and lifetime benefits are the Residential Instant Savings and Residential Home Energy
3 Assessment programs. Please explain E1's rationale for shifting investments from other
4 programs to these programs.
5

6 **Request IR-36:** Page 37 of Appendix A – Preferred Plan states, “Additionally, the Preferred Plan
7 includes a reduction in total full time equivalent employees from 114.3 in the 2026 DSM
8 Extension to an average of 106.7 for the 2027–2031 period.” Please explain which positions
9 are being eliminated and/or are no longer needed and provide the job title and descriptions
10 of those positions.
11

12 **Request IR-37:** Page 39 of Appendix A – Preferred Plan states, “The conclusion of the federal
13 government’s Canada Greener Homes Grant program in 2025 which provided incentive top ups and
14 subsidized energy audit costs directly impacted costs for the Home Energy Assessment program
15 component. Customers have signaled that greater financial support is required to influence their
16 decision making in whether to invest in efficiency measures and providing this support through
17 modest increases in residential customer rebates is increasingly important in the current economic
18 context.”

- 19 a. How have customers signaled that greater financial support is required?
20 b. What incentives is E1 proposing, per unit and in total dollars per year? Please indicate
21 the units.
22 c. How do these incentive levels compare to the incentive top ups that were provided
23 previously, per unit and in total dollars per year? Please indicate the units.
24 d. Why is E1 proposing this level of incentive?
25 e. Were other incentive levels considered? If so, why didn’t E1 propose those incentive
26 levels?
27

28 **Request IR-38:** Page 39 of Appendix A – Preferred Plan states, “Additionally, incentive top ups for the
29 Affordable Multifamily Housing program component are no longer provided by the Province, as this
30 provincial funding has been fully allocated as of May 2025. E1 has increased incentive levels to
31 maintain participation following the end of this funding, directly increasing per-unit delivery costs
32 attributable to the DSM Plan.” Please also refer to footnote 14 on the bottom of the same page
33 which states, “The supplemental provincial funding utilized the Green Fund to top up DSM rebates
34 to lower project costs for participants. This supplemental provincial funding was in place from 2021
35 to 2025.”

- 36 a. What incentives is E1 proposing, per unit and in total dollars per year? Please indicate
37 the units.
38 b. How do these incentive levels compare to the incentive top ups that were provided
39 previously, per unit and in total dollars per year. Please indicate the units.
40 c. Why is E1 proposing this level of incentive?

- 1 d. Were other incentive levels considered? If so, why didn't E1 propose those incentive
2 levels?
3

4 **Request IR-39:** Page 40 of Appendix A – Preferred Plan states, "E1 has committed to improve the
5 accuracy of the estimates used for the rate class allocation of expenditures in the DSM Plan. For the
6 2027–2031 DSM Preferred Plan, E1 largely followed its approach taken for the 2026 DSM Extension,
7 and established the rate class allocation of expenditures by considering the following factors:
8 reliance on three years of historical data to inform the rate class allocations for both energy
9 efficiency and demand response (i.e., reflective of 2022, 2023, 2024 allocators); completed a review
10 of customer commitments for projects within programs; and incorporated assumptions for any
11 program changes that may impact specific rate classes. 2027–2031 rate class estimates are based on
12 the methodology of using the past three years of available data (2022, 2023, and 2024) to
13 determine the spending by rate class percentages and applying those to the 2027–2031 years."

- 14 a. Why did E1 decide to use three years of historical data to inform these improved
15 allocations, and the three years that were selected? Why is three years the right amount
16 of historical data to reference and why are these years most appropriate?
17 b. What changes may impact specific rate classes in the proposal plan and how were these
18 changes accounted for in the improved allocations?
19

20 **Request IR-40:** Page 43 Appendix A – Preferred Plan states, "Data Analytics and Insights: Leveraging
21 data analytic tools including segmentation data, website user behaviour insights, and advanced
22 metering infrastructure (AMI) data. Marketing tactics that leverage data analytic tools include
23 personalized email messaging, customized website offers, geo-targeting emails based on customer
24 proximity to retailers, automated co-program marketing techniques (e.g., when customers complete
25 Efficient Product Installation, eligible customers will be presented information on Home Energy
26 Assessment and HomeWarming to continue their journey), and targeted Residential and BNI email
27 campaigns based on electricity use patterns;"

- 28 a. How is E1 using segmentation data in its DSM Plan?
29 b. How is E1 using website user behavior insights in its DSM Plan?
30 c. How is E1 using AMI data in its DSM Plan?
31 d. Can E1 identify a home with faulty or failing equipment based on electricity use
32 patterns?
33 e. If so, does E1 use this data to target its DSM programs and measures to customers?
34 f. If not, how does E1 reach customers with faulty or failing equipment to ensure they
35 replace that equipment with the most efficient equipment available?
36 g. With the shift to deeper savings measures, does E1 see that customers benefit from
37 more advance notice of equipment failure and the ability to prepare for a larger
38 weatherization or heating system replacement project?
39 h. Does E1 see any opportunity to improve its outreach to customers with faulty or failing
40 heating or water heating systems to ensure they have sufficient time to prepare for
41 replacement of these systems?

Request IR-41: Pages 44-45 of Appendix A – Preferred Plan state, “Enhancements to E1’s energy-efficiency offerings for the 2027–2031 Plan period include: introduction of a new program component, Mi’kmaw New Home Construction, supporting the construction of close to net-zero new homes in Mi’kmaw communities and integrated delivery of the Solar-PV program (also new in 2027–2031).” Why aren’t the Mi’kmaw New Home Construction new homes being constructed to net-zero performance standards? What does close to net-zero mean?

Request IR-42: Page 45 of Appendix A – Preferred Plan states, “updates and expansion of program measures to reflect evolving market conditions and customer needs, such as:

- elimination of customer co-pay for “D” audits in Home Energy Assessment to help address the rising cost of home retrofits.”

Please answer the following questions regarding the quote above:

- a. What are “D” audits?
- b. Why is E1 proposing to eliminate the customer co-pay for these audits?
- c. Please provide a list of all of the audit types offered in the plan, a definition of these audit types, the total cost of each of these audits, and the customer co-pay associated with each of these audits.

Request IR-43: Please refer to the Target Market section of Table 17: 2027–2031 Instant Savings Program Component starting on Page 47 of Appendix A – Preferred Plan which includes, “mini-split and centrally ducted heat-pumps (new for 2027–2031, starting in 2028) and electric thermal storage units (new for 2027–2031, starting in 2028).”

- a. Why do offerings for these measures start in 2028?
- b. Could E1 offer these measures in 2027? If not, why not?
- c. What are electric thermal storage units?

Request IR-44: Please refer to the Target Market section of Table 19: Existing Residential - Overview, Objectives, Opportunity starting on Page 49 of Appendix A – Preferred Plan which includes, “property owners that provide affordable housing or non-profit organizations that provide support services (e.g., shelters, transition houses, community hubs).”

- a. How many property owners provide affordable housing?
- b. Has this number changed over time? If so, in what way?
- c. What proportion of these property owners have been served to date?
- d. What proportion of these property owners does the DSM Plan propose to serve by year and in total across all years of the plan?
- e. How many non-profit organizations provide the types of support services that enable a non-profit organization to be eligible for these incentives?
- f. Has this number changed over time? If so, in what way?
- g. What proportion of these non-profit organizations have been served to date?

- 1 h. What proportion of these non-profit organizations does the DSM Plan propose to serve
2 by year and in total across all years of the plan?
3

4 **Request IR-45:** Please refer to the first section of Table 20: 2027–2031 Affordable Multifamily Housing
5 on Page 51 of Appendix A – Preferred Plan which shows participation declining over time from a
6 high of 155 in 2028 to a low of 90 in 2031.

- 7 a. Why is 2028 the year of highest participation?
8 b. Why does forecasted participation decline between 2028 and 2031?
9 c. Do these customers face pre-weatherization barriers? Please explain.
10 d. If so, please provide data on the proportion of customers that could not proceed in past
11 years due to pre-weatherization barriers. If the data is not available, please explain why
12 not.
13 e. Is funding available to assist these customers to address pre-weatherization barriers in
14 this DSM Plan? If so, please provide the funding, the source of the funding, and the
15 measures and incentives provided. If not, why not?
16

17 **Request IR-46:** Please refer to the first section of Table 21: 2027–2031 Affordable Single-family Homes
18 Program Component on Page 52 of Appendix A – Preferred Plan which shows participation declining
19 over time from a high of 600 in 2027 to a low of 475 in 2031.

- 20 a. Why is 2027 the year of highest participation?
21 b. Why does participation decline between 2027 and 2031?
22 c. How many affordable single-family homes exist today?
23 d. Has this number changed over time? If so, in what way?
24 e. What proportion of these homes have been served to date?
25 f. What proportion of these homes does the DSM Plan propose to serve by year and in
26 total across all years of the plan?
27 g. Do these customers face pre-weatherization barriers?
28 h. If so, please provide data on the proportion of customers that could not proceed in past
29 years due to pre-weatherization barriers. If the data is not available, please explain why
30 not.
31 i. Is funding available to assist these customers to address pre-weatherization barriers in
32 this DSM Plan? If so, please provide the funding, the source of the funding, and the
33 measures and incentives provided. If not, why not?
34

35 **Request IR-47:** Please refer to the Program Component History section of Table 21: 2027–2031
36 Affordable Single-family Homes Program Component on Page 53 of Appendix A – Preferred Plan
37 which states, “2023 – E1 re-introduced Affordable Single-family Homes. Heat pump installations
38 were added as an eligible space heating upgrade. Natural Resources Canada (NRCan) also launched
39 the Oil to Heat Pump Affordability grant, with E1 co-delivery through the Affordable Single-family
40 Homes program component, which is targeted at converting whole home oil heating systems to
41 heat pumps. Although the Oil to Heat Pump Affordability grant is primarily targeted at non-

1 electrically heated homes, electric savings are realized in cases where homes have both electric and
2 non-electric heating systems.”

- 3 a. Please provide a count of the number of eligible customers for each program that have
4 both electric and non-electric heating systems.
- 5 b. Are customers with both electric and non-electric heating systems in these programs
6 eligible for heat pump incentives to replace their electric heating system in the DSM
7 Plan?
8

9 **Request IR-48:** Please refer to the Program Component History section of Table 21: 2027–2031
10 Affordable Single-family Homes Program Component on Page 53 of Appendix A – Preferred Plan
11 which states, “2026 – Oil to Heat Pump Affordability funding was fully allocated in Q1 and is
12 expected to be completely disbursed in Q1 2027.”

- 13 a. Has E1 engaged in any discussions regarding the impact of the war in Iran on home
14 heating oil costs and potential solutions for the 2026/2027 heating season? If so, when,
15 with whom, and about what?
- 16 b. Has E1 engaged in any discussions regarding the impact of the war in Iran on home
17 heating gas costs and potential solutions for the 2026/2027 heating season? If so, when,
18 with whom, and about what?
19 c.
20

21 **Request IR-49:** Please refer to Table 36: 2027–2031 Custom Program Component on Page 69 of
22 Appendix A – Preferred Plan which states, “Enhancements in 2027-2031: Better support for E1’s BNI
23 Demand Response program component by encouraging customers to install demand response event
24 compatible equipment and participate in events.”

- 25 a. What equipment types are currently demand response event compatible?
- 26 b. Will the compatible equipment change over the five years of this plan? If so, how does
27 the plan account for this evolution? If not, why not?
- 28 c. What proportion of customers install demand response event compatible equipment?
- 29 d. Is E1 encouraging Residential customers to install demand response event compatible
30 equipment over the five years of this plan? If so, what equipment and how is the plan
31 encouraging the installations? If not, why not?
- 32 e. What share of BNI curtailable load is subject to manual versus automatic control?
- 33 f. Of the automatically controllable BNI curtailable load, what is the percentage
34 breakdown by end-use category (e.g., HVAC, process load, and other)?
- 35 g. How does BNI participant opt-out vary by curtailment mode (automatic vs manual)?
36

37 **Request IR-50:** Please refer to Table 39: 2027–2031 Custom Incentives Low-income and Equity
38 Performance Indicators on page 71 of Appendix A – Preferred Plan which shows Participation
39 (projects) of 1 for 2027, 0.4 for 2028, 0.3 for 2029, 0.3 for 2030, and 0.2 for 2031.

- 40 a. Please describe how E1 can invest in and claim savings for a portion (e.g., 0.4) of a
41 project in most years of this plan.

1 b. Who are these low-income/equity participants?
2

3 **Request IR-51:** Please refer to Table 41: 2027–2031 Small Business Energy Solutions Program

4 Component on page 73 of Appendix A – Preferred Plan which states, “Overview: Provides small
5 business customers with access to technical assistance and financial incentives for the installation of
6 energy efficient and system-peak demand reduction equipment.”

7 a. Please define “small businesses.”

8 b. Does the BNI demand response effort include small businesses?

9 c. If so, please identify the portion of the BNI demand response effort participants who are
10 projected to be small business customers by year and in total across years.

11 d. If not, why not?

12 e. If not, why are small business customers provided with system-peak demand reduction
13 equipment in this program?
14

15 **Request IR-52:** Please refer to the statement on pages 76–77 of Appendix A – Preferred Plan which
16 states: “Residential Demand Response (Eco Shift pathway) will remain constant at the 2026 DSM
17 Extension levels with no new installations. E1 does not intend to enroll new customers in 2027–2031
18 for Residential Demand Response but will continue to leverage existing equipment assets by
19 encouraging participants to continue to participate in demand response events, with the
20 expectation that the residential program will be cost effective in the future.” Please explain in detail
21 why E1 does not intend to enroll new customers in the Residential Demand Response program
22 during the 2027–2031 period.
23

24 **Request IR-53:** Page 76 of Appendix A – Preferred Plan states, “The level of available demand response
25 capacity proposed for 2027–2031 remains within, not exceeding, the optimal level identified in NS
26 Power’s 2022 IRP.”

27 a. Please provide the optimal level of demand response capacity identified in NS Power’s
28 2022 IRP, by year and in total across the plan years.

29 b. Please illustrate how the available demand response capacity proposed in the plan
30 “remains within, not exceeding, the optimal level”.
31

32 **Request IR-54:** Pages 77-78 of Appendix A – Preferred Plan states, “E1 understands that NS Power is
33 currently developing a Distributed Energy Resource (DER) Integration Roadmap, expected to be filed
34 in early 2026, which will outline locational planning strategies for the 2027–2031 period. E1 has
35 been engaged as a stakeholder in this work, contributing demand response program experience and
36 customer program design expertise to support alignment between distributed resources and system
37 planning. E1 understands the DER Integration Roadmap is expected to provide timing of initiatives,
38 including those related to customer programs and include ongoing coordination across planning,
39 program design and system capabilities. E1 is expected to remain a key stakeholder as the roadmap
40 evolves. Access to more granular locational data will allow for further or expanded assessment of
41 E1’s demand response program’s value and for E1 to fully support the deployment of demand

1 response resources to the specific constrained areas during peak events. E1 has requested that the
2 AMI data feeds provided to E1 by NS Power be expanded to include the feeder ID fields and that NS
3 Power also provide the list of feeder IDs that should be prioritized. Having this data is critical for E1
4 to target enrollment of E1's demand response programs for these constrained areas. E1 expects that
5 assessment of the data and appropriate solutions for priority constrained areas will be further
6 explored with NS Power and through their work with stakeholders on the DER Integration
7 Roadmap."

- 8 a. Please provide the current status of the DER Integration Roadmap.
- 9 b. Please provide the anticipated schedule and key milestones for development of the DER
10 Integration Roadmap.
- 11 c. Please provide the anticipated schedule and process for stakeholder engagement
12 related to development of the DER Integration Roadmap.
- 13 d. When does E1 currently expect this roadmap to be filed?
- 14 e. Please summarize any input E1 has provided to NS Power on its roadmap.
- 15 f. When does E1 currently expect to receive AMI data feeds including the feeder ID field
16 and list of priority feeder IDs?
- 17 g. If the roadmap is filed and E1 receives AMI data feeds including the feeder ID field and
18 list of priority feeder IDs, does E1 recommend any modifications to its plan to
19 incorporate this information? If so, what modifications does E1 recommend? If not, why
20 not?

21
22 **Request IR-55:** Please refer to the discussion of the TVA pilot on page 78 of Appendix A – Preferred
23 Plan.

- 24 a. Please provide any additional information E1 is aware of regarding the TVA pilot
25 referenced in Appendix A – Preferred Plan.
- 26 b. Please explain E1's understanding of the expected timeline and process for resolving
27 cybersecurity and AMI data issues associated with the pilot.

28
29 **Request IR-56:** Please refer to Table 44: Demand Response - Overview, Objectives, Opportunity on page
30 79 of Appendix A – Preferred Plan which states, "Target market: Enrolled residential and BNI
31 customers for the Eco Shift pathway and larger BNI energy users for the BNI Smart Synergy pathway.
32 E1 notes that interruptible customers have not been eligible to participate in the past. The potential
33 for them to be eligible in the 2027–2031 DSM Plan period was raised through DSMAG discussions
34 and E1 is committed to further discussions to fully assess incremental value and appropriateness
35 with the members."

- 36 a. Please explain how NSPI currently interrupts or reduces electricity service for existing
37 interruptible customers.
- 38 b. Please explain whether, and if so how, the frequency and duration of service
39 interruptions for interruptible customers differ from those applicable to BNI customers
40 participating in E1's BNI Demand Response program. If there are differences, please
41 explain the reasons for those differences.

- c. Please explain the primary issues or barriers associated with allowing interruptible customers to become eligible participants in the BNI Demand Response program.
- d. When will E1 engage in further discussions with the DSMAG members on this topic?
- e. What actions could E1 take during the plan period as a result of the engagement with DSMAG members on this topic? Would E1 need to modify the plan to take these actions?

Request IR-57: Please refer to Table 45 on page 80 of Appendix A – Preferred Plan regarding the measures promoted for the demand response programs.

- a. Please explain why the list of measures does not include batteries, EV telematics, or EV charger devices.
- b. Please address the apparent inconsistency with (i) Page 34 of the 2025 DSM Annual Progress Report; and (ii) Slide 11 of the DSMAG presentation entitled “DR Overview” dated November 19, 2025, both of which indicate that such technologies had previously been supported.

Request IR-58: Please refer to the available demand response capacity (MW) estimates presented in Table 45 on page 80 and Table 46 on page 81 of Appendix A – Preferred Plan. Please explain whether the available demand response capacity estimates account for any impacts associated with effective load carrying capability (“ELCC”) as estimated by NSPI.

Request IR-59: Please refer to page 82 of Attachment A – Preferred Plan, where E1 projects 21.1 MW of available Demand Response capacity in the 2026/2027 season, and to page 9 of Appendix A – Preferred Plan, where E1 states it expects to meet its approved Performance Target of 16.3 MW. Please refer also to Appendix A, Attachment 4, sheet 4a, where Guidehouse estimates 2027 achievable potential at 21 MW, comprised of C&I Curtailment (10.3 MW), C&I Loadshift to Back-Up Generators (6.6 MW), DLC-Thermostat (3.1 MW), and DLC-Water Heating (1.1 MW).

- a. Please describe how past-season performance is factored into projected achievable capacity, including any adjustments to enrollment, retention, or per-device response rates based on observed results.
- b. Attachment 4, sheet 4a indicates that C&I Curtailment achievable potential nearly doubles from approximately 5.7 MW in 2026 to 10.3 MW in 2027, despite sheet 8 indicating declining C&I curtailment participation. Please explain what operational, contractual, or load-side changes are expected to drive this improvement – over that observed between 2025 and 2026 – among existing C&I participants, and what steps E1 has taken or plans to take to ensure that this substantial projected performance improvement is realized.

Request IR-60: Please refer to Table 45: 2027–2031 Residential Demand Response Program Component on page 80 of Appendix A – Preferred Plan which states, “Overview: Provides incentives to

1 customers to shift or curtail loads during peak events when there is value to the utility (Eco Shift
2 pathway).”

- 3 a. Please provide the Eco Shift incentives for Residential customers.
- 4 b. Did E1 consider reducing the incentives for new participants to make the program more
5 cost effective?
 - 6 i. If so, what changes to incentives did E1 consider?
 - 7 ii. If not, why not?
- 8 c. Has E1 considered adding new Residential customers to its Eco Shift demand response
9 program in constrained area once NS Power files its DER Integration Roadmap and
10 provides E1 with the AMI data feeds?
 - 11 i. If so, why didn't E1 propose this in its plan?
 - 12 ii. If not, why not

13
14 **Request IR-61:** Please refer to Table 46: 2027–2031 BNI Demand Response Program Component on
15 page 81 of Appendix A – Preferred Plan which states, “Program Component History: 2024 to 2025 –
16 participation grew from 9 participants in 2023 to 76 in 2024 to 143 in 2025.”

- 17 a. Please explain the primary reasons for the increase in participation in 2025 as compared
18 to 2024.
- 19 b. If participation nearly doubled from 2024 to 2025, why is participation only expected to
20 grow from 169 to 175 from 2027-2031?
- 21 c. Please provide the demand response incentives for BNI customers.
- 22 d. Has E1 considered adding new BNI customers to its demand response program in
23 constrained area once NS Power files its DER Integration Roadmap and provides E1 with
24 the AMI data feeds?
 - 25 i. If so, why didn't E1 propose this in its plan?
 - 26 ii. If not, why not?

27
28 **Request IR-62:** Please refer to Table 47: 2027–2031 Demand Response Performance Indicators on page
29 82 of Appendix A – Preferred Plan which shows a PAC of 1.2 for 2028 and PACs for all other plan
30 years of 1.7 to 2.0.”

- 31 a. Why is the PAC for 2028 substantially lower than for all other plan years?
- 32 b. Please break out the data into two tables, one for Residential and one for BNI.
- 33 c. Please provide two new tables, one for Residential and one for BNI, showing the PAC
34 test results assuming that all participants reside in constrained areas. Please use the
35 most recent avoided costs for constrained areas provided by NS Power. Please provide
36 a comparison of the avoided cost values for constrained areas used in this analysis to
37 the avoided cost values used in the plan.

38
39 **Request IR-63:** Page 83 of Appendix A – Preferred Plan states, “E1’s proposed solar-PV program is
40 focused on equity to deliver meaningful benefits to Mi’kmaw communities facing high energy

1 burdens. The proposed delivery approach adopts a targeted, small-scale launch focused on
2 residential new home construction in Mi'kmaw communities.”

- 3 a. Has E1 ever met with the Mi'kmaq of Nova Scotia regarding any of its previous DSM
4 Plans? If so, when and for what purpose? What did E1 learn from those discussions?
- 5 b. If so, did those discussions affect the historical DSM Plan investments? In what way(s)?
- 6 c. Did E1 meet with the Mi'kmaq of Nova Scotia regarding its proposed 2027-2031 DSM
7 Plan? If so, when and for what purpose? What did E1 learn from those discussions?
- 8 d. If so, did those discussions affect the proposed 2027-2031 DSM Plan investments? In
9 what way(s)?
- 10 e. At any point in these discussions, did the Mi'kmaq of Nova Scotia discuss any concerns
11 with electric system reliability or any other concerns that may or may not be directly
12 relevant to DSM planning? If so, when and what did E1 learn?
- 13 f. Does solar-PV offer reliability benefits for the Mi'kmaq of Nova Scotia if they are not
14 paired with batteries? If so, were any of these reliability benefits captured in the DSM
15 cost-effectiveness modeling?
- 16 g. Did E1 consider including batteries in this offering? Why or why not?

17
18 **Request IR-64:** Page 92 of Appendix A – Preferred Plan states, “The Roving Energy Manager facilitates
19 Mi'kmaw participation in E1's BNI programs throughout the 2027– 2031 DSM Plan period.”

- 20 a. Please describe how the Roving Energy Manager facilitates participation.
- 21 b. Please identify the types of Mi'kmaw BNI participants that the Roving Energy Manager is
22 reaching out to.

23
24 **Request IR-65:** Page 93 of Appendix A – Preferred Plan states, “3. Complete program harmonization
25 initiative: E1 will complete a program harmonization initiative to streamline and modernize E1
26 operations, aimed at improving the customer experience by simplifying the requirements and
27 processes customers must navigate when participating in E1 programs. The initiative involves the
28 use of technology, process engineering, and data integration (across customer touch points and
29 channels).”

- 30 a. When will this initiative be conducted and when will it be complete?
- 31 b. Will E1 conduct an evaluation of the effects of this initiative? If so, when? If not, why
32 not?

33
34 **Request IR-66:** Please refer to Table 57: 2027–2031 Other Enabling Strategies on page 95 of Appendix A
35 – Preferred Plan. Please provide a detailed description of the activities that necessitate the budgets
36 allocated to each of the Areas of Focus in each year.

37
38 **Request IR-67:** Pages 97-98 of Appendix A – Preferred Plan state, “The Heat Pump Water Heater pilot
39 will undergo at least one evaluation during the 2027–2031 Plan period to understand the evaluated
40 savings potential as well as process improvements for intervention activities carried out to date.
41 (Note: Market Transformation programs require a much longer planning horizon and it can take
42 several years before results can be measured).”

- 1 a. Please provide the anticipated timing of the impact and process evaluations during the
2 2027-2031 Plan period.
- 3 b. Would E1 consider transitioning this effort from pilot to program implementation during
4 the 2027-2031 Plan if the pilot is deemed successful? Why or why not? What criteria
5 would E1 use to determine if the pilot should be implemented as a program?
6

7 **Request IR-68:** Page 101 of Appendix A – Preferred Plan states “A condensed impact evaluation
8 involves using key elements such as evaluation parameters, methodologies and related calculations
9 referenced in previous comprehensive evaluation reports. Condensed impact evaluations are
10 expected to consist of energy (annual and lifetime), system peak demand savings, and available
11 capacity results. This means that for stable, mature program components, the Evaluator will use
12 unitary savings values, realization rates, and/or installation rates previously determined.”

- 13 a. Please identify the programs for which a condensed impact evaluation will be conducted
14 and provide the rationale for this decision.
- 15 b. Please clarify the new data, research, and/or analysis that will be part of each
16 condensed impact evaluation.
17

18 **Request IR-69:** Page 102 of Appendix A – Preferred Plan states, “E1 will work with the Evaluator to
19 determine what program components should be evaluated based on the following criteria:

- 20 • newly created program components that have not yet been evaluated;
21 • program components that have incurred major changes;
22 • program components that received many recommendations from the evaluator; and
23 • program components that have a variance of energy savings larger than 25 percent of Plan year
24 target.”

25 Please answer the following questions regarding the quote above:

- 26 a. Did E1 consider aligning the ‘25 percent of Plan year target’ with the reduced MCA
27 threshold of 20 percent for program changes for both spending and savings that require
28 explanations?
- 29 b. Would it make sense to align these two thresholds? Why or why not?
30

31 **Request IR-70:** Page 103 of Appendix A – Preferred Plan states, “The Evaluator will present total
32 available capacity, defined as the total demand response capacity that was available during the
33 evaluated period. Available capacity from demand response differs from peak demand savings since
34 the former considers the load reduction that was made available by participating devices during the
35 events called for the demand response season instead of the load reduction that coincided with the
36 utility peak period. This distinction was made since E1 does not control the calling of events and,
37 thus, does not control how the resources made available to NS Power are used to reduce peak
38 demand.”

- 39 a. Is it possible for the Evaluator to reach out to NS Power for information regarding the
40 coincidence of the load reduction with the utility peak period? If so, can this be added to
41 the evaluation? If not, why not?

- 1 b. Does the avoided capacity cost reflect the value of the load reduction that coincided
2 with the utility peak period? If so, how can the benefits of the program be evaluated if
3 the data regarding the coincidence of the load reduction with the utility peak period is
4 not available? If not, what does the avoided capacity cost represent?
5

6 **Request IR-71:** Please refer to page 103 of the Attachment A – Preferred Plan, where E1 states that
7 Demand Response events can be called for a four-hour duration during any time of day. Please also
8 refer to page 35 of the 2025 Progress Report, where E1 states that “On average, BNI DR generated
9 6.8 MW in available capacity during morning events compared to 4.9 MW during evening events.”

- 10 a. Please describe why BNI customers tend to show stronger morning performance.
11 b. Please provide average morning and evening performance for the residential program
12 and explain factors contributing to performance differences, if they exist.
13 c. Please describe any projected changes to the distribution of morning vs winter events
14 over the course of the 2027-2031 plan.
15

16 **Request IR-72:** Page 106 of Appendix A – Preferred Plan states, “The purpose of this session is to
17 provide stakeholders with a comprehensive review of:

- 18 • cumulative progress toward approved performance targets;
- 19 • rate class spending trends and variances;
- 20 • evaluation findings and lessons learned;
- 21 • market conditions affecting plan delivery; and
- 22 • any implementation challenges or opportunities.”

23 Can E1 also use this session to provide updates on:

- 24 a. progress/performance of new programs or initiatives;
- 25 b. progress/performance of pilots;
- 26 c. progress/performance of market transformation efforts;
- 27 d. progress/performance of the Innovation Plan to date and the proposed Innovation Plan
28 for the upcoming year;
- 29 e. status of data on constrained areas and NS Power’s DER Integration Roadmap and
30 outcomes of discussions regarding further demand response coordination with NS
31 Power;
- 32 f. updates on work with NSIESO on IRPs and avoided costs;
- 33 g. recommended changes to respond to implementation challenges or opportunities;
- 34 h. the potential for additions and/or terminations of programs; and
- 35 i. the potential for a plan amendment and the cause(s), including but not limited to:
36 significant and unforeseen changes in avoided costs, material shifts in market conditions
37 or technology availability, legislative or regulatory changes affecting DSM delivery, or
38 other extraordinary events materially impacting plan feasibility or ratepayer value?
39

40 **Request IR-73:** Pages 109-110 of Appendix A – Preferred Plan make multiple references to variances
41 including:

- “10 percent or greater variances in incentive levels at the measure level);
- discussion on variances to the approved Plan (YTD results to the approved Plan, 15 percent or greater variances);
- year-end forecast by rate class to provide insight on the expected rate class expenditures by year-end, along with discussion on variances to the approved Plan (forecast and/or YTD results to the approved Plan, 15 percent or greater variances).”

Did E1 consider aligning the ‘15 percent or greater variances’ associated with the discussion on variances to the approved Plan (bullet #2) with the MCA threshold of 20 percent for program changes for both spending and savings that require explanations? Would it make sense to align these two thresholds? Why or why not?

Request IR-74: Page 2 of Appendix A – Attachment 5 states, “The Executive Leadership Team oversees E1’s innovation activities, providing strategic direction, approvals, and compliance oversight.” How many people are part of the Executive Leadership Team? Who are they and what are their qualifications? Is there anyone on the Executive Leadership Team who is not from E1?

Request IR-75: Page 8 of Appendix A – Attachment 5 states, “Identify and develop hybrid-heating solutions for households with high retrofit costs or structural barriers.” Please define the term ‘hybrid-heating solutions’ and provide a list of eligible measures.

Request IR-76: Page 9 of Appendix A – Attachment 5 states, “Based on stakeholder engagement in NS Power’s Distributed Energy Resource Integration Roadmap project, E1 anticipates customer engagement and education around Time Varying Pricing Rates. Should this proceed, E1 will coordinate with NS Power to ensure rate design and E1 programs reinforce (not conflict with) each other, including supporting customer education and aligning program participation with evolving rate signals.” Should this be considered as part of the Demand Flexibility area of focus, as it does not appear to be related to Locational DSM?

Request IR-77: Please refer to Figure 3: Average Rate Impacts (2027-2046) as a Result of 2027-2031 DSM Preferred Plan Activities on page 8 of Appendix B - Rate and Bill Impact Analysis of the 2027–2031 DSM Plan and 2026 Historical. Why are the rate impacts negative for the medium industrial rate class?

Request IR-78: Page 19 of Appendix B - Rate and Bill Impact Analysis of the 2027–2031 DSM Plan and 2026 Historical states “A Renewable to Retail adjustment was applied to the NS Power rate model.” Please describe what the “Renewable to Retail” adjustment is.

Request IR-79: Please refer to Table 1: Rate and Bill Impacts by Rate Class as a Result of 2027-2031 DSM Preferred Plan Activities Preferred Plan DSM Activities on page 12 of Appendix B - Rate and Bill Impact Analysis of the 2027–2031 DSM Plan and 2026 Historical. Please add and populate the following two columns: Active Participants (# of NSPI accounts, thousands) and Non-Active Participants (# of NSPI accounts, thousands). Please determine the optimal way to present participant counts over five-year periods and explain the approach taken.

Request IR-80: Please refer to Table 2: Rate and Bill Impacts by Rate Class over the study period (2011–2041) from 2011-2026 Historical DSM Activities on pages 17-18 of Appendix B - Rate and Bill Impact Analysis of the 2027–2031 DSM Plan and 2026 Historical. Please add and populate the following two columns: Active Participants (# of NSPI accounts, thousands) and Non-Active Participants (# of NSPI accounts, thousands). Please determine the optimal way to present participant counts over five-year periods and explain the approach taken.

Request IR-81: Please refer to the table titled Rate and Bill Impacts of DSM on the Large General Class on page 4 of Appendix B - Attachment 2: Results by Rate Class (2027 - 2031 Preferred Plan), which shows Active Participants and Annual Number of Participants.

- a. Please explain the relationship between these two rows.
- b. Is the Active Participants an annual or cumulative count?
- c. Why is the Annual Number of Participants declining over time and less than the Active Participants?

Request IR-82: What are the incentives for solar-PV, on a per unit basis and in total?

Request IR-83: Please provide an evaluation plan for the 2027-2031 time period, including studies other than impact and process evaluations (e.g., saturation/baseline, participation, benchmarking, potential), schedule for conducting it, focus (e.g., sector, program, end use), need for the study, and rationale for the proposed timing.

Request IR-84: Please refer to the table on page 24 of Appendix D – Purchase Agreement (Redline), Schedule A – Demand-Side Management Activities with blanks for Performance Targets. Is the ‘Available demand response capacity over the five-year plan’ cumulative as of the end of 2031? If not, please explain what this represents.

Request IR-85: Please refer to the table on page 25 of Appendix D – Purchase Agreement (Redline), Schedule B – Compensation with blanks for NSEB Approved Investment Amount, 2023-2026 DSM Resource Plan Underspend, and Net Contract Amount to be Paid by NSPI. Please provide estimates of the NSEB Approved Investment Amount, 2023-2026 DSM Resource Plan Underspend, and Net Contract Amount to be Paid by NSPI based upon the proposed Plan and results to date.

Request IR-86: Please refer to page 3 of Appendix F – Proposed Updated Standardized Filing Framework which states, “The Framework was reviewed in the DSMAG as part of E1’s engagement on development of the five-year DSM Plan and updated in [Insert Date/year].”

- a. Did the DSMAG review this version of the Framework? If so, when?
- b. If not, please provide the version of the Framework that was last reviewed by the DSMAG redlined to indicate the changes between that version and the one that appears in the filing.

Request IR-87: Please refer to the Table 1: Glossary of Terms starting on page 3 of Appendix F – Proposed Updated Standardized Filing Framework.

- a. Please provide definitions of the terms “energy efficiency”, “solar PV”, “electricity costs”, “GHG emissions reductions”, “program component”, and “program”.
- b. Does E1’s 2027-2031 include programs within each resource or do programs include components of multiple resources?
- c. Please provide a mapping of the relationship between 2027-2031 DSM Plan program components, programs, sectors, resources, and the portfolio as a whole.

Request IR-88: Please refer to page 5 of Appendix F – Proposed Updated Standardized Filing Framework which states, “Provide portfolio-level metrics for each Plan year and in total, both in aggregate and by DSM resource. Metrics include E1 investment, first-year and lifetime energy savings, peak demand savings, available demand response capacity, weighted average measure life, lifetime benefits, PAC results, savings and investment by rate class. Provide program-level savings and investment, reference benchmarks of plans from other jurisdictions that are comparable as appropriate (e.g., depth of savings to load). Apply the same metrics provided at the portfolio level to each program.”

- a. Will E1 also provide these metrics for each year of the plan (annual) and across plan years (cumulative) as it is proposing to do under the ‘Previous Plan Results’ section?
- b. Please clarify which metrics will be provided by program, by resource, by rate class, and for the portfolio as a whole.
- c. Did E1 consider including the modified PAC? If so, why didn’t E1 include this metric?
- d. Did E1 consider including GHG emissions reductions as a metric? If so, why didn’t E1 include this metric?
- e. Did E1 consider including metrics such as the cost of saved energy and cost of GHG emissions reductions? If so, why didn’t E1 include these metrics?
- f. Is generation for solar PV missing from this list? If so, should it be added?
- g. Please clarify which of these metrics are also indicators and/or targets. Are all of the indicators and targets included? If not, why not?

Request IR-89: Please refer to 4.5 DSM Resource Plans (5-year cycle) of Appendix F – Proposed Updated Standardized Filing Framework on page 10. Please provide a draft schedule indicating when these activities would occur during the 5-year cycle.

Request IR-90: Please refer to Appendix A - Attachment 4, Sheet 21 (Annual Cost Category).

- a. Please provide in Excel format demand response enrollments, program costs, and peak energy savings for 2023 (actuals), 2024 (actuals), 2025 (actuals), 2026 (planned), 2027 (proposed), 2028 (proposed), 2029 (proposed), 2030 (proposed), and 2031 (proposed) broken out by customer segment (Residential vs BNI), DR Option (battery, EV, hot water heaters, thermostats, curtailment, loadshift to BUGs, other – please add), and existing

1 vs. new participants. Please break out the cost data by the cost categories (program
2 delivery, technology enablement, etc.) used in the 2027-2031 plan.

3 b. Please describe the types of costs that are included in the categories "Program Delivery
4 Cost" and "Technology Enablement Cost."

5 c. Please provide a breakout of any costs incurred due to the cybersecurity incident
6 (including but not limited to secondary meter installations and new implementation
7 vendor costs) at the most granular level available.

8 d. Please indicate whether E1 is still contracted with the original implementation vendor,
9 and if so, whether E1 plans to revert operations to the original vendor or fully transition
10 to the new vendor.
11