

**M12780 – 2027-2031 Demand Side Management (DSM) Plan Application
NSPI Information Requests to EfficiencyOne (E1)**

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Request IR-1:

Reference: Appendix A, Table 49, “Program History,” page 85.

Please provide a table which, for each year from 2020 to 2026, includes:

- (a) total DSM investment for solar PV projects/measures, by program component;**
- (b) the percentage of total DSM expenditures within each year that were allocated to solar PV projects/measures;**
- (c) the number of solar PV systems installed, total installed capacity (MW), and estimated generation (MWh); and**
- (d) for each program component, please indicate whether the solar PV projects/measures were supplemented with provincial and/or federal funds.**

Request IR-2:

Reference: 2025 DSM Annual Progress Report, Attachment 3, Table 1.

For solar PV measures/projects with DSM savings, please confirm whether provincial and/or federal funds were included as a cost in the actual PAC calculations for the 2023-2025 period. Please also confirm whether the avoided costs associated with these solar PV measures were included as a benefit in the actual PAC calculations.

- (a) If provincial and/or federal funds were applied to solar PV projects/measures with DSM savings and included as a benefit but not included as a cost in the actual PAC calculations for the 2023-2025 period, please provide an updated Table 1 comparing**

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1 the reported 2023-2025 actual PAC results and revised actual PAC results for each of
2 2023 to 2025 with the provincial and/or federal funds included as a cost in the PAC
3 calculation.

4
5 Request IR-3:

6
7 Reference: Evidence, page 34, lines 4-5.

8
9 E1 notes that any expansion of solar-PV to other customer segments in future
10 DSM Plans would be subject to cost-effectiveness analysis and Energy Board
11 approval.
12

13 If E1 expands solar PV to other customer segments within this DSM Plan period, would this
14 expanded offering be subject to cost-effectiveness analysis and Energy Board approval? If
15 not, please explain why not.

16
17 Request IR-4:

18
19 (a) Please identify all Strategic Electrification (SE) evaluated during Plan development,
20 including those not ultimately included in the Preferred Plan, and explain why each
21 SE measures or programs failed or passed cost-effectiveness screening. In the
22 response, please provide any analysis E1 conducted, including model outputs and
23 technical tables produced, when evaluating SE before determining that it was unable
24 to be included in the Plan.

25
26 (b) Did E1 consider SE measures or programs that were designed to:

- 27
28 (i) target only off-peak or non-winter hours;
29 (ii) include mandatory load controls; and/or
30 (iii) avoid winter coincident peak demand entirely.

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1 **If not, for each of subparts (i) to (iii), please explain why not.**

2
3 **(c) Were transportation electrification programs or measures considered for inclusion in**
4 **the 2027-2031 DSM Plan? If so, please describe how. If not, please explain why not.**

5
6 **(d) Were hybrid heating programs or measures considered for inclusion in the 2027-2031**
7 **DSM Plan? If so, please describe how. If not, please explain why not.**

8
9 **(e) Resistive water heating with direct load control is currently offered as an option in**
10 **Residential Demand Response. Was this option considered for inclusion in the 2027-**
11 **2031 DSM Plan as an SE measure? If so, please describe how. If not, please explain**
12 **why not.**

13
14 **Request IR-5:**

15
16 **Did E1 conduct a jurisdictional review of peer utilities with electrification mandates or**
17 **programs to inform the 2027-2031 DSM Plan development, including the development of**
18 **Strategic Electrification programs or measures as part of this Plan? If so, please provide the**
19 **materials produced from this work and summarize the findings related to electrification**
20 **programs or measures. If not, please explain why not.**

21
22 **Request IR-6:**

23
24 **Does E1 expect that it will be in a position to consider Strategic Electrification (SE) programs**
25 **or measures during the Plan and, subject to cost-effectiveness analysis and Energy Board**
26 **approval, introduce SE programs or measures before the end of the Plan term? If not, please**
27 **explain why not.**

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Request IR-7:

Reference: Appendix A, Table 45, “Overview,” page 80.

(a) Please explain why, in E1’s view, maintaining existing enrollment of Residential Demand Response (DR) without growth is preferable to alternative approaches, including targeted enrollment growth or program redesign.

(b) Please identify, and explain, whether pausing enrollment is intended as:

- A temporary program design approach, pending improvements such as improved performance and/or a reduction in costs; or**
- A longer-term strategic determination regarding the role of Residential DR within the DSM and DR portfolio.**

(c) Are there any scenarios under which new Residential DR enrollment would be considered during the 2027-2031 Plan? If so, please explain these scenarios and provide specific conditions that may trigger new Residential DR enrollment during the 2027–2031 Plan period. If not, please explain why not.

Request IR-8

Reference: Appendix A, Attachment 4, Sections 1, 3a, 4a, and 19a–19c.

(a) Please describe the intended role of load shift to Backup Generators (BUGs) in the 2027-2031 DSM Plan.

(b) Please provide the details of a BUGs program, including:

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1 (i) details on the type of generator(s) (fuel, size, etc.) to be included in such a
2 program;

3 (ii) whether the program will recruit new or existing generators, or both;

4 (iii) how, and to whom, the program will be marketed; and

5 (iv) how participation will be measured.

6
7 (c) Please explain whether emissions, permitting constraints, and fuel availability were
8 accounted for in modeling this option. If so, how were these factors accounted for? If
9 not, please explain why not?

10
11 **Request IR-9:**

12
13 **Evaluated results for Demand Response (DR) available capacity are filed one season behind**
14 **the completion of the current DR season (e.g. 2024/25 evaluated results were filed in 2025,**
15 **after the 2025/26 season has been completed).**

16
17 (a) **Would E1 be agreeable to amending the timeline for filing evaluated performance**
18 **results so that these results are available before the next DR season begins? If**
19 **applicable, please identify and explain the barriers or constraints to amending the DR**
20 **evaluation reporting timeline as described.**

21
22 **Request IR-10:**

23
24 (a) **Please explain if, and how, results from the forthcoming IESO Nova Scotia Integrated**
25 **Resource Plan (IRP) will be incorporated into the 2027-2031 DSM Plan. If the**
26 **forthcoming IRP will not be incorporated into this Plan, or if E1 has not considered**
27 **this, please explain why not.**

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(b) Please confirm whether E1 will use the same DSM Potential Study process, approach, and methodology for the IESO Nova Scotia IRP as was used for the 2019 DSM Potential Study? If not, please explain why not and describe the methodology E1 plans to utilize.

Request IR-11:

Reference: Evidence, page 65, lines 4-7 and page 66, lines 8-16.

The mid-term check-in proposed below is intended to enhance transparency and stakeholder engagement during plan implementation, but does not constitute a full plan reopening or amendment process, nor does it alter E1's approved performance targets or total spending authority.

//

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.

(a) How does E1 define “significant and unforeseen change in avoided costs” and “material shift in market conditions”? Please provide examples.

(b) Has E1 defined specific thresholds (i.e. percent increases/decreases in investment levels or performance targets) which would result in the filing of an appropriate application for NSEB approval? If so, please provide.

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1 **(c) What would constitute an extraordinary event or material impact to plan feasibility**
2 **or ratepayer value?**

3
4 **(i) How will Plan feasibility and ratepayer value be evaluated over the course of**
5 **the Plan period?**

6
7 **Request IR-12:**

8
9 **Does E1 maintain written policies, procedures, or guidelines governing how measures are**
10 **evaluated internally for addition to or removal from the DSM portfolio (programs,**
11 **components, DR options)? If so, please provide these written policies, procedures, and/or**
12 **guidelines.**

13
14 **(a) In the absence of any written documentation, please describe the internal process for**
15 **adding or removing measures from the DSM portfolio, including:**

- 16
17 **(i) what triggers the internal review of a measure;**
18 **(ii) an explanation of the criteria required for measures to be added, removed, or**
19 **continued within the DSM portfolio; and**
20 **(iii) a description of the internal approval process for adding/removing a measure.**

21
22 **Request IR-13:**

23
24 **Reference: Evidence, page 25, lines 25-26.**

25
26 **Please provide the materials produced as a result of the jurisdictional scan conducted by**
27 **APEX.**

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Request IR-14:

Reference: Appendix A, Attachment 3, “PAC Review” tab, column H, rows 9 and 10.

This measure has been included to support past program participants with equipment maintenance and help protect E1 investments in heat pumps made through the Affordable Single-family program component. This measure is an important addition to our energy affordability and equity package for homeowners on lower incomes.

(a) Please identify any Canadian or US Technical Reference Manual (TRM) that includes heat pump cleaning as an energy efficiency measure with savings associated and summarize these savings values from other jurisdictions. If none are identified, please indicate the precedent E1 used to establish energy savings for this measure-type.

(b) How often are participants eligible to receive fully-funded heat pump cleanings over the EUL of the heat pump measure?

(c) What specific services are intended to be included in the heat pump cleaning measure/equipment maintenance service?

(d) Please provide a detailed measure characterization worksheet for the heat pump cleaning measure with all formulas and assumptions clearly intact.

Request IR-15:

Reference: Appendix A, Attachment 5.

Please describe the governance structure for the Innovation Framework, including:

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1 (a) external reporting commitments regarding outcomes, lessons learned, and
2 continuation/discontinuation decisions; and
3

4 (b) the role, if any, of the Energy Board and/or DSMAG in reviewing, approving, or
5 modifying innovation activities during the Plan period.
6

7 Request IR-16:
8

9 Reference: Appendix A, Section 9.4.4 Market Transformation.
10

11 Please describe the underlying Market Transformation initiatives in the Plan. In the
12 response, please:
13

14 (a) Identify the specific market gaps that each Market Transformation activity is
15 intended to address and the mechanisms by which E1 intervention is expected to
16 result in durable market changes (e.g. price reductions, increased availability,
17 customer familiarity, supply-chain development).
18

19 (b) Identify the Market Transformation exit strategy and explain how the risk of Market
20 Transformation initiatives becoming ongoing, indefinite resource acquisition
21 programs is managed.
22

23 (c) Explain the interaction between the Innovation Framework and Market
24 Transformation.
25

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