M12780

NOVA SCOTIA ENERGY BOARD

IN THE MATTER OF: *The Public Utilities Act, as amended.*

IN THE MATTER OF: An Application by EfficiencyOne for Approval of the 2027–2031 Demand-Side Management (DSM) Purchase Agreement between EfficiencyOne and Nova Scotia Power Incorporated, the establishment of a final agreement between the parties, and approval of a 2027–2031 Demand Side Management (DSM) Resource Plan.

INFORMATION REQUESTS
(NON-CONFIDENTIAL)

To: **Martha Casey,**
Interim President and CEO
c/o McInnes Cooper,
James R. Gogan Counsel for Efficiency One (E1)

From: Small Business Advocate

Responses Due: May 28, 2026

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Melissa P. MacAdam**
Blackburn Law Inc.
Small Business Advocate
Phone (902) 835-8544
mmacadam@blackburnlaw.ca

Issued at Bedford, Nova Scotia on this 7th day of May, 2026

Request IR-1:

Refer to M12780, Exhibit E-1, Efficiency One (E1)'s application for approval of its 2027–2031 Demand Side Management (DSM) Resource Plan, dated March 31, 2026, (the "DSM Plan") Section 1.1 Approval of the 2027-2031 DSM Resource Plan, Page 1 of 71:

a) How does E1 support its claim that the preferred DSM Plan recognizes the cost-of-living pressures faced by Nova Scotia households and businesses and is affordable, if this preferred DSM Plan also acknowledges, on page 47 lines 29-30, that first year unit costs have increased?
b) What options does E1 have to help reduce first year unit costs?
c) On page 47 of 71, Lines 18-23, E1 refers to 'deeper, more complex measures'. How are those types of measures identified and why were they not identified previously?
d) Does E1 identify all potential measures when working with customers, or are third party service providers involved?

Request IR-2:

Refer to M12780, Exhibit E-1, the DSM Plan, Appendix A – Preferred Plan. On page 67 of 112, under Barriers, it refers to Industry awareness and references a lack of familiarity with the Custom Incentives Program.

a) What type of Third-Party consultants is E1 referring to?
b) How is E1 working with those Third-Party consultants? Who pays for the work they do? Is there any overlap with the services provided by E1 and these Third-Party consultants?
c) Do any of the Third-Party consultants referred to work with businesses to evaluate where small businesses could improve energy efficiency? If so, how does that overlap or replicate the services that E1 provides?
d) If a customer were to engage with a Third-Party consultant, would this reduce/increase/maintain the amount of incentive that would otherwise be available to them under the DSM Plan?

Request IR-3:

Refer to M12780, Exhibit E-1, the DSM Plan, Appendix A - Section 3.1 DSM Engagement in the Development Process, Page 15 of 112, Lines 13-18, which states:

> DSMAG engagement played a central role in development of the 2027–2031 DSM Preferred Plan. Throughout the planning process, E1 engaged a range of DSMAG members including rate class representatives, provincial government representatives and internal subject matter experts. Input from this engagement, together with insights from E1's ongoing customer satisfaction surveys, was incorporated at all stages of plan development to inform portfolio and program design.

a) Please provide dates and detailed results for the customer satisfaction surveys for small businesses, other than multi-unit residential businesses, and describe how this influenced the DSM Plan, other than for lighting measures.

b) Has E1, or any third party company on E1's behalf, spoken with or interviewed individual small businesses to learn why they have not pursued E1 programs that were also offered in the past and that are contained in the DSM Plan? If yes, how did the responses influence the development of the preferred DSM Plan. If no, what are E1's plans to ensure sufficient participation to meet the proposed targets in the preferred DSM Plan.

Request IR-4:
Refer to M12780, Exhibit E-1, the DSM Plan, Appendix A, page 23 of 112, lines 1-2, which states "…Savings further decline beginning in 2029, related to the removal of BNI lighting after 2028;", and page 64 of 112, Measures Promoted, that also references lighting application rebates ending December 2028:

a) Has E1 considered alternatives to the current lighting measures, such as lighting control measures? If so, please provide details. If not, why not?

b) Would lighting control installation measures be considered included in the "deeper, more complex measures" E1 recommends on page 47 of 71 of Exhibit E-1, the DSM Plan, lines 18-21? If not, please explain.

g) Does E1 have the ability with the preferred DSM Plan, such as part of a mid-term program review, to substitute in or resurrect lighting programs if the market for them evolves such that they become more cost-effective?

Request IR-5:
Refer to Exhibit E-1, the DSM Plan, page 35 of 71, lines 19-20 and lines 30-31, confirming E1's decision to eliminate Strategic Electrification (SE) as part of the preferred DSM Plan and instead to include research on SE by allocating investment for it within its Enabling Strategies budget.

a) Prior to making the decision to eliminate SE from inclusion in the Preferred Plan, how many different types of SE program designs were reviewed to determine if these might be cost effective? How did these alternatives differ from one another?

b) Was any of the research conducted as part of the previous plan's enabling strategies on SE utilized in assessing potential SE programs?

c) When was it determined that the proposed SE programs were not cost-effective?

c) Did E1 consult with other DSM organizations that offer SE programs to Canadian customers to compare results and conclusions?

d) What are the expected outcomes from Enabling Strategies?

e) Are results from Enabling Strategies able to influence changes within this 5-year plan or only for the next plan?

f) If only the next 5-year plan, has E1 considered adjusting the investment in Enabling Strategies such that it is more aligned with the latter half of the DSM Plan and closer in time to when the new plan is being developed?

Request IR-6:

Refer to Exhibit E-1, the DSM Plan, Section 5.2 Program Delivery Costs, page 49 of 71, lines 9-13, which states:

> To manage overall investment levels in the Preferred Plan, E1 has reduced full-time equivalent (FTE) staffing in the 2027–2031 Preferred Plan to 106.7 as compared to 114.3 in the 2026 DSM Extension, reduced spending on enabling strategies, and focused resources on proven, cost-effective program delivery. These cost management efforts demonstrate E1's commitment to prudent expenditure control while maintaining program effectiveness.

a) What areas of E1's program management and deployment had FTE reductions?
b) How did E1 determine that these FTE reductions would not compromise program delivery and savings results?

Request IR-6:
Refer to Exhibit E-1, the DSM Plan, Section 3.1 Affordability, page 24 of 71, Line 10 and page 25 of 71, Lines 1-2 and provide detail as to how E1 has adjusted the DSM Plan in later years to account for inflationary impacts to its expenses, such as labour and other fixed costs, given its decision not to include an annual inflationary increase and describe what impact that will have on the DSM Plan breakdown in future years, as shown in Figure 3: 2026 DSM Plan Expenditures, on page 39 of 71.

Request IR-7:
Refer to Exhibit E-1, the DSM Plan, Section 9: Alternative Scenario, Page 67 of 71, Lines 18-21 and provide details regarding what would happen to current Eco Shift program customers should the Eco Shift program be eliminated.