

NOVA SCOTIA ENERGY BOARD

IN THE MATTER The PUBLIC UTILITIES ACT
OF:

-and-

IN THE MATTER An Application by EfficiencyOne for approval of the 2027-2031
OF: 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

M12780

**INFORMATION REQUESTS from:
NRStor Incorporated**

To: EfficiencyOne
 James R. Gogan, Counsel
 McInnes Cooper
 By email: James.Gogan@mcinnescooper.com

From: NRStor Incorporated

Contact Person: Homaira Siddiqui
 Business Development and Partnerships Manager
 hsiddiqui@nrstor.com

DATED at Toronto, Ontario, this 7th day of May 2026.

IR-1 – Avoided Costs

Reference:

Appendix B – Attachment 5: Assumptions, Section 5. Avoided Costs.

Questions / Requests:

- a) Does the DSM model's avoided capacity in \$/kW include both bulk and local capacity values?
- b) Did E1 evaluate the Total Resource Cost and Societal Cost Test in addition to the Program Administration Cost Test?
- c) Could E1 provide an explanation for the assumption that the carbon pricing is embedded within the avoided cost of energy for the 2025 to 2055 period?
- d) Did E1 consider customer and grid resilience in the avoided costs quantification?

IR-2 – Avoided Capacity from New Residential Batteries

Reference:

"The Preferred Plan represents a comprehensive suite of programs and service offerings which will deliver approximately 435.4 GWh of affordable, incremental net energy savings, 85.0 MW of cumulative system peak demand savings, 29.3 MW of available capacity from demand response and 1.7 GWh of energy reductions from solar-PV generation to Nova Scotians over the 2027–2031 Plan period. These energy savings reflect approximately 0.8 percent of NS Power's load."

Question / Request:

- a) Has E1 evaluated the incremental available capacity from demand response under a scenario where new batteries were an eligible DSM measure?

IR-3 – Eco Shift Program Cost Effectiveness

Reference:

"While the Residential Demand Response (Eco Shift) program component does not yet meet the standard cost-effectiveness threshold, there have been noted improvements." (Page 28)

"Beyond cost-effectiveness metrics, Eco Shift contributes to electricity system resilience during cold weather events by enabling demand-side flexibility that complements supply-side resources and rate design." (Page 29)

Questions / Requests:

- a) In addition to the Program Administration Cost Test, did E1 evaluate the Total Resource Cost and Societal Cost Test for the EcoShift program?
- b) Could E1 confirm whether greenhouse gas emission reductions and customer and grid resilience were quantified and modeled as part of the avoided costs for the Eco Shift program? If yes, please provide a breakdown of these benefits.

IR-4 – Program Design for Residential Demand Response under the Preferred Plan

Reference:

“E1 does not intend to enroll new customers in 2027–2031.” (Table 45 under 7.3.2 PROGRAM DESIGN)

“Available demand response capacity is evaluated based on events called from December to February.” (12.1.2 DEMAND RESPONSE EVALUATION APPROACH, Page 103)

Questions / Requests:

- a) Could E1 provide a rationale as to why new measures including batteries are not eligible in the Residential Demand Response Program under the Preferred Plan?
- b) Could E1 share the sizes and respective durations as well as capital and operating costs for new behind-the-meter residential battery systems that were considered in its modeling exercise?
- c) Could E1 share the cost and benefit categories included in the modeling of new residential batteries?
- d) Has E1 factored the incremental bulk capacity benefits in addition to local capacity that new residential batteries provide in its cost effectiveness tests?
- e) Could E1 confirm whether greenhouse gas emission reductions and customer and grid resilience were quantified and modeled as part of the avoided costs for new behind-the-meter batteries in the Residential Demand Response program? If yes, please provide a breakdown of these benefits.
- f) Are there areas in the Nova Scotia grid that experience greater outage hours that would benefit from new residential batteries?
- g) Could E1 confirm whether the Demand Response benefits in the model capture only the December to February period or if year-long benefits are quantified and captured?

IR-5 – Combined Effects and Benefits

References:

Section 7.2 CRITICAL PEAK PRICING OVERLAP & Appendix B – Attachment 5: Assumptions

Questions / Requests:

- a) Has E1 conducted a jurisdictional scan on the overlap of time-varying rates and demand response programming, such as the case in Ontario with the Peak Perks program and the eligibility of solar and battery incentives under Home Renovation Savings Program for the residential customers that are on the time-of-use or ultra-low overnight retail electricity rates?

- b) Has E1 studied the combined effect of new residential batteries and electrification measures such as heat pumps on electricity bill affordability?

IR-6 – Residential batteries in Mi'kmaw homes

Reference:

“Energy efficiency remains the foundation of the 2027–2031 Preferred Plan portfolio, complemented by growth in demand response, and the introduction of solar photovoltaic (solar-PV) support for Mi'kmaw communities.” (Page 1)

“The Preferred Plan introduces a new Mi'kmaw New Home Construction and residential solar-PV offer to ensure continued support to Mi'kmaw communities after the completion of the Mi'kmaw Home Energy Efficiency Project in 2027.” (Page 53)

Questions / Request:

- a) Has E1 consulted with Mi'kmaw communities to confirm their interest in new battery installations for the Mi'kmaw New Home Construction programs as well as in existing Mi'kmaw homes?

IR-7 – Residential batteries in Innovation Framework

Reference:

Appendix A, Attachment 5, Table 1

Table 1: Projected Direct Expenditures by Focus Area

Focus Area	DSM Direct Expenditure (\$)					Total (\$)
	2027	2028	2029	2030	2031	
Demand Response	160,650	178,815	123,175	110,250	111,500	684,390
Demand Flexibility	183,600	204,360	221,715	198,450	200,700	1,008,825
Strategic Electrification	45,900	51,090	24,635	22,050	22,300	165,975
Market Transformation	22,950	25,545	24,635	22,050	22,300	117,480
Locational DSM	45,900	51,090	98,540	88,200	89,200	372,930
Total Direct (\$)	459,000	510,900	492,700	441,000	446,000	2,349,600

Question / Request:

- a) Will new residential batteries be eligible under these four focus areas, including Virtual Power Plants under Demand Flexibility and Locational DSM?

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