M12780

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.**

INFORMATION REQUESTS

To: **H Gil Peach**
H. Gil Peach & Associates LLC
Consultant for the Nova Scotia Energy Board

From: The Consumer Advocate

Responses Due: June 16, 2026

Copies: 1 electronic copy (PDF searchable)

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The following Information Requests are directed to H. Gil Peach & Associates LLC ("the verification team" or "the authors") regarding the 2025 *Savings Verification Review of Efficiency Nova Scotia DSM Programs (Exhibit E-17).* Page references are to that document unless otherwise indicated.

Request IR-1:

Reference: 2025 Savings Verification Review (Exhibit E-17), Introduction, p. 1; Savings Verification Approach, p. 24; and Evaluation Effort for 2025 Programs, p. 22:

> "We have reviewed calculating methods, checked the math of some evaluations, conducted due diligence site visits to check installation counts and quality of work. In these site visits, we checked installed measures and discussed program experience with customers." (p. 1)
>
> "We conducted 108 site visit inspections for the 2025 program year." (p. 24)

The report states that the Econoler impact evaluation work included "sixteen impact evaluations" (p. 22).

Please answer the following questions regarding the quotes and references above:

a. Of the sixteen 2025 impact evaluations, how many had their calculation methods reviewed and their math independently checked? Please identify which evaluations were checked.
b. What did "checked the math" entail — full independent computation of savings, targeted spot-checks of selected calculations, or a high-level reasonableness review? Please clarify.
c. Were any mathematical or calculation errors identified during this review, and if so, were they corrected in the reported results?
d. Regarding the 108 site visit inspections:
   (i) how were they distributed across the 2025 program components;
   (ii) what percentage of total installations or participants do they represent;
   (iii) what sampling methodology or selection criteria were used to select them?
   (iv) What information was gathered from a site visit?
e. Were all 108 inspections conducted in person and on-site, or did some rely on remote or desk-based review?

Request IR-2:

Reference: 2025 Savings Verification Review, Evaluated Energy Savings at the Generator, p. 19-20.

> "The multiplier is the ratio of Lifetime Evaluated Net Savings (GWh) to Annual Evaluated Net Savings (GWh) …" (p. 19)
>
> "The multiplier represents the average lifetime of energy savings." (p. 20)

Figure 3 (p.19) ranks each program by this multiplier, rounded to the nearest whole number; the report gives sector multipliers of fourteen (Residential), ten (BNI), and eleven (portfolio).

Please answer the following questions about the references above:

a. Please confirm that the "value multiplier" is, in substance, the savings-weighted average measure life for a program, consistent with the report's statement that it "represents the average lifetime of energy savings" (p. 20).

b. Does the verification team agree that a program could exhibit a high multiplier (long measure life) while delivering low annual savings and/or poor cost-effectiveness, such that the multiplier should not be read as an indicator of program value or ratepayer benefit? Why or why not?

Request IR-3:

Reference: 2025 Savings Verification Review, Introduction, p. 1, Evaluation Effort for 2025 Programs, p. 22

> "Generally, the evaluator's goal is to conduct a full (comprehensive) evaluation of each program every three years, with condensed evaluations between. However, full evaluations may be assigned to mature programs less frequently, while complex situations may require more frequent full evaluations." (p.22)

The report also states that "Almost all programs can be considered as mature programs" (p. 1, footnote 1).

Please answer the following questions regarding the references above:

a. Does the verification team consider the current evaluation cadence — comprehensive evaluation roughly every three years, condensed evaluations in intervening years, and less-frequent comprehensive evaluation for mature programs — adequate to ensure the accuracy of reported savings? Please explain.
b. In the team's opinion, are there 2025 program components for which the comprehensive-evaluation interval should be shortened? If so, which, and why?

Request IR-4:

Reference: 2025 Savings Verification Review, Determinations Regarding Evaluation Results, p. vi; Key Findings — Residential and BNI DR, pp. 71–72.

In regard to Residential Demand Response programs the Verification report states:

> "… we caution that the resulting savings and demand reductions are small in magnitude and may lack practical significance currently." (p. vi)
>
> "… the programs should continue to be developed for at least five to seven years to see if both participation levels and demand response results can be meaningfully increased." (p. vi)

In 2025, Eco Shift delivered 0.854 MW against a 7.135 MW target and BNI DR delivered 5.941 MW against a 10.726 MW target (pp. 71–72).

Please answer the following questions regarding the references above:

a. What specific participation or available-capacity milestones would the verification team use to judge whether the demand response programs are achieving "practical significance" during the recommended five-to-seven-year development window?

b. Does the team have a view on the point at which continued ratepayer investment in a demand response program that is persistently below its capacity target should be re-examined rather than continued?

Request IR-5:

Reference: 2025 Savings Verification Review, Recommendations, p. vi-vii; General Recommendation SVR25-G-2, p. 74.; M12249 CA IR-5

> "Evaluators should explicitly identify programs with negligible practical savings, regardless of statistical significance." (p. 74)

In the Program Year 2024 Savings Verification proceeding (Matter M12249), in response to Consumer Advocate IR-5, the authors stated they did not have a specific number for "real" energy savings at the household level.

Please answer the following questions regarding the references above:

a. The report characterizes the Demand Response program as having savings that "may lack practical significance." (p.vi) Beyond this program component, are there other 2025 program components that the verification team considers to deliver "negligible practical savings"? Please list any, or confirm the list is limited to the Demand Response program component..
b. What threshold — expressed, for example, in MWh, in $/kWh acquisition cost, or as a share of sector or portfolio savings — does the team use, or recommend, to distinguish "negligible practical savings" from meaningful savings?
c. In Matter M12249 the authors declined to specify a threshold for "real" savings. Given the team now recommends that evaluators explicitly identify programs with negligible practical savings, please reconcile the present recommendation with that earlier position and explain how an evaluator is to apply the recommendation without a defined threshold.

Request IR-6:

Reference: 2025 Savings Verification Review, Recommendations, p. vii, General Recommendation SVR25-G-3, p. 74; Normalized Metered Energy Consumption Evaluation Framework, p. 10.

> "Evaluation reports include enhanced transparency in statistical methods and, in particular, provide more focus on explanation of data limitations similar to that required for California NMEC evaluations." (SVR25-G-3, p. 74)
>
> "Since the CPUC has adopted and then expanded the application of NMEC for utility energy efficiency projects, there is good current experience with the approach." (p. 10)

Please answer the following questions regarding the references above:

a. Recommendation SVR25-G-3 is framed in terms of transparency and documentation of data limitations "similar to that required for California NMEC evaluations." Does the

verification team also recommend that Efficiency Nova Scotia and/or Econoler adopt NMEC-based evaluation methods for any programs, or is the recommendation limited to transparency and documentation practices?

b. If the team is recommending adoption of NMEC methods, for which programs would NMEC be appropriate, and what advantages would it offer over the current evaluation approach?

c. What specific transparency or documentation elements drawn from the CPUC NMEC framework does the team recommend that Econoler adopt?