

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 FOR PEACH VERIFICATION REPORT
(NON-CONFIDENTIAL)

To: H. Gil Peach
 H. Gil Peach & Associates LLC

From: Small Business Advocate

Responses Due: June 16, 2026

Copies: 1 electronic copy (PDF searchable)

Contact Person: **Melissa P. MacAdam**
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 Small Business Advocate
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Issued at Bedford, Nova Scotia on this 9th day of June, 2026

1 **Request IR-1:**

2 Refer to M12780, Exhibit E-17, Savings Verification Report – H. Gil Peach, dated June 1, 2026
3 (the “Peach Report”) which presents its independent savings verification review of Efficiency
4 Nova Scotia’s Demand-Side Management (DSM) program evaluations for Program Year 2025 as
5 conducted by Econoler. Page “v” of the Peach Report includes a summary of Econoler’s Verified
6 Portfolio Results of Savings contributions distributed across sectors as follows:

7
8 Savings contributions are distributed across sectors as follows:

- 9 • Business, Non-Profit, and Institutional (BNI): approximately 63% First-Year, 54%
10 Lifetime.
 - 11 • Residential: approximately 36% First-Year, 45% Lifetime.”
- 12
- 13 a) What reasons were provided to explain the decline in savings contributions between the
14 first year and over the lifetime of the plan? Are these reasons different for BNI versus
15 Residential? Do you agree with the explanations as provided?
16
17

18 **Request IR-2:**

19 Refer to Exhibit E-17, the Peach Report, page vii, which states:

20
21 **Recommendations**

22 The verification recommends that:

- 23 1. Evaluation results be accepted.
- 24 2. Evaluators explicitly identify programs with negligible practical savings, regardless
25 of statistical significance.
- 26 3. Evaluation reports include enhanced transparency in statistical methods and, in
27 particular, provide more focus on explanation of data limitations similar to that
28 required for California NMEC evaluations.

29
30 **Conclusion**

31 The Program Year 2025 DSM evaluation portfolio reflects a high level of methodological
32 rigor and general compliance with accepted evaluation standards. The reported savings are
33 reasonable and appropriate for regulatory consideration.

34
35 However, targeted adjustments in evaluation practice and program review are warranted to
36 ensure that reported impacts reflect not only statistically valid results, but also practically
37 meaningful and policy-relevant outcomes.

- 38
39 a) What were the programs included in the Econoler report that showed “negligible practical
40 savings”?
- 41 b) What does Peach recommend Econoler and E1 do to address programs with negligible
42 practical savings and statistical significance? Is this a recommendation to exclude these
43 programs from the E1 Plan?

- 1 c) What does Peach mean by “negligible” practical savings and where is it defined in this
2 Report?
3 d) Despite the above referenced concerns, does the Peach Report still find the results found
4 by Econoler in E1’s 2025 plan to be acceptable?
5 e) What are the thresholds for regulatory consideration referenced in the Conclusion?
6
7

8 **Request IR-3:**

9 Refer to Exhibit E-17, the Peach Report, pages 9-10, which references the term “normalized” but
10 without providing definition of the term directly or in context in relation to the Econoler report or
11 the E1 Plan, as shown in the following references:
12

13 “7. Normalized Metered Energy Consumption Evaluation Framework

14 The Normalized Metered Energy Consumption (California NMEC) Evaluation Framework
15 is a preferred evaluation framework of the California Public Utilities Commission (CPUC)
16 that combines elements of the Deep Retrofit Framework and the Load Research Evaluation
17 Framework.” (Peach Report, page 9.)
18

19 “NMEC is a whole-building, meter-based approach that uses regression to normalize
20 energy use (primarily for weather). For NMEC, energy savings is the difference between
21 normalized baseline and normalized post-period energy consumption. It is like the IPMVP
22 Option C (whole facility) approach but takes advantage of advances in metering technology
23 (AMI data) and additional analytics. The evaluation logic of IVMVP is included in NMEC
24 but having population or near-population data transforms analytic steps that follow IVMVP
25 evaluation logic.” (Peach Report p. 10.)
26

- 27 a) What is meant by the reference to “normalized” in the sections quoted above? Please
28 provide details as to how it is calculated/determined.
29 b) Is the reference to normalized intended to address differences in weather over time and
30 across geography and thus able to be helpful for evaluating DSM and EE plans used in
31 different parts of North American?
32 c) Please provide a description of IPMVP Option C and explain the differences/benefits
33 between it and the NMEC. Please provide examples how the use of NMEC assists E1 in
34 improving its plan.
35 d) Are you recommending adoption of the NMEC approach immediately?
36
37

38 **Request IR-4:**

39 Refer to Exhibit E-17, the Peach Report, page 11, ‘Integrating Evaluation Frameworks’ which
40 discusses integrating a different evaluation framework into E1’s DSM program with the Deep
41 Retrofit and Load Research programs that are currently under consideration.
42
43

- 1 a) Did you consider the cost of E1 forsaking the resource acquisition approach in favor of
2 connecting its plan to the other evaluation frameworks mentioned? If so, please explain the
3 likely impact on customer classes and the dollar impact in percentage terms and the time
4 frame. If not, please explain why not.
5 b) Why would it be acceptable to prioritize deep energy savings that may cost more over
6 programs that produce low energy savings that are also cost effective? What time frame is
7 being used to determine that these programs produce low energy savings vs the time frame
8 for the alternatives proposed?
9 c) Have you confirmed the availability, accuracy, and cost effectiveness of AI assistance with
10 its proposed modelling approach to evaluation? If so, which AI model will be used?
11 g) Will the alternative approach proposed above cost more to develop and implement than the
12 current budget for E1's plan?
13
14

15 **Request IR-5:**

16 Refer to Exhibit E-17, the Peach Report, and the questions associated with the numbered pages
17 listed below:
18

- 19 a) Page 18, please provide the missing Table number in the sentence following Figure 2.
20 b) Please provide missing references for the error message "**Error! Reference source not
21 found**" at the top of page 22, in the 4th bullet on page 25, and below Figure 8 on page 29.
22
23

24 **Request IR-6:**

25 Refer to Exhibit E-17, the Peach Report, which presents Recommendation No. 2 on page 31 that
26 includes several questions to be addressed.
27

- 28 a) Has E1, or Econoler, considered any of the questions set out in Recommendation No. 2?
29 b) Have you inquired whether profit-making vendors will cover the opportunities no longer
30 served by E1? If so, please provide this analysis and how the cost of these services by
31 profit making vendors will compare to the cost that E1 recovers through its Plan. If not, is
32 there any plan for you or Econoler to complete such an analysis?
33 c) Do you have an information about the intelligent recycling of appliances after the end of
34 ARet?
35 d) Is the recommendation at the bottom of Page 31, to include 'values such environmental
36 protection, service to low-income and moderate-income customers, and social inclusion *as
37 well as benefit-cost analysis* ' allowable under current legislation and Board orders? (*italics
38 added.*)
39

40 **Request IR-6:**

41 Refer to Exhibit E-17, the Peach Report, page 53, which states:

1
2 **Inclusion in Portfolio Calculations.** Although there was some discussion of exclusion of
3 results from the portfolio realization rate calculation, the result following regulatory review
4 is to include results in portfolio energy savings for the year.
5

- 6 a) Please describe the name of the matter or nature of the regulatory review referenced.
7
8

9 **Request IR-7:**

10 Refer to Exhibit E-17, the Peach Report, Recommendation No. 3, page 53, which states:
11

12 **Recommendation No. 3:** The 2025 Residential Behaviour results should be interpreted as
13 partial-year findings based on limited data availability (as with the recorded energy savings
14 for the Appliance Retirement program). As the program was paused in May due to a
15 cybersecurity incident, the evaluation should not be understood as reflecting full-year
16 program performance. Reported savings are correctly calculated and valid for the observed
17 period.
18

- 19 a) What was the impact of the cybersecurity incident on the E1 Plan, the Econoler evaluation
20 and the Peach Report evaluation other than data availability?
21 b) When did any interruptions due to impacts supplied in response to a) above occur and when
22 did those interruptions resolve?
23
24

25 **Request IR-8:**

26 Refer to Exhibit E-17, the Peach Report, Key Findings, page 55, which states:
27

28 **Key Findings**

- 29 • BER surpassed its net energy savings target by 5% (40.244 GWh achieved vs. 38.451 GWh
30 planned) but undershot its net peak demand target by 26% (5.332 MW vs. 7.241 MW).
31 • Application Rebates free-ridership levels declined relative to 2021, lifting NTGRs to 0.83
32 (HVAC), 0.94 (lighting), and 0.91 (other measures), versus the prior overall 0.74.
33 • Updated adjustment ratios applicable for 2025 range from 1.117 (lighting energy) to 0.514
34 (peak demand for non-lighting/non-HVAC). The latter carries a higher-than-expected
35 margin of error and is not considered reliable for ongoing use without additional supporting
36 data.
37
38 a) How did the authors of the Peach Report, or Econoler, confirm that Application Rebates
39 free-ridership levels had declined? And is the change in NTGRs (assuming this refers to
40 Net-to-Gross Ratio) supported by or at least consistent with comparable programs?
41 b) What is the reason for the higher-than-expected margin of error and why is it considered
42 not reliable?
43