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 FOR INTERVENOR EVIDENCE (NON-CONFIDENTIAL)

To: **David Brushett, Chair**
Solar Nova Scotia (SNS)

From: Small Business Advocate

Responses Due: July 17, 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 6th day of July, 2026

Request IR-1:

Refer to M12780, Exhibit E-24, Solar Nova Scotia (SNS) Evidence, dated June 23, 2026 ("SNS Evidence") Executive Summary, page 3 of 16, 3rd paragraph, which states:

> …. Energy Manager-supported projects accounted for nearly all Existing Buildings Custom Program savings in 2024 and 2025, according to EfficiencyOne's responses to Solar Nova Scotia information requests. Yet EfficiencyOne funds only four partial Energy Manager positions through DSM, none of which serve the small business segment, and it has chosen to direct available funds to financial incentives rather than to this enabling support.

a) Did SNS, or one of its members, participate in the above referenced "Energy Manager-supported projects" that accounted for the existing buildings custom program savings?
b) Does SNS, or do any of SNS's members, participate in EfficiencyOne ("E1") programs in the capacity of a third-party energy manager?

Request IR-2:

Refer to M12780, Exhibit E-24, SNS Evidence, Section 2.3 Energy Manager-Supported Projects Are the Main Source of Custom Savings, page 6 of 16, 3rd and 4th paragraphs, which state:

> Despite the central role of this delivery model, the Energy Manager capacity funded through DSM is very limited. EfficiencyOne confirmed that, as of the end of the first quarter of 2026, only four Energy Manager positions were partially funded by DSM, of which three are roving within the industrial sector and one is embedded with an institution (E1 (SNS) IR-09(c)). None are dedicated to the small business segment. The delivery model responsible for the large majority of cost-effective business savings is therefore supported by a small, industrially focused complement of DSM-funded staff, and the customers least able to access that support, small businesses, receive none of it.
>
> Businesses that do not have access to this type of support are at a disadvantage. As traditional low-cost prescriptive opportunities become more limited, expanding access to Energy Manager type support will be important to maintaining cost-effective business savings and enabling deeper projects across a broader range of customers.

a) How did SNS confirm, for its evidence cited above, that none of the roving Energy Managers are dedicated to the small business sector?
b) What do you mean by "…the customers least able to access that support…"? Why are small businesses the least able to access the support and what is your basis for saying that they receive "none of it"?
c) Does SNS provide Energy Manager type support to customers? If so, for how many small business customers and over what time frame and how are these services funded?

d) If E1 were to dedicate more of its DSM Plan funding to support Energy Managers, how much would this cost per year? What would the energy savings be per additional Energy Manager?

Request IR-3:

Refer to M12780, Exhibit E-24, SNS Evidence, Section 3.4 Recommended Direction for SBES, pages 9-10 of 16, which states:

> Solar Nova Scotia recommends that the Board require EfficiencyOne to revise the proposed SBES design to reduce unit costs and move away from a default no-cost direct-install model. The Board should direct EfficiencyOne to:
> …
> - replace full-cost direct install as the default approach with Energy Manager-style technical assistance, project development, and funding-navigation support;
> - use reasonable cost-share incentives that allow small businesses to access federal tax incentives and stretch DSM dollars further;
> - permit this support to be delivered by qualified private-sector providers where appropriate;
>
> …

a) What is meant by the reference to "funding-navigation support" and who would provide this type of support?
b) What is meant by "reasonable cost-share incentives" and how would the reasonableness be determined?
c) What is the definition of "qualified private-sector providers" and how are they different from the third-party consultants referred to by E1 in response to SBA IR 2(b)[1]?
d) Who does SNS recommend bear the cost of the proposed qualified private-sector providers?

Request IR-4:

Refer to M12780, Exhibit E-24, SNS Evidence, Section 4.1 New Controllable Load is a Demand Response Resource, page 10 of 16, 2nd paragraph of this section, which states:

> Solar Nova Scotia agrees with Nova Scotia Power's evidence that demand response should play a larger and more disciplined role in the DSM portfolio, and should be treated as a dispatchable system-capacity resource rather than merely another customer program. The Preferred Plan, however, limits new residential demand response enrollment and has closed enrollment in EcoShift at the same time that controllable residential load is expected to grow rapidly. The result is that DSM funds are being used to deploy controllable devices while the capacity value those devices could provide is left unsecured.

[1] M12780, Exhibit E-14, E1 Response to SBA IR 2(b) Page 2 of 2.

a) Please provide the support for the statement "…at the same time that controllable residential load is expected to grow rapidly"?
b) What does SNS mean by the statement that…"the capacity value those devices could provide is left unsecured"?[2]

Request IR-5:

Refer to M12780, Exhibit E-24, SNS Evidence, Section 4.2 Smart Thermostats Illustrate the Missed Opportunity, page 10 of 16, 2nd paragraph of this section, which states:

> Solar Nova Scotia recommends that DSM-funded controllable devices, including smart thermostats, electric water heaters, and heat pumps, be made demand-response capable and integrated into DR programming wherever technically feasible, subject to appropriate customer consent, override protections, and annual reporting on verified peak reduction and capacity value. Enrolling devices that DSM is already paying to deploy is among the lowest-cost sources of incremental demand response available to the portfolio.

a) How is SNS's proposal put forward above different than E1's current residential DR program?
b) Are you recommending automatic enrollment or incentives that are conditional on enrollment? If so, how would that work with instant rebates?

Request IR-6:

Refer to M12780, Exhibit E-24, SNS Evidence, Section 4.5 Recommended Direction for Demand Response, pages 11-12 of 16, which states:

> Solar Nova Scotia recommends that the Board:
> - direct IESO Nova Scotia, as the Independent Energy System Operator responsible for resource procurement, to procure longer-term demand response and aggregator capacity, so that capital-intensive demand response such as customer-sited batteries, which require performance-incentive certainty beyond the DSM Plan term to be economic, can be unlocked;
> - require that DSM-funded controllable devices (smart thermostats, electric water heaters, and heat pumps) be demand-response capable and enrolled in demand response wherever technically feasible, with appropriate customer consent and override protections;
> - direct EfficiencyOne to grow back-up generator and hybrid heating demand response capacity, with a focus on new construction, and to enable these resources to provide longer-duration (e.g., eight-hour) calls;
> - require EfficiencyOne to bias residential demand response acquisition toward enabling

[2] Emphasis added.

new equipment at the point of purchase while still enrolling the controllable devices DSM is already deploying, to reduce incremental customer-acquisition costs; and

- require EfficiencyOne to report annually on demand response enrollment, verified peak reduction, capacity value, and customer opt-outs.

a) Referring to the 1st bullet, has SNS discussed this recommendation with IESO Nova Scotia? If so,
    a. What is the status of these discussions with IESO Nova Scotia?
    b. What is meant by "performance-incentive certainty beyond the DSM Plan term"?
b) Referring to the 3rd bullet, what is the current duration of existing batteries and does SNS recommend that this direction be applied to the current DSM plan before the Board for approval? Under what program?

Request IR-7:

Refer to M12780, Exhibit E-24, SNS Evidence, Section 5.5 Recommended Direction for Strategic Electrification, page 14 of 16, where SNS recommends: "that the Board require Efficiency One to develop a strategic electrification pathway within the 2027-2031 DSM Plan, rather than deferring strategic electrification to research-only activities", and the pathway should include "hourly modelling of costs, emissions, and peak impacts[3]."

a) Has SNS confirmed whether E1 already has access to hourly modeling capabilities?
b) If E1 does not have access to hourly modeling capabilities, is SNS aware of the time/cost for obtaining such capabilities?
c) Are the recommendations in this section being recommended to be carried out as part of the 2027-2031 DSM Plan or for development during the 2027-2031 DSM Plan and for actual execution during the next DSM Plan?
d) If the answer to question (c) above is that the recommendations are for development during the 2027-2031 DSM Plan only, does SNS recommend that any of the results from the recommendations referenced above be used as a trigger to introduce a mid-plan adjustment in the 2027-2031 DSM Plan?

[3] M12780, Exhibit E-24, SNS Evidence, Page 14 of 16, Section 5.5. Recommended Direction for Strategic Electrification, 1st bullet