

EfficiencyOne Information Requests to the Consumer Advocate (CA)

M12780 - In the Matter of EfficiencyOne's (E1) 2027–2031 Demand Side Management (DSM) Resource Plan Application

IN THE MATTER OF: *The Public Utilities Act*

- and -

IN THE MATTER OF: EfficiencyOne's (E1) 2027–2031 Demand Side Management (DSM) Resource Plan Application (M12780)

INFORMATION REQUESTS

To: **Green Energy Economics Group**
Consultant to the Consumer Advocate (CA)
Pink Larkin
1463 South Park Street, Suite 201
PO Box 36036
Halifax, NS B3J 3S9
Email: droberts@pinklarkin.com; mmurphy@pinklarkin.com;
tlove@greenenergyeconomic.com

From: **EfficiencyOne**
c/o McInnes Cooper

Responses Due: **July 17, 2026**

Copies: **1 electronic copy (PDF searchable)**

Contact Person: James R. Gogan
McInnes Cooper
1969 Upper Water St., Suite 1300
Purdy's Wharf, Tower II P.O. Box 730
Halifax, NS B3J 2V1
By e-mail: james.gogan@mcinnescooper.com
Telephone: (902) 563-5920

Issued at Halifax, Nova Scotia, this 6th day of July, 2026.

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Request IR-01:

Reference: Evidence of Green Energy Economics Group, page 9, lines 7–8:

“The SFF directs E1 to provide a Preferred Plan that is informed by the level of DSM savings identified in NS Power’s Integrated Resource Plan (“IRP”).”

(a) What section of the Standardized Filing Framework (SFF) is being referenced?

(b) Does the SFF dictate how the IRP is to inform the development of a preferred DSM Resource Plan?

(c) Does the SFF require E1 consider factors in addition to the IRP when developing a DSM Resource Plan?

Request IR-02:

Reference: Evidence of Green Energy Economics Group (GEEG), Section VIII, Pre-Weatherization Barriers, page 34, line 9 – page 39, line 20)

(a) GEEG states that referral for pre-weatherization barriers results in “forgoing [...] energy savings” (page 34, line 13), but it also states that “measures such as performing asbestos abatement or addressing a leaky roof may not have direct energy savings associated with them” (page 35, line 14–15). Does Green Energy Economics Group (GEEG) therefore agree that referral only results in forgoing energy savings in respect to the pre-weatherization barriers which have energy savings associated with them?

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- 1 (b) GEEG notes that carving out 10% of the budget for dedicated low-income retrofit program
2 funding to mitigate or eliminate pre-weatherization barriers through performing asbestos
3 abatement or addressing a leaky roof “means that benefits would be \$5 M lower, and the
4 dedicated low-income PAC BCR would be 0.8 instead of 0.9” (page 38, lines 9–16). Why is
5 it appropriate to increase ratepayer costs to carry out services that might have no or limited
6 energy savings associated with them?
7
- 8 (c) Would GEEG agree that the pre-weatherization proposal would result in increased unit
9 costs?