

EfficiencyOne Information Requests to Nova Scotia Power, Inc. (NS Power)

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 NS POWER

To: **Nova Scotia Power Inc.**
Jennifer Ross,
Director, Regulatory Planning Compliance
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From: **EfficiencyOne**
c/o McInnes Cooper

Responses Due: **July 17, 2026**

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

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

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

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Request IR-01:

Reference: Brattle Evidence, Section III: Affordability of E1's Preferred Plan, page 6:

"While E1 and its consultant (Apex Analytics) did conduct a Jurisdictional Scan comparing E1's first year unit costs to other similar programs, it is unclear whether the peer group is sufficient."

(a) Please identify each specific deficiency Brattle has identified in the APEX peer group, including:

i) which utilities should have been excluded and why, and

ii) which utilities should have been included and why.

(b) Please identify any specific Canadian utility benchmarking studies Brattle considers more probative of E1's cost performance than the APEX scan, and explain why.

Request IR-02:

Reference: Brattle Evidence, Section III: Affordability of E1's Preferred Plan, page 7:

"While some of these factors are unique to Nova Scotia, depletion of LED-driven savings as well as broader inflationary pressures and supply chain constraints are similarly experienced in other jurisdictions; therefore, they do not fully explain why E1 is delivering one kWh of energy savings at twice the cost it takes for other jurisdictions."

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

NON-CONFIDENTIAL

1 Please quantify the specific portion of the average lifetime unit cost differential (E1 at \$0.05/kWh
2 vs. American Council for an Energy-Efficient Economy (ACEEE) median at \$0.029/kWh) that
3 Brattle attributes to each of:

- 4 i) E1-specific delivery inefficiency;
- 5 ii) Nova Scotia market structure;
- 6 iii) Mi'kmaw community-targeted programming;
- 7 iv) low-income/equity programming share;
- 8 v) climate/geography;
- 9 vi) measure mix; and
- 10 vii) other factors.

11
12 **Request IR-03:**

13 Reference: Brattle Evidence, Section IV: Representation of Demand Response in E1's Preferred
14 Plan, page 14, footnote 25:

15
16 "In October 2022, IESO received a ministerial directive that increased the CDM
17 budget by \$342 million, from \$692 million to just over \$1 billion, to enable new and
18 expanded CDM programming."

- 19
- 20 (a) Please confirm Brattle's understanding that Peak Perks was launched under a specific
21 Ontario Ministerial Directive and a \$342 million budget expansion, and please describe how
22 the Ontario regulatory/funding context differs from Nova Scotia's statutory framework,
23 where E1 operates under the *Public Utilities Act*, is subject to Nova Scotia Energy Board
24 (NSEB)-approved budgets, and must satisfy the Program Administrator Cost (PAC) test at
25 the portfolio level.

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

NON-CONFIDENTIAL

(b) Please provide the most recent published Peak Perks PAC test result and confirm whether Peak Perks has, as of the date of the Brattle Evidence, achieved cost-effectiveness under the PAC test (Brattle Evidence page 13: "Through these discussions, E1 concluded that their Eco Shift program 'is expected to reach cost-effectiveness under the Program Administrator Cost test within the next year.'")

Request IR-04:

Reference: Brattle Evidence, Section IV: Representation of Demand Response in E1's Preferred Plan, page 13, footnote 20 citing Peak Perks Program Evaluation Report (Cadmus, March 2025) and page 14:

"Customers enroll an eligible Wi-Fi thermostat, and the response is automated. Eligibility also uses equipment many higher-usage households already have in the form of central air conditioning or a heat pump controlled by an eligible smart thermostat."

(a) Please confirm Brattle's understanding that Peak Perks is principally a summer cooling-based Demand Response (DR) program (precooling, 2°C temperature setback during summer afternoon peaks).

(b) Please identify the portion of Peak Perks' 200+ MW available capacity that is sourced from winter heating-controlled thermostats (e.g., heat pump or electric heat-controlled thermostats) versus summer air conditioning-controlled thermostats.

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

NON-CONFIDENTIAL

1 (c) Please confirm Brattle's understanding that Nova Scotia is a winter-peaking system and that
2 summer cooling-based DR provides no value during NS Power's December–February peak
3 period.

4
5 (d) Please provide any utility-scale winter-heating thermostat DR programs in winter-peaking
6 jurisdictions that Brattle considers more directly comparable to Eco Shift than Peak Perks,
7 including cost-per-kW data.

8
9 **Request IR-05:**

10 Reference: Brattle Evidence, Section IV: Representation of Demand Response in E1's Preferred
11 Plan, page 12:

12
13 "Costs for residential thermostat programs are \$577/kW-year by 2031 while BNI
14 curtailment programs only cost \$172/kW-year."

15
16 (a) Please provide the underlying source data for each peer utilities referred to including:

- 17 i) utility name;
18 ii) program type (thermostat vs. domestic hot water vs. battery vs. other);
19 iii) program maturity / years of operation;
20 iv) number of enrolled devices;
21 v) summer-peaking vs winter-peaking system;
22 vi) USD or CAD conversion year and rate.

23
24 (b) Please quantify the assumed scale (number of residential participants) at which Brattle
25 believes E1's residential DR program would achieve cost-effectiveness under the PAC test,
26 and the program investment required to reach that scale.

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

NON-CONFIDENTIAL

Request IR-06:

Reference: Brattle Evidence, Section IV: Representation of Demand Response in E1's Preferred Plan, page 12:

"E1's logic for limiting residential DR in the Preferred Plan is internally inconsistent in that E1 states residential DR is important but then pauses expansion until cost-effectiveness improves."

(a) Please confirm whether Brattle's recommendation to actively scale residential DR is contingent on:

- i) the Board waiving or relaxing the portfolio PAC ≥ 1.0 threshold;
- ii) reallocating funding from other programs; or
- iii) increasing the total DSM budget. If any of (i), (ii) or (iii), please specify.

(b) Please identify any DSM administrator in a winter-peaking jurisdiction that has expanded a residential DR program from sub-1.0 PAC at developmental scale to cost-effective scale within a 5-year planning period, and provide supporting data.

Request IR-07:

Reference: Brattle Evidence, Section V: Representation of Strategic Electrification in E1's Preferred Plan, page 20-21:

"...the Board must also require E1 to consider transportation electrification measures into any proposed set of strategic electrification programs" and "...Newfoundland Power's 2021–2025 Electrification, Conservation and Demand Management [ECDM]

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

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1 Plan... shows that managed charging passes the cost-effectiveness test while
2 unmanaged charging fails it.”
3

4 (a) Please reconcile Brattle's recommendation to include managed EV charging as Strategic
5 Electrification (SE) with the Board's 2025 Benefit Cost Analysis (BCA) Decision requirement
6 that SE measures must reduce both GHG emissions AND electricity costs for customers
7 under the modified PAC test.
8

9 (b) Please provide the cost-effectiveness assumptions used in the Newfoundland Power 2021–
10 2025 ECDM Plan for managed EV charging, including the cost-effectiveness test (CET) used,
11 and confirm whether the result would be cost-effective if evaluated under Nova Scotia's
12 modified PAC test.
13

14 **Request IR-08:**

15 Reference: Brattle Evidence, Section VII: Conclusion, page 35:
16

17 "Support targeted Solar PV for Mi'kmaw communities, if desired, through non-DSM
18 funding mechanisms such as government programs, equity programs..."
19

20 Please identify the specific non-DSM funding mechanisms that Brattle considers currently
21 available, in place, and committed to support solar-PV in Mi'kmaw communities in Nova Scotia
22 during the 2027–2031 period. Please provide funding amounts and program details.
23

24 **Request IR-09:**

25 Reference: Brattle Evidence, Section V: Representation of Demand Response in E1's Preferred
26 Plan, page 9, Figure 2:

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1 "...other winter-peaking utilities like Otter Tail Power have achieved DR peak
2 reduction capability of 28% peak reduction capability (13%, if large customer
3 flexibility contracts excluded)."
4

5 (a) Please provide a comparison table of Otter Tail Power and NS Power on each of the
6 following metrics:

- 7 i) total system peak (MW);
- 8 ii) residential customer count;
- 9 iii) industrial customer count and size distribution;
- 10 iv) generation mix;
- 11 v) capacity reserve margin;
- 12 vi) historical DR program maturity (years of operation);
- 13 vii) presence of interruptible industrial customers
14

15 (b) Please identify any winter-peaking utility with comparable system size and residential
16 customer profile to NS Power (~525,000 residential customers; ~2,460 MW peak) that has
17 achieved residential DR penetration above 5% of system peak, and provide the underlying
18 program design data.
19

20 (c) Please confirm whether Otter Tail Power's 13% (excluding large customer contracts) is
21 achieved across residential and small commercial customers, and provide the residential-
22 only DR penetration for Otter Tail Power.