

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 Incorporated, the establishment of a final agreement between the parties, and approval of a 2027-2031 Demand-Side Management (DSM) Resource Plan

INFORMATION REQUESTS

To: **Brattle Group**
c/o Jennifer Power
Nova Scotia Power Inc.
1223 Lower Water Street
Halifax, NS B3J 2A8

From: The Consumer Advocate

Responses Due: **July 17, 2026**

Copies: 1 electronic copy (PDF searchable)

Contact Person: **David J. Roberts**
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1 **Request IR-1:**

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3 On Page 7 of 39 of its Report, the Brattle Group states that the Proposed Plan remains heavily
4 weighed towards traditional energy efficiency with 90% of the total investment directed towards
5 energy efficiency compared to 9% of the total investment in Demand Response.
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7 A. What percentage of program investment should be directed towards energy efficiency and
8 what portion should be directed to Demand Response?
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10 B. Why are the percentages set out in paragraph A above more appropriate than the
11 proportions in the Proposed Plan?
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14 **Request IR-2:**

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16 On Page 8 of 39 of its Report, the Brattle Group states that E1's reliance on the modified PAC test
17 creates a structural barrier to Strategic Electrification because it "excludes many of the broader
18 benefits that motivate electrification".
19

20 A. Please identify the broader benefits that are excluded by the modified PAC test.
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22 B. Please explain in detail how these benefits are excluded from consideration by the modified
23 PAC test.
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26 **Request IR-3:**

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28 On page 11 of 39 of its Report, the Brattle Group states that E1 does not fully explain why it costs
29 twice as much to deliver one kWh of energy savings in Nova Scotia than in other jurisdictions.
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31 A. Against what jurisdictions is the Brattle Group comparing the performance of E1 in
32 delivering energy savings.
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34 B. How do these jurisdictions allocate funds to create higher system value compared to the
35 allocation proposed by the E1?
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38 **Request IR-4:**

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40 On page 12 of 39, the Brattle Group states that the lack of commitment by E1 to Demand Response
41 programs threatens the planned load reserve margin of Nova Scotia as system capacity for Nova
42 Scotia gets tighter.
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44 A. What level of investment in Demand Response programs would be sufficient to offset
45 pressures on the planned reserve margin?

1 B. Please explain how that level of investment could be advanced while maintaining the
2 affordability of the overall program in the short term.
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5 **Request IR-5:**
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7 On page 13 of 39, the Brattle Group refers to an analysis of the Demand Response peak reduction
8 capability of certain US investor-owned utilities.
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10 A. How many of the investor-owned utilities that are referred to are winter peaking utilities?
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12 B. How would the Demand Response peak reduction capability for winter peaking utilities
13 differ from the capability in non-winter peaking utilities?
14

15 C. What is the basis for the statement that “NS Power’s achievable DR potential is likely far
16 higher than the levels set in the current E1 plan”?
17

18 D. By what amount does the current E1 plan understate NS Power’s achievable DR potential?
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21 **Request IR-6:**
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23 With reference to page 14 of 39 of the Report, how will the exclusion of residential customers
24 from any growth in Demand Response capacity affect the nature and character of the Demand
25 Response program?
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28 **Request IR-7:**
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30 On page 16 of 39 of its Report, the Brattle Group states that there may be opportunities for
31 reduction in the cost of the implementation of Residential Demand Response programs if E1
32 learned from their prior challenges, improved their administration of the DR program and followed
33 best practices and lessons learned from other utilities with more robust established DR programs.
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35 Please explain this statement, in particular:
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37 A. What “prior challenges” could E1 learn from?
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39 B. How could E1 improve the administration of its DR program?
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41 C. What best practices and lessons learned by other utilities could E1 apply to its DR program?
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1 **Request IR-8:**

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3 On page 19 of 39, the Report states “E1’s current residential DR design is too limited, too
4 expensive and too passive in its approach to program development”.

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6 A. Please explain this statement.

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8 B. Please explain how residential DR programs can become an increasingly important systems
9 resource without imposing challenges for affordability in the immediate term.

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12 **Request IR-9:**

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14 On page 25 of 39, the Report states that it is very unlikely that a Strategic Electrification program
15 could pass the modified PAC test that has been adopted by the Board. In table 2, page 26 of 39,
16 the Report shows that Strategic Electrification could meet the modified PAC test if it increased
17 Utility revenues enough to offset all the other costs introduced by the program.

18
19 A. What are the implications of this for the implementation of Strategic Electrification as part
20 of the DSM program?

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22 B. Could the modified PAC test be altered or applied so that it was not a barrier to the inclusion
23 of Strategic Electrification in E1’s DSM program?

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25 i. If so, how could the modified PAC test be altered or applied so that it was not a
26 barrier to the inclusion of Strategic Electrification?

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28 C. What non-electric system impacts of Strategic Electrification are overlooked by the
29 Application of the modified PAC test.

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32 **Request IR-10:**

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34 On page 30 of 39, the Report recommends that E1 be required to develop a “Strategic
35 Electrification pathway” that satisfies the statutory requirement to reduce both electricity costs and
36 GHG emissions.

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38 A. Is such a pathway achievable during the life of DSM Plan?

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40 B. What measures and in what priority would create such a pathway?