

2 NOVA SCOTIA ENERGY BOARD

3 IN THE MATTER OF: *The Public Utilities Act*

4 IN THE MATTER OF: An Application by EfficiencyOne for approval of the 2027-2031
5 Demand-Side Management (DSM) Purchase Agreement
6 between EfficiencyOne and Nova Scotia Power Incorporated,
7 the establishment of a final agreement between the parties,
8 and approval of a 2027-2031 Demand-Side Management (DSM)
9 Resource Plan

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11 INFORMATION REQUESTS

To: Posterity Group
Eastward Energy Incorporated

From: The Industrial Group

Responses Due: July 17, 2026

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

14

15 Request IR-1:

16 Reference: E-20, Page 2.

17 Please confirm whether the NECB Part 8 code-compliance baseline is used as the DSM program
18 baseline in other Canadian jurisdictions, and, if so, whether it has been the subject of regulatory
19 challenge or evaluation findings similar to those identified in Posterity's evidence. Please provide
20 any specific examples.

21

1 **Request IR-2:**

2 **Reference:** E-20, Page 2.

3 *For the purposes of DSM programs, the baseline case is typically intended*
4 *to represent what the energy consumption and demand would have been in*
5 *the absence of the program.*³

6 ³ See, for example, *Independent Electricity System Operator (IESO),*
7 *Evaluation, Measurement and Verification Protocol, Version 5.0. Toronto,*
8 *ON, Canada: IESO, Jan. 2025. [Online]. Available: [https://www.ieso.ca/-](https://www.ieso.ca/-/media/Files/IESO/Document-Library/EMV/Evaluation-Measurement-and-Verification-Protocol-V5.pdf)*
9 */media/Files/IESO/Document-Library/EMV/Evaluation-Measurement-and-*
10 *Verification-Protocol-V5.pdf. Accessed: Jun. 17, 2026*

11 **Preamble:** The IESO EM&V Protocol V5.0 identifies three broad approaches for
12 establishing a net-to-gross ratio (and, by extension, a counterfactual baseline): self-
13 reporting surveys, enhanced self-reporting surveys, and econometric methods.

14 (a) Please confirm which, if any, of these approaches Posterity has considered
15 for establishing the "absence of program" baseline for the Custom New
16 Construction (NC) Program.

17 (b) Please explain why the recommended approach was selected over the
18 alternatives.

19 (c) Given that the NC Program has already been in operation for several years,
20 please explain how Posterity proposes to mitigate recall bias when asking
21 participants and non-participants to reconstruct fuel and equipment choices
22 they did not actually make.

23 (d) Please confirm whether Posterity considered the option of an independent
24 baseline study, and, if so, what factors led Posterity to recommend
25 participant and non-participant interviews as the preferred mechanism
26 rather than an independent baseline study.

27 **Request IR-3:**

28 Large and medium industrial customers may participate in the NC Program primarily through
29 custom new construction of commercial and industrial facilities.

30

(a) Please confirm whether Posterity's analysis and recommendations apply equally to, the following, and if the recommendations apply differently to any of these categories, please explain the differences and their rationale.

(i) commercial and institutional buildings;

(ii) industrial process facilities; and

(iii) multi-fuel industrial facilities that may rely on fuel-switching or co-generation.

(b) Please confirm whether Posterity's recommended peak demand incentive framework would apply to:

(i) all NC Program participants;

(ii) participants above a specified demand threshold; or

(iii) only specific building types.

Request IR-4:

Reference: E-20, Page 3.

Posterity's evidence identifies that the NC Program does not include any mechanism to recognize peak demand reductions relative to an "appropriate" baseline.

(a) Please confirm what metric Posterity recommends for measuring and verifying peak demand reductions in the context of new construction (where there is no pre-existing load profile) and identify any precedent jurisdictions where such a metric has been applied in a new construction DSM program.

(b) The Brattle Group evidence (Exhibit E-22) and Synapse evidence (Exhibit E-23) both recommend that E1 use hourly modelling when assessing demand-side measures that affect peak load. Do you consider hourly modelling necessary for the Custom NC Program to properly assess the peak demand reduction value of industrial building design decisions? Please explain your reasoning.

(c) For large and medium industrial customers constructing new facilities, peak demand is often a significant cost driver given the demand charge components of industrial tariffs. Please explain what design changes to the Custom NC Program incentive structure you recommend to recognize the system-level peak demand reduction benefits of industrial building design decisions, including HVAC, refrigeration, and process load configurations.

Request IR-5:

Reference: E-20, Page 3.

The NC Program uses a tiered incentive structure, where incentives are calculated based solely on the electrical energy savings, excluding lighting savings. Error! Bookmark not defined.

Please provide the footnote referenced.