

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: Solar Nova Scotia

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.

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15 Request IR-1:

16 (a) Please identify the person or persons who authored this evidence and
17 provide their qualifications, professional credentials, and relevant
18 experience in DSM program design, benefit-cost analysis, and regulatory
19 proceedings.

20 (b) Please confirm whether Solar Nova Scotia retained any independent
21 expert to prepare, review, or validate the quantitative analysis, figures, and
22 program design recommendations set out in this evidence. If so, please
23 identify that expert and provide their qualifications.

1 Request IR-2:

2 Reference: E-24, Pages 6.

3 *Despite the central role of this delivery model, the Energy Manager capacity*
4 *funded through DSM is very limited. EfficiencyOne confirmed that, as of the*
5 *end of the first quarter of 2026, only four Energy Manager positions were*
6 *partially funded by DSM, of which three are roving within the industrial*
7 *sector and one is embedded with an institution... None are dedicated to the*
8 *small business segment.*

9 And Reference: E-24, page 8.

10 *A more efficient response would be to provide small businesses with Energy*
11 *Manager-style advisory and project-development support. This support*
12 *would help customers understand energy use, identify and prioritize*
13 *opportunities, assess costs and benefits, navigate funding, and carry*
14 *projects through to implementation. Rather than funding 100 percent of*
15 *installed costs by default, EfficiencyOne could combine technical assistance*
16 *with reasonable cost-share incentives.*

17 (a) Please confirm how the cost of the four existing DSM-funded Energy
18 Manager positions is currently allocated across rate classes.

19 (b) Please provide Solar Nova Scotia's estimate of the incremental cost of
20 adding Energy Manager-type capacity for the small business segment as
21 recommended, and the proposed rate class allocation of those additional
22 costs.

23 (c) What is the specific unit-cost target (expressed in \$/kWh) that Solar Nova
24 Scotia recommends for SBES, the benchmark or methodology it proposes
25 for establishing that baseline, and the evidence or analysis supporting that
26 target as achievable within the 2027-2031 Plan period?

27 (d) Solar Nova Scotia also recommends permitting Energy Manager-type
28 support to be delivered by "qualified private-sector providers where
29 appropriate" (see pages 4 and 9). Please identify the qualification criteria
30 Solar Nova Scotia proposes for those providers and explain how E1 would
31 oversee quality, consistency, and cost-effectiveness of privately delivered
32 advisory services in a way that is reviewable by the Board.

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1 Request IR-3:

2 Reference: E-24, Pages 9, and Table 2.

3 *In the illustrative example above, full DSM funding could forfeit up to roughly*
4 *\$18,675 in federal support that could otherwise be brought into Nova Scotia.*
5 *A cost-share model, supported by Energy Manager-style advisory*
6 *assistance, would allow a business to capture federal support while*
7 *reducing the required DSM contribution.*

8 Preamble: Solar Nova Scotia recommends that E1 leverage the federal Clean
9 Technology Investment Tax Credit (ITC) and accelerated capital cost allowance (CCA) to
10 reduce the DSM contribution required for SBES projects. Solar Nova Scotia acknowledges
11 that E1 does not incorporate federal incentives into the PAC test because it takes the utility
12 perspective and excludes host-customer impacts.

13 (a) Please confirm whether medium and large industrial customers
14 undertaking eligible projects through the Custom Program are also eligible
15 for the Clean Technology ITC and accelerated CCA, and if so, whether
16 Solar Nova Scotia recommends that E1 leverage those federal supports in
17 the Custom Program in the same way it recommends for SBES. If Solar
18 Nova Scotia does not recommend this, please explain why.

19 (b) Solar Nova Scotia states that a cost-share approach “directly lowers the
20 program's first-year unit cost.” Please confirm whether this reduction in
21 program unit cost would be reflected in the DSM budget (reducing total
22 DSM spending and the costs allocated to all rate classes) or whether it
23 would simply reduce the cost to the individual participant while leaving the
24 DSM budget unchanged.

25 (c) Please confirm whether Solar Nova Scotia's federal leverage
26 recommendation would require E1 to assess or verify individual customers'
27 tax eligibility, and how Solar Nova Scotia proposes this would be managed
28 without creating legal, privacy, or liability exposure for E1.

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1 **Request IR-4:**

2 **Reference: E-24, Page 11.**

3 ***Hybrid heating systems and back-up generators are well suited to participate***
4 ***in longer-duration calls because they can sustain load reductions over***
5 ***extended periods, including during the multi-hour winter peaks that***
6 ***increasingly drive Nova Scotia's capacity needs.***

7 (a) Please confirm whether the hybrid heat pump DR recommendation is
8 intended to also apply to medium and large industrial customers. If not, why
9 not? If it does apply to industrial facilities, please explain how hybrid heating
10 integrates with industrial process loads that may not be interruptible during
11 winter peak events.

12 (b) Solar Nova Scotia recommends targeting new commercial construction for
13 back-up generator and hybrid heating DR capacity. Please provide Solar
14 Nova Scotia's estimate of the scale of available back-up generator and
15 hybrid heating capacity from new commercial construction over the 2027-
16 2031 period, and the incremental DSM cost, and allocation of those costs,
17 required to enroll that capacity.

18 (c) Solar Nova Scotia notes that scale of the available opportunity for back-up
19 generator capacity in its Demand Response Program is considerably larger
20 than the target of approximately 6 MW. Please provide the data or analysis
21 supporting that assertion, including an estimate of the total achievable
22 back-up generator and hybrid heating DR capacity in Nova Scotia's
23 commercial and industrial sector, and the source and methodology of that
24 estimate.

25 **Request IR-5:**

26 **Reference: E-24, Page 11, bullet 1.**

27 ***Solar Nova Scotia recommends that the Board direct IESO Nova Scotia, as***
28 ***the Independent Energy System Operator responsible for resource***
29 ***procurement, to procure longer-term demand response and aggregator***
30 ***capacity, so that capital-intensive demand response such as customer-sited***
31 ***batteries, which require performance-incentive certainty beyond the DSM***
32 ***Plan term to be economic, can be unlocked.***

33

- 1 (a) Please identify the statutory authority under which the Board could direct
2 IESO Nova Scotia to procure longer-term demand response capacity.
- 3 (b) If IESO Nova Scotia procures longer-term capacity contracts for capital-
4 intensive demand response assets such as customer-sited batteries,
5 please confirm the cost-recovery mechanism Solar Nova Scotia proposes
6 for those contracts and identify how those costs would be allocated across
7 rate classes.
- 8 (c) Please confirm whether Solar Nova Scotia has considered that capital-
9 intensive DR resources procured directly by IESO-NS would fall outside
10 E1's DSM Performance Target framework, and explain how Solar Nova
11 Scotia proposes the capacity value and cost-effectiveness of those
12 resources would be measured, reported, and accounted for in any
13 evaluation of E1's performance under the approved DSM Plan.

14 **Request IR-6:**

15 **Reference: E-24, Page 12.**

16 ***Solar Nova Scotia recognizes that several of these measures may not pass***
17 ***the modified PAC test on a stand-alone basis under EfficiencyOne's current***
18 ***approach....Solar Nova Scotia submits that strategic electrification should***
19 ***be assessed within that portfolio framework rather than excluded measure-***
20 ***by-measure, and that the Board should direct EfficiencyOne to screen***
21 ***strategic electrification using a test that reflects its full value, including***
22 ***avoided non-electric fuel costs, emissions reductions, and peak and***
23 ***capacity impacts, rather than electricity savings alone.***

- 24 (a) Please explain how Solar Nova Scotia's recommendation that SE be
25 screened using a test that includes "avoided non-electric fuel costs,
26 emissions reductions, and peak and capacity impacts" is consistent with
27 the Board's findings in Matter M12282 (2025 NSEB 18), which declined to
28 adopt such a test and instead directed E1 to use the modified PAC test.
- 29 (b) Is Solar Nova Scotia suggesting that the Board approve a different benefit
30 cost test for SE within this proceeding?

- 1 (c) Please confirm what rate class allocation Solar Nova Scotia proposes for
- 2 the SE pathway it recommends, including specifically the allocation (if any)
- 3 to medium and large industrial customers, and whether those customers
- 4 are expected to be net beneficiaries of the proposed SE measures.