



Blackburn Law

July 28, 2026

VIA EMAIL

Ms. Crystal Henwood
Clerk of the Board
Nova Scotia Energy Board
1601 Lower Water Street, 3rd Floor
Halifax NS B3J 3S3

Dear Ms. Henwood:

Re: M12920 – Nova Scotia Power Inc. - CI C0021839 - IT – Customer Energy Management (CEM) – 2025 Evaluation, Measurement and Verification (EM&V) Report

The Small Business Advocate (SBA) has reviewed Econoler's Evaluation of the Customer Energy Management Platform – Year 4 (the "Report")¹ and provides the following comments for the Board's consideration.

While it is disappointing that the Report is based only on 3 months of data, the SBA recognizes that the cyber security incident is the reason for the lack of information and that the issue is being addressed through other matters. It is important going forward, however, that the momentum with respect to the activation of commercial customers is not lost.

Noting that the first three months are the only ones that we have data for in 2025, it is interesting to see in Figure 13: Monthly Energy Usage Savings, Commercial General – High Users² that there is a substantially different trend in the first three months between 2024 and 2025 in energy usage. Users and the SBA would appreciate any insight that NSPI or Econoler may be able to provide for that difference.

The Report shows only limited increases in activation of CEM accounts for commercial customers and a reduction in the customers who logged in even once since activating their account³. It is therefore crucial that Nova Scotia Power Inc. (NSPI) works to maintain and increase the activation levels for Year 5. As noted by NSPI in its cover letter accompanying the Report⁴, the Board directed NSPI in its decision on the Year 3 CEM EM&V Report to undertake additional work with

¹ M12920 – Exhibit N-1 - Econoler's Evaluation of the Customer Energy Management Platform – Year 4 (the "Report").

² M12920 – Exhibit N-1 – The Report, Page 24, Figure 13: Monthly Energy Usage Savings, Commercial General – High Users.

³ M12920 – Exhibit N-1 – The Report, Page 10, Table 3: CEM Logins per Commercial Customer in 2024 and 2025.

⁴ M12920 – Exhibit N-1 – Letter from Nova Scotia Power, June 29, 2026, Page 2 of 5.

respect to the CEM specifically to engage and incentivize more commercial customers to use the CEM platform⁵. NSPI states that, due to the cyber security event, it was not able to implement any new initiatives in this regard⁶. The SBA understands the issue with timing but respectfully submits that this should be a priority for NSPI going forward.

Engaging with commercial customers is even more important when you review the findings of Econoler regarding the negative energy savings results for those customers:

The evaluation results for high and low users under the Commercial General code and for low users under the Commercial Small General rate code appear to be statistically significant, but they result in negative energy savings. Econoler suspects that some electrification (heating and non-heating related) may still be captured by the analysis even though only customers identified as electrically heated in both the baseline and post periods were considered in the analysis. Ideally, only customers consuming high levels of electricity would have been considered (as was the case for the Residential Standard rate code), but the relatively small sample of available CEM users in the Commercial rate codes made this option impractical⁷.

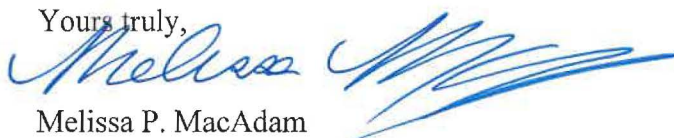
The SBA notes that this was the same explanation that was provided by Econoler in its CEM 2024, EM & V Report⁸, and respectfully submits that it is important for NSPI to confirm if Econoler's suspicion is correct and how that can be accounted for in future evaluations.

Noting the above quote, which refers to statistically significant results for high and low users under the Commercial General code, it is unclear how that ties into Econoler's finding that:

For Commercial General customers, load savings were measured for the monthly peak demand. Figure 16 below illustrates that these load savings are usually near zero and generally remain between the confidence interval, which corresponds to statistically non-significant savings⁹.

The SBA understands the limited use that can be made of the information within the Report, given that only 3 months of data is available, and looks forward to the next report, which the SBA expects will provide a better update on the development and use of the CEM platform.

Yours truly,



Melissa P. MacAdam
Small Business Advocate

⁵ M12251, Board Decision, CI C0021839 IT – Customer Energy Management (CEM) 2024 (Year 3) Evaluation, Measurement and Verification (EM&V) Report, July 8, 2025, Page 5 of 5.

⁶ M12920 – Exhibit N-1 – Letter from Nova Scotia Power, June 29, 2026, Page 3 of 5.

⁷ M12920 – Exhibit N-1 – The Report, Page 19, last paragraph and Table 9: Summary of Customer Load and Energy Usage Savings – Commercial.

⁸ M12251, Exhibit N-1, Nova Scotia Power Inc. - CI C0021839 IT - Customer Energy Management (CEM) 2024 Evaluation, Measurement and Verification (EM&V) Report, (the "2024 Report"), Page 16, 2nd to last paragraph.

⁹ M12920 – Exhibit N-1 – The Report, Page 25, last paragraph, (Attachment 1, Page 33 of 71).