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1 **Request IR-1:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix A, pp. 71-72. Table 37 and the**
4 **following statement:**

5
6 **“Table 37 summarizes the estimated changes in load during the highest ANL**
7 **hours overall, as well as during ANL hours that coincide with TOU peak**
8 **periods. Results indicate that the load increase or reduction by commercial**
9 **TOU participants was not statistically significant during the top 20, 50, and 88**
10 **highest ANL hours. When focusing specifically on ANL hours that coincide**
11 **with TOU peak periods, the commercial TOU participants exhibit**
12 **insignificant load increases or decreases during the top 20, 50 and 88 ANL**
13 **hours compared to the corresponding highest ANL hours overall.”**
14

15 **Question: How would NS Power characterize the commercial TOU tariff’s load-shifting**
16 **performance given that Table 37 shows no statistically significant load change during any of**
17 **the top 20, 50 or 88 highest ANL hours, whether coincident with TOU peak periods or**
18 **overall?**

19
20 **Response IR-1:**

21
22 While the Year Four evaluation identified statistically significant load reductions by commercial
23 Time-of-Use (TOU) participants during TOU peak periods generally, Table 37 of the Year Four
24 Report did not identify statistically significant load reductions during the top 20, 50, or 88 highest
25 adjusted net load (ANL) hours that coincided with TOU peak periods. Accordingly, NS Power
26 would characterize the commercial TOU results as demonstrating customer response to TOU price
27 signals generally, but not demonstrating statistically significant load reductions during the highest
28 ANL hours evaluated. Given the inherent variability of ANL and the absence of statistically
29 significant results across the highest ANL hour categories, NS Power considers these results
30 informative but not determinative.

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1 **Request IR-2:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 73, and Table 40 on that**
4 **page.**

5
6 **“The commercial TOU customers experienced an average Bill increase of**
7 **approximately 12.3 \$/day and 3.8 \$/day across the Winter and annually,**
8 **respectively, which are statistically significant.”**
9

10 **Table 40 reports those changes as relative average bill savings of –42.8% for the Winter and**
11 **–13.2% annually.**

12
13 **Question: Please state whether NS Power considers commercial TOU participants to have**
14 **been made worse off financially in Phase 4, in light of these reported statistically significant**
15 **bill increases and describe any tariff, eligibility or screening changes NS Power is considering**
16 **before the Pilot resumes for the 2026/27 Season on November 1, 2026**

17
18 **Response IR-2:**

19
20 **Preamble:** Table 40 was updated in Appendix A as refiled on July 13, 2026. Please refer to
21 Table 40 of the refiled Appendix A for the corrected values, which were
22 approximately -\$11.90 per day during the winter period and -\$1.10 per day
23 annually.
24

25 NS Power does not consider commercial Time-of-Use (TOU) participants to have been made
26 worse off financially in Phase 4. While commercial TOU participants experienced a statistically
27 significant increase in the winter season bill impact, the annual bill impact was not statistically
28 significant. TOU rate design is intended to be evaluated on an annual basis, recognizing that
29 customers may experience bill increases during winter periods and bill decreases during non-
30 winter periods.
31

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1 The evaluation also found that commercial TOU participants increased annual energy consumption
2 by approximately 7.5 percent, while annual energy bill impacts were estimated to increase by
3 approximately 3.1 percent. Energy increases were primarily in off-peak periods as shown in Table
4 38.

5
6 With respect to tariff, eligibility, or screening changes, the purpose of the evaluation is to assess
7 customer response to the existing pilot design rather than evaluate potential modifications to the
8 tariff. The Year Four and Year Five results will be considered, together with other customer,
9 operational, and rate design considerations, through NS Power's ongoing pricing innovation
10 process. At this time, the Company has not identified specific tariff, eligibility, or screening
11 changes for implementation before the Pilot resumes for the 2026/27 Season. Please also refer to
12 the 2026/27 Work Plan set out in Attachment 1 to the Year Four Report and as updated in Appendix
13 B of the Year Five Report.

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Request IR-3:

Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 18.

“When separated by rate class, Small General customers exhibit a load increase during peak periods (0.22 kW) relative to the General rate class that demonstrate a load reduction (2.6 kW).”

Questions:

(a) Please provide the Phase 4 commercial TOU and commercial CPP results separately for the Small General and General rate classes, including load reduction, ANL-hour, usage and bill-impact results.

(b) Given the load increase for Small General during peak periods, please state what changes to the Small General TOU and CPP tariffs NS Power is considering, including redesign, defaulting to the tariff, or retirement of the offering.

Response IR-3:

(a-b) The Company has not conducted this analysis. Such analysis would be a substantial undertaking at the scope and scale of a fulsome EM&V and, as such, is not practical to be conducted as part of an IR process. The Small General and General rate class results are combined for comparability with prior reports and consistent with the Board-approved EM&V Plans. As part of the ongoing pricing innovation process, the Company welcomes the opportunity to discuss and review potential refinements to components of the TVP tariff program, including rate options, redesign, and EM&V, as outlined in the 2026/27 Work Plan.¹

¹ Please refer to Appendix B (pages 116-117) of the Year Five Report.

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1 **Request IR-4:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 15.**

4
5 **“Notably, no change in monthly demand was observed in MURB TOU**
6 **participants, despite the removal of the demand charge.”**
7

8 **Question: Does the referenced finding of no change in monthly demand effect NS Power’s**
9 **assessment of demand charges as a barrier to load shifting on the other TVP tariffs. Why or**
10 **why not.**

11
12 **Response IR-4:**

13
14 NS Power has not concluded that demand charges are a barrier to load shifting on the other TVP
15 tariffs. The Multi-unit Residential Building (MURB) Time-of-Use (TOU) pilot was implemented
16 without a demand charge and provides an opportunity to further assess customer response under a
17 time-varying pricing structure that does not include demand-based pricing. While the Year Four
18 evaluation found no change in monthly demand among MURB TOU participants, that result
19 reflects the observed behaviour of participants during the evaluation period and, on its own, should
20 not be interpreted as a conclusion regarding the extent to which demand charges may influence
21 customer participation or load-shifting behaviour under the TVP tariffs.

22
23 Additional evaluation of the MURB TOU pilot is required to better understand the impact, if any,
24 of demand charges on customer response to time-varying pricing. Consideration of these issues,
25 including any potential implications for future rate design, would be appropriately undertaken
26 through NS Power’s ongoing pricing innovation process and stakeholder discussions.

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1 **Request IR-5:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix Am Table 52 and the following**
4 **statement from Appendix A, p. 92:**

5
6 **“Results indicate that MURB TOU participants exhibit load reduction during**
7 **the top 20, 50, and 88 highest ANL hours, although only reductions during the**
8 **top 50 and 88 highest ANL hours are statistically significant. When focusing**
9 **specifically on ANL hours that coincide with TOU peak periods, participants**
10 **exhibit load reductions of 9.6%, 12.2% and 9.1% during top 20, 50, and 88**
11 **hours, although only load reductions during top 50 and 88 are statistically**
12 **significant.”**
13

14 **Question: The top-20 ANL-hour load reduction reported for MURB TOU participants (3.3**
15 **± 4.0 kW, Table 52) is not statistically significant, while the top-50 and top-88 reductions are.**
16 **Please identify which of those three ANL-hour distributions NS Power relies on in assessing**
17 **the MURB TOU tariff’s contribution to peak reduction, and explain how the absence of a**
18 **statistically significant result in the top 20 ANL hours is treated in that assessment.**

19
20 **Response IR-5:**

21
22 NS Power assesses the Multi-unit Residential Building (MURB) Time-of-Use (TOU) Tariff
23 contribution to peak reduction based primarily on the average peak-period load reduction observed
24 for participating customers and the application of the relevant Effective Load Carrying Capability
25 (ELCC) assumptions. The top 20, 50, and 88 highest adjusted net load (ANL) hour analyses are
26 considered supplementary evaluation metrics that provide additional information regarding the
27 extent to which observed load reductions align with periods of highest system need after
28 accounting for intermittent generation. Accordingly, NS Power considers the results across the top
29 20, 50, and 88 ANL hour categories collectively, recognizing that each provides a different
30 perspective and is subject to different statistical limitations.
31

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1 In this case, the absence of statistically significant results in the top 20 ANL hours is considered
2 alongside the statistically significant results observed in the top 50 and 88 ANL hours. While, it
3 can be an indication that customers are not shifting during key periods if the result is sustained and
4 not due to a random effect, the Company does not interpret the lack of statistical significance in
5 the top 20 ANL hours as determinative of the tariff's peak-reduction performance. Rather, the
6 result is considered as part of the broader evaluation evidence and indicates that additional study
7 and continued evaluation of ANL-based metrics are warranted before drawing broader conclusions
8 regarding performance during the most critical periods.

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1 **Request IR-6:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 91 and Table 51, footnotes**
4 **b and c.**

5
6 **“This effect is evaluated based on the same DiD approach that was applied to**
7 **the load reduction calculation, but *specifically for the four hours* following the**
8 **morning and evening peak hours. As summarized in Table 51, MURB TOU**
9 **participants exhibit average load reductions of 1.2 kW and 0.53 kW during the**
10 **morning and evening snapback periods, respectively, although only the load**
11 **reduction during morning snapback period was statistically significant. ...**
12

13 **b *From 11 AM – 2 PM*; c *From 9 PM – 1 AM.*” (emphasis added)**
14

15 **Question: Please explain why the snapback window is described as four hours, while the**
16 **footnote for the morning window indicates a three-hour timeframe (11AM – 2 PM). If a**
17 **three-hour time frame was used for the analysis, why was it different than the four-hour**
18 **window for the evening event?**

19
20 **Response IR-6:**

21
22 **In the course of responding to this request, the Company identified an error in footnote (b) of Table**
23 **51 in the Year Four Report. The correct morning snapback window evaluated is 11 AM to 3 PM**
24 **(four hours), not 11 AM to 2 PM (three hours) as indicated in the Report.**

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1 **Request IR-7:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 20.**

4
5 **“The objective of these rates is to provide customers with rate choice that can**
6 **enable them to save on their electricity bill while shifting demand from peak**
7 **periods. By promoting load shifting, the program aims to reduce, in the near-**
8 **term, fuel and purchased power costs, and over the longer-term reduce costs**
9 **in the form of avoided generation, transmission, and distribution**
10 **infrastructure capital costs.”**
11

12 **Question: The Year Four Report identifies avoided generation, transmission and**
13 **distribution capital costs as a longer-term objective of the TVP tariffs, but reports results**
14 **only as per-customer load reduction (kW), daily usage (kWh/day) and daily bill impacts**
15 **(\$/day). Please confirm that the Year Four Report does not quantify, for any TVP tariff,**
16 **either the aggregate peak load reduction achieved in MW or the value of that reduction in**
17 **dollars. If the report does specify this value, please identify where.**

18
19 **Response IR-7:**

20
21 **Confirmed. The Year Four Report does not quantify, for any TVP tariff, the aggregate peak load**
22 **reduction achieved in MW or the value of that reduction in dollars. Consistent with the Board-**
23 **approved EM&V Plans, these metrics are not included within the scope of the TVP evaluation.**

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1 **Request IR-8:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix E, Attachment 3, p. 24 of 60.**

4
5 **“Customer benefits calculated using avoided cost values will be recalculated**
6 **to reflect the updated Demand Side Management (DSM) Avoided Cost series**
7 **from August 2024.”**
8

9 **Question: Please state whether the recalculation of customer benefits against the August**
10 **2024 DSM Avoided Cost series has been completed. If it has, please provide it for each TVP**
11 **tariff, showing the avoided cost value applied to Phase 4 load reduction in dollars, separated**
12 **into generation capacity, transmission, distribution and fuel or energy components. If it has**
13 **not, please state when it will be completed.**

14
15 **Response IR-8:**

16
17 The recalculation of customer benefits using the August 2024 demand side management avoided
18 cost series is not completed as part of the evaluation reporting process. This analysis is an item on
19 the 2026/27 Work Plan for review through the Company’s ongoing pricing innovation process. As
20 reflected in Appendix B to the Year Five Report, the Company expects to review and update the
21 application of avoided costs to TVP in Technical Session 2.¹

¹ Year Five (2025/26) Report, Appendix B, page 116.

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Request IR-9:

Reference: M12932 N-1 TVP Evaluation Report, Appendix E, Attachment 4, p. 17 of 47 (Rate Design Scorecard, Fair Value criterion added at Technical Session 2).

“The Tariff provides customers savings equal to the avoided cost to the system when considering load shifting.”

Question: Please provide the completed Rate Design Scorecard for each TVP tariff for Phase 4, including the Fair Value criterion quoted above, and state the dollar avoided-cost figure used to score that criterion for each tariff. If that criterion has not been scored, please explain how NS Power assesses whether the TVP tariffs are cost-reflective in its absence.

Response IR-9:

The Rate Design Scorecard has not been completed as part of the evaluation reporting process. The Rate Design Scorecard is intended to be a forward-looking rate design assessment tool used to evaluate potential tariff designs and rate options developed and reviewed with parties through the Company’s ongoing pricing innovation process. It is not an evaluation tool used to assess the historical performance of existing tariffs. The Company assesses the performance of existing TVP tariffs through the Board-approved EM&V Plans, which evaluates customer load impacts, load shifting, bill impacts, participation, and other metrics.

As reflected in the 2026/27 Work Plan, the Company intends to continue development and application of the Rate Design Scorecard through the ongoing pricing innovation process.¹

¹ Please refer to the Year Four (2024/25) Report cover letter, Attachment 1, and Year Five (2025/26) Report, Appendix B, page 116.

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1 **Request IR-10:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 148, quoting the Board's**
4 **Decision in M12249:**

5
6 **"... the Board notes that E1 should be fully prepared to address the questions**
7 **raised in this proceeding about potential overlap with NS Power's Critical**
8 **Peak Pricing Program and the targeting of constrained areas of the**
9 **transmission and distribution system in its application. If it fails to adequately**
10 **address these issues, this may complicate the approval of its DSM Plan. The**
11 **Board expects NS Power to cooperate fully with E1 in exploring these issues."**
12

13 **Question: With reference to the Board's direction in M12249 quoted above, please describe**
14 **each program's ability to target constrained areas of the transmission and distribution**
15 **system, state what NS Power has done to date to cooperate with E1 in exploring that question,**
16 **and describe the equity and rate-impact consequences of funding demand response through**
17 **DSM charges as against through tariff design.**

18
19 **Response IR-10:**

20
21 Neither Eco Shift, E1's residential demand response (DR) program, nor NS Power's TVP program
22 currently includes a direct mechanism to target constrained areas of the transmission or distribution
23 system. However, NS Power continues to engage with, and provide support to, E1 on these matters.
24

25 On March 25, 2026, E1 formally requested additional data from NS Power to support the
26 development of locational demand side management (DSM), including the addition of feeder
27 identifiers associated with each customer account, as well as information identifying priority
28 feeders for further analysis. Efforts to respond to this request have been integrated into the
29 restoration of regular data feeds to E1 following the cyber incident. E1's proposed 2027-2031
30 DSM Plan (M12780) describes the complexity of locational DSM and locational demand response

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1 and has been identified as an area of focus within E1's Innovation Framework.¹ The Application
2 also includes a commitment to further assess DSM opportunities in constrained areas as feeder and
3 AMI data become available.² NS Power looks forward to continuing its collaboration with E1 to
4 identify priority locations, establish the planning rulesets and governance required for locational
5 DR, and develop a framework that transparently links targeted DSM investments to least-cost
6 system planning outcomes and the deferral of future infrastructure investments.³

7
8 DSM-funded DR programs and tariff-based initiatives, such as TVP, rely on different mechanisms
9 to influence customer behaviour and achieve demand reductions or load shifting. DSM-funded DR
10 programs provide direct incentives to participating customers in exchange for available DR
11 capability, with costs recovered from customers through the DSM Cost Recovery Rider (DCRR).
12 In contrast, TVP uses time-differentiated price signals that provide participating customers with
13 an opportunity to reduce their bills by reducing or shifting load, with costs recovered through the
14 underlying rate design.

15
16 TVP tariffs consider equity through its Rate Design Scorecard⁴ using metrics such as:
17 Accessibility, to ensure the tariffs remain affordable and accessible to vulnerable sub-populations;
18 and Customer Equality, to ensure tariffs balance structural winners and losers and that savings
19 equal to the avoided cost to the system when considering load shifting. These metrics, along with
20 the complete Rate Design Scorecard, ensure the benefits of TVP rates are accessible to a broad
21 range of customers while minimizing restrictions based on geography, investment, or technology
22 requirements, and protecting non-participants from TVP tariff cost impacts. Additional
23 supplementary analysis was completed on Bill Impact by Household Income⁵ showing that savings
24 from TVP tariffs are consistent across household incomes, including the lowest income brackets.

¹ M12780, E-1, EfficiencyOne 2027-2031 DSM Application, March 31, 2026, Appendix A – Attachment 5, page 1.

² M12780, E-1, EfficiencyOne 2027-2031 DSM Application, March 31, 2026, Appendix A – Preferred Plan, page 77-78.

³ M12780, E-1, EfficiencyOne 2027-2031 DSM Application, March 31, 2026, page 18-19.

⁴ Year Four Report, Appendix E, Attachment 4, page 511.

⁵ Year Four Report, Appendix E, Attachment 4, pages 508-509.

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Request IR-11:

Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 17.

For Residential TOU: “Significant enhancements to load reduction (+0.40 kW) occurred where technology (i.e. Eco Shift + smart device) were present.”

For Residential CPP: “Significant enhancements to load reduction (0.46 kW) occurred where technology (i.e. Eco Shift + smart devices) were present.”

Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 27.

“As of the end of TVP Phase 4, enrolment 2,500 participants were enrolled in E1’s Eco Shift program, 209 of which were also TVP participants.”

Question: Given that concurrent EcoShift enrolment improves results and that currently the percentage of TVP customers enrolled in EcoShift is small, please state whether NS Power has adopted, or intends to adopt, any strategy to incentivize, subsidize, or require enabling technology — including smart thermostats, controlled electric water heating or other thermal storage, or other automated load control — as a condition of or inducement for TVP enrolment.

Response IR-11:

The TVP tariffs are designed to be accessible to all eligible customers without specialized equipment or controls, consistent with the foundational design principles established in the Company’s original TVP Application (M09777). This principle – that customers can respond to TVP price signals through behavioural changes without capital investment – remains central to the program’s tariff design, as reflected in the Rate Design Scorecard’s “Accessibility” criterion, which seeks to ensure the tariffs remain accessible to vulnerable sub-populations.

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1 While enabling technology may enhance TVP performance, as reflected in the Year Four Report,
2 the Company's approach for its TVP program supports participation by both customers who
3 choose to adopt enabling technologies and by those who prefer to participate without them, while
4 maintaining the voluntary, opt-in nature of the tariffs. The Company also recognizes the
5 demonstrated benefits associated with participation in both TVP and Eco Shift and continues to
6 support net growth in demand response program participation that can capitalize on this
7 demonstrated synergistic relationship.

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1 **Request IR-12:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix E, Attachment 2, p. 16 of 121.**

4
5 **Regarding TVP and EcoShift cross enrolment:**

6
7 **“NS Power and EfficiencyOne (E1) will be monitoring this year before**
8 **deciding whether cross-program enrolment should continue for future years.”**

9
10 **“The marketing timelines of both pilot programs differ, and both NS Power**
11 **and E1’s marketing teams are working collaboratively to grow cross-**
12 **promotional efforts more holistically.”**
13

14 **Question: Given the cross-enrolment load-reduction results addressed in Request IR-11,**
15 **Please describe the cross-promotional activity undertaken during Phase 4 and its results, and**
16 **describe NS Power’s plan for combining or cross-marketing the Eco Shift program with the**
17 **TOU and CPP tariffs when the Pilot resumes.**

18
19 **Response IR-12:**

20
21 NS Power collaborated with E1 on co-ordination efforts focused on program administration and
22 enabling customer participation in both programs should customers wish to do so.

23
24 While NS Power generally promotes Eco Shift to its customers, existing and prospective Time-of-
25 Use (TOU) and Critical Peak Pricing (CPP) participants were not directly targeted with Eco Shift-
26 specific marketing. Similarly, E1 did not conduct marketing activities specifically targeting TOU
27 or CPP participants for enrollment in Eco Shift.

28
29 NS Power and E1 continue to monitor customer participation and load reduction results from
30 cross-enrolled customers to inform future program decisions. At this time, there are no specific
31 plans for combined- or cross-marketing activities, however, NS Power remains supportive of
32 opportunities to collaborate with E1 to cross-promote these initiatives.

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1 **Request IR-13:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix B, p. 6 of 67.**

4
5 **“Table references presented in the report refer to the detailed banner tables.”**

6
7 **Question: Are these banner tables filed on this docket? If not, please file those banner tables,**
8 **in native format, together with the full survey questionnaire.**

9
10 **Response IR-13:**

11
12 Please refer to Attachment 1 for the data tables. These show aggregate results from the study,
13 breaking down responses by overall, rate plan and year of program. These data tables only include
14 anonymized results.

2024/25 (YR4) and 2025/26 (YR5) TVP Evaluation Reports
CA IR-13 Attachment 1 has been filed electronically.

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1 **Request IR-14:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix B, p. 13 of 67.**

4
5 **“Overall satisfaction with the Time-Varying Pricing Rate Pilot (TVP) is**
6 **consistent from 2025, with top 4 box scores increasing by two points.”**
7

8 **Question:**
9

10 **(a) Please state the basis for reporting results in the chosen bands — such as “top box”**
11 **and “top 4 box,” or 7–10, 5–6 and 1–4 — rather than as means or a full distribution**
12 **(i.e. counts by each number).**
13

14 **(b) Please identify any benchmark, norm or internal targets NS Power applies in judging**
15 **customer satisfaction using scaled responses.**
16

17 **(c) Why is a score of 7 is counted within the “top 4 box.”? Does NS Power considers a**
18 **mean of 7 out of 10 to be a satisfactory result? Please explain your response.**
19

20 **Response IR-14:**
21

22 **The following response has been provided by Narrative Research.**
23

24 **(a) Results for any numeric scale question are evaluated in numerous ways, including**
25 **individual scores out of 10, as well as grouped scores (referred to in commentary and data**
26 **tables as ‘box’ scores) as well as average or mean scores. Data tables¹ show all of these**
27 **breakdowns for each question, and during analysis of results, data is thoroughly reviewed**
28 **on all of those various parameters.**
29

¹ Please refer to CA IR-13 Attachment 1.

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1 (b-c) The groupings of 7-10, 5-6, and 1-4 are based on dozens of years of market research
2 experience showing that when asked to explain scores, respondents in Nova Scotia
3 commonly consider a score of '7' and higher to be a positive score (whether it be
4 importance, satisfaction or agreement), while scores of '5' and '6' are commonly explained
5 as more neutral ratings by participants, and scores of '1-4' are most often explained as poor
6 or negative scores. These groupings are therefore used in analysis for ease of explaining
7 the overall distribution of opinions.

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Request IR-15:

Reference: M12932 N-1 TVP Evaluation Report, Appendix B — mean scores as displayed in the survey charts at the pages indicated.

Survey question	Reported mean (2025, 10-point scale)	Appendix B page
Q.24b – Overall satisfaction with the TVP Rate Pilot	Overall 7.1 (n=2,103); TOU 6.9 (n=1,332); CPP 7.5 (n=771)	p. 13 of 67
Q.15 – “I understand how the rate plan influences my power bill”	TOU 7.6; CPP 7.7	p. 51 of 67
Q.15 – “The power bill I last received was easy to understand”	TOU 7.2; CPP 7.4	p. 51 of 67
Q.15 – “The rate plan positively impacts my power bill”	TOU 6.6; CPP 7.3	p. 51 of 67
Q.15 – “The power bill I received was as expected”	TOU 5.7; CPP 6.6	p. 51 of 67
Q.11a.v – Feelings about the number of peak events called	CPP 7.2 (n=771)	p. 33 of 67
Q.7d – Satisfaction with Customer Care experience	TOU 7.1 (n=163); CPP 7.2 (n=109)	p. 24 of 67

Question: Please explain how those individual results produce an overall mean of 7.1, identify which of them NS Power considers to be pulling the overall result down, and state which of them NS Power regards as areas of concern.

Response IR-15:

The following response has been provided by Narrative Research.

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- Each question outlined in the reference is an individual question asked of respondents. Question 24b (overall satisfaction with the TVP Rate Pilot) is an overarching question asked of respondents (“What is your overall satisfaction with the [Time-of-Use/Critical Peak] Rate Pilot?”). The average score offered for that question is 7.1 overall (this is the mean score across all 2,103 respondents), indicative of positive reactions to the program overall.
- Of the seven questions referenced, the lowest average score is for question 15 (“The power bill I received was as expected”), where mean scores are considered to be neutral, though scores for each of the other six questions would be considered positive (each being over 7.0).

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1 **Request IR-16:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix A, p. 22, Table 6 (figures as**
4 **reported):**

5
6 **Domestic TOU — 2,174 enrolled prior to the Phase 4 Winter plus 4,271 newly**
7 **enrolled, less 829, leaving 5,616 enrolled at March 31, 2025; 87% of enrolled**
8 **participants completed Phase 4.**

9
10 **Domestic CPP — 885 plus 2,023, less 266, leaving 2,642 enrolled at March 31,**
11 **2025; 91% completed Phase 4.**
12

13 **Question: NS Power reports Phase 4 residential retention of 87% (Domestic TOU) and 91%**
14 **(Domestic CPP). These retention figures are positive, yet overall participant satisfaction**
15 **stands at a mean of 7.1 out of 10. (See Request IR-15) Please explain how NS Power reconciles**
16 **those two results, state whether it regards the satisfaction results as a matter of concern, and**
17 **explain why or why not.**

18
19 **Response IR-16:**

20
21 The following response has been provided by Narrative Research.

22
23 From our experience, retention rates of 87 percent or higher reinforce that participants are satisfied
24 with the program. The separate matter of overall satisfaction with the programs (average of 7.1 out
25 of 10) shows that overall, participants give positive scores, including 18 percent giving superlative
26 scores of 10/10, 14 percent giving extremely high scores of 9/10, 20 percent giving very high
27 scores of 8/10 and 15 percent giving positive scores of 7/10. Only 12 percent of participants give
28 scores of 1-4 in evaluating the programs overall, indicative of a small minority of participants. In
29 Narrative Research's experience, a mean evaluation of 7.1 and 67 percent giving top box scores
30 of 7-10 would be considered to be a positive evaluation of the program, and this is reinforced by
31 the strong retention rates.

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1 **Request IR-17:**

2
3 **Reference: M12932 N-1 TVP Evaluation Report, Appendix B, p. 14 of 67.**

4
5 **“Comparing satisfaction results across the provinces, overall TVP pilot**
6 **participant satisfaction is significantly lower in Western Nova Scotia**
7 **compared to Metro. While smaller sample sizes prevent confidence in a**
8 **statistical variation for the individual pilots, Western Nova Scotia participants**
9 **appear to be at least somewhat less satisfied with ToU, likely driven by the**
10 **higher number of participants in that region indicating electricity as primary,**
11 **secondary, or tertiary heat source (91%) compared to the rest of the province**
12 **(NE – 83%; Metro – 83%; CB – 85%).”**
13

14 **Reference: M12932 N-1 TVP Evaluation Report, Appendix B, p. 16 of 67.**

15
16 **“Satisfaction among CPP and ToU participants does not vary significantly**
17 **between those relying on electricity as their primary heat source and those**
18 **who are not.”**
19

20 **Question: The first reference states that Western Nova Scotia is likely less satisfied due to**
21 **the prevalence of electric heating, but the second reference states that satisfaction does not**
22 **vary by heat source. Please reconcile these statements.**
23

24 **Response IR-17:**

25
26 **The following response has been provided by Narrative Research.**
27

28 In reviewing the data for questions evaluating satisfaction of the programs by heat source, there is
29 a numeric difference across results whereby those with electric heat tend to offer slightly lower
30 scores than those who have other types of heat (percent scores vary by as much as three points by
31 heat source overall). However, as noted in the analysis, there is a somewhat larger gap (up to a
32 seven point difference) between regions, whereby satisfaction in the West tends to be lower than
33 other areas. There is a correlation of higher incidence of individuals with electricity as a heat source
34 in the western region, which is postulated to be related to these somewhat lower scores in that

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1 region. However, when looking at results as a whole across the province, there is not a significant
2 difference by heat source (only numeric differences). We can therefore conclude that higher
3 incidence of electric heat in the western region may be a contributor to somewhat lower evaluation
4 scores, but there may be other reasons why there is a difference seen in evaluations in this region
5 (including small sample sizes which can lead to variability).

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Request IR-18:

Reference: M12932 N-1 TVP Evaluation Report, Appendix E, Attachment 4, p. 12 of 47.

“This indicates that, at the anticipated levels of load shift for a TOU customer, the current rate structure and/or pricing signal ratios of the existing TOU rate are the primary restrictions, independent of demand charge. In order to achieve load shifting levels above 6%, revisions to the demand pricing structure should also be considered as a secondary improvement if not otherwise mitigated by technology to optimize demand.”

“Explore the impact to customer bill and demand with a time-differentiated demand charge TOU rate (i.e. separate peak and off-peak demand charges). Note: NS Power’s current systems cannot support this as configured with current demand calculation.”

Question: Please answer the following questions regarding the quotes and references above:

- (a) Please state the current expected timeline, scope and cost for the Customer Information System replacement or upgrade needed to support a time-differentiated (peak/off-peak) demand charge for TOU rate classes.**
- (b) Pending that system capability, please state whether NS Power has evaluated any interim option for approximating a time-differentiated demand-charge signal, and if not, why not.**
- (c) Please confirm whether NS Power’s stated position quoted above — that the current rate structure and/or pricing signal ratios, rather than the demand charge, are the primary restriction on load shifting — reflects a decision not to pursue elimination or restructuring of non-coincident demand charges for General Service customers, and if so, please state the basis for that decision.**

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1 Response IR-18:

2
3 (a-b) As noted in Appendix E, Attachment 4 (page 12), NS Power identified a number of
4 potential areas related to commercial TVP rate design for future exploration through the
5 ongoing pricing innovation process. The 2026/27 Work Plan was developed through that
6 process and is based on prior Board directives, commitments of the 2024 Consensus
7 Agreement, and stakeholder feedback from prior Technical Sessions. Revisions to the
8 demand pricing structure were not identified as an area for review through this process and,
9 accordingly, are not currently included in the 2026/27 Work Plan. As a result, the Company
10 has not established a scope, timeline, or cost estimate for implementation of a time-
11 differentiated demand charge, nor has it evaluated interim options to approximate such a
12 pricing structure.

13
14 Further, and as noted in the referenced discussion, NS Power's current systems cannot
15 support a time-differentiated demand charge as contemplated in the referenced discussion.
16 The Company expects to submit an application to the NSEB in 2026 related to the
17 replacement of its legacy Customer Information System (CIS). Any future consideration
18 of time-differentiated demand charges would be appropriately considered through the
19 Company's ongoing pricing innovation process and stakeholder discussions.

20
21 (c) No. The referenced statement does not reflect a decision by NS Power not to pursue the
22 elimination or restructuring of non-coincident demand charges for General Service
23 customers. Rather, it reflects the findings of the specific analysis presented in Attachment
24 4, which indicated that, at the levels of load shifting evaluated, the existing rate structure
25 and/or pricing signal ratios appeared to be a more significant constraint on load shifting
26 than demand charges. This statement was intended to inform the discussion of potential
27 future rate design options and should not be interpreted as a conclusion regarding future
28 planned or anticipated rate design changes. Please also refer to the response in parts (a-b).

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Request IR-19:

Reference: M12932 N-1 TVP Evaluation Report, Appendix E, Attachment 5, p. 2-3 of 12.

Regarding targeting SMB customers by load profile:

“This approach was explored. Customers who could save after shifting load were identified as priority recruitment targets. After further review of these priority recruitment targets, it appeared their business models would likely not respond to load shifting.”

“For the next active recruitment period, this approach will be repeated using learnings from the most recent EM&V and incorporating feedback from key account managers such as filtering on customers with multiple accounts customers.”

Reference: M12932 N-1 TVP Evaluation Report, Appendix E, Attachment 3, p. 22 of 60.

“The model uses AMI consumption data and Environment Canada weather data to classify customers into each category.”

The 2023 Classification table on that page reports: Primary Electric 38.5% (158,656 customers); Secondary Electric 16.0% (65,941); Non-Electric 43.4% (178,887); Inconclusive 2.2% (8,915).

Question: The references above show NS Power considering load-profile analysis to select which non-enrolled commercial customers to prioritize for recruitment outreach.

(a) Has NS Power used an equivalent data-driven approach — for example, the AMI-and-weather space heating classification model described at Appendix E, Attachment 3, p. 22 of 60, or any other AMI-derived indicator of electric heating — to identify non-enrolled residential customers for TVP marketing, education or recruitment outreach?

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1 **(b) If yes, please state in which seasons, for how many customers, and with what**
2 **enrolment result by heating class.**

3
4 **(c) If not, does NS Power plan to do so once active recruitment resumes?**

5
6 Response IR-19:

7
8 (a) As described in the Year Four Report,¹ NS Power's 2024/25 residential marketing and
9 recruitment efforts included introducing retargeting and segmentation-based emails. The
10 Company tested a follow-up recruitment email based on AMI data driven segmentation,
11 with customers who had heat pumps. This included a personalized email speaking directly
12 to the benefits of the TVP pilot for heat pump owners. Segmentation based on past
13 recruitment email engagement was also implemented as a follow-up email. These
14 customers were all included in the initial email at the beginning of this campaign so this
15 would have been their second touchpoint from NS Power.

16
17 (b) The test email targeted to customers based on heating class segmentation was sent during
18 the active recruitment campaign in December 2024 and was delivered to 784 customers.
19 This outreach effort underperformed, generating limited application intake and below
20 benchmark email metrics (open and click-through rates). As a result, NS Power focused
21 further efforts on retargeting, which produced stronger application results and resulted in
22 the highest level of application conversions.

23
24 The complete email campaign ran from October 22-December 15, 2024 with emails sent
25 to over 355,000 Residential Customers.² This was the strongest recruitment approach in
26 Year 4, accounting for 87 percent of new participants.³ Close to 67 percent of pilot

¹ TVP Year Four (2024/25) Report, Appendix C, page 4.

² TVP Year Four (2024/25) Report, Appendix C, page 14.

³ TVP Year Four (2024/25) Report, Appendix C, page 14.

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1 participants identified they heat their homes electrically (e.g. baseboards, heat pump) on
2 the application form.⁴

3

4 (c) Please refer to SBA IR-6.

⁴ TVP Year Four (2024/25) Report, Appendix C, page 8.