

2017 Industrial Programs EM&V Key Observations and Recommendations

The EM&V key observations and recommendations were categorized according to the degree of impact they have on the implementation of the Save on Energy programs and the program results. High impact recommendations (Table 1) which can be actioned within the current Conservation First Framework (CFF) were responded to by both representatives of the Independent Electricity System Operator (IESO) and the Joint Program Operations Committee (JPOC). JPOC helps inform key activities aimed at enhancing the performance of new and existing province-wide CDM programs. Medium and low impact recommendations (Table 2) were responded only by the IESO.

Table 1 - High Impact Recommendations

NO.	PROGRAM	KEY OBSERVATIONS	2017 EM&V RECOMMENDATIONS	IMPACT	IESO RESPONSE	JPOC RESPONSE
1.	Industrial Portfolio, Cross-cutting	<p>Behind-the-meter generation (BMG) projects account for 56% of gross verified energy savings and account for the majority of savings in both LDC-administered and IESO-administered programs evaluated in PY2017.</p> <ul style="list-style-type: none"> All BMG projects in the PY2017 evaluation were CHP units. The Government of Ontario's 2017 Long-Term Energy Plan ended funding for CHP projects that burn fossil fuels in both the CFF and IAP. Effective July 1, 2018 the IESO is no longer accepting applications for CHP projects. While many CHP projects are currently in the application phase and will create significant energy savings over the next few years, the number of BMG projects and their impact on the Industrial Portfolio will surely decline in the future. CHP units that use non-fossil fuels, such as biogas, are still eligible for funding, so opportunities to encourage energy savings through CHP projects still exist. 	<ul style="list-style-type: none"> Create a standing committee with the IESO, LDCs and partners to develop a plan to sustain participation in the Industrial Portfolio following the removal of a popular energy efficiency measure. Investigate the potential for biogas-fueled CHPs in Ontario, as well as other projects that were overshadowed by CHPs. 	High	<ul style="list-style-type: none"> In April 2018, a redesign to the PSUP was implemented to attract more energy efficiency projects to the program through basing incentives on project performance thereby reducing the upfront accuracy requirements of the technical review. Note that many of these changes are also planned on being adopted through the Industrial Accelerator Program. There are ongoing efforts to increase (waste-to-energy recovery) WER activity through IAP. It is expected that the market will respond and consultants will engage customers to identify WER opportunities. 	<ul style="list-style-type: none"> Members agree that the redesign of PSUP should encourage more participation.
2.	Monitoring & Targeting	<p>There are substantial barriers to participation for the current iteration of the M&T program, resulting in low participation and a small contribution to portfolio savings.</p> <ul style="list-style-type: none"> The current iteration of the M&T program is seen as not workable for the vast majority of industrial customers. 	<ul style="list-style-type: none"> Discontinue the M&T program and direct relevant new customers to other program offerings such as the Energy Performance Program (EPP) unless there is a reason to redesign the program instead. 	High	<ul style="list-style-type: none"> The IESO, in collaboration with LDCs, will review the M&T Program and determine whether it is appropriate to redesign or to wind down and allow other programs to serve customers. 	<ul style="list-style-type: none"> Members will discuss the evaluator's findings with the PSUP committee, and determine whether the M&T should be considered for additional review.

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Table 2 - Medium and Low Impact Recommendations

NO.	PROGRAM	KEY OBSERVATIONS	2017 EM&V RECOMMENDATIONS	IMPACT	IESO RESPONSE
1.	Industrial Portfolio, Cross-cutting	<p>Tracking data and project documentation is generally accurate and comprehensive but can be improved to ensure accurate estimations of verified savings.</p> <ul style="list-style-type: none"> Lower-priority project parameters are sometimes not reported at all. This can potentially impact verified savings, cost effectiveness, etc., especially when many projects prevent individual verification of each parameter. In some cases, unique project and measure level IDs were not consistently recorded across databases. For instance, several iCon IDs, a unique project identifier used by the IESO and technical reviewer, were different for the same projects between the Energy Manager Measure Extract Database and Application Tracking Database. 	<ul style="list-style-type: none"> Open a channel of communication between the evaluator and technical reviewer, facilitated by the IESO, to ensure tracking data and project documentation issues are understood and impactful and realistic solutions can be implemented. 	Medium	<ul style="list-style-type: none"> The IESO will continue to work with both our Technical Reviewer and Evaluation Contractor to ensure tracking of data and project documentation issues are understood and resolved.
2.	Industrial Portfolio, Cross-cutting	<p>The cost of natural gas used to calculate avoided costs of natural gas consumption in the IESO's Cost Effectiveness Tool is not frequently updated to reflect current market conditions, resulting in inaccurate calculations that do not account for actual natural gas costs incurred in the fuel market.</p> <ul style="list-style-type: none"> The cost of avoided gas is set at \$8.80/MMBtu in the CE Tool, which was first used in 2014 and developed leveraging data from 2007. Since January 1, 2017, the spot market price of natural gas (Henry Hub) has fallen 10%. Market prices for natural gas are extremely sensitive to ever-changing supply and demand dynamics, as well as unpredictable weather events. 	<ul style="list-style-type: none"> Update the avoided cost of natural gas used in the CDM Cost Effectiveness Tool on an annual basis to reflect current market conditions. A comparison study of marginal natural gas costs in Ontario and other provinces with similar markets is recommended to ensure the avoided costs used reflect industry practices. 	Medium	<ul style="list-style-type: none"> The IESO will be updating the avoided cost of electricity and natural gas in the CE tool by the end of 2018, as discussed as part of the mid-term review process. The IESO recognizes the importance of updating these costs frequently and will work to determine an optimal schedule for such updates in the future.

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3.	Industrial Portfolio, Cross-cutting	<p>The technical review process generally yielded accurate energy savings calculations but could benefit from a more uniform methodology.</p> <ul style="list-style-type: none"> Metered data provided by the technical reviewer is inconsistent, subject to issues such as duplicate or missing hourly data due to daylight savings time and leap years. For projects evaluated with one quarter of post-project data, a consistent methodology was not used for forecasting annual savings. For example, annual savings values for some projects were forecasted by simply multiplying quarterly savings by four while others were extrapolated based on annual expected operating days compared to operating days in the metered period. Measure and baseline classifications and calculations were not consistent between evaluation years. For example, during the PY2016 evaluation, CHP projects were classified as a lost opportunity with an Industry Standard Practice (ISP) baseline instead of a retrofit with pre-existing conditions as the baseline as was used by the technical reviewer in the PY2017 evaluation. 	<ul style="list-style-type: none"> Create a standard procedure or similar guidance for the technical review process, including baseline classifications and calculations based on measure type. Require the technical reviewer to consider seasonal variations and other correlations when forecasting annual savings and encourage the technical reviewer to provide clear explanations of the methods used to extrapolate partial-year results to annual results. 	Medium	<ul style="list-style-type: none"> The amount of project data available varies on a project by project basis and, in some cases, does require assumptions to complete the technical review. Flexibility with application data is important to ensuring a positive customer experience. However, the IESO will revisit the technical review protocols with the technical reviewer and determine opportunities for improvement.
4.	Industrial Portfolio, Cross-cutting	<p>The cost of natural gas used to calculate avoided costs of natural gas consumption in the IESO's Cost Effectiveness Tool is not frequently updated to reflect current market conditions, resulting in inaccurate calculations that do not account for actual natural gas costs incurred in the fuel market.</p> <ul style="list-style-type: none"> The cost of avoided gas is set at \$8.80/MMBtu in the CE Tool, which was first used in 2014 and developed leveraging data from 2007. Since January 1, 2017, the spot market price of natural gas (Henry Hub) has fallen 10%. Market prices for natural gas are extremely sensitive to ever-changing supply and demand dynamics, as well as unpredictable weather events. 	<ul style="list-style-type: none"> Develop functionality in the Cost Effectiveness tool to account for the seasonality of natural gas prices. Seasonal avoided cost prices of electricity are utilized in the CE tool by leveraging hourly electric load profiles, which should serve as an example for seasonal avoided cost of natural gas. 	Medium	<ul style="list-style-type: none"> The IESO's avoided cost of natural gas (as with other avoided costs) should be harmonized across the organization (e.g. with Power System Planning) for consistency in policy and decision making. We will investigate the feasibility of making this change.
5.	Industrial Portfolio, Cross-cutting	<p>Administrators described significant overlap between IESO energy conservation programs and the Industrial Conservation Initiative (ICI).</p> <ul style="list-style-type: none"> Program staff and participants report mixed opinions on whether the ICI helps or hinders Save on Energy/IAP projects; some believe that the ICI helps prompt conversations on conservation projects, while others that the ICI is prioritized for funding and effort within facilities. 	<ul style="list-style-type: none"> Leverage the ICI to spur conversations with customers and use it to market to their priorities without making the project explicitly about demand reduction. 	Medium	<ul style="list-style-type: none"> While an overall approach to energy management is important, in the past it has been observed that ICI discussions can distract resources from energy efficiency projects. However, additional training for program administrators related to ICI may be beneficial.

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6.	Industrial Portfolio, Cross-cutting	<p>Smaller LDCs are often less confident in their understanding of the complex industrial programs.</p> <ul style="list-style-type: none"> Smaller LDCs with less experience in the industrial programs – generally because they have fewer large customers and thus less chance to go through the participation process – requested resources that would help them quickly become acquainted with the program and help customers who might be interested. This is also helpful for LDCs with recent turnover. The LDCs requesting materials are small and have a smaller impact on the program portfolio; however, they still represent a not insignificant number of customers and potential participants. Given the recent PSUP redesign, the timing is good to ensure that all LDCs understand the program, the changes, and the LDC’s role in customer projects. Likewise, the EM program was the least recognized of the industrial offerings (see Finding 2, below) and may be less promoted than PSUP. Finally, depending on what is decided for the M&T program, IESO should either provide a training that explains how customers can use alternative programs to achieve similar ends or a training after the program is redesigned. 	<ul style="list-style-type: none"> Develop training for the PSUP, EM, and M&T programs, given to the LDCs that cover their rules, processes, and the LDC responsibilities. 	Low	<ul style="list-style-type: none"> The PSUP was updated to include pre-consultations between the Technical Reviewer, the customer and the LDC. This reduces the onus on the LDC to address detailed questions in advance of an application submission. In addition, since the PSUP redesign was implemented in April 2018, there has been a webinar and LDC Champion Sheet developed to support LDCs with the delivery of the updated program.
7.	Industrial Portfolio, Cross-cutting	<p>Only a little over a third of LDCs have some form of channel partner network, and several commented that their vendors tend to focus on either CHP or Retrofit projects.</p> <ul style="list-style-type: none"> Some LDCs already have robust networks and utilize regular email updates, meetings, events, and even awards to build relationships with channel partners. Highlighting existing successes from those LDCs or giving them the opportunity to briefly explain their structure as part of a presentation would provide good examples for other LDCs to implement and more motivation to do so. As a related effort, the LDCs and IESO IAP staff should collaborate on developing a list of channel partners with demonstrated experience and knowledge with process efficiency projects for PSUP/IAP. Some LDCs commented that their trade ally networks tend to have vendors focused on Retrofit; most vendors with PSUP experience are CHP vendors and can no longer bring those projects to the program. LDCs and the IESO IAP staff should make a concerted effort to engage the vendors who can still participate in PSUP/Process & Systems with large efficiency projects, which may also help in meeting savings goals after the phase-out of natural gas fired CHP. 	<ul style="list-style-type: none"> Encourage and help LDCs without channel partner networks to develop them. Conduct further research to identify the appropriate channel partner networks to develop and leverage into increased program participation. Compare with trade ally networks established in other markets. 	Low	<ul style="list-style-type: none"> There’s an established network of engineering firms that have participated in PSUP. There may not be PSUP opportunities across all LDC service territories to attract these engineering firms. However, there is an opportunity for the Energy Manager network to engage these engineering firms where opportunities have been identified.

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8.	Industrial Portfolio, Cross-cutting	<p>Nonparticipants are generally aware of the Save on Energy programs and offerings with the exception of the EM program.</p> <ul style="list-style-type: none"> Despite the EM program's excellent satisfaction scores and role as an enabling program, only 50% of large nonparticipants and much smaller percentages of medium and small nonparticipants know about the Energy Manager program. This could be due to fewer marketing materials, less attention paid to it in LDC outreach to potential customers, less of an understanding/interest of the program for some smaller LDCs resulting in little outreach, and/or facilities not knowing to look for an incentive (it's plausible that a customer might think, "I'm performing this project – I wonder if any rebates are available?" due to the prevalence of equipment rebates, but it is far more unlikely they would think, "I'm hiring a facility manager – I wonder if any incentives are available?"). 	<ul style="list-style-type: none"> Increase nonparticipant awareness of the EM program by raising the profile of the program. 	Low	<ul style="list-style-type: none"> There may be selective promotion of the EM Program since not all customers have the minimum savings opportunities at their site(s). However, there is an increased focus on Energy Managers through the updated Save on Energy website.
9.	Process and Systems Upgrade Program (PSUP)	<p>Two PSUP projects were reported to have summer peak demand increases following the technical review stage but were verified to have summer peak demand savings in the savings audit.</p> <ul style="list-style-type: none"> While the focus of the CFF is on energy savings more so than demand savings, accurate demand savings are integral for cost effectiveness analyses, as well as bulk system and local planning. 	<ul style="list-style-type: none"> Ensure the technical reviewer accurately calculates and reports summer peak demand savings as defined by the IESO for all PSUP projects. 	Medium	<ul style="list-style-type: none"> The IESO will investigate the opportunity of reporting more accurate demand savings as part of the technical review process.
10.	Process and Systems Upgrade Program (PSUP)	<p>The application review process remains a major customer pain point for PSUP.</p>	<ul style="list-style-type: none"> Develop measure-specific applications or accompanying guidance to limit the number of information requests. The technical reviewer should determine what types of data they often request in IRs and whether the data was missing or not requested in the application. IESO should then consider revising the application, developing an application amendment, or including more detailed guidance as an accompaniment to the application based on this review. Making the applications or guidance measure-specific for the most common 4-5 measures would also ensure that relevant information is captured upfront for each. This would ultimately save both Technical Reviewer and customer time from having to track down additional unexpected information. 	Medium	<ul style="list-style-type: none"> As part of the program redesign implemented in April 2018 PSUP was updated to include pre-consultations between the Technical Reviewer, the customer and the LDC. This reduces the onus on the LDC to address detailed questions in advance of an application submission. Further, with the changes to payment provisions to be based on actual performance, upfront accuracy requirements are reduced thereby reducing the need for information requests. Under the previous PSUP design, customers were eligible for 100% of the project incentive if they achieved 80% of their contracted savings target. Now the Technical Reviewer no longer needs to achieve the same level of accuracy through their upfront review since the changes to the payment provisions

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					reduce the risk of paying the calculated incentive if the project underperforms.
11.	Process and Systems Upgrade Program (PSUP)	<p>Several PSUP projects relied on spot measurements as short as 90 minutes to extrapolate a year of data.</p> <ul style="list-style-type: none"> Spot measurements were a program requirement on equipment that used current transducers instead of kW meters to collect the instantaneous power factors and voltages. There were instances throughout the program where a piece of equipment did not have a metering period and spot measurements were used. A day or less of spot measurement data can be insufficient as a basis of extrapolation if the equipment being metered would have seasonal or even daily variations such as a chiller pump. 	<ul style="list-style-type: none"> In the case where measurement data is unavailable, interviews with the participant should be conducted and nameplate data should be recorded to inform the technical reviewer and allow the development of an annual profile with inputs from the spot measurements, in lieu of extrapolation of brief spot measurement data. The implementer should always meter equipment using kW meters. <ul style="list-style-type: none"> ➤ KW meters would save both the implementers and evaluators time in converting amperage reading into power readings and would be more accurate as the power factor and voltage for a piece of equipment will vary with different modes of operation. Applying an average voltage and average power factor to interval amperage data will not have the same reliability as true power measurements. 	Low	<ul style="list-style-type: none"> The amount of project data available varies on a project by project basis and in some cases does require assumption methodology to complete the technical review. Flexibility with application data is important to ensuring a positive customer experience. However, IESO will revisit the technical review protocols with the technical reviewer to determine opportunities for improvements.
12.	Energy Manager (non-incented)	<p>The peak demand savings estimates for non-incented Energy Manager projects are inconsistent or non-existent. Projects are often submitted without peak demand savings estimates. When projects have demand impacts recorded, they are frequently the change in connected load rather than an estimate of demand reduction coincident with the system peak.</p>	<ul style="list-style-type: none"> Make the quality and completeness of peak demand tracking and reporting a performance metric for technical reviewers. Although goals are based on energy savings, peak demand impacts are a key factor in system planning and cost-effectiveness. 	Medium	<ul style="list-style-type: none"> Given that Energy Manager incentives are not based on peak demand, accurately reporting peak demand savings is often an onerous requirement for Energy Managers to adopt. However, the IESO will review current reporting guidelines and requirements to determine how best to improve the quality and completeness of tracking peak demand savings.
13.	Energy Manager (non-incented)	<p>Energy Manager program tracking data for PY2017 was very similar to PY2016. It is somewhat less reliable than the data tracked for the other Industrial programs and showed minimal improvements in PY2017.</p> <ul style="list-style-type: none"> The reported kWh savings values for non-incented Energy Manager projects were generally reasonable. In some cases, EcoMetric interviews with EMs and technical reviewers revealed that the savings claims were deliberately conservative to ensure that estimates were not overstated. Several issues were identified with unique identifiers (iCon ID) for participating organizations. For example, measures were recorded twice under a recent LDC merger or measures were recorded under different 	<ul style="list-style-type: none"> Energy Managers and technical reviewers should include participant cost information as this information is critical for program tracking and evaluation purposes. This information should be entered into tracking databases and supported with invoices and other documentation. Require that all key tracking parameters (in-service date, project cost, kWh, kW, and EUL) are completed for all measures and that zero values actually reflect the absence of participant cost or peak demand savings. 	Medium	<ul style="list-style-type: none"> For non-incented savings projects, it is often onerous for Energy Managers to support cost information with invoices and other documentation. However, the IESO can establish a guideline for non-incented savings to outline mandatory requirements and details required for technical review.

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		<p>iCon ID values because of transposed digits.</p> <ul style="list-style-type: none"> Project costs are inconsistently reported. At times Energy Managers record the total cost of a much larger project within the organization. In other cases, zero project cost is recorded when new equipment was purchased. 			
14.	Energy Manager (non-incented)	<p>The annual energy savings estimates produced by Energy Managers are generally very accurate. There is a tendency for Energy Managers to be overly conservative in their estimates once they have met their contractual obligations.</p>	<ul style="list-style-type: none"> Consider a mechanism to reward Energy Managers for exceeding their required amount of non-incented energy savings. One possibility would be a “carry-over” calculation whereby savings more than the contractually required minimum could be applied to future years in the event of a shortfall. Designing a proper incentive would eliminate the conservative behavior of EMs to target the required minimum savings. 	Medium	<ul style="list-style-type: none"> Enabling energy savings to “carry-over” may result in unintended consequences. However, the pay-for-performance compensation model is available through the Energy Manager program and encourages over-performance relative to target.
15.	Energy Manager (non-incented)	<p>EMs vary considerably on their achievement of annual goals, though further research is needed to understand the factors involved.</p>	<ul style="list-style-type: none"> Consider including further research of EM goal achievement as a targeted study item for the PY2018 process evaluation. In addition to establishing a percentage of EMs that achieve their goals, which may or may not already be determined by the Technical Reviewer, the evaluation team can also look at EM performance by incentive type (salary-based vs. performance-based), the EM’s term, the LDC, the industry, the facility size, or other key factors. 	Medium	<ul style="list-style-type: none"> The IESO will investigate the opportunity for targeted initiatives to improve performance through LDCs and support services for Energy Managers.
16.	Energy Manager (non-incented)	<p>The ability to get buy-in and commitment from the rest of the company is one of the most important determining factors of an EM’s success.</p> <ul style="list-style-type: none"> This is bidirectional: the EM must win the respect and support of others, and the company must be willing to commit to energy-saving projects. The two recommendations below correspond to each piece of this equation. 	<ul style="list-style-type: none"> On a regular basis, offer training sessions on the communication skills that allow EMs to pitch projects, network internally, and convince both facility and corporate staff of the benefits of conservation projects. Continue to highlight the successes of EMs in case studies, presentations, and awards, and consider additional venues or methods to do so. 	Medium	<ul style="list-style-type: none"> The IESO, in collaboration with LDCs, provides regular training, case studies and awards to the Energy Manager community as standard practice.
17.	Energy Manager (non-incented)	<p>The EM Hub was not widely used by the EMs interviewed.</p> <ul style="list-style-type: none"> The EM Hub provides data and a valuable platform to exchange information between EMs and between the program implementer and EMs. Nonetheless the survey responses were clear that it is underutilized by EMs. 	<ul style="list-style-type: none"> Survey all EMs on their use of the EM Hub and use the responses to update its functionalities. 	Medium	<ul style="list-style-type: none"> The IESO will take this under advisement, and will continue to engage and enhance the skills development and training of Energy Managers.

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18.	Energy Manager (non-incented)	The evaluation team observed Energy Managers using LDC meter data in savings calculations that was adjusted for transmission and distribution losses.	<ul style="list-style-type: none"> All project savings calculations should be performed at the meter-level for goal assessment. Impacts are grossed up for T&D losses as part of cost-effectiveness calculations. 	Low	<ul style="list-style-type: none"> The IESO will review this observation and determine what educational effort may be needed to address this recommendation.
19.	Energy Manager (non-incented)	<p>The EM program is seen as an enabling program and drives participation and savings in other Save on Energy/IAP programs.</p> <ul style="list-style-type: none"> Although only non-incented savings accrue directly to the EM program for reporting, EMs are also responsible for a good percentage of savings and projects in other programs, such as PSUP and Retrofit. 	<ul style="list-style-type: none"> Consider ways to reward EMs for overachieving the 10% non-incented target, provided that they submit enough documentation for the technical reviewer to fully review and the savings persist to 2020. 	Low	<ul style="list-style-type: none"> The pay-for-performance compensation model is available through the Energy Manager program and encourages over-performance relative to target.
20.	Energy Manager (non-incented)	EMs and their supervisors are appreciative of the support provided by the program implementer, the LDCs, and IESO in the form of frequent training opportunities and check-ins.	<ul style="list-style-type: none"> Conduct industry-specific training sessions that cover relevant technology measures for that industry. <ul style="list-style-type: none"> ➤ Around 40% of the EMs interviewed thought that some of the trainings are too general. Since the quarterly trainings are designed to be applicable to as many EMs as possible, this could either be done as industry-specific applications within a training or separately. Develop an online schedule listing all relevant training sessions and events. 	Low	<ul style="list-style-type: none"> The IESO currently offers incentives/ free training programs. The IESO will continue to engage industry experts and stakeholders to better understand the training needs.
21.	Program Enabled Savings (PES)	PES savings may accrue above and beyond spillover already captured by the NTG analysis conducted for other programs, but they could also be double counted if not calculated properly.	<ul style="list-style-type: none"> Discontinue the PES initiative. Encourage LDCs and participants to leverage IESO support through existing programs that historically influenced PES claims. 	Medium	<ul style="list-style-type: none"> The IESO will review the PES initiative and the noted observations to determine if any changes are required to continue the initiative.
22.	Program Enabled Savings (PES)	<p>PES savings may accrue above and beyond spillover already captured by the NTG analysis conducted for other programs, but they could also be double counted if not calculated properly.</p> <ul style="list-style-type: none"> Participants in the PES program almost always participate in at least one of the IESO's other conservation programs that, in turn, undertake a net-to-gross analysis. In the NTG surveys for these programs, participants are asked about spillover savings or projects and are credited for completing EE projects beyond those being assessed in the program. As such, this creates a challenge for the PES initiative to ensure that spillover credited to one Save on Energy program is not double-counted through a submitted PES claim. 	<ul style="list-style-type: none"> Investigate the potential for double-counting of spillover savings from PES claims. Consider providing the PES claims to each evaluation team (Retrofit Program, etc.) to reduce the possibility of double-counting spillover savings. 	Medium	<ul style="list-style-type: none"> The IESO will review the PES initiative and the noted observations to determine if any changes are required to continue the initiative.

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23.	Program Enabled Savings (PES)	<p>Intention is not investigated as part of the PES claim review.</p> <ul style="list-style-type: none"> Claims that are submitted to the PES initiative are for EE projects that the organization completed without receiving a financial incentive from a Save on Energy program. Although the PES initiative captures spillover, approved PES claims are rewarded 100% of their gross verified savings without taking into consideration the organization's intent—resulting in the reward for savings with an element of unknown free-ridership. 	<ul style="list-style-type: none"> Investigate the potential for free-ridership in the PES initiative and how to account for participants intention scores in the calculation of net verified savings. 	Medium	<ul style="list-style-type: none"> The IESO will review the PES initiative and the noted observations to determine if any changes are required to continue the initiative.
24.	Program Enabled Savings (PES)	<p>The Evaluation Team was unable to verify demand savings as only energy savings were verified.</p>	<ul style="list-style-type: none"> Require the verification of summer peak demand savings as is done in all other industrial programs. 	Medium	<ul style="list-style-type: none"> The IESO will review the PES initiative and the noted observations to determine if any changes are required to continue the initiative.
25.	Program Enabled Savings (PES)	<p>Tracking and technical review documentation data does not include project cost data.</p> <ul style="list-style-type: none"> Project cost data for PES claims remains unverified, with the only cost data available coming from the participant in the PES claim application. 	<ul style="list-style-type: none"> Engage the technical reviewer to track and verify the participant's project costs associated with their PES claim. Require that documentation supporting the project costs be provided by the participant at the application stage for the claim to be eligible. 	Low	<ul style="list-style-type: none"> The IESO will review the PES initiative and the noted observations to determine if any changes are required to continue the initiative.