

IESO Engagement

From: Jimmy Lu
Sent: April 04, 2018 5:37 PM
To: IESO Engagement
Subject: Achievable Potential Study Draft Scope of Work Feedback

Dear APS Project Team,

Please see below for our feedback regarding the proposed scope of work outlined for the 2019 Achievable Potential Study.

Question three: Are there additional tasks and/or deliverables that should be included?

1. We would like to see geographic disaggregation of data to the level of municipalities, regional municipalities, or areas where there are programmatic similarities. This local data on achievable conservation potential will support municipalities the development and implementation of community energy and emissions plans, an initiative supported by the province.
2. In order to promote and disseminate the findings of the 2019 APS, we recommend that the consultant also provide an accessible summary for policy makers in addition to a final report.

Question four: Should the scope of any of the tasks be modified?

1. We suggest that the scope of work is revised to include more explicit considerations of fuel switching. Modelling for the 2017 Long Term Energy Plan demonstrated that significant electrification of heating and hot water in buildings will be necessary in order to reach our climate goals. This is echoed in the draft project charter for the study, which makes clear that fuel switching measures are within the scope, but this does not seem to be strongly reflected in the proposed scope of work. The current language references considerations for both gas and electricity, however in order to provide a comprehensive scope for a consultant, we believe this needs to be more explicit to ensure success of deliverables.
2. The scope of work already includes consideration of the impact of the Ontario Cap & Trade Program; however, we suggest that the scope also includes considerations of the Canadian Clean Fuel Standard (CFS), as this policy will also have a significant impact on the 2019 APS. Both the Cap and Trade program and the CFS will have impacts on the economic potential for both conservation and fuel switching.
3. We would also like to see more explicit consideration of co-benefits (“non energy benefits”) when evaluating conservation opportunities. Under the 2016 Natural Gas Potential Study, co-benefits are considered under the TRC-plus test as an addition 15% adder, including environmental, economic and social benefits. We encourage a more robust consideration of co-benefits by factoring relevant benefits in as individual items, not an overall combined assessment.
4. We suggest the scope of work should include the acknowledgment that investment in transmission loss prevention is considered energy efficiency. This was outlined in directives from the Ministry of Energy to the OEB and IESO. As such, these investments may be treated like CDM going forward and the consultant will need to take this change into account.

As a point of clarification, we were wondering if the models and tools created for Task 10: Final Reporting will be available for public use.

Thank you for providing the opportunity to offer feedback on the scope of work for the 2019 Achievable Potential Study. Please let me know if you have any questions.

Further, I previously applied to be on the APS advisory group but was not selected. May I request to be considered an observer of the advisory group meetings or continue to receive communications on the APS project? Thank you.

Best,

Jimmy Lu | GHG Quantification Manager | **The Atmospheric Fund**

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