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August 23, 2018

Dear Sir/Madam,

Thank you for the opportunity to provide input on the 2019 Achievable Potential Study. The comments from the CHEC Association are summarized in the table below.

If you have any further questions, please let me know.

Regards,

John Sherin

CHEC President



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2019 APS Project Plan Comment & Suggest Action Table		
Task/Topic	Comment	Suggested Action
General Comments on the Project Plan	Very supportive of an integrated plan	Impact on other fuel sources such as gasoline for transportation may require some focus within the plan if electrification policies for transportation are undertaken. A review of the Project Plan notes “electrification” however may want to expand on the transportation element.
	Use of DSM Potential Estimation and Whole Building Benchmarking is supported and should prove to be very interesting.	
	Project Plan very detailed and outlines the process well.	
Task 1 – Project Plan	Under major considerations there is no mention of the study period.	Suggest indicating the study period (2019 to 2038) with 2017 as the base year.
Task 2 – Base Year Disaggregation	End uses for both Residential and Commercial have no mention of electric vehicle loads. This may be an area of growth and opportunity for technological savings over the study period.	Include electric vehicle load as part of the end use.
	Other Plug Load – Smart devices, computers, modems etc. are forming a larger part of the plug load in homes. Some concern exists that this may not be fully captured if only included under “plug load”	Suggest further disaggregation of smart devices and computer equipment in the residential sector.
Task 3 – Reference Forecasts	It is noted that the forecast(s) will account for impact of exiting future codes and standards, and naturally occurring efficiency changes. Forecast(s) could also address the impact of high levels of electrification	The impact of high electrification is one of the reasons that smart plug loads and electric vehicles are suggested as specific end use in the disaggregation task. These loads will most likely, over the study period be significant areas of



		growth.
	Public Policy over the study period is not mentioned within the context of the forecast. How is this going to be dealt with in the study – for instance if the focus on GHC becomes or remains a central area of public policy this could affect home heating as well as transportation.	The Project Plan should outline how public policy will play a role in the forecasts. If the forecasts received from the IESO and Gas Companies are to have taken public policy into consideration this should be clearly identified. If not then the method to address public policy changes over the study period should be outlined.
Task 4 – Measure Characterization	Note the addition of additional sector-specific measure that could have a meaningful impact. These will be assessed to ensure cost effective.	What is the method to determine cost effective over the study period? A measure that may not be cost effective today could be cost effective at year 10 or 15. Perhaps an expansion on how the cost effectiveness is going to be evaluated would be appropriate.
	The Project Plan will develop a Measures List. The IESO Planning Zones were mentioned early in the Project Plan. It is unclear whether the Measures List will be adjusted based on the Planning Zones. The priority of a measure and its load profile will change with the Planning Zone.	Clarify if the Measures List will vary based on Planning Zone and if not why there would not be some form of evaluation to adjust for the difference in planning zones at the measures level.
Task 5 – Technical Potential	Noted measure stacking, interactive effect and persistence. All of these should be accounted for. With persistence there is “reparticipatoin rate” which anticipates the adopter will replace the measure with the same efficient technology. Is there any evaluation of the adopter replacing with a more efficient technology. Over the study period there could be a better measure for the customer.	Address the opportunity to evaluate new technology replacing an existing efficiency measure over the study period.
Task 6 – Economic Potential	In table 18 it notes “Discuss and determine if incentives should be included in the benefit-cost calculation”.	Perhaps expand on the principles behind the discussion and methods to determine whether incentives should be



	This does not appear very rigorous compared to many of the other steps and decision points.	included.
	Note the model is run for regions.	Are the family of assumptions the same for each region or are there different set of assumptions for the regions? For instance if incentives were to be used, would they vary by region for the study or would they be consistent across all regions?
Task 7 – Achievable Potential	This section speaks to incentives and the different method to determining appropriate levels. In this section it appears that achievable potential will be calculated on a regional basis with varying incentives.	Is it possible that the model will determine varying incentives for different regions – If this is the case the Project Plan should contain some guidance on how to determine different levels and how to manage that across the province. While different incentives may be technically correct it may not be acceptable across the customer base.
	Throughout the Project Plan reference is made to Delphi Panels – I had to look this up to see what this was referring to. Seems like a pretty comprehensive process. It is noted that a Delphi Panel will be used to determine awareness and willingness to pay. Is there potential that both of these criteria would vary by region and should this be addressed in the Project Plan?	Include some discussion of the application of the Delphi Panel and how this will be implemented to address regional issues.
Task 8 – Whole Building Benchmarking	Potentially use schools as the building type.	Support the use of schools as per the Project Plan if there is sufficient data.
Task 9 – Sensitivity Analysis		
Task 10 – Final Report	It is noted that Word, Excel and Power Point documents will be provided. Believe the series of dynamic Excel data tables will be most helpful in understanding the assumptions and	



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