

2019 Achievable Potential Study Project Plan Comment Template

August 17, 2018

The Independent Electricity System Operators (IESO) and the Ontario Energy Board (OEB) (collectively the Project Team) are requesting feedback on the draft Project Plan for the 2019 Achievable Potential Study (APS). The draft Project Plan was prepared by Navigant, who is the project consultant and was selected through a competitive procurement process. Navigant presented the draft Project Plan at the August 9, 2018 Advisory Group meeting and the August 20, 2018 public webinar.

More information about the 2019 APS project objectives and governance can be found on the [2019 APS webpage](#).

The purpose of the Project Plan is to:

1. Align expectations at the start of the project between Navigant, the Project Team, the Advisory Group, the Expert Panel and the broader public regarding the methodology, activities, deliverables, and timelines related to this project.
2. Capture any material changes to Navigant's proposed methodology, activities, deliverables and timelines as the project progresses. Changes to the Project Plan may be required as a result of new information regarding data availability, interim findings of Navigant's exploratory analysis or feedback from the Project Team or stakeholders.

To ensure effective tracking and responses to your input, please use the draft Project Plan comment table included below to summarize your comments and suggested actions.

When responding to the draft Project Plan please consider the following questions:

- Does the methodology presented in the draft Project Plan align with best practices in achievable potential studies?
- Will the approach described in the Project Plan tasks achieve the APS objectives?
- Are there any data sources not mentioned in the Project Plan that you think should be considered?

Please submit your comments to engagement@ieso.ca by Wednesday August 29, 2018. The Project Team will work with Navigant to consider and incorporate comments as appropriate and post responses on the 2019 APS webpage by September 12, 2018.

Thank you for your time.

2019 APS Project Plan Comment & Suggest Action Table		
Task/Topic	Comment	Suggested Action
General Comments on the Project Plan	Fuel Switching – how will fuel switching optimization between gas and electricity be determined for any of the potential scenarios?	Provide clarification in the Project Plan
	Project timeline is unclear – what are the expectations for the completion of each task, and sub-task?	Routine project status report indicating milestones and progress for the Project Team, shared with the AG to help manage expectations.
	Gross vs net savings – which value will be represented by the achievable potential?	Conclusion needs to be clear which value is represented.
Task 1 – Project Plan		
Task 2 – Base Year Disaggregation	Page 7, Table 2 (Market segmentation) - In addition to the Project Team being involved, the NG utilities should be actively involved in determining the appropriate market segments for the study, as the NG utilities have years of experience delivering EC programming in Ontario. Without active involvement of the NG utilities, there is a risk that the study's outputs are not produced in a practical or effective manner.	Actively involve NG utilities in market segmentation activities
	Page 6, S.4.1 – given the pending MAADs decision, there seems little value over-thinking regional gas load and savings potential; especially if differentiation between UG and EGD franchise areas becomes unnecessary.	How much of the FSA requested data is needed to support this from UG/EGD – do we need this level of detail in base year and forecasts, or can a proxy be used to simplify the regional considerations.
	Page 6, S.4.3 – how are “large volume” customers going to be segmented? (i.e. UG rate T2/R100 make up ~ 50% of system throughput from 30+ end users in the Province)	Differentiation for the “large volume” segment is necessary to indicate the magnitude of potential driven by these few customers – recommend the segmentation approximates this magnitude of potential by “large volume” for both industrial and commercial end uses.
Task 3 – Reference Forecasts	Page 11, Figure 4 (Reference Case Development) – Will future natural conservation activities (i.e. future decisions by homeowners or businesses to implement an energy conservation	Provide clarity, either in the report or to the Advisory Group, with respect to how future natural conservation will be accounted for in the Reference Case

	<p>project without the influence of an energy conservation program) be included or excluded from the reference case? For example, if the reference case spans 2018-2038, and in 2030 a homeowner decides to upgrade the insulation in their home and that behaviour was not driven by an energy conservation program, will that reduction in energy use be displayed within the 2030-forward reference case?</p>	
Task 4 – Measure Characterization	<p>Page 13, Section 6.1 (Emerging Technologies) - Will emerging technologies be specifically identified with savings associated to them, or will a portion of future savings be ear-marked for future emerging technologies that are not known yet</p>	<p>Do not include savings that are not known or substantiated at the time of the Study. Savings from these technologies cannot be reasonably predicted, but can be included when they are known in future Studies.</p>
	<p>Page 16, S. 6.3 “Custom Measure Characterization” – No reference provided in draft for “the approach for identifying and characterizing custom measures is detailed in Error!”</p> <p>Unclear how many measure packages are anticipated, and how interactive effects will be accounted between competing measure packages (e.g. steam system performance + operational/behavioural measures)</p>	<p>Please provide the intended reference.</p> <p>Recommend the Advisory Group review and discuss the proposed custom measure characterization as a priority when available, given the magnitude of potential driven from these measures (either as a whole or a sub-group)</p>
	<p>Page 17 (Fuel Switching) – What is meant by the example provided that says an electric storage water heater would not compete with a high-efficiency natural gas storage water heater, for savings potential? In a simple example, wouldn’t a homeowner have 3 options: install a base gas water heater, install a high-efficiency gas water heater, install an electric water heater? Each would have a different gas savings assumption.</p>	<p>Provide clarification to the Advisory Group or NG utilities</p>
Task 5 – Technical	<p>Page 24, Section 7.4.2 (Fuel Switching) – How will fuel switching options be</p>	<p>Provide clarification in the Project Plan</p>

Potential	determined for the technical potential? If the measure with the largest gas savings will be used to determine the total technical potential of the competition group, does that mean the fuel switching option (to electricity, which would have the highest gas savings) always be reflected in the gas technical potential? If not, how will it be determined?	
	Page 24, S.7.4.3 – will this be addressed in Navigant’s analysis for all measures, prescriptive, custom and behavioural?	Recommend the AG review and discuss the stacking, interaction and persistence as a priority when available (either as a whole or a sub-group)
Task 6 – Economic Potential		
Task 7 – Achievable Potential	Pages 32-33, Section 9.2 (Market Share projections) – Will future market share projections include impacts from future natural conservation (i.e. future decisions by homeowners or businesses to implement an energy conservation project without the influence of an energy conservation program). For example, if the market share for Technology A is at 15% in 2018 and the Study assumes it can be at 80% by 2030, will the 80% include influences other than the utilities’ programs?	Provide clarification in the Project Plan
	Page 33, S.9.3.3 “Model Calibration” – how are “2017 actual performance results” going to be used?	
	Page 35, S.9.3.5 “scenario analysis” – a range of scenarios may be more appropriate than 3-specific scenarios. “incentive strategies” to define budget constrained scenarios are unclear – how will these scenarios compare to current program budgets and targets/results?	A range will show the change in profile of potential with additional budgets – perhaps agree on a realistic budget range and incremental steps to calculate potential (the model should be capable of simulating multiple results once built, without too much additional effort).
Task 8 – Whole Building Benchmarking	Page 38, S.10.2 – what specific data is required wrt “DSM program participation”?	

Task 9 – Sensitivity Analysis		