

IESO Engagement

From: Svetlana Helc
Sent: July 19, 2017 4:48 PM
To: IESO Engagement
Subject: Feedback to Conservation Framework Mid-term review

Hello Katherine and team,

Great job in leading us through the webinar on July 6th on the Conservation Framework Mid-term review. As requested, our feedback is below.

If you have any further questions or would like to discuss the proposed feel free to reach out. Thank you.

IESO Question: What technologies and services should be eligible under the definition of CDM in the second half of the framework in order to support the policy objectives of the Government of Ontario? Why?

PND Response: We recommend technology that enables LDC's to perform load shifting from Electric Vehicle Supply Equipment (EVSE), commonly known as chargers, be considered eligible for CDM. As you pointed out in your presentation on July 6, this technology aligns very well with many policy objectives, such as:

- Greenhouse gas reductions,
- Innovation,
- Customer Choice, and
- Integration with Regional Planning

In addition, we believe that this technology is also aligned very well or least moderately with:

- **Peak reduction** - As it enables LDC to control and shift the loads as needed, it also shaves off the peak demand. In addition, there is also potential capability to use the car battery and feed-back the home demand during the peak hours.
- **Energy affordability** - By shifting the load as required, LDC could prolong the need to spend the capital investment for equipment upgrade (ie. transformers), therefore making the energy more affordable. Also this would maximize the use of the existing generating assets, by using most the base-load power, the usage would be spread over more KWh and therefore the unit cost would be lower.

Currently the existing MTO rebate on EVSEs covers 50% up to \$500. Which means that any cost above \$1000 would not be eligible for the rebate. Every smart EVSE, which has a Wi-Fi or cellular connection is above \$1000. Therefore there are no incentives in place for customers to purchase the smart EVSEs. This leaves LDCs without visibility and control of large loads, which can easily be controlled and maneuvered to help the grid. There are new devices that convert "dumb" chargers into "smart" chargers and enable the LDC full access to the EVSE. Also "free night time" power would be a great complement to this proposed CDM incentive.

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