



## Housing Services Corporation

30 Duncan Street, Suite 500 | Toronto, ON Canada | M5V 2C3  
t. 416 594 9325 | tf. 1 866 268 4451 | f. 416 594 9422 | [www.hscorp.ca](http://www.hscorp.ca)

---

September 21, 2017

Independent Electricity System Operator  
Terry Young  
1600 – 120 Adelaide Street West  
Toronto, ON M5H 1T1  
[engagement@ieso.ca](mailto:engagement@ieso.ca)

**RE: Input on 2015-2020 Conservation First Framework Mid-Term Review – Collaboration, Governance and Operations, Planning Integration, and Climate Change**

Dear Mr. Young:

On behalf of the Housing Services Corporation (HSC), I welcome this opportunity to submit input on the Independent Electricity System Operator's (IESO) 2015-2020 Conservation First Framework Mid-Term Review.

HSC is focused on the long-term health of Ontario's social housing asset. Since 2002, we have worked with Ontario's 1,400 social housing providers and 47 Service Managers to manage their building portfolios more effectively. We help protect Ontario's \$40 billion housing asset with hands-on services that help social housing operators improve building efficiency and reduce utility costs; protect them from liability and support effective risk management; and help maximize capital dollars via effective asset and data management.

We submit the following comments in response to the request for input as per the September 7, 2017 webinar of the 2015-2020 Conservation First Framework (CFF) Mid-Term Review (MTR):

**Question 1: Have the expected outcomes of delivery efficiencies and customer convenience been achieved through collaborative efforts undertaken to date? (Collaboration between LDCs and between LDCs and gas utilities)**

- Many social housing providers operate building portfolios across multiple LDC territories. To date, they have experienced multiple touchpoints, inconsistent availability of programs and approval of savings, and varying levels of quality in customer experience across LDC areas. Such issues may be addressed through greater collaboration among LDCs and top-down strategies to increase consistency in program availability, interpretation, and delivery across Ontario.
- In addition to the above barriers, social housing providers have identified significant issues with the SaveOnEnergy application portal. The portal is highly unreliable, repeatedly prompts customers to enter the same information, and is extremely slow in uploading documents. It also kicks out customers who are trying to submit applications, which causes extensive delays as they attempt to submit applications and documents. The IESO should overhaul its portal so that it is reliable, easy to use, and convenient for customers.

- Utility programs are divided according to electricity versus gas components. Instead, gas and electricity utilities could collaborate by offering joint programs to commercial customers, including social housing providers. Such offerings should combine elements of existing Audit and Retrofit programs, and include a recommissioning offering. Provided in a single window format, these programs would increase delivery efficiencies and customer convenience. The social housing sector would make a great test group for a multi-residential pilot.

**Question 2: Are the views of interested stakeholders adequately being reflected in the Conservation First Framework (CFF) and Industrial Accelerator Program (IAP) decision-making?**

- Outside of the IESO's defined engagement initiatives, customer feedback opportunities are generally limited to the LDC-level. Customers rely on their LDCs to carry their feedback forward to the Working Groups, CFIC, and IESO. This process can prevent customers from having their input heard at higher levels and addressed in a quick and accurate manner. HSC encourages the IESO to open up the Working Groups to customer representation to ensure customer feedback channels are available at higher levels of the IESO's governance structure.

**Question 3: How can the opportunities for further integration of CDM solutions in the regional planning process be encouraged from various stakeholders?**

- Bulk system, regional, and distribution planning of electricity and gas should be integrated with provincial and municipal infrastructure and urban planning to ensure a conservation first approach and that utilities are equipped to support provincial climate change initiatives. Electricity and gas system planning should proactively guide provincial and municipal planning, and vice versa, in order to drive the most efficient energy delivery and reduce GHG-intensive demand loads.
- LDC business models are at odds with incremental CDM, and incremental CDM, while technically permitted, is not explicitly encouraged or defined by the IESO. To overcome these barriers, incremental CDM needs to be required, have a clear framework or guideline for program design, consider both demand and energy targets, and offer locally specific solutions (such as adders) in order to optimize savings opportunities.

**Question 4: Should aspects of the CFF and IAP be adjusted in light of Ontario's climate change policy objectives? If so, how?**

- CDM and DSM are tools through which the province can achieve its climate change policy objectives. Since opportunities to reduce emissions associated with electricity consumption are largely demand-based, demand targets should be considered in the CFF.

**Question 5: What are the implications for customers with the introduction of Ontario's climate change action plan?**

- The social housing sector received early climate change program support under the Green Investment Fund (GIF). Many utilities and social housing providers were confused about how incentives would be treated under the GIF funded projects. Their experiences highlighted a need

for clear guidelines from the Ministry of Environment and Climate Change (MOECC) and Ministry of Energy (ENERGY) on the treatment of utility incentives for Climate Change Action Plan (CCAP) projects. These guidelines should be distributed to funding recipients and administrators (Service Managers and housing providers), the IESO, the Ontario Energy Board, LDCs, and gas utilities. Clear guidelines on incentives should be provided for any incoming CCAP programs for social housing or other customer groups to reduce confusion among all parties.

- The GIF program for social housing encourages incentive uptake. However, social housing providers must apply to their Service Managers for CCAP funding and then separately to gas and electricity utilities for incentives, a process that has multiple touchpoints and can overburden housing providers. A streamlined “single window” approach to CCAP, CDM, and DSM programs is needed to optimize incentive uptake, reduce confusion, increased delivery efficiencies, and improve customer convenience.

We would be happy to discuss the above feedback. Please feel free to contact me at [hwong@hscorp.ca](mailto:hwong@hscorp.ca) or Myfanwy Parry, Manager, Energy Services at [mparry@hscorp.ca](mailto:mparry@hscorp.ca) to follow up.

Sincerely,

A handwritten signature in black ink, appearing to read 'Howie Wong', written in a cursive style.

Howie Wong  
CEO