

Energy Efficiency Auction Pilot – Feedback Form

Webinar Date: March 23rd, 2020

<u>Date Submitted:</u> 2020/05/04	<u>Feedback Provided By:</u> Company Name: CLEAResult Contact Name: Ryan Shaw & Tracey Brooks Contact Email: [REDACTED]
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Following the March 23rd public webinar on the **Energy Efficiency Auction Pilot**, the Independent Electricity System Operator (IESO) is seeking feedback from participants on the draft detailed design of the auction pilot including the proposed resource participant agreement terms, Measurement and Verification (M&V) procedures, and timeline.

The referenced presentation can be found on the [Energy Efficiency Auction Pilot engagement webpage](#) under the March 23rd, 2020 entry.

Please provide feedback by April 13, 2020 to engagement@ieso.ca. Please use subject header: *Energy Efficiency Auction Pilot Feedback*. To promote transparency, this feedback will be posted on the [Energy Efficiency Auction Pilot engagement webpage](#) unless otherwise requested by the sender.

Feedback received will be considered in order to refine the detailed design, the M & V procedures and the participation agreement. The IESO will work to consider and incorporate comments as appropriate and post responses on the engagement webpage.

Thank you for your time.

Question	Feedback
Are any requirements or processes unclear?	N/A
Do the proposed dates present any challenges?	N/A
Do any of the Participant Agreement terms present an undue barrier to participation?	N/A
Does the requirement for auction participants to provide audited financial statements present an undue barrier to participation?	N/A

General Comments/Feedback:

We appreciate the effort put forward by the IESO regarding the ongoing consultation & design of the EE Auction Pilot.

In our view, the financial risk profile for implementers not only includes the gross revenue potential, but also the risk level tied to realizing payment, the timing of payment, and potential for provided solution to scale. The design continues to have a relatively high risk profile, due to these factors being unfavorable. We do not believe the most recent design addresses the current financial barriers for implementation &/or execution. The payment terms do not incentivize strong participation from market actors and we remain concerned it will inevitably prevent the pilot from achieving its core objectives.

Due to the nature of the initiative being a pilot, we recommend a redesign of the terms to promote greater participation, a more competitive market place, and the capturing of best practices (learnings for future implementation).