

IESO Engagement

From: Alex Tiessen
Sent: November 15, 2016 1:07 PM
To: IESO Engagement
Subject: EPP for Multi-Site Customers: Comments

Hello,

Posterity Group would like to submit the following comments in response to the draft Energy Performance Program for Multi-Site Customers material presented on November 1, 2016.

Does any language appear inconsistent?

1) The IESO may want to consider aligning terminology in the M&V Procedures with terminology in the IPMVP. For example, in Section 1.1.6, the terms “non-routine adjustments” and “routine adjustments” are not being used, and “non-routine adjustments” are being referred to as “Baseline Adjustments.” Further, the first term in the savings equation could be expressed as “adjusted baseline,” rather than “baseline model output.” Another example is the use of “Pay-for-Performance Period” rather than “Reporting Period.”

Are the M&V Procedures clear and comprehensive?

1) The IESO may want to consider citing industry recognized references where possible in the Procedures. For example, how was the 20% CV (RMSE) threshold established? Similarly, how have the CUSUM and rolling variance thresholds been established?

2) The Procedures may benefit from a clearer definition of ‘the same load profile’ in section 3.3. For example, what guidelines/criteria will the IESO’s technical reviewers use to establish whether buildings have the same load profile?

3) The section in the M&V Procedures that discusses the use of multiple regressions in a model should ideally also indicate that a single multi-variate model developed with ‘day type’ and/or ‘occupied vs. unoccupied’ as independent variables may also be appropriate.

4) The example provided in Appendix C of the M&V Procedures could benefit from a more detailed narrative and description of the steps undertaken. It also may not be the best example to present as part of the Procedures. For example, the ‘weekend’ model has a negative slope, which means the building uses less energy on the weekends as the OAT rises. It is possible that the practicality of this relationship can be explained for this example building, but without a detailed narrative about why this makes sense at the building level, it is perhaps not the best example of a model.

Do you see any barriers to participation?

1) Section 4.7 of the Procedures include wording which indicates occupancy data will not be accepted as an independent variable. This has the potential to unfairly prevent multi-distributor customers such as hotel chains and multi-family building owners from participating in the program in an equitable way.

Other

- 1) Would it be possible for the IESO to: a) share the justification for accepting aggregate models; b) indicate where this is being done in other jurisdictions; and c) indicate what industry reference material provides direction on the prerequisites for aggregate models (e.g., same building type, but not same building size)?
- 2) Would it be possible for the IESO to provide an update regarding how it intends to contract the Technical Review role for the EPP?

Thank you very much for the opportunity to provide feedback.

Sincerely,

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