

November 4, 2016

Independent Electricity System Operator  
Suite 1600, 120 Adelaide Street West  
Toronto, ON M5H 1T1

**Attention: engagement@ieso.ca**

Re: Engagement Webinar: Energy Performance Program for Multi-Site Customers

Thank you for including the education sector in this process and for the opportunity to provide comments on this proposed new program.

The K-12 education sector includes over 5,200 sites across Ontario with floor space in excess of 250,000,000 square feet.

The comments provided on the following pages are based on the experience of the education sector in Ontario and the Incentive Programs Advisor.

The Incentive Programs Advisor (IPA) assists school boards in accessing public funding for energy efficient projects. As part of their Energy Management Initiative, the Ministry of Education created the role of the IPA to reduce the barriers that school boards experienced in leveraging incentives that support the implementation of energy efficient equipment and operational improvements in schools. The IPA services are offered at no cost to all school boards in Ontario.

Since 2009 the IPA has submitted over 900 applications on behalf of school boards for electricity and natural gas projects worth an estimated \$8,000,000.

Thank you again for the opportunity to provide comments.

Sincerely,

Robert Smith

## Energy Performance Program for Multi-Site Customers

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Notes from Engagement Webinar November 1, 2016

Robert Smith, Incentive Programs Advisor

November 4, 2016

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### KEY QUESTIONS FOR ENGAGEMENT PARTICIPANTS:

- Does any language appear inconsistent?
  - We have not seen language that appears inconsistent.
  - Eligible Measures is a defined term in the Participant Agreement and refers the reader to the definition in Schedule B – Eligibility Criteria. However, Schedule B, Section 1.3 Measure Eligibility Criteria only lists measures that are not eligible. Therefore, we recommend adding a clearer definition of eligible measures such as the following;
  - *Eligible Measures include but are not limited to the following,*
    - *Re-commissioning (includes operational improvements and maintenance projects)*
    - *Behavioural Projects*
    - *Equipment Retrofits*
  - Eligible Facilities should be a defined term in the Participant Agreement and Schedule A – please see the Excel spreadsheet submitted with this response that clearly identifies the meaning of single site versus aggregated sites in a single agreement.
  
- Are the M&V Procedures clear and comprehensive?
  - The M&V Procedures could be daunting to facilities managers. Help from the Participant’s consultant, the LDCs, and the IESO will be required to help the customer understand the benefits of this program.
  
- Are the triggers for adjustments to energy baseline models clear?
  - Energy Baseline Adjustments should be reviewed with the IESO’s Technical Reviewer to decide if and how the adjustment will be reported before any work is done or the Participant’s consultants are engaged.
  
- Do you see any barriers to participation?
  - availability of hourly data

- cost for energy modeling and costs associated with energy baseline adjustments (not sure if the \$1,500 incentive will be enough)
- incentive rate of \$0.04/kWh appears low when compared with the Retrofit programs, but encourages and rewards customers to engage in operational and behavioural projects
- Are the stated timelines in the contract reasonable?
  - During the webinar it was confirmed that the Agreement and Participation terms in the Agreement are set at 4 years.
  - There does not appear to be any mention in the agreement regarding the term of participation in the program or actual program start and end dates:
    - for example, an agreement may be approved on August 1 but the actual measurement period may not begin until September 1 and then be in place for a defined period of time
    - in the example above the participation/measurement start date is presumed to be at the beginning of the next measurement cycle – for clarity, participation/measurement for a new agreement using energy baseline data covering September 1 to August 31 will need to start on the following September 1 to line up with the baseline data
    - the participation/measurement period would then begin as of September 1 and the Participant would be expected to participate for a minimum of two years after the participation/measurement period start date, then the remaining term, years 3 and 4, would be optional (as described in the webinar today)
  - Regarding Baseline Adjustment - this needs clarification in the Participant Agreement on length of time for the Participant to advise that a Baseline Adjustment will be submitted, the time required to submit a Baseline Adjustment, and the time required to review and confirm the Baseline Adjustment in the agreement.

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## ADDITIONAL COMMENTS:

- The following features of the proposed program could be of interest to the education sector.
  - integrated program across multiple LDCs
  - centrally administered by the IESO to provide a consistent experience for projects across the province and a single program point of contact
  - the IESO will coordinate with the individual LDCs to allocate energy savings toward their CDM targets
  - program designed to encourage customers to become more engaged in energy conservation
  - aggregation of smaller sites (<1.5 GWh annual usage per site) into one agreement
  - the program allows savings from equipment retrofit, re-commissioning (operational improvements) and behavioural programs
  - coordination with natural gas distributors is highly recommended
  
- The following points could dissuade school boards from participating in the program.
  - energy baseline data analysis and reporting (might appear cumbersome and onerous) – need to find a way to sell this program as an opportunity for future savings rather than a lot of work for the incentive
  - availability of hourly data
    - obtaining hourly data will be a major hurdle for some applicants and could restrict enrollment in the program
    - not all LDCs provide interval data in the same format
    - loss factor may or may not be included in the data
    - although we see the need for revenue-grade metered data, if hourly data from a Participant owned system is not approved for the program then the Participant, or their consultant, will need to request this data from their LDC (could be seen as an additional burden if the Participant feels they already have the data)

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**QUESTIONS:**

- Will the NRCan ENERGY STAR Portfolio Manager be a requirement for enrollment in this program?