

Stakeholder Feedback and IESO Response On Proposed Provincial Energy Manager Strategy

The IESO sought feedback from stakeholders on two proposals within a Provincial Energy Managers Program.

On July 24, 2015, the IESO held a webinar for this stakeholder engagement initiative with over 70 stakeholders joining and participating in the discussion. The objectives of the webinar were:

- inform customers about two proposed programs to continue on the success achieved from deploying energy managers under a province-wide strategy, and
- invite feedback from stakeholders to help identify any opportunities or barriers with respect to the proposed programs.

The IESO appreciates the comments received on the proposed enhancements and offers this paper which summarizes the feedback received and how the IESO considered that feedback to shape the Provincial Energy Manager Program. There are three sections to the aggregated feedback – the feedback on the specific questions posed in the presentations, and the questions/comments on the Sector-Based program and the Multi-Distributor program.

For more information on this stakeholder engagement initiative visit:

<http://www.ieso.ca/Pages/Participate/Stakeholder-Engagement/Provincial-Energy-Manager-Program-Development.aspx> or email stakeholder.engagement@ieso.ca.

Section 1: Responses to Questions in the Presentation:

The following section represents stakeholder feedback received in response to the questions posed by the IESO during the webinar presentations. The effort from stakeholders to provide comments to these questions will help direct the design of the RFP and the overall development of the program. Thank you again for the following comments.

Questions	Stakeholder Comments
Sector-Based Resources: What additional criteria should IESO consider in evaluating proposals for sector based resources?	<ul style="list-style-type: none">• Proven track record in obtaining incentives for custom projects in a Sector.• The suggested minimum savings targets and the proposed scope and content of the sector-based program are reasonable.• The previous Energy Efficiency Service Provider (EESP) RFP had included an emphasis on business culture change or market transformation. This focus should be included as part of the evaluation criteria which would support participation and innovation from sectors where uptake of energy efficiency action to

Questions	Stakeholder Comments
	<p>date has been low. This emphasis would also help to ensure that programs are delivered by sector-based groups with a track-record and capacity to achieve change in the targeted sector.</p> <ul style="list-style-type: none"> • The EESP initiative included a confidentiality and non-disclosure requirements that made it difficult for municipalities or other large entities to participate. • Buy-in of key sector stakeholders as well as energy sector (electricity, water, and gas providers) • Experience/track record of organization in sector-based energy initiatives • Value-added initiatives offered by the proposal to build sector support/excitement • Geographic reach and sector reach (number/proportion of sector organizations) of engagement • Ability to address sector-specific challenges in areas such as energy behaviour, capacity building, and innovation
<p>Sector-Based Resources: How should performance of sector based resources be evaluated and compensated?</p>	<ul style="list-style-type: none"> • A percentage of the realized incentives • With respect to performance evaluation and compensation, both should acknowledge the level of participation from the target sector in addition to the energy savings. • Both qualitative and quantitative evaluation measures are needed. Program review could occur on an annual basis and yearly goals for energy savings would be targeted. Evaluation metrics could include: energy conserved, projects/project stages completed, incentives accessed, scope of outreach/engagement (percentage of sector engaged), capacity building (training/education delivered), client organization satisfaction (feedback/testimonials) and retention rates (repeat projects). • In evaluating proposals for sector based energy managers important criteria in addition to capacity and sector knowledge, would include actual hands-on experience in the sector as well as in depth process knowledge of the sector (i.e. not simply adding VFDs or replacing HVAC systems). Having relevant certification such as individuals with a Certified Energy Manager or equivalent designation would also be important. • In terms of performance evaluation and compensation for sector-based energy managers, the first step would be to clearly define the tasks that the sector based energy managers are intended to carry out. Next, that some of the compensation should be awarded based on demonstrated engagement with the companies and not solely based on final results because despite doing everything reasonably possible, a sector-based energy manager might not be able to

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	<p>convince some companies to participate in the next steps to achieve energy savings. A base level of savings could be required in addition to demonstrated engagement in order to get the base compensation and a bonus could be awarded per MW and/or MWh saved above the base threshold.</p> <ul style="list-style-type: none"> • It will be critical to establish a method of properly tracking the impact of the sector-based energy manager’s work. For example, if an energy manager provides an idea to a company that they hadn’t thought of, but then the company doesn’t engage with the energy manager but nonetheless pursues the project and implements it 12 months later, there should be some form of compensation to the energy manager. Perhaps a participant agreement is required in which participants agree to report any projects that are implemented due to involvement by the energy manager at any stage.
<p>Multi-Distributor Customers: What additional criteria should IESO consider in providing funding for MDC energy managers?</p>	<ul style="list-style-type: none"> • It would be helpful to prepare a graph (\$ Vs kWh saved) for the MDC program. • Program funding could correspond with Energy Manager time (i.e. payment would be determined by Energy Manager FTEs administered via the resource and associated expenses for travel, accommodation, etc.). Ideally funding would be in the range of \$150,000 per Energy Manager FTE administered. Energy Manager salaries would be fixed (not tied to energy savings).

Section 2: Additional Questions/Feedback on the Sector-Based Program:

The following sections (2 & 3) identify general feedback and/or questions received from stakeholders and the IESO's response.

Stakeholder Feedback	IESO Response
<p>Regarding the minimum consumption of 75GWh; Is there any flexibility on that volume? A lower minimum may enable more potential participation in the program, especially in rural communities or seasonal businesses.</p>	<p>The IESO has selected this threshold as a reasonable one at which the selected organization has a strong likelihood of achieving the savings target, which on a consumption of 75GWh equates to about a 3% annual reduction in energy use.</p> <p>Should participation in the program not reach the levels expected the IESO may reconsider this threshold.</p>
<p>What is the plan to work with companies that could fall into both groups: Sector-Based (Retail) and Multi-Distributor?</p>	<p>Companies cannot access multiple programs for the same activity. So provided that the same measures or activities were not incented twice, customers could participate in any of the streams.</p>
<p>How many energy managers are currently planned in each of the 4 categories of energy managers:</p> <ul style="list-style-type: none"> • LDC Energy Managers • IAP Energy Managers • Sector-Based Energy Managers • Multi-Distributor Customer Energy Managers 	<p>There is some flexibility in our projections. The numbers will be based on the applications received, and the RFP responses, our current projection is below:</p> <ul style="list-style-type: none"> • IAP Energy Managers: 20 • Sector-Based Energy Managers: 6 • Multi-Distributor Customer Energy Managers: 10 <p>LDCs have the ability to hire their own resources under their Conservation First Framework and therefore, the projections are not known at this time.</p>
<p>How many of those Energy Managers are currently already deployed, by category?</p>	<p>There are no deployed resources under the new Conservation First Framework streams or the IAP program.</p>
<p>For the LDC Energy Managers, typically, how long does an LDC Energy Manager stay embedded in a particular facility?</p>	<p>The program under the previous framework was in place for three years and several energy managers are in their third year. The intent is for this role to become an ongoing part of the company's business model not to create short term resources. Please consult your LDC for the specific rules around their Energy Manager program.</p>
<p>For the LDC Energy Managers, what type and size of customers do LDC Energy Managers get embedded in?</p>	<p>The Program Rules for the Embedded Energy Manager program are available on the IESO website. In general, larger customers are more likely</p>

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<ul style="list-style-type: none"> For type: Small business? Larger commercial and institutional? Industrial? For size: What size range in terms of total MWh consumed per year, or peak demand, or any other readily available metric? 	to have the capability to employ a full time energy manager. Both commercial/institutional and industrial customers have had successful energy managers. Please consult your LDC for the specific rules around their Energy Manager program.
Could you provide an example or two of a suitable host organization? Would a consulting firm qualify as a suitable host organization, as long as they can meet other requirements of the program?	The intent is for the sector resource to have deep sector knowledge and contacts that allow it to act as a central resource to the sector on energy related matters. Any respondent who meets the requirements of the program is eligible to apply.
By grouping by sector, does that mean that one could pool multiple power users across different LDCs with different rate structures?	The sector-based approach could group consumers within the same sector across many LDCs, if applicable, and depends on the creative responses by the RFP applicants.
If the proposed plan would be to include a number of different power users, do they all need to be identified and signed on board to the proposal, or can those details be left until funding approval?	The detailed requirements of the proposal will be set out in the RFP to be issued in future. It is anticipated that the general target sector and key participants will be outlined in the proposal even if all key participants are not enrolled. Greater demonstrated support from the sector will strengthen the proposal.
Are you looking for conceptual proposals that could apply to a sector, or specific conservation / EEMs that you believe you can complete within a sector?	The RFP should elicit responses and approaches that are well-defined and can be implemented upon approval.
Who are the intended target participants of this program? If the industrial sector is included, are there minimum and maximum sizes (based on electrical load) of industrial facilities that are eligible to take part? Are companies that have embedded energy managers under saveONenergy eligible?	<p>The program criterion identifies the eligibility of participants. Successful proponents will be based on applications/responses received and evaluated.</p> <p>Distribution connected industrial facilities who can agree to the performance targets are eligible to apply if they meet the criteria for a sector based approach. Companies cannot access multiple programs for the same activity. Please work with your LDC to see which program can work for you.</p>
Please confirm that a sector-based energy manager can help companies with all of the downstream work (e.g. studies & implementation) after identifying projects.	This depends on the proposal or the scope of work for that sector, but there is not a requirement that would preclude those kinds of activities.
Could you clarify the “minimum 3,000 MWh savings target each year per Sector-Based resource” from the presentation?	One of the criteria for the Sector-Based Program is that proposals, coming forward through the competitive process, contain a minimum of 3,000

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	<p>MWh/year of measureable electricity savings target. The measures used to meet that target are not prescriptive, but each proposal must include that minimum target to be reached within the defined sector.</p>
<p>Compensation should take into account that timeframes for implementation are likely to be more than a year. In recognition of this, the first year compensation should not be based mainly on actual savings achieved but rather on engagement.</p>	<p>Understanding that energy managers need time to build up their plans, assessments, and incentive applications, the contracts are anticipated to be for multiple years and may be renewable.</p>
<p>In my experience I think that your current and proposed programs will struggle to be truly effective for the following reason.</p> <p>Energy conservation doesn't come from projects or incentive programs alone. It comes from senior management's commitment to engage in conservation with all departments. Most organizations that I've seen have separate departments and budgets for capital projects, maintenance, and conservation. And each department works to fulfill their intended purpose. However, unless senior management makes it a priority for all departments to collaborate on energy conservation, the end result is a mix of good and bad results.</p> <p>By engaging senior management you will see far more productive and collaborative projects, and results.</p>	<p>The IESO agrees that engaging organizations broadly, and senior management, in particular, is an important step in building a culture of strategic energy management. That is one of the key tasks of an energy manager and one of the reasons why the program supports human resources rather than simply promoting the development of capital projects. The exact steps to engage companies are not prescriptive, but the IESO requires an energy management plan, and regular updates, along with demonstrated achievement of savings which may come from capital projects or operational interventions. Energy Managers participating in the initiatives will also have access to capability building initiatives to help them succeed in their roles.</p> <p>We agree that greater success can be achieved in conservation and energy management when many divisions of a company are bought into the goals of a strategic approach to energy management.</p>
<p>According to the Minister of Energy's Directive – "the OPA shall procure and coordinate the cost-effective services of energy managers to ensure sufficient availability to target small business, commercial and institutional customers across the province." To really address/support small businesses, consider having a load requirement on individual customers too and not just aggregated load. A customer can have a few mid-size to large customers and meet the aggregated load requirement of 15 MW. LDCs consider customers</p>	<p>Small business customers can be aggregated, and grouped to form a sector. There are also a number of different programs targeting different segments, including small businesses.</p>

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as small businesses if they have 300 kW demand or lower.	
The program as proposed seems like it is providing incentives to companies that can afford hiring an energy manager to manage all its facilities in different locations rather than incenting those small businesses that really cannot afford and will not have any initiative to do any energy efficiency projects.	The IESO believes that this approach to having greater technical resources complements the work of the LDCs and the saveONenergy programs in reaching a broad base of customers – both large and small, and having open access to these programs for all customers. There are also programs targeting small businesses specifically.
Coordination with LDCs CDM staff/activities/programs – how will IESO ensure alignment between the MDC energy managers’ activities, the Sector based EMs and the LDCs activities/staff/programs? LDCs main concern is the customer experience – there is a risk to having negative customer experience if multiple individuals are reaching out to them for the same purpose. How can this be avoided? LDCs also would like to complement their staffing with the provincial energy managers program rather than duplicating efforts.	<p>The IESO will have communication protocol agreements with all contracted resources to ensure effective communication with LDCs as they conduct their business.</p> <p>Close coordination and sharing of energy management plans, regular reports and incentive applications will assist to maintain effective communication between the LDCs and the various streams of energy managers.</p>
Tracking and reporting and allocation of energy savings - Will LDCs get credit on energy savings? How will the savings be tracked/reported to LDCs?	LDCs will get credit for energy savings activities undertaken in their territory. The IESO will work with the LDCs for appropriate tracking and reporting.
Is the cost of the provincial energy manager program covered by the IESO under central services? Will there be an allocation to the LDC’s?	The cost of the programs outlined here will be covered under central services. LDCs will get credit for energy savings activities undertaken in their territory.
Is IESO planning to set boundaries for how they market the programs/incentives and will they be subject to an approval process by the IESO and/or LDC to ensure consistent messaging?	<p>The IESO will have communication protocol agreements with all contracted resources to ensure effective communication with LDCs as they conduct their business.</p> <p>As part of the contract with sector based resources there will be a commitment to follow IESO branding guidelines and submit marketing materials for approval.</p>
Please consider getting LDCs to review and provide feedback on the RFP before releasing it. Can an LDC respond to the RFP? Can an LDC (who has in-house capability) act as a Sector Based	The IESO has and will continue to consult with the LDC community in the development of this program.

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Resource and get funding from the IESO out of its ECA budget?	LDCs are not eligible to apply to act as a Sector Based Resource, but could work with the Collaboration Fund to develop and fund those opportunities.
How was the 3000 MWh target established? Is this net or gross savings? Can they come from incented and non-incented savings? Are there any rules as to how much should come from incented versus non-incented?	<p>The 3000 MWh target is based on gross energy savings from projects completed in the year. The rationale was based on budget and cost effectiveness considerations.</p> <p>There is not a requirement for non-incented savings from the Sector Based Resource, though there isn't anything precluding a Sector Based Resource from including an operational and behavioural savings approach in their proposal response. Deeper penetration and greater influence in the sector will be valuable and could influence acceptance of the proposal.</p>
Minimum 3 year contract – what is the rationale? LDC energy managers are on an annual renewal, the proposed MDC are for 2 year contract and the sector based for 3 years. Please consider aligning the contracts with the mid-term review (2017). Targets and Budget might change depending on the mid-term review. Priorities and strategies might change which may mean less need for energy managers.	It was identified from the previous energy manager programs that energy managers are generally not fully effective until the second year of their contract. The Sector-Based Resources do not have ownership of the facilities and are acting on an influence basis. Based on their proposal response, they may have other activities that require a longer term for completion. Thus it was felt that a three year term would give them the best chance of maximizing their results.
<p>EESP results/lessons learned and how it affects the design of Sector-based EMs:</p> <ul style="list-style-type: none"> • How much \$ was spent on each EESP? How is this related to the proposed incentive? • How many applications and GWh were attributed to each EESP? How is this related to the proposed targets? • What activities each EESP undertake? How is this related to the proposed EM activities? 	<p>The EESP initiative was a pilot and as such, it provided a valuable opportunity to learn about design and implementation approaches. The proposed sector based program is different and distinct to the pilot, and the primary goal is to address gaps in the current availability of Energy Managers to customers.</p> <p>Observations from the pilot have been integrated into the design of the proposed program where possible.</p>
<ul style="list-style-type: none"> • How can the IESO demonstrate that the EESPs were successful? Can the IESO prove the increase in applications are directly related to 	The EESP initiative was a pilot and as such, it provided a valuable opportunity to learn about design and implementation approaches.

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<p>the EESPs and not the effort by the LDC's or their channel partners?</p> <ul style="list-style-type: none"> • What will be different with the sector-based energy managers vs the EESPs to ensure success? 	<p>Lessons regarding design and execution have been learned from the EESP initiative, and have been applied to the Sector-Based Resource design. The inclusion of savings targets, requirement of value-added services and a communication protocol for LDCs, IESO and Sector-Based Resources should all assist in their success.</p>
<ul style="list-style-type: none"> • Why would IESO make this program fixed fee rather than pay for performance? • Would it be prudent to enter a 3 year fixed fee contract and not be guaranteed minimum savings results? 	<p>The Sector-Based Resources will be evaluated for cost effectiveness in the same manner as the other Energy Manager streams. It was recognized that some not for profit organizations cannot participate in performance-based contracts, so elements of a performance-based contract will be integrated into the procurement and evaluation of proposals. Sector based resources will have savings targets.</p>
<p>Is an aggregator/energy service provider eligible to participate in these programs?</p>	<p>Yes.</p>
<p>Cost-effectiveness for low-income customers may be lower than for other markets. Will the IESO use different measurement criteria in evaluating proposals and program success related to cost-effectiveness for sectors such as social housing that, while there may be capacity challenges, also have extremely high electricity savings potential especially when paired with a Sector-Based Energy Manager?</p> <p>Through our work, we have identified significant electricity savings opportunity in the social housing sector in both multi-residential and residential buildings and see great value for IESO in tapping that opportunity. We request that IESO include consideration in the evaluation of proposals from sectors that may have lower levels of cost-effectiveness but also have high savings potential and a strong sector organization to help achieve those savings. We ask the IESO to clearly outline how it will address cost-effectiveness in the competitiveness process, in the evaluation of the resource while in program, and with individual LDCs during in-market program periods.</p>	<p>Any Sector-Based Resource proposals will be evaluated on the merits of the individual proposal, and on what is acceptable for the IESO from a budget and cost effectiveness perspective, to be laid out in the details of the RFP. The IESO recognizes that programs addressing the low income sector may have difficulty achieving the same cost effectiveness thresholds of other sectors and that are valuable components of a portfolio strategy.</p>

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<p>Where a sector organization has not yet made a connection with certain LDCs, will IESO be developing any initiatives to foster these connections? This may include contact lists, networking meetings, or other simple tools for a sector organization to establish a relationship.</p>	<p>Details of how connections with LDCs will be fostered have not been developed at this time. It is intended that a communication protocol will be developed that will facilitate communication between LDCs and provincial energy manager resources as this is an important component of program success.</p>
<p>What is the timing of the RFP release and the expected deadline to reply?</p>	<p>The RFP is currently planned to be released in the early Fall, and more details will be communicated as they are available.</p>

Section 3: Additional Questions/Feedback on the Multi-Distributors Customer Program

Stakeholder Feedback	IESO Response
Is there potential funding for travel, recognizing that single-LDC EMs receive the same level of funding without the expectation for travel between sites around the province? This could encourage travel to find energy opportunities.	There is no incremental funding for travel. For the MDC proposal, those potential costs are between the employee and the company. If travel is a part of the Sector-Based proposal, those costs would be considered in the RFP evaluation.
For custom (i.e. refrigeration) Multi-Distributor projects, who will approve on the behalf of multiple LDCs?	Approval will be done by the host LDC for the applicable saveONenergy program under the same structure as the current head office model.
Can you please confirm if the “\$150K funding cap” (slide #10) is an annual limit, or otherwise.	Confirmed. Based on the payment of \$40/MWh, the payment for one of these resources to the company cannot exceed \$150,000 per year.
Does the energy manager have to be a full time employee, or can they be a part time employee? Does the organization need to hire an employee or can this be a consultant?	The IESO expects that the added Energy Manager will be an incremental full-time resource to the company.
Will the energy efficiency measures identified still be eligible for other funding programs like saveONenergy?	Correct. Energy Managers can continue to apply for incentives on behalf of their company through the relevant saveONenergy program.
<p>Questions on eligibility requirements:</p> <ul style="list-style-type: none"> • How were 15 MW and 75 GWh eligibility requirements established? Why does it say 15 MW and/or 75 GWh? Please clarify what is the exact requirement. • What is the rationale for having the MDCs located in 5 or more LDC territories? Consider reducing that requirement to just 2 LDC territories. Some businesses might only have locations in GTA which might not include 5 or more service territories. 	<p>The size thresholds were established in order to ensure there would be sufficient opportunity for the energy manager to achieve their annual savings target. Either the load or consumption amounts can be used to demonstrate eligibility.</p> <p>The threshold of 5 territories was determined as the threshold where it would be challenging from an administrative perspective to co-ordinate the business relationships between LDCs.</p>
<p>Questions on criteria:</p> <ul style="list-style-type: none"> • Is the 2000 MWh target net or gross energy savings? What is the rationale for establishing this target size? • If 90% of the savings can come from incented projects (such as participation in province-wide programs), how will IESO ensure that the kWh savings are not being incented for twice? (one – through incentives via province-wide program and two – payment to the energy 	<p>The 2000 MWh target represents gross energy savings. The rationale was based on budget and cost effectiveness considerations.</p> <p>Through reporting, the IESO will know what percentage of the savings are attributed to incented projects, and what are unincented.</p> <p>The incented savings could be from any program available in the customer’s territory. The Energy</p>

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<p>manager)</p> <ul style="list-style-type: none"> • Would the incented savings be limited to just province-wide programs or with local programs too? <p>Currently, all existing programs are based on equipment replacement. None of the existing programs provide incentives based on operational and behavioral savings. Would operational and behavioral savings be considered as non-incented savings?</p>	<p>Manager incentive is considered incremental to the program level incentive.</p> <p>Operational and behaviour savings would be considered as non-incented savings.</p>
<p>How was the incentive of \$40/MWh established? Were the available incentives through other programs and the CEM salaries considered when developing this? Will this create competition on LDCs energy managers and employees?</p>	<p>The MDC incentive was determined based on historical budget and cost effectiveness considerations. There should not be any competition with LDC energy managers as the customer can choose to apply directly to the LDC if they wish to employ a local energy manager. Any savings from projects identified by the energy manager will be credited to the appropriate LDC and the energy manager may make use of saveONenergy programs and incentives to complete their projects.</p>
<p>The reference to the achievable potential is quite misleading...as the APS didn't call out ownership structures for commercial facilities. We learned that the IESO has paid for and developed the Business Customers List (which is supposed to show all commercial facilities with more than 10 employees and ownership structure)...we think that the IESO should provide an analysis of the MDC potential for Ontario...what sectors, what regions, past program participation etc.</p>	<p>With clear eligibility and program targets, the individual companies are in the best position to know if they can apply and meet the objectives of the Multi-Distributor Customer energy manager program.</p> <p>The business customer list has been correlated with past program participation so that LDCs can use this information to target their customers.</p>
<p>The challenge of providing the needed breadth of expertise in one person has been previously identified with other provincial programs in Canada, and although the funding would help motivate end-users to reduce, our experiences suggest it will be extremely difficult to find the qualified people to deliver on the objectives. Might the IESO consider optional ways to leverage the use of well qualified people/organizations across multiple MDC end-users?</p>	<p>There are a range of opportunities to address this potential gap, which include collaboration through a social networking platform, where energy managers can connect and share experiences. There will also be training opportunities available.</p>

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Client experience in implementing Energy Management programs at the large-end-user level include challenges with socializing and communicating targets, objectives and results internally in these large organizations. What resources would the IESO consider providing/partnering with regarding “support” in important areas?	The first step is applying and committing to meeting the targets set out in the contract. Through an Energy Management Plan, energy managers can outline their goals and tactics to communicate internally and gain approval for their plans. The proposed social networking platform is also a great resource to share those challenges and opportunities.
Will there be a required “formal assessment” of some kind, in order to qualify an end user (beyond the stated volume thresholds)?	There are no other assessments or restrictions in place. Through the contract, the targets are set out and agreed upon, and the energy manager can put in the effort needed to reach those goals.
How would the IESO consider integrating this MDC program with other existing EEM programs in the end-users’ world?	The proposed program is incremental to the programs and incentives available through the LDCs, and is designed to fill any possible gaps for customers in accessing these resources.
For the multi-distributor EEM, is the agreement with the IESO specifically or does it require a participant agreement to be cosigned by all LDCs?	The agreement is with the IESO, and the IESO will take the lead on co-ordination with the LDCs. As noted, if the MDC energy manager is participating in programs that feature an incentive from the LDC, the LDC will receive that information directly from the program application process.
Confirming that the dedicated EEM resource under the Multi-distributor program is retained by the end-use customer in the same manner as the EEM program has been to-date?	The Energy Manager is to be a full-time incremental resource to the company, similar to the past program.
Are communications directly between the EEM and the IESO which are then filtered to the LDCs (for purposes of granting “credit” for savings) and EEM liaison with LDCs only for purposes of applications? Just trying to differentiate between the LDC-delivered EEM and the multi-distributor EEM (unless the current program restricts or limits use of EEMs across multiple service territories)	The MDC Energy Manager will have a duty to provide reports to the IESO on a regular basis. The IESO will share the relevant sections of those reports with appropriate LDC – for tracking purposes. The LDC-delivered Energy Manager will have a duty to provide reports to the LDC on a regular basis. Please consult your LDC for the particulars around the LDC Energy Manager initiative.