



Andrew Pride Consulting
5324 Cachet Crescent
Burlington, ON L7L 7N5
www.andrewprideconsulting.com

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

Attention: engagement@ieso.ca

RE: COMMENTS ON IESO PROVINCE-WIDE WHOLE HOME PROGRAM DESIGN

Thank you for the opportunity to provide comments on the above mentioned program.

The comments provided herein are based on over 25 years' experience in the energy conservation sector including over 10 years of energy performance contracting; over 4 years as Vice President of Conservation at the Ontario Power Authority; and the past 18 months of strategic consulting services to industry service providers and some of Ontario's electric and gas distributors.

To commence my comments, I would like to congratulate the IESO and the Province for continuing the vision of a Customer-Focused approach to conservation. The results to-date have been exceptional and incredibly inexpensive at a cost of around 3¢/kWh of net verified energy savings. Having a province-wide residential program that accommodates all forms of energy from a single source (i.e. gas and electric) is an important evolution for conservation in Ontario. Attempting to separate the two energy sources can cause confusion for customers.

The attached provides answers to your questions on the program design. In summary, the Whole Home Program is heading in the right direction; incentives should be harmonized with the gas companies – offering one source for incentives; consideration should be given to having assessors directly participate in the savings initiatives; and innovation should be encouraged through a pay-for-performance mechanism.

Thank you again for providing this opportunity for stakeholders to provide our comments. I am available to discuss my comments further if desired by phone 905-616-9448 or email andrew@andrewprideconsulting.com.

Sincerely,

ANDREW PRIDE CONSULTING

A handwritten signature in blue ink, appearing to read 'AP'.

Andrew Pride, P.Eng.

Detailed Comments

1. Customers should see a seamless integration of the electric, gas, and government incentives.
 - a. It would appear that Enbridge Gas Distribution and Union Gas will be the delivery agents for the program. If the goal is to create a single program for all customers in Ontario, the two gas incentives should be harmonized to eliminate yet another variance between homes.
 - b. It may be desirable for customers if the program integrator (assumed to be the gas companies) offered the Save on Energy rebates (most notable HVAC and some local rebates) in the same payment as the gas rebates. Having multiple cheques from various fulfillment centres seems to veer away from the stated program objectives of simplifying a one-stop-shop process for customers.
 - c. A clear Save on Energy message should be developed to integrate the program offer as a comprehensive solution for customers.
2. Drive an early benefit by having the assessors directly participate in achieving savings for the customers.
 - a. LED lighting is very cost-effective. There may be merit in having the assessors install LEDs as part of the initial visit as an incentive for the homeowner to participate and it would drive quick savings from the program. Execution would need to be developed (e.g. who supplies the lamps) however this should not be too challenging.
 - b. Smart WiFi thermostats drive a significant savings for customers if installed a programmed correctly. A design consideration would be to train the assessors to re-program the thermostat with the homeowner as part of the post-assessment
3. Encourage innovative solutions on a pay-for-performance basis.
 - a. Innovative residential solutions are becoming widely available, such as Smart WiFi enabled home devices. Consideration should be given to a rebate for “actual savings” achieved by the homeowner for the installation of innovation technologies such as WiFi switches and appliances. This could introduce a Pay-for-Performance element to the program that could be administered by the LDCs.