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August 8, 2016

Sent via email to: engagement@ieso.ca

To whom it may concern:

Re: Comments Regarding the Whole Home Program

Toronto Hydro Electric System Limited (THESL) welcomes the opportunity to provide comments on the proposed Whole Home Program (WHP). The LDC community has been requesting a WHP for some time and a number of LDCs have currently submitted program and/or pilot applications. THESL fully supports the development and deployment of this type of residential program as it represent a gap in the program offerings.

Please find our comments below about the proposed design of this program. We believe the WHP has the capability to deliver both electricity consumption savings as well as a positive customer experience provided a number of issues are taken into consideration during the development and pre-launch period.

While the program focuses on single homes, approximately 50% of Torontonians live in multi-unit dwellings and therefore would be excluded from taking advantage of the proposed WHB in its current form. In order to optimize customer participation, the program must be adapted to allow participation from customers living in multi-unit dwellings.

As the Gas Distribution Companies (GDC) are the primary delivery agents for WHP, our concern is that LDCs will be losing visibility and contact with customers. To avoid this issue we propose that the on-bill credit is customized at minimum to include the LDC name. All advertising and point of contact materials must be based on co-operative advertising to ensure electricity messaging and specific LDC messaging is included. Our customer satisfaction scores are very closely tied to visibility in the market. Customers look to their LDCs to provide trusted information on electricity conservation and better ways to manage their bills. Positive conservation messaging results in decreased call center volumes; better acceptance of rate increases and legislative changes; as well as overall reductions in electricity consumption.

The current structure of the proposed program includes mandatory pre and post audits. Audits are costly and may be unnecessary for electric measures in gas-heated homes. For these dwellings, the audits for electricity measures should be provided digitally (web based) which will be more cost effective and result in expedited timelines. In the case where an in-home audit is necessary, auditors should be equipped to install simple measures for electricity similar to the current HAP program structure or provide a DIY kit for installation by homeowner. Many customers may prefer a DIY audit option and the ability to install measures without a contractor. Not only will this increase participation but also reduce overall costs associated with audits and contractor installations. It should be noted that Toronto has a very diverse

multi-cultural population and research has shown that there is mistrust of government type audits with a belief that information will be used for other purposes such as increased taxes.

Currently the Whole Home Programs offered by Enbridge and Union Gas have different structures and are not aligned. LDCs who deliver programs that cover both Union and Enbridge territories will incur greater costs for marketing materials and will not benefit from economies of scale in development of collateral materials. There is also a risk of increased market confusion as customers may be unclear as to which program they are eligible for. To address this issue we strongly recommend an alignment of the GDC program offers. It will also be necessary for the GDCs to provide LDCs with detailed information about uptake including customer names, addresses, dates, measures etc. to avoid duplication of outbound marketing. However, for this to be effective the legal intricacies of sharing data between LDCs and GDCs should be worked out on a provincial basis. Finally, a clear policy around QA/QC needs to be established for audit and reporting purposes including SLAs as appropriate.

As many of the measures contemplated for Whole Home are currently being built into the new province wide Coupon/HVAC programs, offering the same measures will cannibalize our provincial programs and negatively impact perceived value to our customers. Careful consideration should be made to ensure that provincial programs are kept intact. Whole Home should be developed as an umbrella program and Coupon/HVAC should flow from it (as opposed to be viewed as distinct programs). Many customers may want to install a single measure and receive an incentive, as they may not have the means nor the need for the full WHP.

Customers with electrically heated homes are not GDC customers and therefore GDCs will not have access to their information. These customers typically have the highest consumption, are most impacted by high bills, and will benefit from education and conservation measures. In order to effectively communicate and engage these customers promotion to this segment should be the responsibility of LDCs.

As the WHP is a pilot, funding is provided by the IESO. Should the WHP evolve to become a full program, we assume that it will be funded through the current LDC framework. The current program does not clearly indicate how costs will be split between LDCs and GDCs. Should an LDC wish to be removed from the program, an opt-out option should be considered.

We look forward to further consultation and discussion to ensure the success of this pilot and ultimately the launch of a new Whole Home Program.

Best Regards,

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Manager, Customer Care

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