

Province-Wide Whole Home Pilot Program Design: IESO response to input received

The Minister of Energy issued a [direction](#) to the IESO on June 10, 2016 to centrally design, fund, and deliver a new province-wide whole home pilot program for residential customers with implementation commencing by the end of Fall 2016. On July 26, 2016, the IESO held a webinar to seek feedback on an engagement plan and draft design for the province-wide whole home pilot program. The IESO appreciates the input received during the webinar, as well as written feedback submitted to engagement@ieso.ca. This document summarizes the questions and comments provide by webinar attendees and written feedback submitted, and presents the IESO's response.

There are seven sections to the aggregated feedback, representing over 120 questions and comments received, which have been grouped into the following topics:

- I. [Eligibility and Measures](#)
- II. [Incentives](#)
- III. [Role of LDCs](#)
- IV. [Program Delivery](#)
- V. [Savings Allocation](#)
- VI. [Program Business Case](#)
- VII. [Other](#)

Related materials, including the proposed program design, are available on the IESO website at <http://www.ieso.ca/Pages/Participate/Stakeholder-Engagement/Province-Wide-Whole-Home-Pilot-Program.aspx>

A list of the parties who have provided feedback, along with their questions and comments, can be found on the aforementioned webpage.

I. Eligibility

Stakeholder Feedback	IESO Response
<p>1. If a residence has already taken part in another program (i.e. Home Assistance Program), are they eligible for this pilot?</p>	<p>Yes, the consumer would be eligible to participate if they meet the eligibility requirements for the pilot. Participation in previous programs does not disqualify a resident from participating in the pilot.</p> <p>The eligibility of the pilot will be based on the eligibility of the Enbridge Gas Distribution Home Energy Conservation Program (http://knowyourenergyscore.ca/home-energy-conservation/); and the Union Gas Home Reno Rebate Program (https://www.uniongas.com/homerenobate)</p> <p>These programs are offered to single family homeowners; participants are required to install two or more of the building envelope and HVAC measures to be eligible for rebates.</p> <p>As part of the pilot, eligibility will be expanded to include electrically heated homes.</p>
<p>2. Can customers with houses not heated by gas or electricity participate in the program to access non-heating electricity savings measures?</p>	<p>Customers that heat their homes with fuels including natural gas, oil, propane, and wood, will have access to the pilot in coordination with the Ontario Government’s Green Investment Fund which is funding Enbridge Gas Distribution and Union Gas Limited to expand the availability of their existing programs to more homes and to homes heated with other fuel sources.</p> <p>As such, the consumer would be eligible to participate if they meet the eligibility requirements for the pilot.</p> <p>The eligibility of the pilot will be based on the eligibility of the Enbridge Gas Distribution Home Energy Conservation Program (http://knowyourenergyscore.ca/home-energy-conservation/); and the Union Gas Home Reno Rebate Program (https://www.uniongas.com/homerenobate)</p>

		These programs are offered to single family homeowners; participants are required to install two or more of the building envelope and HVAC measures to be eligible for rebates
3.	Are only single detached homes eligible for this program?	Eligibility requirements for the pilot would be based on the Enbridge Gas Distribution and Union Gas Limited program eligibility rules, under which town houses and row houses are also eligible.
4.	Does the IESO plan on expanding the program to multi-unit residential buildings?	The energy assessment provided through this program is not available for multi-unit residential building types. Residents of multi-unit residential buildings can take advantage of other conservation program offerings available through Save On Energy.
5.	Specifically which existing gas conservation programs for both Enbridge and Union Gas will determine eligibility for the Whole Home Pilot?	Eligibility for this program will be based on the following existing programs, expanded to include electrically heated homes: 1) Enbridge Gas Distribution Home Energy Conservation Program http://knowyourenergyscore.ca/home-energy-conservation/ 2) Union Gas Home Reno Rebate Program https://www.uniongas.com/homerenob
6.	Have the following measures been considered, or will they be considered for eligible incentives? <ul style="list-style-type: none"> ○ Ground source heat pumps ○ Renewable energy ○ Net metering ○ Energy storage (to reduce peak load) ○ Solar thermal solutions (to reduce gas space and/or domestic water heating) ○ Electric hot water ○ Upgrades to existing 	Measures and related incentives proposed for the pilot were based on the following criteria: <ul style="list-style-type: none"> a) alignment with the delivery model selected for the pilot that leverages existing gas utilities' service organizations; b) alignment with savings opportunities identified in the 2016 Achievable Potential Study; and c) cost-effectiveness <ul style="list-style-type: none"> ○ Ground source heat pumps: The IESO will evaluate whether this could be included in the pilot. ○ Renewable energy: This Measure has not been considered at this time. Homeowners may install

	<p>systems (i.e. upgrades to compressors, heat pumps etc.)</p> <ul style="list-style-type: none"> ○ Solar/tankless water heater ○ Duct sealing 	<p>renewable energy equipment and apply for a MicroFIT contract.</p> <ul style="list-style-type: none"> ○ Net metering: This Measure has not been considered and would not be applicable under the Conservation First Framework direction. ○ Energy storage (to reduce peak load): This Measure has not been considered at this time as it is not eligible under the Conservation First Directive. ○ Solar thermal solutions (to reduce gas space and/or domestic water heating): The IESO will consider whether this could be included in the pilot. ○ Electric hot water: The IESO will consider whether this could be included in the pilot. ○ Upgrades to existing systems (i.e. upgrades to compressors, heat pumps etc.): The IESO will consider whether this could be included in the proposed pilot design ○ Solar/tankless water heater Rebates for tankless water heaters are included in the existing gas utility programs. The IESO will consider whether this could be included in the pilot. ○ Duct sealing: Rebates for air sealing, including duct sealing, is an eligible measure in the existing gas utility programs. <p>Measures that have not been selected for inclusion in the pilot, that meet the definition of conservation under the Conservation First Framework, and that meet the selection criteria above, will be considered when the IESO evaluates whether to turn the pilot into a full program.</p>
7.	<p>Will eligible measures be further expanded? If so, will they be added to the IESO Measures and Assumptions List?</p>	<p>Upon completion of the pilot, should the IESO move to offer a full program, additional measures that meet the definition of conservation under the Conservation First Framework, and meet the selection criteria above will be considered for inclusion in a program.</p> <p>Any new measures added to the pilot or a future program will become part of the IESO's library of measures, which will be made available for the design</p>

		of future LDC conservation pilots and programs.
8.	<p>The current whole home DSM programs offered by the gas companies include the offering of a Wifi-enabled thermostat, the hardware for which is usually an upgrade from the almost 200,000 programmable thermostats that LDCs have installed over the last several years under the PeakSaver program. LDCs are concerned that if this offering is now made under the Whole Home Pilot, then there is the potential for cannibalization of the existing PeakSaver Plus assets and of the future of any potential residential demand response program that the LDC industry might be considering. Some LDCs are also considering providing new thermostats to customers as part of initiatives such as the Green Button and two separate offerings will not only lead to customer confusion, but will also diminish the LDCs' ability to implement those initiatives that are being encouraged by the Ontario government. Therefore, it is recommended that the design of the Whole Home Pilot should not include a thermostat upgrade as a standard offering and that utilities should have the discretion to add on such hardware to their offering.</p>	<p>The Whole Home pilot program as proposed includes a contribution to the gas utilities existing "smart" thermostat incentive so that LDCs may obtain the benefits of the electricity savings associated with its installation. This measure is included as an optional measure that consumers will have the choice to purchase.</p> <p>The measure has the capability to be used in future residential demand response programs thus LDCs can use this opportunity to consider local program designs that align with the measure's capability.</p> <p>LDCs may offer programs with smart thermostats for those customers that would not participate in the whole home program.</p>
9.	<p>The existing province-wide coupon program and the HVAC program are being redesigned to</p>	<p>The draft pilot program design will include participation and reporting requirements to avoid customers receiving more than one incentive for the</p>

	<p>expand measures such as white goods and other heating and cooling measures which are also proposed to be part of the Whole Home Pilot. The EDA is concerned of the potential duplication in available measures in different programs and that it may lead to customer confusion in terms of receiving incentives. Therefore, the Whole Home Pilot Program's measures should not be duplicative of other existing or proposed measures and the IESO's rules should clarify which program will pay out the incentive and count the savings.</p>	<p>same measure.</p> <p>Having certain measures bundled in the Whole Home program or individually through other programs helps improve customer choice and satisfaction.</p> <p>The pilot also proposes to offer training to the home energy advisors on existing Save on Energy programs.</p>
10	<p>Will the new proposed electricity savings measures such as smart thermostats and heat pumps only be offered through the whole home pilot program?</p>	<p>Cost effective measures can be made available through more than one program provided there is a delivery model that avoids the customer receiving two incentives for the same measure.</p> <p>Through the Conservation First Framework, LDCs can propose pilots or local programs that include these measures for customers that choose not to participate in the home energy assessment portion of the program. For example, one large LDC is planning to launch a smart thermostat program.</p>
11	<p>Will project financing be available?</p>	<p>At this time, financing is out of scope for this pilot program.</p>
12	<p>Is there an opportunity for LDCs to develop local programs designed around those technologies to offer a more robust incentive, and other incentive delivery options (e.g. air source heat pumps with a larger upfront incentive and available financing, or smart thermostats with a larger incentive)?</p>	<p>Yes, so long as these programs are cost effective. LDCs are encouraged to develop complementary local programs that are not duplicative of the pilot.</p> <p>Refer to the LDC Business Case Template and the Avoiding Duplication Guideline on the IESO website for more information about avoiding duplication. http://www.ieso.ca/Pages/Conservation/Conservation-First-Framework/LDC-Tool-Kit.aspx</p>

13	Will Save on Energy programs be hampered by the inclusion of measures that might be better served as a COUPON or HVAC Incentive?	Save on Energy programs should continue to be successful running in parallel to the whole home program. Not all customers will chose to participate in the whole home program where multiple measures are a requirement. The pilot design does not prevent LDCs from proposing updates to province-wide programs.
----	--	---

II. Incentives

Stakeholder Feedback		IESO Response
1.	Clarification is requested on who the customer will receive the incentive cheque from (i.e. gas, electric or IESO), and will only one incentive payment be received?	It is anticipated that the customer will receive one incentive cheque mailed by the gas utility that delivered the program to the customer. The branding of the cheque is still to be determined.
2.	What is the breakdown of incentives between the IESO and gas utilities (Green Investment Fund)?	One cheque will be sent to the customers. In principle, the IESO (through Conservation First Framework funding) will fund the electricity-related savings for the program. The detailed split is still to be determined.
3.	Why does the program not include direct installation of LED lighting given the large savings identified in the 2016 Achievable Potential Study?	<p>The pilot design was selected to coordinate with the existing gas utilities' programs and supports consumer choice and flexibility.</p> <p>Market research indicates consumers want choice and flexibility of vendors and measures. The design proposes to include promotion of Save On Energy programs and education on electricity savings opportunities in the home, which could include lighting.</p> <p>LDCs may choose to develop local programs that could feature lighting installation or other measures, so long as those programs are cost effective and not duplicative of the pilot.</p>

4.	Clarification is requested on whether incentives for smart thermostats will be incremental to those already being offered by the gas utilities.	Incentives for smart thermostats are being tested with focus groups to determine the appropriate level to encourage market uptake. The proposed design is that customers will receive one rebate for the smart thermostat.
5.	Will the IESO consider a pay-for-performance incentive model to encourage more innovative solutions and customer engagement?	Not for this pilot. LDCs are welcome to propose pilot and local programs to address these objectives.
6.	If the customer chooses to complete electricity upgrades only, will the incentives provided be sufficient to cover the cost of the audit? Or will the customer be reimbursed for the balance of the audit?	In the proposed design, customers would be required to install two or more of the home envelope and HVAC measures to be eligible for the electricity incentives for upgrading appliances and to be reimbursed for the audit. Customers should not pursue this program if they are only interested in the additional electricity measures. This will be made clear in the marketing material and in the pre-screening that is done prior to the first audit.
7.	Air source heat pump incentive levels are low. If prices range from \$5,000 - \$15,000 the IESO may need to increase the incentive to ensure an acceptable payback period for customers to minimize free ridership and maximize participation.	This input will be considered alongside analysis of available research which is underway to determine the optimal incentive level for this measure among others.

III. Role of LDCs

Stakeholder Feedback		IESO Response
1.	What role are LDCs expected to play (i.e. marketing, customer service, etc.)?	LDCs will be encouraged to market the program locally and may develop complementary local programs that are not duplicative. IESO will work with the LDC Marketing and Sales Working Group to support LDCs with local marketing efforts.

		In designing complementary programs, LDCs should refer to the LDC Business Case Template and the Avoiding Duplication Guideline on the IESO website for more information about avoiding duplication. http://www.ieso.ca/Pages/Conservation/Conservation-First-Framework/LDC-Tool-Kit.aspx
2.	Clarification is requested on how costs will be split between gas and electric utilities if implemented as a province-wide program	The cost allocation model is currently under development.
3.	Clarification is requested on the implications of the whole home pilot program to LDCs that do not have the Coupon or Heating and Cooling Incentive programs in their CDM Plans.	Pilot program savings will be attributed to the LDC that serves the program participant. LDCs do not need to update their CDM plans to receive the savings. LDCs will get the kWh savings for homes in their LDC territory regardless of whether they offer the Coupon or Heating and Cooling Program. LDCs are not required to put the whole home pilot program in their CDM plans to be eligible for these savings, it will be automatic.
4.	Regarding settlement of said credits with the IESO, will this fall under the CDM settlement umbrella (submission monthly to IESO for rebate via monthly IESO invoice)?	This pilot is being funded incrementally to LDCs existing CDM Plan budgets through the Centralized Services Budget. Therefore, LDCs will not be required to settle through monthly or quarterly submissions with the IESO.
5.	Is the intention to run this as a "Value Added Service" thereby reducing LDC budgets based upon savings/activities in each LDC territory?	No. This pilot is being funded incrementally to LDCs existing CDM Plan budgets.
6.	LDC development of complementary local programs will lag far behind the provincial Pilot, leading to a gap between assessments and turnkey options for install for customers. This will have two effects: <ul style="list-style-type: none"> • Additional LDC CDM resources needed to 	LDCs may begin designing local programs now to align local program approvals with launch of the whole home pilot program. Review times for pilots and programs have recently been shortened to 20 days. In addition, pilots and local programs that show gas collaboration can benefit from expedited review timelines as per the guidelines. IESO will make the final pilot program business case available to LDCs for future program design

	<p>develop local programs</p> <ul style="list-style-type: none"> • Additional LDC customer service issues 	<p>purposes.</p>
7.	<p>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 gas distribution company (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 service level agreements (SLAs) as appropriate.</p>	<p>The intention of the pilot is to align with the existing gas utilities' programs. Alignment between the two gas utilities' programs is out of scope. This input will be a key consideration in the marketing plans and efforts to mitigate customer confusion will be made through the province-wide marketing strategy.</p> <p>The intent is to design the program in a way that allows for the collection and sharing of customer data with the LDC.</p>
8.	<p>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</p>	<p>This input will be brought forward as the marketing plans and branding options are developed.</p>

	<p>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. Toronto Hydro’s 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.</p>	
9.	<p>Customers with electrically heated homes are not Gas Distribution Company (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.</p>	<p>Electrically heated homes will be eligible for this pilot through the gas utilities and their service organizations. This input will be considered for the marketing plan with IESO and LDCs and gas utilities. When the plan is shared, IESO will explain how this feedback was addressed.</p>
10	<p>LDCs are disappointed that no engagement/consultation was done earlier with the residential working group RWG. We are concerned and are struggling to</p>	<p>In the spirit of transparency and accessibility, all interested parties were engaged in the proposed design at the same time through the stakeholder and community engagement process. This pilot is being designed to meet a directive from the Minister of</p>

<p>understand why this is the approach being taken, given the IESO had 19 proposed whole home program applications by LDC's under review and could have had several whole home programs in market (which included gas collaboration) earlier if needed. As you may be aware, in early 2017 the RWG is planning to conduct a review all residential pilots being done in Ontario with the goal of developing a priority list of program development for 2017 and beyond. In spite of the approach being taken with the development of the Whole Home pilot, we hope and remain optimistic that this framework will allows LDC's to be both collaborative and innovative at the same time while looking at additional programs that best fit their customer base.</p>	<p>Energy.</p> <p>The delivery model for this pilot intends to help address the delivery challenges of coordinating between multiple LDCs and the two gas utilities that are each targeting homeowners and provides an opportunity to realize efficiencies of coordinated delivery.</p> <p>To clarify, the IESO had received two pilot program proposals for whole home programs (electric measures only) at the time of receipt of the direction.</p>
<p>11 As you may also be aware the RWG has prioritized its focus in 2016 on the redesign of two very critical consumer programs (The Coupon and HVAC programs). It is critical that any Whole Home pilot supports and enhances the effectiveness of our redesigned programs. Consequently we are offering our ongoing service/support during the pilot phase and beyond. We are confident that our collaborative efforts can help to refine any operational issues and further develop the scope of a Whole Home pilot so any future province wide program will result</p>	<p>The IESO is aware of this work and is working to ensure that the pilot design integrates with the existing consumer programs and the proposed redesign/evolution of the programs.</p>

	in a positive customer experience and benefit to both gas and electric conservation efforts in Ontario.	
12	Will LDCs be involved in the training and awareness processes that the Energy Advisors (specific for their territories) are subject to undergo?	IESO will work with LDCs primarily through the Marketing and Sales Working Group on what they would like to see in the training of assessors and leave behind information for the customers.
13	Is there opportunity for LDCs to leverage the program and sell other non-duplicative programs like Dynamic Pricing through the auditors?	IESO will look to include the opportunity in the pilot for LDCs to leverage the program to offer non-duplicative local programs. Refer to the LDC Business Case Template and the Avoiding Duplication Guideline on the IESO website for more information about avoiding duplication. http://www.ieso.ca/Pages/Conservation/Conservation-First-Framework/LDC-Tool-Kit.aspx
14	Can LDCs hire their own energy auditors and service organizations?	It is expected that the IESO will contract with the gas utilities for program delivery and the gas utilities in turn are responsible for maintaining the list of eligible service organizations. Under this pilot LDCs will not be able to hire service providers.
15	Will LDCs be expected to resubmit their CDM plans including the Whole Home program from 2018-2020 and fund it out of their CFF budgets?	Not at this time. Once IESO has sufficient results from the pilot to determine whether it recommends transition to a full program, a plan will be developed for the transition of the pilot to a program and next steps will be communicated to LDCs.

IV. Program Delivery

Stakeholder Feedback		IESO Response
1.	How will the 10,000 homes in this pilot be targeted?	This is a province-wide pilot. Enrollment will be on a first-come, first-served basis.
2.	How will duplication and incentive "double dipping" be addressed and mitigated?	The IESO will develop QA/QC processes to manage the potential for any duplication of incentives.
3.	Has a "Homeowner Information Package" already been prepared for distribution?	Not yet, the IESO plans to work with LDCs and others involved in the

		program on the content for this package.
4.	Are the gas utilities in-market with their programs now? If yes, will they go back to the previous participants to offer electric measures?	Yes, the gas companies are currently in market with their programs. Previous participants will not be offered the electricity measures.
5.	Investigate using an online customer engagement portal, instead of a service organization to conduct audits, as it is a proven system.	The pilot is designed to integrate with the existing gas utilities' programs which include the use of energy assessors.
6.	Single point of intake will be very attractive to residential customers, and branding not tied to electric or gas utilities would be least confusing for them. A contracted service organization will be most responsive to manage intake.	It is expected that customers will be provided with a single point of intake via the gas utilities service organizations. Market research indicates customers trust government and utility sponsored programs. Concern about confusion will be taken into consideration in the branding.
7.	The program must include a streamlined process by which customers who have already participated in the gas whole home program or in any of the existing Save On Energy programs can be incented to avail the rest of the measures that will be offered.	The pilot measures will not be offered retroactively. The design is dependent on the installation of home envelope and weatherization measures in combination with appliances and smart thermostats to deliver this program cost effectively.
8.	Will the education component also include no-cost conservation opportunities (e.g. behavioural recommendations, such as turning off lights in unoccupied rooms, strategies for programming thermostats, etc.)?	Market research, past experience and informal feedback to date has indicated education on behavioural opportunities is a good idea. Therefore it is anticipated that the education component of this pilot will include a range of additional suggested savings opportunities.
9.	At least one LDC's service territory has both gas utilities operating in it, as well as areas where gas is not offered. This creates confusion about which program and incentive levels will be offered to each customer in that LDC's service territory.	A marketing and communications plan will try to address this issue and simplify information as much as possible for customers and utilities. Pilot participation will be based on the consumer's local gas utility. Areas not served by a gas utility will be assigned to Union or Enbridge for the purposes of this pilot program. Experience to date suggests that customer confusion has not been an issue with two different program models

		<p>running in the province.</p> <p>It would be the responsibility of the Energy Advisor to make the consumer aware of which gas utility program the consumer would be eligible for.</p>
10.	Will the coupons that are passed along to a customer in each LDC territory be provincially allocated or LDC specific? Or will the customer simply be referred to the program and expected to seek out the coupons on their own?	This input will be considered as part of the marketing and communications plan which will include what education and leave behind material is available to customers.
11.	What qualifications and certifications will energy auditors be required to have, and how will they be screened?	<p>Energy assessors are required to work with a Natural Resources Canada licensed service organization and pass qualification exams.</p> <p>The gas utilities will be responsible for selecting participating service organizations.</p>
12.	Will the service organizations/energy auditors be educated on all LDC local programs?	This input will be considered for the training plan.
13.	Will the service organizations/energy auditors be expected to deliver customer education?	Delivering education to consumers will be part of the pilot program design.
14.	What quality assurance/control will be done on the service organizations/energy auditors?	Natural Resources Canada sets out the required quality assurance for service organizations and energy assessors.
15.	Will all service organizations be eligible to deliver this program, or with the existing gas utility services providers be used?	The gas utilities will select the service organizations to deliver the pilot.
16.	How will the fees for service organizations be determined and how will they know they are reasonable?	Fees for home assessments are expected to be set by the market (i.e. what consumers are willing to pay).
17.	Can a local retailer who is offering a rebate eligible product participate in the program? If so, how?	Retailers are welcome to raise awareness about the whole home pilot program through their marketing channels. Based on market research, there is potential for some customers to ask retailers for

		advice on implementing and purchasing certain measures in the program.
18.	Concern exists regarding the timing of the pilot rollout and capacity of service organizations to effectively manage anticipated demand, and this is expensive. If the Pilot market rollout is delayed, those hires will negatively impact payroll without work and, subsequently, will leave prior to peak Pilot demand.	Market capacity for pilot delivery is important. Best efforts will be made to regularly update the marketplace, in coordination with the gas utilities, on the pilot implementation plans to ensure adequate capacity for pilot delivery.
19.	Will the service organizations be able to cover all LDCs' service territories?	The intention is for this pilot to be available in all LDC service territories.
20.	Is there any cost to the customer for the pre-audit? If not what percentage of audits did the gas companies find did not have a post audit.	There is a cost for the pre-audit which is reimbursed on completion of the program. The data on percent of completed post audits is not publicly available. Efforts are made to pre-screen for candidates who are likely to complete the program. This has been a highly successful program to date with high customer satisfaction.
21.	Remove the need for a pre-project audit for non-envelope measures.	The pilot design requires the completion of two or more home envelope and HVAC measures to qualify for any pilot incentives. Non-envelope measures can be offered to customers through other programs.
22.	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	The pilot is designed to collaborate with the gas utilities on in-depth assessments and upgrades of envelope and HVAC measures for single family dwellings. Alternative program designs may be tested through other LDC led pilots.

	<p>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’s demographic 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.</p>	
23.	<p>What will the initial assessment entail? How in-depth will the assessment be?</p>	<p>The initial assessment will follow the requirements of the Natural Resources Canada EnerGuide Rating System audit, which includes a comprehensive on-site evaluation of a home to collect all required data to model the house in HOT2000. This includes, for example, documentation of heating systems, insulation levels, air leakages including a blower-door test etc.</p>
24.	<p>A clear Save on Energy message should be developed to integrate the program offer as a comprehensive solution for customers.</p>	<p>This input will be factored into the marketing and communications plan.</p>
25.	<p>One of the major concerns flagged by the LDCs is the lack of opportunity to co-brand the program as LDCs will potentially lose brand recognition to their own customers and this may consequently impact customer participation in other conservation programs. While the potential of a one-stop shopping opportunity could make participation easier for customers, conveying eligible incentives from both gas and LDCs may make the whole process confusing for customers and also reduce brand recognition. The EDA recommends that all measures under the Whole Home pilot, regardless of the delivery agent, be co-branded by both the gas utility and the LDC of that service territory so that customers are aware that the measures are</p>	<p>This input will be taken into consideration for the marketing and communications plan. Minimizing potential customer confusion and brand opportunities for LDCs are key considerations in the development of the marketing and communications plan.</p>

	from both the LDC and the gas utility. The single rebate cheque should also be co-branded to reflect the involvement of both organizations in delivering energy efficiency programs.	
26.	The IESO needs to work with LDCs on the marketing for the program and how the marketing will align with the rest of the provincial marketing and LDCs' local marketing as well. Given that the program will be available in LDCs' jurisdictions, LDCs will be receiving inquiries from customers and therefore need to have input in the marketing materials.	The IESO plans to involve LDCs in the marketing plan and this will be taken into consideration. The Marketing and Sales Working Group will provide advice and input on the marketing and communications plan which will address branding.
27.	The IESO needs to share its strategy for customer acquisition for this pilot so that LDCs can prepare for customer inquiries.	The marketing and communications strategy will be developed with LDC input and shared with LDCs.
28.	Will the IESO include an appliance retirement component to the program?	The pilot design requires consumers to demonstrate the appliances have been retired upon replacement. No appliance retirement services will be included in the pilot.
29.	While the electricity savings currently offered to the province's customers are uniform in nature, the gas programs are not the same as Union Gas and Enbridge Gas offer different programs. Also, not all LDC customers are served by gas utilities. The EDA therefore recommends that the Whole Home Pilot offers the electricity measures as the "base" program and then customers can choose to "opt in" to the gas measures to achieve greater savings.	The gas utility programs are already in market and are successful at enrolling customers. The government is enhancing the existing programs offered by Enbridge and Union Gas and they will be available to homes across Ontario that are heated with natural gas, propane, oil and wood. The pilot is intended to enable collaboration of electric utilities with these existing offerings and extend them to homes heated by electricity.
30.	How long is the pilot?	The pilot assumes delivery to 10,000 homes on a first-come, first served basis. It will likely be complete in 2017.
31.	What is the budget for the program?	The budget for this pilot will be made

	available once the final design is complete.
--	--

V. Savings Allocation

Stakeholder Feedback		IESO Response
1.	How will savings be allocated between gas and electric utilities?	Electricity savings captured through the pilot will be allocated by the IESO to LDCs. Gas savings will be claimed by the gas utilities.
2.	How will savings be allocated for electricity savings within homes that are neither gas nor electrically heated?	The electricity assessment add-on and electricity measure incentives delivered as part of this pilot will be available to all consumers that are eligible for the gas utilities' programs, which would include homes heated by other fuel types. Homes heated by electricity will also be able to receive the incentives for home envelope and HVAC measures as well as the additional electricity measures. Electricity savings will be allocated to LDCs based on participant location regardless of the main home heating fuel type.
3.	If customers update lighting/HVAC (it's been audited) why aren't LDCs getting credit? It can't be assumed that they've used existing programs.	If customers update their lighting/HVAC in the pilot then LDCs will get savings. The proposed program design also seeks to capture spillover, including non-incented electricity upgrades. During the pilot, all electricity savings will be allocated to the LDCs.
4.	If an LDC offers local programs for air source heat pumps and smart thermostats to complement the Whole Home program, how would that LDC get credited for those measures if they are funded through GIF (to customers not in Enbridge's/union gas' service territory and have electric heating)	All electricity savings that occur through the pilot will be allocated to LDCs based on participant location.

VI. Program Business Case

Stakeholder Feedback		IESO Response
1.	The full Business Case outlining participation forecasts (gas and electrically heated), savings (including those persisting to 2020), TRC and PAC scores is requested to assist LDCs in understanding how the program was developed.	IESO will make the final pilot program business case available for future LDC pilot and program and design purposes.
2.	What are preliminary estimates for per-home savings averages on the electric (kWh) and gas (m3) sides, respectively?	Electricity savings estimates for the pilot program will be made available when the final design is complete.
3.	Is there a minimum number or types of measures the customer will need to undertake for the program to be cost-effective?	Pilot program cost-effectiveness assumes consumers undertake two or more envelope and HVAC measures as required in the pilot.

VII. Other

Stakeholder Feedback		IESO Response
1.	The proposed program design includes the consumer being out of pocket for the cost of the assessments and upgrades prior to applying for the rebate which seems like a barrier to participation. This, in our view, limits the demographic of consumers that are financially able to participate and puts coordination efforts of the first assessment, upgrade installation and second assessment in the hand of the consumer which they may find inconvenient. Just Energy suggests allowing the participation of third party companies, such as Just Energy, to participate in the Whole Home Pilot Program who can develop products that include the coordination of the first assessment, customer chosen installation/upgrades, second assessment and rebate application. This would remove the barrier to participation by	The pilot program design aligns with the gas utilities' existing delivery model. Program results and market research suggests that consumers are supportive of this model that offers them the option to choose who performs the work. Customers also like that the assessor is independent of the contractor or supplier that installs the measures.

	relieving consumers of the financial burden and inconvenience that arise from being out of pocket for and having to coordinate the assessments and installs. Just Energy’s solution would increase program participation and ultimately result in the furtherance of the provincial government’s conservation goals.	
2.	What is the pilot and subsequent EM&V timeline? Will pilot results be made available to the LDCs?	EM&V will begin six months after the start of the pilot to ensure there is adequate data to review. The final evaluation report will be published 1.5 years later. Pilot results will be shared with LDCs.
3.	Will this pilot utilize any portion of cap and trade revenues either at its inception, or, later if it evolves beyond pilot status?	The source of funding for this pilot is the Conservation First Framework budget.
4.	What are the plans and process for transition into a province-wide program to 2020?	Once the IESO has sufficient information on the performance of the pilot it will determine the next step.