

To: Independent Electricity System Operator (IESO)
120 Adelaide Street West, Suite 1600,
Toronto, ON M5H 1T1
C/O: Jason Grbavac,
Manager, Stakeholder Relations

Re: IESO 2021-2024 CDM Framework Mid-Term Review

Jason,

BOMA Toronto, is a non-profit organization representing building owners and management professionals in Southern Ontario. We have long been a leader in advocacy and promotion for energy conservation in the building sector and a long-standing contributor to electricity conservation programs in the province.

In support of IESO's mid term review process BOMA Toronto has consulted with its members and its internal energy committee to feedback on the delivery of CDM programs in Ontario. BOMA Toronto applauds IESO's ongoing commitment to the delivery of CDM and improvements that have been made administratively to streamline processes.

BOMA Toronto has four primary points of emphasis for your consideration.

- 1) Property owners and managers continue to prioritize programs with streamlined delivery and straightforward performance-based metrics. This includes efforts to reduce M&V expenditures as much as possible while maintaining program rigour. This effort would benefit from continued innovation in the adoption of automated data solutions to estimate and verify potential and achieved savings. This is particularly important for smaller (mid-tier) properties and regions where M&V activities pose greater barriers to program participation.
- 2) We are expecting a massive shift in emphasis toward decarbonization over time to align with both regulatory and corporate targets (ie. City of Toronto's Transform TO 2040 goal). This will surely result in significant electrification of heating, domestic hot water, and vehicles. This may result in buildings with greater electricity consumptions from expanded loads, even while overall efficiency is improved. We need programs that better reflect these scenarios. This includes recognizing gas savings on electrification projects.
- 3) Grid capacity is going to be an issue as buildings electrify at scale. Emphasizing peak demand and electrical service capacity in buildings is important as it dictates the capacity of the industry as a whole to use electrification as a decarbonization strategy. Peak electricity also remains the most carbon-intense electricity in Ontario. We do not currently provide enough incentive for Peak reduction for non class-A electricity customers.
- 4) Economical Decarbonization is an activity intertwined with capital planning on 10+ year timelines. The industry requires significant support to develop decarbonization roadmaps even though the realized efficiencies may not occur for many years (beyond what is currently expected under CDM). Incentive programs that provide guaranteed support for investigation

and planning for decarbonization, independent of measured electrical savings achieved is much needed.

Thank you for including BOMA Toronto's feedback in the Mid-Term Review process and we look forward to continuing to support IESO CDM program development and delivery.

Sincerely,

Jeff Ranson



Sr. Director, Energy, Environment & Advocacy
BOMA Toronto.