

Feedback Form

eDSM Industrial Program Evolution - May 22, 2025

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the [Electricity Demand Side Management \(eDSM\) Framework](#) webpage unless otherwise requested by the sender.

Following the May 22, 2025 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the current industrial program (Industrial Energy Efficiency Program). The webinar presentation and recording can be accessed from the [engagement webpage](#).

Please submit feedback to engagement@ieso.ca by **June 05 19, 2025.** If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Topic	Feedback
Would a first-come, first-served model with a single sign-off better support your project planning - and are there any risks or challenges you foresee with this approach?	<ol style="list-style-type: none"> 1) A first-come, first-served model is ok, provided it is based on objective evaluation criteria. Such criteria should ensure tracking/measuring the output to ensure that the results promised are being delivered. Mandatory installation existing/available equipment/devices such as power meters and relevant instrumentation/sensors should be mandatory. 2) There's a benefit to tying this program to adoption of already existing technology/solutions to further reduce the cost. For example, there are validated reference architectures shorten engineering times and therefore enable quick adoption of the suitable technology.
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Would a tiered, standard-offer incentive – like \$/MWh, with potential adders for grid-constrained areas or large projects – make it easier for you to pursue projects? What is your desired incentive ie. \$/MWh?	We would suggest starting with \$/kWh to accommodate small manufacturers that may not consuming as much.
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What minimum threshold would align with your projects? What types of projects or facility areas could you see benefitting from a broader eligibility criteria?	A large majority of Ontario manufacturers are small & mid-size companies, using relatively small amounts of energy that nevertheless adds up. To get these important stake holders to participate, the program should be designed to look at saving starting in the \$/kWh, and not just at the MWh level. In grid-constrained areas, encouraging own-generation through use of microgrids could be beneficial. This provides and opportunity to convert these stakeholders into suppliers to the system/network through Prosumer programs. In other words, industrial players that are able to not just generate their own power through non-fossil fuel renewables while the possibility to sell to the grid in peak times should receive special preferential treatment.
Topic	Feedback

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Would access to audits and feasibility studies help you identify and advance more energy-savings projects? How should it be structured to ensure early assessment lead to real, completed projects?	From our experience in the market, many industrial consumers would like to vet projects but often aren't able to complete the business cases. Helping fund a significant portion of the cost of audits – energy management and sensor audits would help clear the hurdle. Audits should be simplified, while ensuring they don't get abused, such that technology suppliers can help complete for customers. In any case, a clear ROI (that will be tracked and reported on) within a reasonable timeline should be mandatory.
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What type of support or coordination would make it easier for you to complete projects and access incentives with greater confidence?	Help with engineering/consulting expenses to help identify the ROI and build the business case. A couple more ideas: 1) There's technology that enables more efficient use of energy. IESO could work with technology and equipment suppliers to help fund several showcase/demonstration centers across the province. Industrial consumers could visit these centers for inspiration on available solutions. Such centers could also be the conduit for connecting industrial consumers to suitable/qualified suppliers of different related products and services, including affordable consulting services. 2) Support could be given to major or medium users to convert old fossil-fuel facilities to ultra-modern energy-efficient Lighthouse Facilities, over a few years to ensure feasibility and or piloting of different use-cases. These should be open for showcasing to others within the industry with lessons-learned, including the process to get it done.
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Are you considering new construction projects? How should the program evolve to better support energy-efficient new construction projects?	The program should encourage the use of technology to optimize projects from the onset, to ensure efficiencies are built into the project. Some of these could become Sustainability Lighthouses (certified to World Economic Forum standards) for other businesses across the province or even nationally.

General Comments/Feedback