

# Energy Efficiency Auction Pilot – Feedback Form

## Proposed revisions to timeline and meter data requirements

Communication Date: May 19, 2020

**Date Submitted:** 2020/06/08

**Feedback Provided By:**

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Following the March 23<sup>rd</sup> public webinar on the **Energy Efficiency Auction Pilot**, the Independent Electricity System Operator (IESO) posted an additional communication on May 19<sup>th</sup>, 2020 and is seeking additional feedback from stakeholders on two areas of the EE Auction Pilot design: 1) A proposed revised timeline responding to the COVID-19 public health crisis, and 2) Options to encourage successful auction participants to voluntarily provide hourly meter data from facilities.

The referenced communication can be found on the [Energy Efficiency Auction Pilot engagement webpage](#) under the May 19<sup>th</sup>, 2020 entry.

**Please provide feedback by June 9, 2020 to [engagement@ieso.ca](mailto:engagement@ieso.ca).** Please use subject header: *Energy Efficiency Auction Pilot Feedback*. To promote transparency, this feedback will be posted on the [Energy Efficiency Auction Pilot engagement webpage](#) unless otherwise requested by the sender.

Feedback received will be considered in order to finalize the timeline and meter data requirement. The IESO will work to consider and incorporate comments as appropriate and post responses on the engagement webpage.

Thank you for your time.

Question	Feedback
<p>Does the new proposed timeline enable stakeholders to participate in the pilot auction?</p> <p>If not, please explain why not and suggest an alternative timeline.</p>	<p>Yes.</p>
<p>Aside from financial incentives, how could IESO encourage successful auction participants to voluntarily provide hourly meter data for their facilities?</p>	<p>Remove certain costly and burdensome requirements for participants who choose to voluntarily provide hourly meter data.</p> <ol style="list-style-type: none"> <li>1. For prescriptive measures:             <ol style="list-style-type: none"> <li>a) Eliminate the verification of the base case measure for facilities where a deemed value savings measure is being installed. This will make the program similar to the <i>Save on Energy</i> Retrofit Program as opposed to where the base case measure must be confirmed which is similar to the <i>Save on Energy</i> Small Business Lighting Program. Significant cost differences are observed in these two programs, partially because of this requirement. This base case measure requirement causes the program delivery agent to have to send an assessor to record what the Base Case is, and the installation must be done by a representative of the program delivery agent versus the customer’s contractor, since the Base Case eligibility must be verified. This adds additional costs to the program as well as making it less flexible for or adaptive to the needs of a customer.</li> <li>b) Also remove the requirement for a Basic M&amp;V Plan for measures where a deemed value approach is being used, and instead simplify that to providing the IESO a spreadsheet of measures and quantities at each facility along with the savings calculated as per the deemed value savings.</li> </ol> </li> </ol>

Question	Feedback
	<p>2. For custom measures:</p> <p>a) For participants that provide hourly facility data, have their savings evaluated based on whatever is higher between the measure specific M&amp;V and facility M&amp;V. This would still only be appropriate, however, where the measures in question constitute a substantial (material) amount of the facility’s demand.</p> <p>3. Generally: Consider making available, to those who voluntarily provide hourly meter data, a higher level of participation and revenue opportunity beyond the currently proposed limits.</p>

**General Comments/Feedback:**

Alectra supports the IESO’s continued, albeit deferred, pursuit of this initiative, believing that it holds tremendous long term value for the Ontario electricity market. In order for this auction pilot to garner the greatest participation, and hence provide increased value, the framework and requirements should be designed as simple and non-complex as possible and should provide incentives (as opposed to costly burdens) for participants.