

Feedback Form

Industrial Energy Efficiency Program – June 23, 2021

Feedback Provided by:

Name: Nicholas Gall

Title: Director, Distributed Energy Resources

Organization: Canadian Renewable Energy Association (CanREA)

Email: [REDACTED]

Date: 15 July 2021

To promote transparency, feedback submitted will be posted on the Industrial Energy Efficiency Program webpage unless otherwise requested by the sender.

Please provide feedback by July 14, 2021 to engagement@ieso.ca. Please use subject:

Feedback: Industrial Energy Efficiency Program

For context, the questions below are taken from slides 22 to 25 from the June 23, 2021 [presentation](#) posted on the [engagement webpage](#).

General

Topic	Feedback
Are there any key areas of interest and/or concern on the draft program proposal and framework presented today?	Thank you for the opportunity to provide comment on the Industrial Energy Efficiency Program plan. CanREA strongly supports the core requirement that projects must prove to be cost-effective for electricity ratepayers (based on the ratepayer investment), providing net energy and net demand reductions through efficiency improvements of an industrial process. CanREA recently commissioned analysis of the whole-system impact of additional Behind-the-Meter solar in Ontario. This research found that BTM solar can provide savings by lowering HOEP during peak demand hours in the summer, reducing the need to procure additional capacity through IESO's Capacity Auction (or other future procurements) and mitigating costs related to carbon prices and gas-fired generation. BTM solar can also mitigate the need for transmission infrastructure in response to load growth and the forthcoming retirement of the Pickering NGS. A copy of this analysis is appended to this consultation submission. There is more than sufficient justification for inclusion of BTM solar PV as an eligible measure within the Industrial Energy Efficiency Program framework, on the basis that it can provide significant and long-term savings for all ratepayers through avoided infrastructure reinforcement and reduced energy and capacity costs.

Participant Eligibility

Topic	Feedback
Should the program allow for aggregation of projects at different sites by the same participant?	CanREA supports this proposal

Topic	Feedback
Should third parties be allowed to submit projects if they have the necessary authorization to deliver?	CanREA supports this proposal

Project Eligibility

Topic	Feedback
What questions do you have about technologies or projects that would be eligible under this program, given the definition of CDM?	During the June 23 stakeholder session, the presenters indicated that it remained to be determined whether and to what extent BTM solar PV could be included within the framework, noting that net metered renewable generation might be ineligible as net metering would “be considered an ‘other program’ by the Government”, but that purely load-displacing generation, including BTM solar PV, might be eligible. We would strongly recommend that the IESO seek clarity as to whether Ontario’s net metering regulation constitutes a “program” and that this be communicated to stakeholders. We would also recommend that the IESO clearly establish that load-displacing renewable generation including solar PV is eligible for Industrial Energy Efficiency funding.
Topic	Feedback
Are the minimum size and maximum incentive award thresholds reasonable?	CanREA recommends that a minimum demand savings threshold of 100 kW would be more inclusive and accessible to a wider range of industrial consumers.
Topic	Feedback
What should be considered when enabling stacking of incentives?	There should be no limit on stacking of incentives

Project Selection Framework

Topic	Feedback
Does the two-stage project selection framework presented today support or challenge your internal business processes?	CanREA supports the proposed initial vetting before proponents spend significant time and resources on a detailed project proposal, and to receive assurance on eligibility of the proposed project. Provided the time required to receive a response to a Stage I application is minimized, this could support applicants’ internal business processes.
Topic	Feedback
Are there any related key considerations that the IESO should consider in developing the two stages? Any required timing?	Ideally, applicants would receive notification regarding a Stage I application within 2 weeks of submission, so that they can either revise their proposal, or move forward with the detailed Stage II application as quickly as possible

Topic	Feedback
Topic	Feedback
What are some key outputs from a stage I approval that would help facilitate your business processes?	Click or tap here to enter text.
Topic	Feedback
What are considerations that should be applied to the weighting of selection criteria? Are there additional criteria IESO should consider?	Click or tap here to enter text.

General Comments/Feedback

Click or tap here to enter text.