

Indigenous Energy Support Programs Review

Community Feedback & IESO Response from July 24th Webinar

Following the July 24, 2020 meeting to discuss the Indigenous Energy Support Programs (ESPs) redesign, the IESO received feedback from communities on the proposed redesign of the Indigenous ESPs.

The IESO received feedback from:

- Big Grassy River First Nation
- Grand Council Treaty #3
- Hydro One
- IPM Integrated Project Management Inc. / Pic River
- Ogemawahj Tribal Council
- Temagami First Nation

Note on Feedback Summary

The IESO appreciates the feedback received from communities and stakeholders. The feedback has been noted and will be considered as the engagement moves forward. The IESO has provided a summary table below, which outlines specific feedback or questions for which an IESO response was required at this time.

Community comments and IESO responses

Topic	Feedback	IESO Response
Community Energy Champion Program		
<p>What specific materials and expected expenses should be considered by the IESO when reviewing eligible costs?</p>	<p>Communities and stakeholders suggested a number of different materials and expenses be considered eligible:</p> <ul style="list-style-type: none"> • Office supplies (desk, laptop/desktop, filing cabinet, clipboard, etc.) • Equipment (FLIR Thermal Imaging. Etc.) • External Resources • Buying/Renting/Maintenance testing equipment, blow door equipment, sub meters, data logging equipment, infrared camera, etc. • Travel, hotel, and trade show fees, show seminars, show training, outside of the province, or at least part of the fees outside of Canada (e.g. Airfare) most energy and HVAC shows are in the U.S. (e.g. ASHRAE, AHR Expo) 	<p>Thank you for the feedback. Costs associated with the use of personal devices (e.g. personal mobile, landline phones, or laptops that are not used for work purposes) and travel outside Ontario are not eligible for funding. The proposed additional expense stream of the CEC program will fund these suggested expenses, provided they are demonstrated as necessary for the work of the CEC to be completed.</p>
<p>Does the new proposed CEC expense stream address the current and future capacity needs (e.g.</p>	<p>Community feedback on this topic varied:</p> <ul style="list-style-type: none"> • One community suggested the proposed expense stream does address capacity 	<p>Thank you for the feedback. The updates to the programs that are proposed by the IESO will apply to new applications for new initiatives. The IESO does not permit withdrawal from</p>

Topic	Feedback	IESO Response
<p>training, equipment, materials) of Indigenous communities and organizations? If not, what are the gaps?</p>	<p>needs, stating that the additional \$15-20K should fill the gaps.</p> <ul style="list-style-type: none"> Another community suggested that if the additional expenses are eligible for reimbursement, the proposed funding stream would meet their needs. However, it was suggested the new funding could help with existing funding agreements (e.g. allow for addendums to the existing funding agreements, or cancel and re-apply to get the new expense stream funding), and if that is not allowed, then the proposal would not meet their needs. 	<p>existing funding agreements and reapplying for the same project under new program rules. Current recipients of the CEC program are able to apply to the Education and Capacity Building program to fund skills training and community engagement in support of the work of the CEC. Once any existing CEC funding agreement has been completed, the community may apply for new funding under the programs and program rules that are applicable at that time.</p>
<p>Does incorporating a new minimum standard for all CECs impose any barriers to the program or to hiring practices?</p>	<p>Community and stakeholder feedback indicated that a new minimum standard could impose barriers in a variety of ways, with the following points submitted:</p> <ul style="list-style-type: none"> Incorporating a new minimum standard would create a barrier only for communities with little professional development among community members; aside from organizational staff that are already employed. 	<p>Thank you for your feedback. In response to this feedback, the IESO will not implement any minimum requirements for CECs to ensure accessibility to the program for all Indigenous communities and organizations. The IESO plans to build in professional development opportunities within the CEC program to further support Indigenous communities and organizations, which the energy champions will be expected to participate in. These</p>

Topic	Feedback	IESO Response
	<ul style="list-style-type: none"> • This change will likely be a barrier to organizations that represent more than one community who want to apply to the program. To consider all applicants from communities they represent, unbiasedly and fairly, they will need to advertise a CEC job position and hire a CEC from job applicants who apply. If this is done before the application stage, there is a risk that funding will not be approved, and this could impact the reputation of the organization if they are unable to keep the person hired. • This may be difficult for communities to identify a person with an appropriate background. IESO should consider applications with a specific training plan in place (that the IESO will fund) to get to the desired education/experience standard. • Would be a problem; it would be difficult to advertise and hire a CEC for a job position that is not ready to hire until funding is approved. 	<p>opportunities will be offered by the IESO free of charge.</p> <p>In response to this feedback and to mitigate against hiring barriers, the IESO will require applicants to identify and hire an energy champion after their application is approved and before the Funding Agreement is signed. Therefore, the CEC does not need to be identified at the application stage and recruiting can occur once funding has been approved. However, in order to access the top-up funding for certain CEC qualifications, the IESO will require that the CEC candidate is identified at the time of the application to ensure the eligibility criteria are met.</p>

Topic	Feedback	IESO Response
	<ul style="list-style-type: none"> • Adding minimum qualifications would be counterproductive to supporting the indigenous community, if they have interested members to take the position. With additional training being offered a handyman, or tradesman could fill the position. The funding agreement may require three streams of funding for a CEC. One for a new “In Training CEC” with a longer term than 3 years – allowing time to learn, and a second stream for a CEC, and third for a CEC with technical qualifications, with three funding levels. • One community noted a potential challenge in that it may be difficult to identify a person (who will also meet the training requirements) prior to applying, but then have no guarantee they will still be available for the position following the application, clarification, and approval process. 	

Topic	Feedback	IESO Response
<p>Should a new top-up stream tailored for certain CECs with additional technical qualifications be created? If so, what standards are appropriate and should be considered by the IESO? (ex. Canadian Institute for Energy Training (CIET) Certified Energy Manager or Certified Energy Auditor, 20/20 Catalyst, etc.)</p>	<p>Communities generally voiced support for a new top-up stream, stating:</p> <ul style="list-style-type: none"> • If a CEC has qualifications such as: CIET CEM, CEA, etc., it is only right for their salary to reflect that, especially if the salary is identical to a CEC with no qualifications. It creates an incentive. • This is a great idea, especially for retention of CECs. IESO should consider allowing communities to apply for CEC funding with a training plan in place which, once completed, they will be eligible for the top-up. • Should be available for existing funding agreements, either through an additional funding agreement, or addendum, or a cancel and re-apply for funding. • Many indigenous locations are remote, and require moving and living in the area, for a 3-year contract it would be difficult to uproot a family and home, and with little opportunity for more work in the area for the CEC or family members. And many times, requires the CEC to have two residences and 	<p>Thank you for your feedback. The IESO will consider these qualifications for the new salary top-up that will be introduced. To ensure accessibility to the program for all communities and organizations, no minimum standards will be in place for CECs.</p>

Topic	Feedback	IESO Response
	<p>additional travel back and forth. (additional funding could be offered for remote communities).</p> <ul style="list-style-type: none"> The top-up should be substantially higher than \$5,000 to attract a CEC with technical qualifications and experience. <p>In terms of appropriate standards to be considered, communities provided the following suggestions:</p> <ul style="list-style-type: none"> Recommend that all CEC's complete the Certified Energy Auditor (CEA) program offered by Canadian Institute for Energy Training (CIET). Energy audits will likely comprise a large portion of a CEC's job duties so they should receive high quality certification to do so. Additional standards that should be considered for a technical qualification: 3-year diploma in mechanical, electrical, HVAC, and energy management technology (Technologist), ASHRAE certified as a Building Commissioning Professional (BCxP), Building Energy 	

Topic	Feedback	IESO Response
	<p>Assessment Professional (BEAP), Building Energy Modeling Professional (BEMP), High Performance Building Design Professional (HBDP).</p>	
Indigenous Community Energy Plan Program		
<p>Does the prerequisite of a Community Energy Champion for any Community Energy Plan update pose any issues or barriers?</p>	<p>Generally, feedback received indicated support for the prerequisite of a CEC for any Community Energy Plan update:</p> <ul style="list-style-type: none"> • Only in the case of those without one, but to counteract that; the prerequisite for a CEC provides an incentive to apply for the CEC funding streams. Which ensures optimal engagement of these projects. • I think it is a great idea to require a CEC in place for an ICEP. This will help with Community Engagement and ensuring the ICEP is a community lead initiative, reflective of the community priorities. • Energy Planning should be part of the community strategic planning process. • One community commented that the ICEP is a high level plan that does not 	<p>Thank you for your feedback.</p>

Topic	Feedback	IESO Response
	<p>require a CEC, however, a CEC would be more helpful than a consultant and reduce costs.</p>	
<p>How many community engagement sessions would ensure appropriate community involvement and awareness of the Community Energy Plan development?</p>	<p>Communities provided a range of responses with respect to the required number of engagement sessions:</p> <ul style="list-style-type: none"> • Quarterly engagement sessions should be standard, and as often as needed. • One minimum. • I think the number of engagement activities is specific to the community (size, method, etc.). However, communities should consider engagement at the beginning, during the process, and at the end of the ICEP development. • Many communities need support to get the strat plan developed and would need to also understand how each project needs to be developed so that the overall community budget and financing planning can be completed properly. 	<p>The proposed approach to community engagement for the ICEP program would allow each community to have the opportunity to tailor engagement to their own specific needs. Some form of engagement will be required as well as rationale for both the number of sessions and the approach taken to community engagement.</p>

Topic	Feedback	IESO Response
<p>Do the new proposed CEP components meet community expectations for energy planning? Are there additional areas that the IESO should consider?</p>	<p>One community stated flatly that the new CEP components do meet community expectations.</p> <p>Communities also suggested the following additional areas be considered:</p> <ul style="list-style-type: none"> • Energy Innovation. Communities also value “Walking with the old and new” approach. Embracing innovation but keeping traditional values. • I would suggest that it might be less costly overall, if IESO supported Project management training sessions in various key geographic areas that is targeted to energy projects. • Asset management • Operation and maintenance <p>IESO also received comments of support:</p> <ul style="list-style-type: none"> • We believe Community Energy Plans support efforts to better understand and manage local energy needs and identify improvements that can be undertaken. CEPs are a holistic and integrated approach to energy management and the proposed 	<p>ECB is accessible throughout the process for communities, and can be used for project management training.</p> <p>The proposed additional areas may be applicable for some communities but not all, and can be incorporated within the proposed categories, for example, asset management and O&M can be part of a baseline energy assessment, similarly energy innovation can be part of the future energy needs and resources assessment.</p>

Topic	Feedback	IESO Response
	<p>enhancements support a more robust approach to ensure improved outcomes for communities that prioritizes needs.</p> <ul style="list-style-type: none"> • We are interested in supporting communities with their efforts of developing CEPs and can be an additional resource for assistance to communities. We welcome dialogue with communities who wish to leverage our expertise in areas of energy management and project identification. 	
Education and Capacity Building Program		
<p>What ECB streams would address the current and future capacity needs of Indigenous communities and organizations?</p>	<p>Communities suggested the following streams would address the capacity needs:</p> <ul style="list-style-type: none"> • Community Engagement and Capital Project Skill Certification are the current funding streams most impactful to overall. • Many first nations are needing Project Management Training. They need it to be tailored to their immediate need. Then they need follow up training so that they can learn how to apply the specific training to all projects. 	<p>The proposed ECB streams would address capacity needs for engagement, skills and training. The IESO's intention is that the enhanced CEC program will provide funding support to cover associated costs for a Community Energy Champion in place of the ECB program.</p> <p>At this time, travel outside Ontario and Canada are ineligible expenses.</p>

Topic	Feedback	IESO Response
	<ul style="list-style-type: none"> • If there is an education requirement for CEC prior to being hired, ECB should address this. • Possibly use ECB funding for the CEC program recommendations: <ul style="list-style-type: none"> ○ Buying/Renting/Maintaining testing equipment ○ Trade show and training seminars outside Ontario/Canada ○ “CEC In Training” Costs ○ Remote Location Funding for CECs 	<p>Applicants would have to demonstrate that any material or equipment purchases under the ECB program are necessary to meet the program objectives.</p>
<p>What allocation of funds per stream is practical for the work to be carried out?</p>	<p>One community indicated that the \$50,000 for Capital Project Skills Certification is great as is. Stating further that the Community Engagement funding should be \$30-35,000, as the ECB “care packages” can take a good amount of it above anything else.</p> <p>Another community suggested to leave the allocation of funds open, with explanation in application.</p>	<p>Thank you for your feedback.</p>

Topic	Feedback	IESO Response
<p>In what other ways can the ECB program support Indigenous communities and organizations in better understanding and navigating current energy systems, policies, and funding?</p>	<p>Communities and stakeholders suggested the ECB program could further support them in the following ways:</p> <ul style="list-style-type: none"> • An initial walkthrough of the process and expectations, as well as keeping an open dialogue is sufficient. • They are entering into contracts that are large and construction related. They need formal PM training so that they can better understand contract management and risk management and will support later operations. • Understanding Energy Environment: when IESO is developing their training opportunities, should provide info on energy systems, policies, funding (how to develop proposals/business case). <p>One community commented that the ECB program is quite flexible and no recommendations at this time.</p>	<p>Thank you for your feedback. The IESO will provide additional support for applicants through dedicated sessions during the intake period. The IESO is also available to answer any specific questions related to completing an application. Please direct any questions to the dedicated program emails: ECB@ieso.ca; CEC@ieso.ca; ICEP@ieso.ca; and IEP@ieso.ca</p> <p>IESO is planning to expand the information provided in the training that is offered to CECs. This will include grant writing and basic financial analysis. These recommendations will be considered for future updates to the training.</p>

Indigenous Energy Projects Program

Topic	Feedback	IESO Response
<p>Do the new proposed definitions for “feasibility”, “project development” and “innovation” under IEP capture the various projects that Indigenous communities and organizations are looking to pursue? If not, what are the gaps?</p>	<p>Feedback was provided on the following potential gaps in the proposed definitions:</p> <ul style="list-style-type: none"> • Feasibility should also include a defined environmental assessment. • I believe there would be different levels of feasibility. At a high level, most things would appear to be feasible, simply based on goals and will. Quite often the project needs to be planned to determine financial and operational viability. • Innovation should not only be about reliability and cost-effectiveness. This should include its actual overall impact. • Innovation should include projects that are innovative to the specific FN community. 	<p>Thank you for the comments. The proposed definition for feasibility will support a range of activities including financial, technical and operational viability, and in particular, permitting.</p> <p>The proposed Innovation category is intended to recognize unique community and organization contexts and allow applicants define projects accordingly.</p>
<p>Does a Community Energy Plan (CEP) prerequisite pose any unforeseen issues for capital project development?</p>	<p>One community indicated no concerns with the CEP prerequisite, instead stating that it would be an asset.</p> <p>Other communities provided the following considerations:</p> <ul style="list-style-type: none"> • The two should be incorporated into larger slices versus a two step process. 	<p>Thank you for the feedback. The requirement to provide a Community Energy Plan (CEP) is not intended to exclude participation. Applicants are encouraged to align existing plans with future implementation, but it is not a requirement to only draw upon specific projects identified within the CEP for capital project development as part of the IEP program.</p>

Topic	Feedback	IESO Response
	<ul style="list-style-type: none"> • Ideally, CEP will identify project, but allow for communities who have identified in other documents such as Comprehensive Community Plan. • The prerequisite of having or linking IEP application to the CEP, can cause issues. The CEP is a high-level study, and may not include some specific and unique opportunities. The hired consultant for the CEP may not have experience or knowledge of all technologies. New technologies may not be covered in the CEP. 	<p>Additionally, there will not be a requirement to submit a CEP for applications to the partnerships stream for a transmission project.</p>
<p>In what other ways can the IEP program support Indigenous communities and organizations to explore equitable access to energy project partnerships, employment, and leadership?</p>	<p>Community and stakeholder feedback included the following suggestions on how the IEP program can further support their communities:</p> <ul style="list-style-type: none"> • In consideration of remote communities, it is possible they lack external resources entirely (in terms of access or existence) that would be beneficial in carrying out the plans and projects. These communities would require a larger budget in comparison to my own. 	<p>Thank you for the comment. The ECB program may be used to meet the capacity building needs of communities and organizations to compliment an IEP project.</p>

Topic	Feedback	IESO Response
	<ul style="list-style-type: none"> Knowledge of capital projects, required project management knowledge. 	
Partnerships Stream	<p>Feedback was provided on the partnerships stream of the IEP program:</p> <ul style="list-style-type: none"> Funding should be retroactive to February 2020, due to the gap in IESO programs during the year. As it relates to the Partnerships Stream, we do not support the IESO positioning IEP as an implementation program following community visioning (ICEP) and capacity resourcing (CEC, ECB). Transmission projects do not always flow as an implementation program from other IESO programs. 	<p>Under the IEP program, retroactive costs are eligible dating back to October 26, 2017.</p> <p>The intention for positioning IEP as an implementation program is to align long-term community energy visioning and planning with the projects that communities develop in the IEP program. Based on the feedback provided, the IESO will require completed CEPs, if available, to be included in an IEP application, but it will not require a specific IEP project to be identified in the CEP.</p> <p>Based on the feedback received, there will not be a requirement to submit a CEP for applications to the partnerships stream for a transmission project.</p>
Other		

Topic	Feedback	IESO Response
General	One community provided overall support for the planned enhancements, stating: We support the enhancements being recommended by the IESO to Community Energy Champion, Indigenous Community Energy Plan Programs and Indigenous Energy Projects, as continuous improvement ensures that these programs deliver the most meaningful outcomes.	Thank you for your feedback.

Please note that the information and responses provided by the IESO herein are for information and discussion purposes only and are not binding on the IESO. This document does not constitute, nor should it be construed to constitute, legal advice or a guarantee, representation or warranty on behalf of the IESO. In the event that there is any conflict or inconsistency between this document and the Market Rules, Market Manuals or any IESO contract, including any amendments thereto, the terms in the Market Rules, Market Manuals or contract, as applicable, govern.