GreenON Business Plan – Preliminary Draft, v. 6.0
Comments from Ministry of Energy
February 22, 2018

Proposed request to MOECC

- Could MOECC share the following documents with ENERGY?
    1. MOU between MOECC and GreenON for ENERGY's information (referenced in section 1.1 Mandate, Page 4)
    2. Stakeholder engagement plan for ENERGY's information (referenced in section 5 Communications Strategy, Page 21)
    3. Draft strategic plan for ENERGY's review (referenced in section 1.2 Strategic Plan, Page 5)
        - GreenON notes that it is in the process of consulting with ministries on the draft plan before finalizing, but ENERGY hasn't yet seen this plan.

Comments for MOECC

Section Page Paragraph	Language from Plan	Comments and suggested edits
Executive Summary Paragraph 3	The Agency will also integrate and support existing programs offered by utilities and others in order to provide a "one-window" approach for residents and businesses.	**Requested Edit:** The Agency will also coordinate and integrate with ~~and support~~ existing energy efficiency programs offered by electricity and natural gas utilities and the Independent Electricity System Operator (IESO) ~~others~~ in order to provide a "one-window" approach for residents and businesses. **Comment:** The Agency is not supporting existing EE programs; it is providing one-window access. Edits to clarify those involved in EE program delivery.

Executive Summary Paragraph 5	GreenON has already taken responsibility for a number of existing programs that target the buildings and goods producing sectors.	**Comment:** Although it is not explicit here, section 3 further clarifies that this language is referring to the GIF-supported programs. Section 3 also indicates that these programs will be exited or transitioned to GreenON. **Suggested Edit:** GreenON has already taken responsibility for a number of existing programs that target the buildings and goods producing sectors, and were originally offered through the Green Investment Fund.
Executive Summary Paragraph 6	The Agency will be responsible for distributing over $600 million annually to program participants.	**Comment:** Does the $600 million include administrative costs associated with program delivery? As currently written, this sentence could suggest the $600 million does not include administrative costs. For context/comparison, MOECC is currently paying the IESO to cover its administrative costs to deliver certain GreenON programs (per the MOECC-IESO TPA/collaboration agreement).
Executive Summary Paragraph 6	Key to this will be an organizational structure that allows for decision-making that can respond quickly to changing market conditions, as well as a modern IT infrastructure that will effectively support operations. Furthermore, it will be important to work collaboratively with partners to ensure timely delivery of programs.	**Comment:** We understand that some sections of this document were removed for purposes of ENERGY's review (e.g. operational, HR). If not already addressed in the operations section, could MOECC consider including content regarding the IESO's role in helping to launch GreenON website and programs?
Executive Summary	One of the most significant is the complex market into	**Suggested Edit:**

Paragraph 7	which it is entering, where rebate programs are provided by a number of organizations. To address this, GreenON will act as a "one-window" source to help minimize market confusion and ensure Ontarians can easily get the information they need to make low-carbon decisions. GreenON will work collaboratively with other program administrators to maximize participation in all programs, focus on incremental (additional) savings, and help energy consumers reduce their energy consumption.	To address this, GreenON's website will act as a "one-window" source of information about energy efficiency, conservation, and GreenON programs, ~~to~~ help minimize market confusion and ensure Ontarians can easily get the information they need to make low-carbon decisions. GreenON will work collaboratively with other program administrators to avoid program duplication, maximize participation in all programs, focus on incremental (additional) GHG and energy savings, and help energy consumers reduce their energy consumption.
1.1 Mandate Page 4	Provide a simple and easy "one-window" approach for GreenON programs and all other available programs to Ontario residents and businesses.	**Suggested edit:** Provide a simple and easy "one-window" approach for GreenON programs and all other ~~available~~ energy efficiency and conservation programs available to Ontario residents and businesses.
1.1 Mandate Page 5	With the support of MOECC and GreenON's delivery partners (see Section 8.1), GreenON has already realized significant	**Suggested Edit:** Section 8.1 should read 6.1. In August 2017, the simultaneous launch of the Agency, the "one-window" GreenON website for all energy efficiency, conservation, and GreenON

	achievements. These include: - … - **In August 2017, the simultaneous launch of the Agency, the "one-window" GreenON website for all energy and GreenON programs,** and GreenON Installations, including the registration of over 130,000 Ontarians wanting to fight climate change - … - Entering into transfer payment agreements with the Independent Electricity System**s** Operator (IESO) and the Ontario Centres of Excellence (OCE),	programs, and GreenON Installations, including the registration of over 130,000 Ontarians wanting to fight climate change. IESO is the Indpendent Electricity System Operator – delete the extra "s" in "Systems".
Section 2.1 Page 10 Para 3	GreenON is entering a complex marketplace where energy efficiency and conservation programs are provided through a variety of	IESO is the Indpendent Electricity System Operator – delete the extra "s" in "Systems".

	organizations, including the Independent Electricity Systems Operator (IESO), local distribution companies (LDC), and natural gas providers (e.g., Enbridge, Union Gas).	
Electricity and Natural Gas Conservation Programs, Page 10	GreenON is entering a complex marketplace where energy efficiency and conservation programs are provided through a variety of organizations, including the Independent Electricity Systems Operator (IESO), local distribution companies (LDC), and natural gas providers (e.g., Enbridge, Union Gas).	**Suggested Edit:** Utility-delivered conservation programs have been in place in the province since the mid-1990s, and the Province increased its conservation efforts following a commitment in the 2013 Long-Term Energy Plan (LTEP) to put "Conservation First," reaffirmed in the 2017 LTEP. As such, GreenON is entering a complex marketplace where energy efficiency and conservation programs are provided through a variety of organizations, including the Independent Electricity Systems Operator (IESO), local distribution companies (LDC), and natural gas providers (e.g., Enbridge, Union Gas). **Comment:** Recommend providing context as to why this existing suite of conservation programs exist. $3 billion has been allocated to the 2015-2020 electricity Conservation First Framework and natural gas Demand Side Management Framework to achieve committed energy savings targets and associated GHG reductions that will contribute to the province's 2020 emissions target.
Page 10	Due to variations in program design, funding, delivery models and variability in availability, GreenON will play a key role to minimize market confusion and will work with other program	**Comment:** This is a misrepresentation of ENERGY's recent directions to the IESO and through the LTEP, and suggests that GreenON programs will alleviate the current market complexity, which may not be the case if more programs and delivery partners are added to the mix. The December 2016 amending direction required the IESO to take steps to ensure all customers across the province have access to province-wide electricity conservation programs, and February 8, 2018 for IESO to deliver a

	providers to create a "one-window" approach.	province-wide Indigenous conservation program/s, where not already offered by an LDC. **Requested Edit:** ~~Due to variations in program design, funding, delivery models and variability in availability,~~ GreenON will play a key role to raise awareness in programs, minimize market confusion and will work with other program providers to create a "one-window" approach.
Energy Policy, Page 11	Energy Policy The Ministry of Energy's Long-Term Energy Plan (LTEP) indicates that Ontario's electricity system is well-supplied until the mid-2020's. This will impact GreenON's ability to substantially add more renewable power generation through its programming without negatively impacting the electricity market and grid. As well, GreenON is mindful of the province's new Net Metering structure and policies. To this end, GreenON will work closely with both the Ministry of Energy and MOECC, as well as IESO to carefully design new programs where new	**Suggested Addition:** Ontario's energy sector is playing an important role in the fight against climate change. Ontario's robust supply of clean electricity will help transition the province to a clean economy. The 2017 Long-Term Energy Plan (LTEP) reaffirms Ontario's commitment to Conservation First to improve affordability and choice for people, businesses and communities, and to co-ordinate its conservation programs with Ontario's climate change objectives. To this end, GreenON will work closely with both the Ministry of Energy and the IESO to complement Ontario's suite of existing conservation and energy efficiency programs, by offering consumers greater choice and convenient access to all programs. The Ministry of Energy's ~~Long-Term Energy Plan (~~LTEP~~)~~ indicates that Ontario's electricity system is well-supplied…

	electricity generation is involved to minimize negative impacts to the grid and electricity market. Additionally, the regulation of electricity pricing will be an important consideration for GreenON. The underlying economics of many low-carbon technologies are impacted as energy prices change or the relative market price of fuels change. GreenON will model programs based on current and forecasted energy prices and assess the economics from the society, program, and participant perspective.	
Page 12	The single largest emission source in the home is the heating system. About 65 per cent of homes are heated with natural gas, 22 per cent with electricity, and 13 per cent by other fuels. These values are similar for single and multi-family dwellings.	**Correction:** Over 75% of customers use natural gas to heat homes and facilities. Source: http://www.statcan.gc.ca/pub/11-526-s/11-526-s2013002-eng.pdf The 62% stat you referenced is specific to the total energy use….ie 62% of total household energy use in Ontario is from natural gas (pg 20) On page 19: 76% of Ontario homes use natural gas as the main heating fuel.

Section 3.1 Page 14 Para 1	"It is essential to ensure that everyone is able to access GreenON programs and participate in the low-carbon economy. This will mean creating programs designed to be accesible by all Ontarians…"	ENERGY recommends including language clarifying that electricity related programs, specifically programs involving electricity generation, may not have province-wide applicability due to grid constraints in certain areas. Or alternatively, at least some language that recognizes generally that there may be technical or geographic considerations that affect where certain types of programs (e.g. electricity) can be utilized by specific markets.
Table on Page 15	The following are offered to eligible Ontarians at no charge: - The installation of a smart thermostat… - A high-level walk through… - Home-specific advice on tips for …	**Suggested Addition (under Description for GreenON Installations):** GreenON Installations is currently not accepting new registrations/participants, and may reopen in 2018.
Future GreenON Programs, Page 17	As per GreenON's program design principles, final program design will be informed by stakeholder consultations.	**Comment:** Where does GreenON intend to provide information publicly about past and ongoing stakeholder consultations? For example, the IESO has an area on their website devoted to engagement activities.
Section 4 Page 18 Para 4 (table)	"Operational Risk Category: Performance management of third-party service providers"	ENERGY recommends including language regarding an additional risk related to third-party service providers (i.e. contractors): "The risk that third-party service providers (i.e., contractors) do not adhere to relevant consumer protection legislation/regulation resulting in consumer protection issues for program participants."

5 Communication Strategy, Key Audiences Page 21	Energy providers: The Agency will engage with energy providers such as local distribution companies, utility companies, and natural gas distributors, on information and decisions pertaining to new and existing programs.	**Suggested edits:** Energy providers: The Agency will communicate and engage with energy providers such as local distribution companies~~, utility companies, and~~ natural gas distributors and other fuel providers on information and decisions pertaining to new and existing programs. **Comment:** Suggest to mirror that language regarding communication and engagement used in other bullets because LDCs and gas distributors are also energy efficienty program delivery agents. Deleted "utility companies" as it seems redundant.
6.1 Delivery Partners	Independent Electricity System Operator: GreenON has retained the Independent Electricity System Operator (IESO) to design and deliver programs that improve consumer access to measures related to conservation and management of electricity. This partnership will not only result in cost efficiencies for both organizations, but also a streamlined customer experience. IESO is currently helping to deliver the following programs: • Home Energy Concierge Service • Smart Thermostat Installation Service	**Suggested Clarification:** Recommend clarifying for accuracy and transparency that the IESO has been retained through the MOECC-IESO Collaboration Agreement (TPA), and that the intention is to transfer this agreement to the Green Ontario Fund. Recommend also using market names of programs (e.g. GreenON Rebates). **Questions:** Confirm IESO is involved in commercial and agricultural programs?

	• Low-carbon Building Technology Incentives • Low-carbon Technology Incentives for Commercial and Agricultural SMEs	