

The Canadian Energy Efficiency Alliance (CEEAA)

Submission

Ontario's Long Term energy plan

Introduction:

CEEAA is the independent advocate for energy efficiency in Canada. We work with governments and stakeholders to ensure energy efficiency is a priority for all sectors of the economy. The organization was founded 21 years ago in Ontario and over half of our members are either located in or do business in Ontario.

Since the last public consultations on Ontario's long term energy plan there has been considerable change in the policy context for the province. Climate change mitigation has become a major focus for our country and the province. The province has also focused considerable attention on policies and programs that put "conservation first," a focus that CEEAA and its members support.

The International Energy Agency (IEA) has identified energy efficiency or energy conservation as essential to meeting climate goals. The Agency has identified energy efficiency as both cost effective and a huge opportunity that may be going unrealized within any climate framework. The IEA challenges us to look at energy efficiency/energy conservation through the lens of energy productivity – or using energy to do more with less: cutting energy waste, lowering expenditures, lowering emissions. It works for consumers; it works for businesses.

Recommendations

We note that the majority of conservation programs have just been launched recently and, therefore, it is difficult to comment on their effectiveness. In addition, former Energy Minister Bob Charelli has directed that the IESO:

- Undertake a plan to launch province-wide programs thus hopefully relieving certain Ontario businesses and groups from having to take a utility by utility approach to conservation programs. CEEA fully supports this approach.
- Undertake a technical review of certain programs, including conservation and DSM programs which will be available, we understand, in September. Public consultations will take place after that point and CEEA intends to participate.

Based on CEEAA's knowledge in the efficiency/conservation area plus our involvement with climate policy provincially, federally and internationally our recommendations are:

- **Continue to ensure that Conservation First remains a fundamental goal of the LTEP.**



- **Conservation and climate programs should be brought together into some form of single access point for Ontarians** – with the recent announcement of Ontario’s climate Change Framework, there is considerable confusion in the marketplace, among individual Ontarians and businesses. While local utilities are promoting “conservation” programs – there appears to be new climate-change-related undertakings, such as those focussed on retrofits for homeowners, that are reflective of or similar to already established utility programs. There needs to be better integration for the sake of Ontario citizens and businesses – we need to make well thought out **access to programs** an essential principle. Success for Ontario in terms of both conservation and climate mitigation will depend on having the largest number of citizens of the province engaged.
- **Review the framework of ‘Total Cost Recovery’** to allow for more flexibility in programing enabling better uptake in deep energy retrofits for Ontarians.
- **Future conservation and climate mitigation programs will need to be aligned with generation programs (renewables).** This is occurring already in the US where it is becoming evident that the traditional separate silos are no longer viable.
- **No new agencies are needed** – Ontario already has agencies like the IESO dedicated to developing both consumer and commercial programs etc. They have invested in extensive research on consumer engagement – both residential and commercial. Ontarians depend on local utilities as the source of such programs. Some changes are already underway - such as establishing province-wide programs through the IESO based on a recent directive to the agency. Rather than creating yet another organization and causing further confusion, increased inter-organizational turf wars and undermining shared goals of energy conservation and climate mitigation, it makes more sense to re-examine the existing organization(s) and re-focusing their mandates in light of today’s reality.

Given the changes referred to above and the lack of data now available, CEEA will await the consultations on the IESO’s technical report to make further comments.

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