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<tr>
<td>Retrofit</td>
<td>Prescriptive Lighting Measures with Broad Baseline Definitions</td>
<td>Consider modifying the baseline equipment for prescriptive measures to ensure a smaller range of operational wattage. In the case presented above the retrofit equipment can be compared to each lamp type (metal halide, high pressure sodium, and T12) individually to ensure that per unit savings are as accurate as possible. Adjusting the per-unit savings will also align the incentive so accurate levels of energy savings are achieved.</td>
<td>Medium</td>
<td>The intent of prescriptive measures is to simplify the application process for customers. Based on the program’s realization rates (100.6%) broad baselines do not appear to have a negative impact on reported results.</td>
<td>The Business Working Group (BWG) agrees with the evaluation recommendation, however further consideration is required to determine the best approach to updating the Prescriptive worksheet while maintaining the intended simplicity. The recommendation will be considered during the next round of Prescriptive Lighting Measure updates as per the BWG 2018 Work Plan, currently pending IESO approval.</td>
</tr>
<tr>
<td>Retrofit</td>
<td>Expired Prescriptive Lighting Measures</td>
<td>Review incoming applications to ensure that changes to program measures are accurately and consistently applied to all projects.</td>
<td>Medium</td>
<td>Due to technical difficulties experienced with the iCon system leading up to the implementation of changes, some participants were unable to initiate applications prior to the measure expiry date. LDCs, at their discretion, reserve the right to approve applications using the expired measures so long as the participant can demonstrate their intent to apply to the program before June 20, 2016. It remains the responsibility of the LDC to ensure that participants utilizing these expired measures continue to meet these criteria. It has been over a year since these measures were expired, the IESO will discuss with the BWG the timeline for removing the expired measures from the iCon system and expired worksheets from the Save on Energy website.</td>
<td>The BWG agrees with the Evaluators’ recommendation, such that particular attention should be paid to which version of the worksheet is used, which is a responsibility of the LDCs. The BWG will work with the IESO to create a reminder email which can be sent to LDCs via an IESO e-blast. Applications pre-approved with expired measures can be completed up to Dec 2020, therefore removing the expired measures is not an option unless the program rules are updated.</td>
</tr>
<tr>
<td>Retrofit</td>
<td>Generic Custom Track Measure Names</td>
<td>Screen custom applications to determine if the provided measure description includes sufficient detail. Revise measure name to reduce ambiguity if necessary.</td>
<td>Low</td>
<td>Capturing enough detail from participants through a form field is expected to be an ongoing challenge. As part of the CDMIS Working Group Response, a request has gone forward to CDM IS group to add a measure category dropdown list along with</td>
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### Retrofit Program

**Key Findings**
- Many custom applications include generic and vague measure names (e.g. kWh, kW, 3rd Floor, Energy Consumption, etc.) that make it impossible to tell if measures belong in the lighting or non-lighting strata. This was again seen in the 2016 impact evaluation. Appropriately classifying lighting or non-lighting measures will allow for more accurate estimation of the net verified savings for the Retrofit Program.

**Recommendations**
- **Support Needed by Retrofit Program Contractors in Delivering the Program to Customers**
  - Overall, one-half of surveyed contractors (50%) were satisfied with the program. They were most satisfied with utility interactions (69%) and equipment availability (60%).
  - Satisfaction was lowest for the application processes (22%) and worksheets associated with the program (45%). These aspects were described as inconsistent and/or cumbersome.
  - Around one-half (52%) of contractors did not receive any formal training or education through the program. Among those that did, a formal group session was the most common form of training (61%).
  - Some of the program improvements suggested by the contractors include:
    - reducing website crashes and telephone hang-ups, increasing incentives;
    - allowing for more customization outside of the custom track; and
    - making the audit, review, and pre-approval process more consistent across LDCs as well as less time-intensive overall.

- **Improve Retrofit Program customer participation through improved customer experience**
  - LDC staff reported that the largest barriers to increased customer participation in the Retrofit Program in line with their business practices so long as it is delivered in accordance with the applicable rules. While the IESO will continue to support the Working Groups with the development of program guides and reference material, the customer (or channel partner) experience through the program is expected to remain largely driven by each LDC’s own processes. The IESO is currently developing a new Conservation and Demand Management Information Solution (CDMIS) Retrofit solution which is expected to alleviate many of the application processing concerns experienced with the iCon system. In addition, the IESO will continue engaging customers and channel partners through various training opportunities to improve their program knowledge.

**IESO Response**
- Retrofit solution, a new field will be introduced into custom applications requiring the participant to identify the type of technology used in an effort to improve data quality.
- In the interim, LDCs are encouraged to review custom applications to ensure the participant has provided sufficient detail within the forms to appropriately identify the type of technology deployed.

- The current iCon system limitations do not allow the LDCs to update the measure description. Evaluators and LDCs will need to rely on application documentation submitted with the applications until the systems are updated.

**Working Group Response**
- Continuous improvement of worksheets and development of new worksheets and sales tools will be completed as required.
- The BWG provides webinars to LDCs on program updates who in turn can use this info to train applicant representatives and channel partners.
- As CDMIS Retrofit is under development by the IESO, the ease of program participation must be considered by the development team.
- LDCs continue to do outreach and engage their Channel Partners as evidence by the success of the Retrofit program.

**2016 EM&V Recommendation**
- To better assist contractors in delivering the program to their customers, improve program resources and functionality, and provide additional training and education for contractors regarding:
  - program offerings,
  - program rules and application process,
  - installation procedures and practices, and
  - marketing and outreach techniques to better upsell customers on program offerings.

**Impact**
- Medium

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<td>To better assist contractors in delivering the program to their customers, improve program resources and functionality, and provide additional training and education for contractors regarding:</td>
<td>Medium</td>
<td>Retrofit solution, a new field will be introduced into custom applications requiring the participant to identify the type of technology used in an effort to improve data quality. In the interim, LDCs are encouraged to review custom applications to ensure the participant has provided sufficient detail within the forms to appropriately identify the type of technology deployed.</td>
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<td>Retrofit</td>
<td>Improve Retrofit Program customer participation through improved customer experience</td>
<td>LDC staff reported that the largest barriers to increased customer participation in the Retrofit Program.</td>
<td>Support increasing program awareness and adoption among customers by:</td>
<td>Medium</td>
<td>As a core component of the Conservation First Framework, each LDC has the authority to market and deliver the Retrofit Program in line with their business</td>
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### Evaluation’s Key Findings and Recommendations: 2016 (Retrofit, Small Business Lighting, Audit Funding, High Performance New Construction)

**March 20, 2018**

#### Program Key Findings

- Program included the cost of upgrades (32%), difficult application process/website (26%), lack of customer understanding (15%), and market saturation (6%).
- Participating customers were satisfied with the program overall (83% satisfied).
- Over two-thirds (68%) of the participants surveyed indicated high satisfaction ratings with their interactions with their LDC and just over one-half (54%) indicated they were satisfied with their interactions with IESO representatives.
- Participant suggestions for improving the program included:
  - simplifying the program rules and applications requirements;
  - improving customer service and follow up;
  - increasing incentives; and
  - increasing the number of third party service providers to help encourage competition.

#### 2016 EM&V Recommendation

- improving LDC customer communications,
- increasing program awareness among customers,
- improving LDC and contractor marketing and outreach to customers,
- improving program materials to clearly demonstrate the value and benefits of the program-qualified energy-efficiency upgrades,
- creating program-specific marketing collateral containing case study information from successful projects to increase trust in program outcomes, and
- increase number of contractors participating in program to help encourage competition.

#### Impact

- practices so long as it is delivered in accordance with the applicable rules. While the IESO will continue to support the Working Groups in the development of program guides and reference material, the customer (or channel partner) experience through the program is expected to remain largely driven by each LDC’s own processes. The IESO is currently developing a new system for Retrofit which is expected to alleviate many concerns experienced by customers and channel partners with the application process through the current system. In addition, the IESO will continue engaging customers and channel partners through various training opportunities to improve their program knowledge.

#### IESO Response

- During 2016, only one LDC was offering Retrofit under the Pay-For-Performance funding model. It is difficult to determine if the lower proportion of non-lighting savings achieved is the result of the Pay-For-Performance funding model or if it is the result of the specific LDC’s business practices. It is recommended that this observation be revisited once results from the Pay-For-Performance funding model are analyzed.

#### Working Group Response

- The BWG agrees an improved application process is required through CDMIS Retrofit. Simplification of Program participation is held paramount by the BWG, and pursued where mutually agreed upon by the LDC community and the IESO.

#### Retrofit P4P

**Additional Savings Opportunity from Non-lighting Measures**

The P4P Retrofit Program captured a large portion of energy savings (82%) from lighting measures. The segment of non-lighting based energy savings (18%) is significantly lower than the FCR Retrofit Program, due to smaller P4P project sizes and lower proportion of completed non-lighting projects. Non-lighting measures from the prescriptive and engineered tracks are provided by a few end uses. Using the FCR Retrofit Program as a benchmark we expect additional savings opportunities by targeting non-lighting end uses outside of unitary air conditioners, VFDs, and compressed air improvements. Based on average project sizes there is also opportunity to target larger non-lighting measures.

**Focus on potential non-lighting energy savings opportunities, especially VFDs on motors and process improvements, to increase total program savings.**

- Low

1 In 2016, only one LDC had the P4P funding mechanism.
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<td>Small Business Lighting</td>
<td>Lighting Schedules (Hours of Operation)</td>
<td>Applicants to the Small Business Lighting Program are required to fill out a ‘Small Business Lighting Assessment Tool’. Applicants are required to input their facility’s lighting operating schedule, which determines the hours of use through which energy savings are calculated. The tool only accepts one schedule for the entire facility. Nexant found 15 instances in the sample (N=68) where lighting equipment was installed in multiple spaces with varying schedules. Additionally, the tool accepts schedule inputs in terms of a weekly schedule, which is assumed to be constant over the entire year. Nexant found 7 instances within the sample where the facility, and therefore the installed lighting equipment, operated at varying schedules throughout the year. With only one input schedule, applicants tended to input the schedule that corresponded to the greatest amount of hours a light would operate if varying schedules were observed. This resulted in overestimated energy savings of 4% within the sample.</td>
<td>Allow SBL participants to enter multiple schedules, both by space and by season or month, to increase the accuracy of the calculated reported energy savings.</td>
<td>Medium</td>
<td>The IESO plans to make available a more sophisticated tool which may improve the accuracy of savings calculations. Through the process of developing a new tool, risks associated with increasing the complexity of application inputs must be taken into consideration.</td>
</tr>
<tr>
<td>Small Business Lighting</td>
<td>SBL Savings Assumptions</td>
<td>Of the 68 sampled projects, 15 (21%) received adjustments to their reported savings due to inappropriate wattage assumptions on installed lamps. The SBL Assessment Tool allows for manual input of removed lamp wattages, but assigns assumed wattages to installed lighting fixtures through measure codes. Measure codes typically represent a specific lighting application broken down into bins of wattages where the deemed wattage is the highest possible wattage in the bin. For example measure codes SBL_12, SBL_13, and SBL_14 represent Energy Star qualified LED A-shape lamps with wattages ≤10, ≤12, and ≤16 respectively. Their respective deemed wattages are 10, 12, and 16, effectively rounding up the installed wattage of lamps. Consider revising the SBL measure baseline assumptions to be the average wattage of the range or increase the number of SBL measure codes so that a more representative baseline wattage can be selected.</td>
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<td>The IESO plans to make available a more sophisticated tool to improve the accuracy of savings calculations but must consider the risks associated with increasing the complexity of application inputs.</td>
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Evaluation’s Key Findings and Recommendations: 2016 (Retrofit, Small Business Lighting, Audit Funding, High Performance New Construction) March 20, 2018

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<td>any lamp within the bin to the highest possible value, creating the most conservative possible savings estimate. With the available measures through the SBL program, a 4-watt LED would be evaluated at 10 watts, which is more than double the actual wattage. This can lead to the reported energy savings being understated which leads to increases in realization rates.</td>
<td>Consider revising the SBL Assessment Tool to estimate the amount of demand savings based on the EM&amp;V peak demand definitions</td>
<td>Low</td>
<td>The IESO can explore updating the demand savings definition and calculations within the SBL Assessment Tool as part of future updates.</td>
<td>Recommendations were forwarded to SBL subgroup for consideration in program redesign.</td>
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<td>Small Business Lighting</td>
<td>Further Engage SBL Program Assessors and Installers to Better Understand Perceived Barriers to Increased Program Participation</td>
<td>Consider further engaging assessors and installers to allow LDCs and IESO to more fully understand challenges related to dollar cap of the incentives (both for the project overall and for the specific measures) and what equipment types they have concerns about or would recommend being included in future program years. The team recommends further investing the following suggestions recommended by the interviewed Assessors and Installers regarding specific lighting types: allowing T12 replacements (suggested by 6 respondents), increasing incentives for exterior lighting (suggested by 3 respondents), increasing incentives for T8/T12 to linear LED upgrade (suggested by 2 respondents), and including magnetic ballasts (suggested by 2 respondents).</td>
<td>Medium</td>
<td></td>
<td>The Business Working Group is currently undertaking a project to re-design the SBL program and will include a review of the eligible measures and incentives. As part of the re-design process, the Business Working Group will engage participants and channel partners to incorporate their feedback into the changes. The SBL Tool was recently updated to clarify the eligibility of LED Tube Re-Lamp projects where T12s are the base case.</td>
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|                             | incentives for customers more generally.  
|                             | • They were also less satisfied with the number and types of equipment incentivized through the program (average satisfaction rating for both of 3.4).                                                                 |                                                                                          |        |                                                                             |                                                                                        |
| Small Business Lighting     | Improve SBL Program Customer Participation Through Improved Customer Experience  
|                             | • LDC staff reported that the largest barriers to increased customer participation in the SBL Program were confusion caused by the program, the cost of upgrades, and lack of customer understanding (each mentioned by 11% of respondents).  
|                             | • Overall SBL program participants were generally satisfied with all aspects of the program (with 83% satisfied with the program overall).  
|                             | • The most common suggestions that SBL participants provided for improving the program included:  
|                             | o speeding up the process overall (from initial customer contact to final installation); and  
|                             | o improving customer service and follow-up in cases where the customer is dissatisfied with the initial lighting installation.                                                                                             | Consider improving customer participation by:  
|                             | • clarifying program requirements,  
|                             | • improving customer service through decreasing response time to address customer requests by LDCs, and  
|                             | • creating program-specific marketing collateral containing case study information from successful projects to increase trust in program outcomes.                                                                 | Medium | The Small Business Lighting Program was launched through the Conservation First Framework in 2016 and the majority of LDCs were either not in market or entering into the market during the 2016 program year. It is expected that many of the customer service standards and program inconsistencies will improve as LDCs and service providers become more familiar with the program.  
|                             |                                                                                                                                          |                                                                                          |        | The SBL program re-design is currently underway.  
|                             |                                                                                                                                          |                                                                                          |        | Program specific marketing and education collateral will be developed with the support of Marketing and Sales Working Group with the launch of the re-designed program. Feedback from vendor and contract stakeholdering will also be incorporated into the forthcoming implementation plan. |
| Audit Funding               | Improve Audit Funding Program Awareness to Customers and Contractors  
|                             | • Majority of Audit Funding participants are satisfied with the program and would recommend it to others (89%).  
|                             | • Participants hear about the program primarily through contractors (30%) and via LDC representatives (25%).  
|                             | • According to LDC staff, the largest barriers to increased customer participation in the Audit Funding Program are the lack of customer experience through the program is largely driven by each LDC’s own processes while  
|                             |                                                                                                                                          | To expand program awareness and participation among key customers and the trade allies that typically service them consider:  
|                             | • increasing outreach and marketing efforts to key customer segments,  
|                             | • creating program-specific marketing collateral containing case study information from successful projects to increase trust in program outcomes.                                                                 | Low    | In response to the December 16, 2016 Minister’s Directive, it is expected that all LDCs who have elected to include the Audit Program as part of their CDM Plan will ensure the program is actively delivered to eligible participants in their service territory. As a result of this commitment, we expect to see the customer and channel partner outreach improve.  
|                             |                                                                                                                                          |                                                                                          |        | The BWG will engage with the Marketing and Sales Working Group to develop collateral to help promote the value of the Audit program and how LDCs can maximise results in converting audit recommendations into projects. |
## Evaluation’s Key Findings and Recommendations: 2016 (Retrofit, Small Business Lighting, Audit Funding, High Performance New Construction)

**March 20, 2018**

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| High Performance New Construction | Understanding (12%), inadequately trained contractors (9%), cost of upgrades (6%), and audit costs (6%).  
- Participant results indicate a high satisfaction rate with program components including energy auditors, and the reports. High participant satisfaction rates indicate this program has strong potential for increased participation should program awareness infiltrate desired building sectors. | Track and completely fill in the measure and project level details of reported HPNC projects, and identify the different stages (such as modelling, decision making and project completion). | Medium          | The IESO supports Working Groups with the development of program guides and reference material. | More emphasis on LDCs processes for capturing data has been addressed by the IESO’s LDC Report. |
| Data Collection              | The previous program evaluator noted that many gaps existed within the reporting database. While there was some improvement to the reporting of the identification of measures and track information this issue was still present to some extent in the 2016 program data. In an effort to mitigate the uncertainty of the reporting database, Nexant requested all available project files for any HPNC project reported through April 1st to fill in these gaps but this could be avoided and further analysis of the measures could be completed if the database was more complete. | Better publicize and promote the program to builders and developers to ensure they understand program offerings and to ensure that customers are enlisted as participants as early as possible in the construction process. | Medium          | As part of the 2017 HPNC program re-design, the Marketing and Sales Working Group in cooperation with the Business Working Group are developing new marketing materials to improve promotion of the program. | The BWG agrees with the Evaluators’ recommendations. As part of the 2017 HPNC program re-design, the HPNC sub-group has drafted post-implementation engagement plans including training and guides as per the BWG 2018 Work Plan, currently pending IESO approval. This work is planned to be completed with the support of the Marketing and Sales Working group. |
| Improve Program Awareness among HPNC Builders and Developers through Increased Marketing, Outreach, and Training Efforts | Most builders were satisfied with the HPNC program overall. Builders gave a median rating of 4 when asked about overall program satisfaction (using a scale of 1 to 5, where 1 is “not at all satisfied” and 5 is “completely satisfied”).  
- Builders who attributed low satisfaction ratings to the program overall noted difficulty in finding the program. However, they expressed satisfaction that it is available.  
- Nearly all of the builders' projects that did not go through the program occurred prior to the | | Medium          | | |
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<td>High Performance New Construction</td>
<td>Only one builder heard about the program through a utility representative, and none through an IESO representative or through program marketing materials. None of the respondents reported that they or anyone in their company had participated in any type of program training in 2016.</td>
<td>Increase customer participation by:</td>
<td>Medium</td>
<td>The customer (or channel partner) experience through the program is driven by each LDC’s own processes while the IESO supports the Working Groups with the development of program guides and reference material. As part of the 2017 HPNC program re-design, the Working Group has addressed many of the recommendations including:</td>
<td>A program re-design was recently completed in 2017, expected to result in an improved customer experience. HPNC sub-group has drafted post-implementation engagement plans including training and guides as per the BWG 2018 Work Plan, currently pending IESO approval. This work is planned to be completed with the support of the Marketing and Sales Working Group.</td>
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<td>builders learning about the program’s existence.</td>
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<td>- LDC staff reported that the largest barriers to increased customer participation in the HPNC Program were lack of new construction in the service area (16%) and the difficult application process (9%).</td>
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<td>- Over one-half of HPNC participants (53%) gave high satisfaction ratings to the program overall.</td>
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<td>- Most (85%) were also very likely to recommend the program to others.</td>
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<td>- Respondents were most satisfied with the quality of work done by the builders (90% very satisfied) and the performance of the new equipment (79% very satisfied).</td>
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<td>- Roughly one-quarter of respondents provided low satisfaction rating for the dollar amount of the incentives (five of 19 respondents), and a slightly lower proportion (four of 19) gave low satisfaction ratings to the time it took to receive these incentives.</td>
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<td>- Respondents rated their satisfaction with the interactions that they had with local utility representatives similarly to their satisfaction with the program incentives: just under one-half of respondents (eight of 19) rated these interactions highly, while few (three of 19) gave low satisfaction ratings.</td>
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<td>- Although none of the program factors received</td>
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### Evaluation's Key Findings and Recommendations: 2016 (Retrofit, Small Business Lighting, Audit Funding, High Performance New Construction)

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<td>Cross Cutting</td>
<td>overwhelmingly low ratings, the lowest proportion of respondents gave high satisfaction ratings to the interactions that they had with IESO representatives (six of 19), and to the content of any technical study or report(s) related to the program (five of 19).</td>
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<tr>
<td>Cross Cutting</td>
<td><strong>Continue to Improve IESO Responsiveness</strong></td>
<td>Continue to improve IESO responsiveness both in terms of:</td>
<td>Medium</td>
<td>To improve the quality and timeliness of responses, the IESO has added an additional LDC Business Advisor Resources and has also begun developing a repository of questions and responses to LDCs. In addition, the IESO is working to develop a new series of service standards for responses to LDC inquiries and the various IESO processes. The performance of the iCon system has improved with the recent implementation of system enhancements while the new CDMIS Retrofit solution is in development. The IESO is committed to providing updates to all LDCs through regular E-Blast as well as special bulletins, as required. Each LDC can deliver the programs in line with their business practices so long as it is in accordance with the applicable program rules. It is not always appropriate for the IESO to provide guidance when decisions are at the discretion of the LDC.</td>
<td>The BWG recommends that the IESO develop and publish FAQs for LDCs to self-serve. The BWG and associated subgroups can support the IESO in developing the FAQs. The BWG recommends the IESO publish services standards for responding to inquiries and requests.</td>
</tr>
<tr>
<td>Cross Cutting</td>
<td><strong>Identify Potential Gaps in Coverage</strong></td>
<td>Identify and address gaps in coverage to find additional savings opportunities through further collaboration with IESO and LDC staff.</td>
<td>Low</td>
<td>The IESO will continue to work with LDCs via the Working Groups to improve programs and address gaps in coverage.</td>
<td>The BWG agrees with the IESO’s response and will continue to work on improving programs and uptake through Working Groups.</td>
</tr>
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</table>

**Cross Cutting Continue to Improve IESO Responsiveness**
- LDC staff were asked to rate IESO on various aspects of communications with the LDCs on a scale of 1 to 5, where 1 means “very poor” and 5 means “excellent.” LDCs rated IESO as a 3.3 for ‘adequacy or completeness of responding to inquiries or requests for clarification from LDCs’. One LDC staff member said they often receive incomplete responses and need to follow up for additional information.
- In terms of ‘IESO time needed to respond to inquiries or requests for clarification from the LDCs’, LDCs provided an average rating of 2.5. One LDC staff member noted that timeliness of response has been more of an issue recently due to issues with the iCon system.
- In terms of ‘overall communication with LDCs’, LDC staff provided an average rating of 3.3. One LDC staff member said it can be difficult to get a clear answer to requests for information. Another LDC said their communication experience has been improved through the assistance of a dedicated IESO representative to help address larger issues.

**Cross Cutting Identify Potential Gaps in Coverage**
- IESO staff noted that there are very likely deeper savings opportunities that are not being addressed yet, and that it will likely require more work and deeper collaboration between IESO and the LDCs.
- Several LDC staff mentioned gaps in coverage related to technologies (such as T-12s associated
### Cross Cutting

**Address Customer Barriers to Participation and Increase Program Uptake**

- IESO and LDC staff provided feedback on common barriers to participation. These included:
  - the inability to quickly implement program refinements;
  - not working closely enough with channel partners who typically submit applications on the customers’ behalf;
  - burdensome contractual or administrative obligations;
  - delays in reimbursement;
  - difficulty in explaining program benefits
  - lack of information about technologies
  - too many program offerings;
  - incentives aren’t high enough
  - program rules sometimes limit participation; and
  - LDCs and channel partners not knowing how to pitch programs to customers.

- IESO and LDC staff suggested enhancing the process for the customer as much as possible through:
  - improving the website used to submit applications; and
  - providing more clarification on what is required; and simplifying paperwork requirements.

**2016 EM&V Recommendation**

- Consider increasing program uptake by:
  - improving marketing by IESO and LDCs;
  - offering fast tracks for small projects;
  - improving the iCon system for the Retrofit program, moving Audit Funding and HPNC programs from paper to online application submission process;
  - enhancing channel partner training and education including guidance on cross-selling customers on all relevant Save On Energy programs;
  - removing cost-sharing aspects and the kW-based incentive for some programs;
  - adding to the approved vendors list for Audit Funding; and
  - expanding program rules, and streamlining programs.

**Impact**

- Medium

**IESO Response**

- All of the active program redesign efforts are focused on improving the participation experience for customers. Through a revised working group structure, greater emphasis will be placed on engagement with program participants and channel partners to provide input on program improvements. The IESO and LDCs are identifying opportunities to quickly implement program refinements through a review of the current structure of Working Groups.

**Working Group Response**

- The BWG agrees with the IESO’s response and is looking forward to opportunities to improve program redesign processes and effectiveness.