

Feedback Form

2021-2024 Conservation and Demand Management Framework – Mid-Term Review

April 22, 2022

Feedback Provided by:

Name: Corey Lee

Title: Director of Operations

Organization: Green Integrations Inc.

Email: [REDACTED]

Date: April 27/2022

Following the April 22, 2022 webinar on the 2021-2024 Conservation and Demand Management Framework – Mid-Term Review, the IESO is seeking feedback from participants on information presented at the April session or for any other areas of clarification.

The referenced presentation can be found under the April 22, 2022 entry on the <https://ieso.ca/en/Sector-Participants/Engagement-Initiatives/Engagements/Conservation-and-Demand-Management-Mid-Term-Review>.

Please provide feedback by May 12, 2022 to engagement@ieso.ca. To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the [CDM-MTR engagement webpage](#) unless otherwise requested by the sender.

Thank you for your time.

Proposed Discussion Questions from the April 22 presentation materials

Topic	Feedback
Are there any emerging system needs or demand trends that IESO should be considering?	Solar and BESS projects for small and medium business. Prescriptive based on AC or DC system sizes solar systems.
How are customer needs changing? Are there emerging issues for your customer segment that should be considered?	Customers are looking for onsite generation.
What program changes/new program opportunities might be beneficial to address emerging customer needs?	Incentives with open windows to install on site generation. Previous federal incentive incorporates tight timelines and are not consistent.
How has COVID impacted your business? Do you foresee additional challenges as your business recovers from the impacts of the pandemic that may impact your ability to implement energy efficiency projects?	Customers are looking for incentives to help with onsite generation and demand management.
Are there systemic barriers that your organization or community faces when undertaking energy efficiency projects?	If the new plan for large distributors to receive the incentives directly for LED sales, then yes, this is a barrier. If you make this open for ESCO's and all distributors to apply, then it would be efficient. This cannot be limited to the biggest companies like NEDCO, Robertson, Greybar and Wesco.

Other General Comments/Feedback:

The main comment we would have is the proposed new direction for LED lighting retrofits and how the discount would come directly from a distributor. This essentially is forcing all companies in Ontario to purchase from IESO selected distributors, which does not promote an equal and fair industry, what this does is promote the largest distribution companies to gain free business.

For example, in most cases we would purchase off a manufacture or perhaps a local distributor and apply for the grant on behalf of our customer, but if you force us purchase from a distributor, there is an added layer of costs as well as a limit to what material maybe available, often we use multiple manufactures in one project to make sure the customer has the best system when its completed. This does not help promote an industry, unless you make the rebate open to any company selling lights, otherwise the IESO would be promoting anti-competition.

Overall, this limits the market, and would deter new manufacturers, existing manufactures, and other ESCO's out of this market, unless any ESCO, or distributor can apply and be accepted.

I think some more information on the IESO plan to proceed with this would be evaluated. Our company has been using the SOE program for 10 years now and have been a big part of the CDM.