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# Industrial Conservation Initiative Background and FAQs

Updated July 2022



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# Disclaimer

The following document is provided for the convenience of local distribution companies and other interested parties. Please be advised that the information in the following document is subject to change. The IESO may revise, withdraw or make final these materials at any time at its sole discretion without further notice. The reader should be aware that where a provision of Ontario Regulation 429/04 is applicable, the obligation that needs to be met is as stated in Ontario Regulation 429/04. To the extent of any discrepancy or inconsistency between the provisions of Ontario Regulation 429/04 and this document, the provision of Ontario Regulation 429/04 shall govern.

# 1. Overview

Ontario's electricity system is built to ensure an adequate and reliable supply of electricity in order to meet the energy needs of all customers in Ontario. Ontario's electricity system is also designed to be able to supply all of Ontario's electricity demand, especially during hours in which the demand for electricity is the highest. The Industrial Conservation Initiative (ICI) program was designed to incentivize eligible industrial and commercial customers to reduce their demand during peak periods in order to help the province defer the need for investments in new electricity infrastructure that would otherwise be needed. Customers who participate in the ICI, referred to as Class A, pay GA based on their percentage contribution to the top five peak hours over a 12-month<sup>1</sup> period.

Customers who are eligible to participate in the ICI program may include:

- Customers in the manufacturing and industrial sectors, including greenhouses (with NAICS codes commencing with the digits "31", "32", "33" or "1114") with an average monthly maximum hourly demand greater than 500 kW and less or equal to 1 MW during the applicable base period
- Customers with an average monthly maximum hourly demand greater than 1 MW but less than or equal to 5 MW during the applicable base period. Customers in this category need to opt-in to the program
- Customers with an average monthly maximum hourly demand greater than 5 MW during the applicable base period. Customers in this category are automatically entered into the ICI program and need to opt-out if they wish to be treated as a Class B customer for the applicable base period
- Existing Class A customers who participated in one or more of the conservation programs specified in Ontario Regulation 429/04 in Section 6.2 (3), who dropped below the average monthly maximum hourly demand threshold, may still be eligible to participate in the ICI. LDC consumers should contact their local distribution company (LDC) and market participants should contact the IESO if they believe that their eligibility has been impacted by their participation in these programs. Please refer to Ontario Regulation 429/04, sections 6.2 and 7.2 for more information.

Key terms:

- **Class A:** customers participating in the ICI. The term 'customers' refers to both IESO market participants and LDC consumers.
- **Global Adjustment (GA):** the electricity bill component that covers the cost of building new electricity infrastructure, maintaining and refurbishing existing generation resources and covers the cost of delivering conservation programs in order to ensure adequate electricity supply over the long term in the province of Ontario.

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<sup>1</sup> On May 28, 2020, the Regulation was amended to provide option for customers to use a 10-month base period ending February 29, 2020 to exclude months where operations may be reduced or suspended due to COVID-19 impacts.

- **Peak Demand Factor (PDF):** a Class A customer's percentage contribution to the top five peak hours over a 12-month base period (May 1-April 30)
- **Base Period:** 12-month period which lasts between May 1 to April 30 of the following calendar year. A customer's consumption and demand data during this period are used to determine if a customer is eligible to participate in the ICI program. If eligible, the customer's consumption during the top five peak hours (which also occur during the same base period) is used to calculate the customer's PDF.
- **Adjustment Period:** 12-month period which lasts between July 1 to June 30 of the following calendar year. If a customer chooses to participate in the ICI program for a given adjustment period, their monthly Class A global adjustment charges, during the adjustment period, will be calculated based on their PDF.
- **AQEW:** Allocated quantity of energy withdrawn (in MWh) by a market participant at a metering point in each 5-minute interval. The sum of the twelve 5-minute interval AQEW quantities represents the hourly volume of electricity withdrawn from the IESO-controlled grid. Refer to the IESO's [Market Rules and Manuals Library](#), Chapter 9 – Settlements and Billing for more information.
- **Load Facility:** For market participants, a load facility is defined in Ontario Regulation 429/04, as a load facility or an embedded load facility, as those terms are defined in the market rules (O. Reg. 163/12, s. 1.). For LDC consumers, a load facility is defined in Ontario Regulation 429/04 as a facility that withdraws electricity from the distribution system of a licensed distributor (O. Reg. 163/12, s. 1.)
- **Ontario Demand:** Electricity dispatched through the IESO-administered markets for the purpose of supplying Ontario's electricity requirements. For more details related to the calculation of Ontario demand, please refer to the [Realtime Constrained Totals Report Description](#).

All requirements related to the ICI can be found in [Ontario Regulation 429/04](#) (the Regulation). More information on GA is available on the IESO's [website](#). Customers connected to a distribution network should contact their local distribution company (LDC) with any questions. For other enquiries on the ICI and GA, please contact IESO Customer Relations:

e. [customer.relations@ieso.ca](mailto:customer.relations@ieso.ca)

t. 1.888.448.7777 / 905.403.6900

## 2. Regulation Amendments that Impact ICI Eligibility (effective May 1, 2022)

The Ministry of Energy recently filed regulatory amendments related to its administrative review of Ontario Regulation 429/04 (Regulation). The amendments came into effect May 1, 2022, to align with the start of the current ICI base period. The amendments to the Regulation were made to streamline and enhance the transparency of certain aspects of the ICI program. Review the [amendments to the Regulation](#).

### 2.1 Update to ICI Peak Hour Determination

Prior to May 1, 2022, the top five peak hours were determined using final adjusted AQEW (allocated quantity of energy withdrawn). At the start of the May 1, 2022 to April 30, 2023 base period, the final adjusted AQEW will no longer be used for determining the top five peak hours. The five peak hours will be determined using Ontario demand (i.e., the 5 hours during the base period in which the greatest volume of electricity was dispatched through the IESO-administered markets for the purpose of supplying Ontario demand). Please refer to the '[Industrial Conservation Initiative Update - Reminder](#)' IESO bulletin for more information and links related to this regulatory amendment.

### 2.2 Update to LDC Coincident Peak Form Submissions and PDF Timeline

The IESO uses the coincident peak hour data submitted by LDCs to calculate their PDF for the following adjustment period. As of May 1, 2022, there is no longer a regulatory requirement for the IESO to provide LDCs with draft PDFs by May 31. Therefore, the IESO will not be asking LDCs to submit their Class A consumer consumption data until the opt-in/opt-out period has ended (on June 15). LDCs will receive their PDFs following the close of the second coincident peak data form submission window. PDFs will be provided to LDCs no later than June 30.

### 2.3 Update to the Collection of IESO Market Participant and LDC Consumer Data

Eligible customers must provide the required data and consent outlined in Ontario Regulation 429/04, section 6.(1), subsections 5 and 6 (for LDC consumers) and section 7.(1), subsections 5 and 6 (for IESO market participants) in order to participate in the ICI program during the associated adjustment period. If a customer elected to be a Class A customer for a prior adjustment period, they will automatically retain their Class A status if the necessary data and consent are provided. The data must be provided for all Class A load facilities, irrespective of whether the information was provided in a prior year.

### 3. Regulation Amendments in Response to the Impact of COVID-19

On May 1, 2020 the Government issued an Emergency Order (and subsequently amended the Regulation) to provide immediate, temporary relief on electricity bills by deferring a portion of the GA charges for April 1 to June 30, 2020.

- The Class B rate will not exceed \$115/MWh.
- The Class B 1st estimate for April 2020 was set prior to the government's announcement. A lower 1st estimate of \$92.93/MWh for May 2020 was calculated to offset the higher April rate for these customers.
- Class A customers will receive a reduction in GA charges commensurate with the reduction received each month by non-RPP Class B customers. This 'deferral adjustment ratio' between the unadjusted monthly non-RPP Class B costs and the adjusted amount (capped at \$115/MWh) will be applied to a Class A customers' GA charge. Read more about the deferral in the IESO's [Deferral of Global Adjustment Charges Q&A Document](#).

On May 28, 2020, the Government amended the Regulation such that Class A customers that did not qualify based on their average monthly maximum hourly demand using the 12-month base period may still qualify with a 10-month base period ending February 29, 2020. This allows a customer whose demand dropped below the threshold as a result of the COVID-19 pandemic to still qualify for Class A status. The amendment also extended the GA deferral through to the end of June 2020.<sup>2</sup>

On June 26, 2020, the Ontario Government amended the Regulation<sup>3</sup> and introduced a mandatory ICI peak hiatus for ICI participants to allow businesses to focus on recovering from the impacts of COVID-19. The peak hiatus applies to Class A customers participating in the 2020-2021 base period (i.e., May 1, 2020 – April 30, 2021). Class A customers will have their peak demand factor (PDF) from the 2019-2020 base period to determine their GA charges in the 2021-2022 adjustment period. Class B customers wishing to participate in the ICI during the 2021-2022 adjustment period would have their peak demand factor assessed based on their peak hours consumption contribution during the 2020-2021 base period.<sup>4</sup>

Frequently asked questions for both LDCs and electricity customers are detailed in Appendix A of this document.

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<sup>2</sup> The Ontario Energy Board guidance on the regulation amendments is available [here](#).

<sup>3</sup> Ontario Regulation 429/04 was amended via Ontario Regulation 335/20.

<sup>4</sup> For additional information, refer to the Ministry's news release [here](#).

## 4. Details of the ICI Program

### 4.1 Eligibility

To be eligible to participate in the ICI, the total volume of electricity supplied by a customer (or their applicable load facility) to the IESO-controlled grid or to the distribution system of a licensed distributor must not exceed the total volume of electricity the customer (or their applicable load facility) withdrew from the IESO-controlled grid or distribution system of a licensed distributor during the applicable base period.

Furthermore, eligible customers must have an average monthly maximum hourly demand greater than 500 kW during the applicable base period, which lasts from May 1 to April 30<sup>5</sup>. Note that customers with an average monthly maximum hourly demand of greater than 500 kW and less than or equal to 1 MW are eligible if they are within targeted manufacturing and industrial sectors, including greenhouses, (i.e., with NAICS codes commencing with the digits "31", "32", "33" or "1114"). The following example shows how the average monthly maximum hourly demand is determined:

**Table 1.1 | Example of average monthly maximum hourly demand calculation**

Base Period Mos.	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr
Peak hourly consumption (in MW) <sup>6</sup>	3.6	2.8	2.1	3.2	4.8	4.6	4.9	3.8	4.1	5.1	3.7	3.5

12-month avg =  $(3.6 + 2.8 + 2.1 + 3.2 + 4.8 + 4.6 + 4.9 + 3.8 + 4.1 + 5.1 + 3.7 + 3.5)/12 = \mathbf{3.85}$

Data from separate load facilities, even if they are under the same ownership, can not be aggregated for the purpose of ICI eligibility determination, unless the load facilities meet the conditions outlined under the Regulation, subsections 6.1(4) or 7.1(4). For example, a customer that has a load facility with an average monthly maximum hourly demand of 350 kW and another load facility with an average monthly maximum hourly demand of 750 kW, it is not permitted to have the two values added together to qualify unless the load facilities meet the conditions outlined under the Regulation, subsections 6.1(4) or 7.1(4).

The Ontario Energy Board (OEB) issued a [Staff Bulletin](#) (October 18, 2018) providing additional guidance on load aggregation.

A subsequent [FAQ document](#), dated May 29, 2020, was issued by the OEB to address common questions received from distributors and consumers since the publication of the Bulletin.

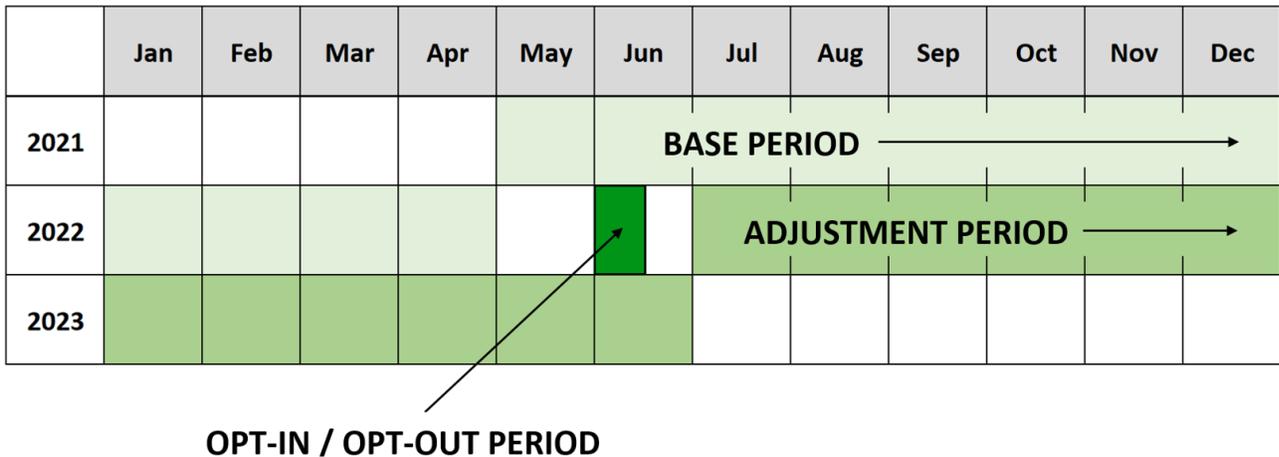
<sup>5</sup> On May 28, 2020, the Regulation changed to provide option for customers to use a 10-month base period ending February 29, 2020 to exclude months where operations may be reduced or suspended due to COVID-19 impacts.

<sup>6</sup> Must include losses as defined in subsection 1(2) of Ontario Regulation 429/04

## 4.2 Timing

Each ICI cycle starts with a 12-month 'base period' which lasts between May 1 to April 30 of the following calendar year. A customer's consumption and demand data during this period are used to determine if the customer is eligible to participate in the ICI program. If eligible, the customer's consumption during the top five peak hours (which also occur during the same base period) is used to calculate the customer's PDF. If the customer chooses to participate in the ICI program, their monthly global adjustment charges, for the associated adjustment period (12-month period which lasts between July 1 to June 30 of the following calendar year), will be based on their PDF.

**Figure 4.1 | Calendar mapping of base period, adjustment period, and opt-in/opt-out time period**



Customers who are eligible to participate in the ICI program will be notified of their PDF by their local distribution company or the IESO (for IESO market participants) by May 31.

## 4.3 Peak Demand Factor (PDF)

Class A customers' monthly global adjustment charges are based on their Peak Demand Factor (PDF). A customer's PDF is based on their percentage contribution (i.e., the quantity of energy withdrawn from the IESO controlled grid or distribution system of a local distribution company) during the top five peak hours of the corresponding base period.

At the end of each base period, the IESO will publish the top five peak hours which typically occur during the summer because Ontario is a summer peaking province, meaning that the hours in which the peak demand is the highest, tend to be during hot, humid days and/or during a heatwave. The IESO then collects coincident peak data (embedded generation and energy storage injections quantities) from LDCs in order to calculate the total system-wide consumption during the top five peak hours. The IESO publishes this total in early May. Once the total is published, the IESO and LDCs will then use this total to calculate the PDFs for all their customers. For more details on how a customer's PDF is calculated, visit the IESO [web page](#).

## 4.4 Anticipating Peaks

Eligible customers who choose to participate in the ICI program can reduce their Class A global adjustment charges by reducing their consumption during the top five peak hours. The more accurately that a Class A customer can predict and reduce their consumption during the top five Ontario peak demand hours, the more they will be able to reduce their PDF and, in turn, their Class A global adjustment charges. Recent Regulation updates have made the prediction process more transparent which should allow customers to better predict and respond to potential peak hours.

The IESO publishes data on our [Peak Tracker](#) web page to assist Class A participants with anticipating the possible peaks. Prior to May 1, 2022, the top five peak hours were determined using final adjusted AQEW. At the start of the May 1, 2022 to April 30, 2023 base period, the IESO will no longer use final adjusted AQEW for determining the top five peak hours. The top five peaks will be determined using Ontario Demand (i.e., the 5 hours during the base period in which the greatest volume of electricity was dispatched through the IESO-administered markets for the purpose of supplying Ontario demand).

Please refer to the ['Industrial Conservation Initiative Update - Reminder'](#) IESO bulletin for more information and links related to this regulatory amendment.

Information on energy management is available on the IESO's website at [www.ieso.ca/market-education](http://www.ieso.ca/market-education).

## Appendix A – Frequently Asked Questions (FAQs)

**Q: Since the top five peak hours will be set using Ontario demand values rather than final adjusted AQEW, will there be a change to how a PDF is calculated?**

A: There are no changes to how PDFs are calculated. Although the top five peak hours for a base period will be set using Ontario demand values starting in May 1, 2022, a customer's consumption during the peak hours will continue to be determined using final AQEW quantities (for IESO market participants) and volume of electricity withdrawn from the distribution system of a licensed distributor (for LDC consumers). Furthermore, the denominator of the PDF will still be calculated using final adjusted AQEW quantities (and will also continue to include embedded generation and energy storage injection quantities as well).

**Q: Why was the Regulation amended so that (effective May 1, 2022), the top five peak hours will be determined using Ontario demand rather than final adjusted AQEW?**

A: The amendments to the Regulation were designed to streamline and enhance the transparency of certain aspects of the ICI program. Most notably, starting from the base period commencing on May 1, 2022, the Regulation will utilize real-time Ontario demand as the basis for determining the five peak hours under ICI, which will improve cost visibility for ICI participants.

**Q: Can Ontario demand values change following the initial publication of the data on the IESO's Peak Tracker webpage?**

A: O. Reg. 429/04 uses Ontario demand values to establish peak hours during the base period. The publication of Ontario demand is based on the Real-Time Constrained Totals Report (RTCTR) and is subject to administrative events and pricing processes. An administrative event is the result of our ex-ante operations processes. Whenever an input to the RTCTR becomes unavailable or the value cannot be determined, our ex-ante processes auto-fills (copy forward interval values) from the last valid interval. This can occur due to a failure in or planned outage of the software, hardware or communications systems that supports the operation of the dispatch algorithm. When this occurs, the interval(s) are deemed administered and identified in red text in the RTCTR. All administered events are investigated to determine if administrative pricing is needed. If it is determined that administrative pricing is required, the last or next valid interval is copied forward or backward, respectively, to establish updated schedules and prices. This process is completed within two business-days of the trading date.

**Q: Why are LDCs no longer able to submit their Class A consumer consumption during the 1<sup>st</sup> submission window for the Coincident Peak Form?**

A: There is no longer a regulatory requirement for the IESO to provide LDCs with draft PDFs by May 31, therefore the IESO will not be asking LDCs to submit their Class A consumer consumption until the end of the opt-in / opt-out period (June 15). LDCs will receive their PDFs following the close of the second coincident peak form submission window. PDFs will be provided to LDCs no later than June 30.

**Q: Will the data in the Ontario demand peak tracker web page be publishing in Eastern Standard Time (EST) or Eastern Daylight Time (EDT)?**

A: All information posted on the Peak Tracker, as well as other global adjustment related web pages, have always been and will continue to be published in Eastern Standard Time (EST).

**Q: How will the consumption and demand data outlined in section 6.(1), subsection 6 be collected from LDCs?**

A: The IESO will provide details to LDCs regarding the collection of the data outlined under section 6.(1) subsection 6 at a later date. The details will be communicated via email to all individuals who are registered in Online IESO as a 'Primary' or 'Settlement' contact as well as individuals with access to online settlement submissions for LDCs.

**Q: If a customer has already provided data outlined in section 6.(1), subsection 5, do they have to resubmit the data to be able to participate in the ICI for the adjustment period starting on July 1, 2022?**

A: Due to the amendments in section 6.(1), subsection 5, customers are now required to submit NAICS codes for all their Class A load facilities. This data was not previously collected and, therefore, the data under this section will need to be provided irrespective if the data was provided during a prior year. Furthermore, the address and geolocation of the head office of the Class A customers is no longer required.

**Q: Are there any other changes resulting from the latest Regulation amendments that have not been covered in this document?**

A: Interested parties are encouraged to review all of the [Regulation amendments](#).

Additional amendments include, but are not limited to the following:

- Subject to the prescribed conditions, allowing ICI participation (i.e., Class A status) to be transferred in the event of a partial transfer of ownership, where a portion of an ICI facility is transferred to a new owner.
- Updating the ICI eligibility provision related to Conservation and Demand Management (CDM) programs to remove outdated references and replace them with updated references to CDM programs.
- Allowing IESO or LDCs to administer transfers of ownership of load facilities for their customers.
- Changing the notification deadline for IESO to provide peak demand factors to LDCs.
- Clarifying the reference to total system demand throughout the Regulation to remove potential ambiguity in the Regulation.

**Q: Why is the ICI program on hiatus?**

A: On June 26, 2020, the Ontario Government amended the Regulation<sup>7</sup> and introduced a mandatory ICI peak hiatus for ICI participants to allow businesses to focus on recovering from the impacts of COVID-19. The peak hiatus applies to Class A customers participating in the 2020-2021 base period

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<sup>7</sup> Regulation 429/04 was amended via Regulation 335/20.

(i.e., May 1, 2020 – April 30, 2021). Class A customers will have their PDF from the 2019-2020 base period to determine their GA charges in the 2021-2022 adjustment period. Class B customers wishing to participate in the ICI during the 2021-2022 adjustment period would have their peak demand factor assessed based on their peak hours consumption contribution during the 2020-2021 base period.<sup>8</sup>

**Q: How long will the ICI hiatus last?**

A: The ICI peak hiatus applies to those who are Class A for the 2020-21 adjustment period. If they were a Class B customer for the 2020-21 adjustment period, then the hiatus does not apply to them. They would need to qualify for Class A based on the 2020-21 base period and their consumption activities during this time will be used to settle them for the 2021-22 adjustment period.

**Q: Will the ICI hiatus impact the reliability of Ontario’s electricity system?**

A: Ontario’s electricity system is expected to remain reliable without peak reductions from customers participating in the Industrial Conservation Initiative.

**Q: I would like to continue to participate in the ICI program and don’t feel that my company will benefit from the hiatus. Do I have the option?**

A: The ICI peak hiatus applies to all customers who are Class A for the 2020-21 adjustment period. If a customer were a Class B customer for the 2020-21 adjustment period, then the hiatus does not apply to them. They would need to qualify for Class A based on the 2020-21 base period and their consumption activities during this time will be used to settle them for the 2021-22 adjustment period.

**Q: Will you take into account reduced electricity demand that resulted from COVID-19 when assessing eligibility for ICI?**

A: Yes. If a customer does not qualify based on the 12-month base period, they will be assessed based on a 10-month base period ending February 29, 2020.

**Q: How is a customer’s eligibility for the 500kW threshold determined?**

A: To qualify for the ICI, an eligible customer’s monthly demand peaks must average above 500 kW over a 12-month base period (with sector requirements). The monthly demand peak used in the calculation must be an hourly demand value and must include losses as defined in subsection 1(2) of Ontario Regulation 429/04. The customer may have some months with a peak demand under the eligibility threshold, but they are eligible if their 12 monthly peaks over the base period average out to more than the eligibility threshold (i.e. above 500 kW). Also, throughout the applicable base period, the load facility is identified by a NAICS code commencing with the digits “31”, “32”, “33” or “1114”. Eligible customers will be informed by their LDC before May 31 each year if they are eligible. These customers must opt in by June 15 of each year to participate in ICI.

A customer of an LDC must meet a number of other requirements with respect to the applicable base period, including:

- Withdraw electricity from the same licensed distributor for the entire base period

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<sup>8</sup> For additional information, refer to the Ministry’s news release [here](#).

- Not supply more electricity to the distribution system than it withdrew from the same system (i.e., a net generator) over the entire period
- Provide information to the LDC related to the name and location of its head office and Class A load facility and written consent for the LDC to provide the information to the Ministry of Energy, and for the Ministry to publish that information.

**Q: How is a customer’s peak demand factor (PDF) calculated?**

A: Class A customers are assigned their portion of GA costs based on the percentage that their consumption contributes to the top five system coincident peaks during a predetermined base period, referred to as their Peak Demand Factor (PDF). The IESO calculates a PDF for each eligible Class A customer. After the IESO establishes the final top five Ontario demand peaks using adjusted allocated quantity of energy withdrawn (AQEW) for a base period, the IESO and LDCs then look at each Class A customer's consumption during those five hours (coincident peaks) to calculate their corresponding portion of peak demand. This portion is called a peak demand factor and is used to determine a customer's allocation of costs for the adjustment or billing period. The peak demand factor is calculated by using the customer’s consumption during the top five hours of peak demand in the province over a base period (coincident peaks). For more details on how a customer’s PDF is calculated, visit the IESO [web page](#).

**Q: Will PDFs be different for each LDC?**

A: Yes. An LDC’s PDF is the aggregate of each of their customers’ PDFs and will therefore be different for each LDC.

**Q: What are the key dates associated with the ICI eligibility process?**

A: The following dates are based on the current regulatory requirements as outlined in Ontario Regulation 429/04. Dates are subject to change based on ICI process updates and weekends / holidays each calendar year.

- April 1 – April 19: LDCs submit embedded generation and energy storage injection volumes through the coincident peak form in [Online IESO](#)
- May 3: The IESO will post the total system-wide consumption volumes for the top 5 peak hours
- May 31: Deadline for LDCs to provide eligible customers their peak demand factors
- June 15: Deadline for eligible customers to opt-in/opt-out of the ICI
- June 15 – June 24: Deadline for LDCs to submit their Class A consumer consumption based on their customers’ opt-in / opt-out decisions
- June 30: IESO to provide LDCs their PDFs
- August 19: Deadline for LDCs to submit their Class A consumer data Excel template

**Q: How does a customer opt-in or opt-out of the initiative?**

A: The opt in/out window for qualifying customers is between June 1 and June 15 of each year. Eligible customers with an average monthly maximum hourly demand greater than 500 kW and less than or equal to 5 MW over a base period must opt-in to the initiative. Customers with an average monthly maximum hourly demand of above 5 MW are automatically considered Class A and must opt-out if they choose not to participate.

**Q. What happens if a customer that had previously been Class A didn't meet the average monthly maximum hourly demand threshold for the base period that just ended?**

A: Customers must re-qualify every year. If they drop below the threshold for a base period, they cannot be settled as a Class A customer for the upcoming adjustment period. They will be settled as a Class B customer.

**Q: Can a customer that dropped below the eligibility threshold as a result of participating in energy efficiency programs get an exemption and still participate in the ICI?**

A: [Effective](#) April 13, 2017, existing Class A customers that participated in one or more of the programs specified in subsection 6.2(1) of Ontario Regulation 429/04 and dropped below the peak demand threshold during a base period for an adjustment period that began on or after July 1, 2016, may be eligible to opt back into the initiative. Customers must work with their LDC to provide supporting information and to determine eligibility.

**Q: What should an LDC do if a Class A customer ceases to be part of the LDC's service territory?**

A: The IESO requires the following information when PDF revisions are required as a result of a Class A customer that is no longer part of the LDC's service territory as soon as possible:

**LDC information:**

- a. name and Market Participant ID (MPID).
- b. base period affected (May 1, 20YY to April 30 20YY).

**Class A customer information:**

- a. Class A customer name.
- b. effective date that the Class A customer is no longer part of the LDC's service territory.

**Consumption values:**

- a. Revised Class A consumer consumption values during the top five coincident peaks for the base period need to be provided.

**Q: Can customers aggregate their facilities to meet the eligibility threshold?**

A: No. A customer's maximum hourly demand (peak) for electricity in a month shall be determined separately for each of its load facilities unless permitted otherwise under [Ontario Regulation 429/04](#), subsection 6.1(4).

**Q: Can customers be eligible as Class A if they became customers of their host LDC partway through the base period?**

A: No, Ontario Regulation 429/04 requires that electricity was distributed to the consumer throughout the applicable base period by the same licensed distributor that currently distributes electricity to the consumer.

**Q: If a customer is only a load customer for one month in the base period but has a demand of 2 MW in that month, is the customer eligible for the ICI?**

A: No, the customer must be supplied by the same distributor throughout the entire base period. In addition, the customer would not meet the eligibility requirements. To calculate a customer's average monthly maximum hourly demand an LDC must take the customer's highest hourly demand value for each month and calculate the average of the 12 monthly values.

**Q: What happens when a Class A customer changes ownership during an adjustment period? What is the LDC's responsibility?**

A: Section 8 of Ontario Regulation 429/04 identifies the actions Class A electricity customers and their LDC must take when there is a change of ownership.

**Q: Where can I get more information to learn about anticipating peak demands to better utilize the ICI?**

A: The IESO [website](#) includes tools and data to assist with anticipating peaks.

**Q: Can a customer be Class A and participate in the Demand Response Auction?**

A: Yes, a customer can participate in both the Industrial Conservation Initiative and the Demand Response Auction (either as a direct participant or as a contributor under a DR aggregator). Customers should be aware of their obligations for the DR auction and market rules. Please visit the IESO website or contact Customer Relations for additional information.

**Q: If a Class A customer is participating in the DR Auction, will they be notified of the ICI's top five peak hours?**

A: No, the top five peak hours and determining a customer's peak demand factor can only be established at the end of the base period (after April 30). Activation for DR is determined through the energy market for both the winter and summer commitment periods. Please visit the IESO website or contact Customer Relations for additional information.

**Q: Is demand response factored into the Ontario demand forecast?**

A: No, the impacts of demand response programs and the ICI are not factored into the Ontario Demand Forecast.

**Q: Does the IESO have a forecast of how many consumers will opt-in to the ICI for the upcoming adjustment period?**

A: No, the IESO does not have a forecast of how many customers will opt-in to the ICI for an upcoming adjustment period.

**Q: Is there a resource available that indicates what proportion of Ontario demand is made up of Class A customers?**

A: No, the IESO does not report on this. Total global adjustment costs and consumption figures for Class A and Class B customers are available on the Global Adjustment Components and Costs [page](#) of the IESO website.

**Q: Are customers that are designated as Regulated Price Plan customers during a base period eligible to qualify for Class A status?**

A: No. Section 6(1) of Ontario Regulation 429/04 outlines the eligibility of regulated customers:

- 6(1) A customer in Ontario is a Class A customer for an adjustment period under this Part if the following conditions are satisfied:

The customer is not a market participant, an embedded distributor or a regulated customer.

**Q: Will behind-the-meter energy storage in anyway affect a customer's peak demand factor? Is a customer restricted from offsetting peaks using behind-the-meter energy storage or paralleling gear?**

A: A customer's peak demand factor is calculated based on its percentage contribution to the top five hours of peak demand in Ontario over a base period. A customer's coincident consumption during the top five peaks is used, which is measured at the meter point. There are no restrictions in this regulation about how a customer chooses to reduce demand behind the meter.

**Q: Is the requirement to provide GPS coordinates applicable for all customers that opt-in to the ICI including customers? Do LDCs have to provide this information for customers that opted-in for a previous adjustment period?**

A: Yes, all customers that opt-in to the ICI must provide this information. For the adjustment period commencing on July 1, 2018, and going forward, the IESO requests that LDCs provide the GPS coordinates and customer consent for all customers opting-in regardless of a customer's past participation.

**Q: If a customer has a co-generation facility are they eligible for Class A?**

A: An electricity customer that has a co-gen facility is eligible for Class A. However, they are ineligible if they are a net generator over the applicable base period.

**Q: Are peak demand factors also used to settle the charge type 1350 Capacity Based Recovery Amount for Class A Loads?**

A: Each Class A customer's portion of the province-wide total Capacity Based Recovery Amount (charge type 1350) is calculated using their peak demand factor.

**Q: Should net metering and behind-the-meter generation be reported as embedded generation as part of the submission of coincident peak data for Class A customer consumption and embedded generation in April and as part of the monthly Class A Load and embedded generation submission?**

A: As outlined in the [Guide to Online Data Submission via the IESO Portal](#), the volume reported for embedded generation by LDCs includes only those volumes that offset distributor load; total embedded generation volumes should not include injections to the IESO-controlled grid. The submission includes embedded generation volumes for all non-contracted generation and all contracted generation (Renewable Energy Standard Offer Program, Hydroelectric Contract Initiative and Feed-In Tariff Program). The contracted embedded generation volumes are reported for the month they are metered, regardless of the contract approval status. Distributors are not required to provide the IESO with generation amounts for facilities that are eligible for net metering (Ontario Regulation 541/05) if that generation has offset the related load. If the generation is greater than the related load, the amount injected to the LDC system should be submitted to the IESO.

**Q: Are customers required to opt-in to the ICI for every adjustment period even if they were designated as Class A for the previous adjustment period?**

A: Eligible customers with an average monthly maximum hourly demand greater than 500 kW and less than or equal to 5 MW that wish to participate will need to opt-in to the ICI by June 15 unless the conditions in subsections of Ontario Regulation 429/04 listed below are satisfied:

- 500 kW to 1 MW: Section 6.1.1 subsection 1.2 and Section 7.1.1 subsection 1.2
- Greater than 1 MW and less than or equal to 5 MW: Section 6.1.1. subsection 1.1 and Section 7.1.1 subsection 1.1

In these instances, as outlined in Section 6.1.1 and 7.1.1, existing Class A customers, who are eligible, automatically retain their Class A status for the upcoming adjustment period, unless the customer chooses to opt-out. Customers with an average monthly maximum hourly demand above 5 MW are automatically considered Class A and must opt-out by June 15 if they choose not to be settled as a Class A customer for the upcoming adjustment period.

All customers are required to provide data and consent outlined in section 6.(1), subsections 5 and 6 and section 7.(1), subsections 5 and 6 in order to participate in the ICI program.

**Q: How should customer demand be adjusted for losses?**

A: Customer demand must be adjusted for losses. The Ontario Regulation 429/04 is not prescriptive on how demand should be adjusted for losses.

**Q: When calculating the average monthly maximum hourly demand requirement of greater than 1 MW for Class A eligibility, should LDCs use a customer's individual load facility's peak, or the facility's consumption during Ontario's peak for the month?**

A: To calculate the average monthly maximum hourly demand requirement, LDCs should take a customer's individual load facility's highest hourly peak demand value for each month and determine the average of the 12 monthly values.

For more information, please contact [customer.relations@ieso.ca](mailto:customer.relations@ieso.ca)

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