

ONTARIO ENERGY ASSOCIATION

RESPONSE TO ONTARIO'S GREEN BUTTON INITIATIVE CONSULTATION

AUGUST 12, 2016

To shape our energy future for a stronger Ontario.



Ontario Energy Association

ABOUT

The Ontario Energy Association (OEA) aspires to be the most credible and trusted voice of the energy sector. We earn our reputation by being an integral and influential part of energy policy development and decision making in Ontario. We represent Ontario's energy leaders that span the full diversity of the energy industry.

OEA takes a grassroots approach to policy development by combining thorough evidence based research with executive interviews and member polling. This unique approach ensures our policies are not only grounded in rigorous research, but represent the views of the majority of our members. This sound policy foundation allows us to advocate directly with government decision makers to tackle issues of strategic importance to our members.

Together, we are working to build a stronger energy future for Ontario.

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OEA RESPONSE

The Ontario Energy Association is pleased to provide the following responses to the consultation on Ontario's Green Button Initiative.

QUESTION 1

UTILITY AND CUSTOMER TYPES

What are your thoughts on the draft proposal to require all electricity, natural gas and water utilities (who have metering infrastructure in place) and unit sub-metering companies to implement both DMD and CMD for residential, commercial, institutional and industrial customers?

OEA RESPONSE

In principle the OEA supports the proposal to require all electricity and natural gas utilities who have metering structure in place to implement both DMD and CMD for residential, institutional and industrial customers.

Our support is conditional on the assumption that the Green Button program will be funded through the Climate Change Action Plan (CCAP) Greenhouse Gas Reduction Account (GGRA), since this a CCAP initiative (p. 29 of the CCAP), and that there is a sound business case on which this initiative should be based.

While water data does complete the data requirement for improved building portfolio energy management, the research undertaken by Dunsky Energy Consulting for the provincial government clearly indicates that the Green Button program does not pass the cost-benefit test for water, and reduces the cost benefit compared to the electricity and gas only option significantly. Therefore, CCAP funding should be directed to other more beneficial initiatives.

QUESTION 2

IMPLEMENTATION TYPE

What are your thoughts on the draft proposal to require a single integrated (hosted) implementation (i.e., a hosted Software as a Service (SaaS) provider could implement Green Button for electricity, natural gas and water with one implementation platform for each utility type)?

OEA RESPONSE

The OEA does not support the sole option of a single integrated host as the sole option. It could be that a single vendor turns out to be more costly than other solutions available to some LDC's. The OEA recommends that LDC's be given the flexibility to choose the best solution for their situation and customers. It is not clear that the scale of the whole provincial market is needed for the province to be able to work with and set up a service provider for those who do not have a preferred alternative.

QUESTION 3

SOLUTION PROVIDER AND UTILITY REGISTRATION

What are your thoughts on the draft proposal to require utility and application registration through a single platform (i.e., allow solution providers to connect with utilities through a single platform rather than separately registering with each utility to offer their services province-wide)?

OEA RESPONSE

The OEA supports a single registration platform. We believe this will help facilitate easier registration by solution providers to the utilities across the province, as well as allowing for some control over the number and types of solution providers that want to access our market.

QUESTION 4

CERTIFICATION

What are your thoughts on the draft proposal to require a formal Green Button certification and seal for utilities with optional certification and seal for solution provider technical certification and solution provider privacy certification?

OEA RESPONSE

We support both types of certification – Green Button and Privacy certification.

Green Button Certification provides confidence that all parties meet the Green Button standard. Without all parties meeting the standard, the benefits of the Green Button initiative disappear very quickly. It only takes one or two utilities or vendors to deviate from the standard to cause disruption of services for our customers via the Green Button vendors, which translates into increased support costs from technical (IT), Meter Support, and Call Center resources.

Privacy certification provides the utility additional confidence that the personal data that the utility administers on its customers' behalf, will be handled securely throughout the entire process from utility to third-party vendor to customer.

QUESTION 5

PHASE-IN AND TIMING

What are your thoughts on the draft proposal to phase-in implementations starting with Ontario's large and medium electricity and natural gas utilities, followed by the province's small electricity utilities and water utilities?

OEA RESPONSE

The OEA believes that all gas and electric utilities should begin implementation at the same time. Customers across Ontario should expect the same service levels from all LDCs, regardless of size. The OEA recommends a January 2018 start date to allow adequate time for program implementation. An earlier start date would not be achievable for some LDC's going through billing system changes currently.

QUESTION 6

IMPLEMENTATION AND MAINTENANCE

- A. *What are your thoughts on the draft proposal that a single entity (to be determined) would support implementation and maintenance activities?*
- B. *What existing entity might be best positioned to support implementation and maintenance activities? Why?*

OEA RESPONSE

A. To be successful, this initiative requires co-ordination across all utilities (electric, gas, and water) and we do not see this as an initiative that can be left to committees. We do not see a private entity taking up this role without government support. Therefore this should be funded through the Climate Change Action Plan Greenhouse Gas Reduction Account.

The role requires the consistent management and support to the utilities and their implementation plans and efforts, support of vendors desiring to become part of the standard, high level participation in the larger Green Button Alliance (www.greenbuttonalliance.org), and conservation leadership in the expansion of the initiative across the province and beyond.

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Ontario Energy Association

Let's unravel complex energy challenges, together.