

The Honourable Minister Greg Rickford  
Ministry of Energy, Northern Development and Mines  
99 Wellesley St W, Toronto  
Ontario, M7A 1W3  
ndmminister@ontario.ca

May 4, 2020

**Re: Extending and improving Ontario's electricity demand management framework**

Dear Minister Rickford,

While the pandemic has caused significant disruption and uncertainty, as many Ontarians as possible are working with you and the Premier to conquer COVID-19 by staying home. As organizations that provide energy efficiency services in Ontario, our job is to make people's living and work environments more comfortable, safe, secure, and affordable.

Some of our in-person work is now paused, yet we are developing new strategies and planning to make a contribution to economic recovery. Investing in energy efficiency creates more jobs per dollar invested than most other sectors, and re-starts spending in the local economy. A significant energy savings plan in Ontario is estimated to create 56,000 annual full-time jobs and increase the province's annual GDP by \$15.2 billion.<sup>1</sup>

Currently, the pending expiration of the *Interim Framework* for electricity conservation programs at the end of 2020 creates significant uncertainty for electricity customers and people with energy efficiency jobs. To avoid disruptions that could result in the loss of important technical expertise we urge the government to extend the current conservation framework. We also see potential to improve conservation programs to meet economic stimulus and customer affordability objectives, while avoiding future cost pressures related to upcoming capacity needs and transmission constraints. Maintaining strong program delivery capabilities will also enable Ontario to attract federal government economic recovery funding and protect jobs.

A new approach to electricity conservation in Ontario could be based on the following principles:

- 1) **Helping electricity consumers.** Economic recovery will be aided by providing immediate bill reductions to customers that need it most, driving efficiencies and performance in business operations, and creating good local jobs. A new framework must recognize the multiple benefits of energy efficiency, and design performance criteria and programs to realize these benefits<sup>2</sup>, while managing long-term costs by investing in all energy efficiency opportunities that are lower cost than generating and transmitting electricity.<sup>3</sup>
- 2) **Avoiding future threats.** Energy efficiency makes our homes and buildings more resilient in the face of weather extremes and service disruptions. A new approach can also strategically target demand reductions to particular times and regions to avoid expensive electricity system constraints.

COVID-19 is a major challenge that we are managing with your government's leadership and a spirit of cooperation throughout the province. We wish to extend this spirit of cooperation into economic recovery by developing a more strategic approach to electricity conservation focused on rebuilding our economy, making life more affordable for Ontarians, and preparing for the future challenges that confront our electricity system.

Sincerely,

Efficiency Canada

And:

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<sup>1</sup> Dunsky Energy Consulting, *The Economic Impact of Improved Energy Efficiency in Canada*, April 3, 2018. PCF+ scenario is based on ramping up energy savings to levels in leading North American jurisdictions. These are average annual figures over a 14 year period.

<sup>2</sup> See International Energy Agency, *Capturing the Multiple Benefits of Energy Efficiency*.

<sup>3</sup> The 2019 *Achievable Potential Study* shows that 17 TWh and 2100 MW of energy and capacity savings are cost-effectively available by 2030, costing only 3.3 cents for every kwh saved.

Aladaco Consulting Inc.  
The American Society of Heating, Refrigerating and Air-  
Conditioning Engineers (ASHRAE)  
The Atmospheric Fund (TAF)  
Audette  
Baerg's Home Performance Solutions  
Dunsky Energy Consulting  
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