

November 29, 2022

Nupur Deonarine
Ministry of Energy, Conservation and Renewable Energy Division, Energy Conservation Unit
77 Grenville St., 5th floor
Toronto, ON
M7A 2C1
Canada

Dear Nupur,

Re: ERO 019-6168 - Proposed amendments to O.Reg 507/18

This letter and the attached document comprise the County of Oxford's comments with respect to the Ministry of Energy's proposed amendments to O.Reg 507/18 ("Broader Public Sector: Energy Reporting and Conservation and Demand Management Plans") under the Electricity Act, 1998, as posted to the Environmental Registry of Ontario on October 17, 2022 (ERO Number 019-6168).

The comments focus largely on the County's review of the proposed changes, based on the information provided. A copy of the comments were presented to Oxford County Council under PW 2022-48 on November 23, 2022. County Council has endorsed the Comments as provided and approved circulation of the report to Smart Energy Oxford, for their information.

Thank you for the opportunity to provide input on the proposed changes for this provincial regulation. We welcome the opportunity to discuss any questions or concerns you may have with this correspondence. Questions should be directed to the undersigned or Nathan Gerber, Coordinator of Energy Management at ngerber@oxfordcounty.ca or (519) 539-9800 ext. 3340.

Yours Truly,



David Simpson, P. Eng., PMP
Director of Public Works

Encl.

OXFORD COUNTY COMMENT SUMMARY FOR ERO NO. 019-6168

Proposed amendments to O.Reg. 507/18 (“Broader Public Sector: Energy Reporting and Conservation and Demand Management Plans”) under the Electricity Act, 1998

Item #	Proposed amendments to O.Reg. 507/18 ¹	Response	Impacts and Comments
1.	<i>“Streamline reporting and tracking of energy use by moving reporting from a custom-made platform that has reached the end of its life, to the widely used ENERGY STAR Portfolio Manager electronic reporting system.”</i>	County staff support this change.	<p>This change involves moving reporting and tracking of energy consumption and greenhouse gas emissions to Energy Star Portfolio Manager (ESPM).</p> <p>ESPM is known as a useful benchmarking tool; used to compare buildings with similar operations, baselines or reference performance levels. Having this data analysis would be useful to identify and act on potentially high yield energy management opportunities.</p> <p>As indicated by the Ministry and from review of the ESPM website, this service has no anticipated cost; however, additional level of effort may be required for training to use ESPM and to setup the County’s buildings and activities (data submitted for 2020 included just under 150 unique operations). Further investigation would be required to determine this impact.</p> <p>It is recommended that the Ministry provide training and/or workshops to public agencies, on the use of ESPM, to</p>

¹ Proposed amendments to O.Reg. 507/18 (“Broader Public Sector: Energy Reporting and Conservation and Demand Management Plans”) under the Electricity Act, 1998
<https://ero.ontario.ca/notice/019-6168>

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			<p>help alleviate any challenges, and to streamline the transition.</p> <p>Data provided in the current format includes metrics to compare energy usage, such as facility area, or production (i.e. water, waste water flow) and hours of usage. It is recommended that the Ministry verify if, and how, ESPM can receive, track and benchmark various metrics used for comparisons.</p>
2.	<p><i>“Change the energy consumption and greenhouse gas emissions reporting period from two calendar years in the past to one calendar year in the past. Phase in reporting to the previous calendar year as follows:</i></p> <ul style="list-style-type: none"> <i>• require reporting for one year (2021 energy data) in 2023. No change to current reporting requirements</i> <i>• require reporting for two years (2022 and 2023 energy data) in 2024 as a transitional year</i> <i>• starting in 2025, require reporting for one year (2024 energy data in 2025)</i> <p><i>The ministry will support BPS organizations with the dual reporting requirement in the transitional year (2024).”</i></p>	County staff support this change.	<p>This change involves phasing in reporting of energy consumption and GHG data to prior year (rather than two calendar years in the past).</p> <p>Phase approach requires completing 2 Years of data (2022 and 2023) in 2024, and then 1 Year (prior year) reporting starting 2025.</p> <p>The County has implemented an energy management information system (EMIS), which utilizes bill capture technology. This EMIS provides the County with current data (as it becomes available) for all energy consumption utilities related to operations reported on in this regulation. Therefore, no additional effort would be required to expedite data capture and analysis.</p> <p>Additional effort may be required in transition year 2024, to report multiple year’s data. The overall impact would be minimized, as the data would be readily available, duplication of efforts for setup and processing could be mitigated if done in parallel and Ministry has offered support.</p> <p>Consolidating reporting data with other internal and external reporting requirements, which require more current data. This will alleviate duplication of</p>

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			<p>efforts, as data extraction and analysis can be completed in parallel.</p> <p>Performance metrics for water and waste water activities, including flow rates, are anticipated to be available for the County to allow for prior calendar year reporting. No increased level of effort anticipated.</p>
3.	<p><i>“Update prescriptive elements of the regulation such as the exact title of the form, units of measurement, and fields for which data is collected, and referencing a Guide. This guide could provide BPS organizations with detailed information on how to report their building’s energy consumption and greenhouse gas emissions and could be updated from time to time as needed.”</i></p>	<p>County staff support this change.</p>	<p>Update Prescriptive Elements of the Regulation.</p> <p>If categories are changed, this may not line up with prior reports. Some additional effort to coordinate may be required.</p> <p>Impact appears to be minimal, but as details are not provided, impact cannot be determined at this time.</p> <p>Having additional details will allow for better benchmarking capabilities, allowing for improved energy efficiency analysis and comparisons.</p>