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October 26, 2021

Via RESS and E-Mail

Ms. Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
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Dear Ms. Long:

**RE: Green Button Implementation – Draft OEB Staff Guidance
Ontario Energy Board File Number: EB-2021-0183
Comments of Jupiter Energy Advisors Inc.**

Please find below the comments of Jupiter Energy Advisors Inc. on the Draft OEB Staff Guidance set out in the Ontario Energy Board's letter of October 12, 2021.

Jupiter Energy Advisors provides independent, objective advice to large energy users to assist them to reduce costs, manage risk, and resolve complex energy decisions. Of relevance to Green Button Implementation, Jupiter works with large consumers in the institutional, municipal, and retail sectors and uses historical energy consumption and cost data to assist those consumers with conservation planning, energy decarbonization planning, and energy procurement decisions. For more than a decade, Jupiter or predecessor/related companies have used historical data gathered through the EBT/GDAR system for more than 12,000 utility accounts to assist clients in energy management, energy performance benchmarking, conservation planning and decision-making.

Comments

Service Quality Performance Metrics

Jupiter submits that the incorporation of service quality performance metrics from the outset of Green Button implementation is essential to successful implementation at least cost.

OEB staff intends to allow distributors the flexibility to implement Green Button in the manner that is most cost-effective for them, and notes that specific performance metrics for Green Button service quality are not being proposed by OEB staff at this time.

The October 12, 2021 letter notes that “OEB staff is aware if the experiences of other jurisdictions that adopted Green Button where unavailability of data on a consistent basis and poor experience led to the eventual establishment of performance metrics.”¹

Jupiter’s experience has been that poor service quality and non-conformance to standards also have plagued the existing EBT/GDAR processes for gathering historical usage information used to date in Ontario. One persistent problem is discontinuity in data availability when a utility merger or change in billing systems results in a change in account number.

It is well understood that service quality results when business processes are developed with specific service quality performance standards in mind. Service quality is achieved by design. It is far less effective, and much more costly, to come back later and revise processes and systems in reaction to unsatisfactory performance. Given OEB staff acknowledges that poor service quality has been an observed feature of Green Button implementation elsewhere and given that service quality has also been an issue with similar processes used to date in Ontario, Jupiter asserts that service quality standards must be a part of the initial Green Button implementation in Ontario. Failure to include these standards will hurt user adoption of Green Button and blunt the effectiveness of the initiative, and ultimately result in higher costs to retrofit processes to comply with service quality standards introduced later.

Energy Data to be Made Available (Appendix A)

Jupiter submits that a complete set of data elements is essential to maximizing the value of Green Button to users.

In addition to the data elements outlined in Table 1 and Table 2 of Appendix A, OEB staff indicate that the information to be provided is that which would generally be available in the “normal course”.

Jupiter suggests that it would be less ambiguous if, at minimum, the data elements to be provided must include all the data elements needed to enable independent calculation of the invoice presented by the utility. This would enable consumers to determine the cost drivers of relevance to them, understand what aspects of their energy use they must control to achieve cost reductions, and model the cost impact of managing those factors through tactics such as conservation or peak reduction.

If, for example, demand charges are calculated on some “rolling hour” of 60 continuous minutes rather than a clock hour, then consumption data must be provided in intervals (5-minute or 15-minute) to allow independent calculation of the demand value used to determine the peak demand billed by the utility.

Jupiter also suggests there is value in including as a Green Button data element any non-energy related charges that make up the total charge from the utility (for example, late payment charges or third-party charges that are billed by the utility).

¹ EB-2021-0183, Ontario Energy Board October 12, 2021 letter, page 3

Customers rather than Accounts

Jupiter is concerned that use of the word “customer” in the Green Button discourse may mean different things to different participants. The utility’s view of who the customer is may not align with the customer’s view of who they are, with the result that the “customer data” provided by the utility is not in the form that is of most value to the actual customer.

There is a large class of energy consumers comprised of organizations that have many points of consumption (many utility accounts), often spread over multiple utilities. Examples would include municipalities, school boards, commercial property managers, and retail chains. These types of customers often have energy management staff resources focused on managing energy usage and cost, so consumers in this sector have the potential to benefit significantly from Green Button implementation.

Energy managers in these organizations seek to consolidate consumption data from across their facility portfolio, to enable benchmarking and energy performance analysis. This goal is supported if it is easy to identify all the accounts that belong to that organization.

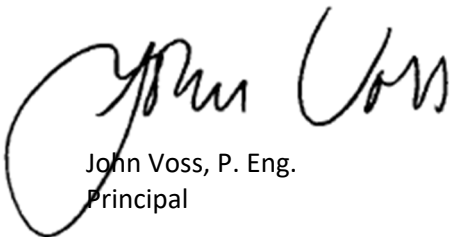
In Jupiter’s experience, utilities most often consider each individual account to be a customer, and utility billing information systems do not uniformly have a way to relate all the accounts that belong to one organization as being the accounts of a single customer. We see, for example, utility billing systems where the name of the school is used as the customer name, rather than the name of the school board.

Having operated for many years within the EBT framework, we continue to see situations where historical usage data is provided in an inconsistent format from one utility to the next, making it necessary to perform transformation and editing of the data before accounts from different utilities can be consolidated to provide an organization-level view. This is another manifestation of the absence of service quality measures to ensure compliance to published standards.

The ambiguity over the definition of “customer” is a factor in the process for customer authorization of third-party access. A third-party may submit a request to a utility for access to data of several hundred accounts belonging to one corporate entity. That customer should be able to conveniently authorize access to all account data, and not be forced to process approval (or revocation) on an account-by-account basis.

Thank you for the opportunity to submit these comments. Should you have questions, please contact me at 416-622-9449, ext. 102 or by e-mail at john.voss@askjupiter.ca.

Yours truly,



John Voss, P. Eng.
Principal

cc. Eamon ORiordan, OEB (e-mail)