

To: Warden and Members of County Council

From: Director of Public Works

Proposed Amendments to Energy Reporting and Conservation and Demand Management Plans, Environmental Registry of Ontario Posting No. 019-6168

RECOMMENDATION

1. That Oxford County Council endorse the comments outlined in Report No. PW 2022-48 in response to the Ministry of Energy's posting on the Environmental Registry of Ontario regarding proposed amendments to O.Reg. 507/18 (Broader Public Sector: Energy Reporting and Conservation and Demand Management Plans) made under the Electricity Act, 1998.

REPORT HIGHLIGHTS

- The Ministry of Energy is proposing changes to O. Reg. 507/18, Ontario's energy reporting regulation for broader public sector organizations, which was posted on the Environmental Registry of Ontario for public comment for a 45 day period, closing on December 1, 2022 (ERO No. 019-6168).
- The proposed changes, as identified by the Ministry, seek to streamline organizational energy consumption reporting, as well as phase in reporting on energy consumption and Green House Gas (GHG) emissions data to the previous calendar year rather than two years in the past as currently done.
- This report seeks to inform County Council of the consultation process and to obtain endorsement of recommended comments regarding the proposed changes.

Implementation Points

Upon County Council endorsement of Report No. PW 2022-48, County staff will submit final comments, along with a copy of the Council resolution, to the Ministry of Energy prior to the December 1, 2022 comment deadline.







Financial Impact

There are no financial impacts associated with this report.

Communications

Upon approval, this Council report will be circulated to Smart Energy Oxford as information.

Strategic Plan (2020-2022)

					
WORKS WELL TOGETHER	WELL CONNECTED	SHAPES THE FUTURE	INFORMS & ENGAGES	PERFORMS & DELIVERS	POSITIVE IMPACT
		3.i.	4.i. 4.ii.	5.i. 5.ii.	

DISCUSSION

Background

Ontario's Broader Public Sector (BPS) energy reporting regulation O. Reg. 507/18 (formerly O.Reg 397/11 under the Green Energy Act, 2009) was developed in 2011 to help organizations better understand how and where they use energy, and identify potential conservation opportunities. Commencing in 2013, for reporting year 2011, this regulation requires all Ontario public agencies, including municipalities, to submit an annual energy and greenhouse gas (GHG) emissions report to the Ministry of Energy (hereafter the Ministry) and post the data on their respective website. In addition to annual reporting, each public agency was responsible for publishing an updated energy management plan (EMP) every five years beginning July 1, 2014.

As required under this regulation, the County has reported its annual energy consumption and GHG emissions, commencing in 2011, with the most recent report being submitted for reporting year 2020. The first EMP was approved by County Council on June 11, 2014 through Report No. [PW 2014-27](#) in accordance with the July 1, 2014 requirement. On August 14, 2019, County Council approved Report No. [PW 2019-33](#), which outlined the County's updated EMP for 2019. The next iteration of this EMP is required in 2024.

On October 17, 2022, the Ministry posted 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", to the Environmental Registry of Ontario. The Ministry is seeking comments on the posting and has opened a 45 day comment period, which closes on December 1, 2022.

Staff have reviewed the proposed changes to O. Reg. 507/18 and prepared comments for submission to the Ministry (Attachment 1) as summarized below.

Comments

The proposed changes to O. Reg. 507/18 would streamline reporting and tracking of energy use by moving energy reporting from the current SharePoint 2013 platform to the ENERGY STAR Portfolio Manager electronic reporting system. Further changes include; phase in reporting of energy consumption and GHG emissions data to the previous calendar year (rather than two calendar years in the past), and update prescriptive elements of the regulation.

Transition to ENERGY STAR Portfolio Manager

This proposed change involves transitioning the reporting and tracking of energy consumption and GHG emissions data to the Energy Star Portfolio Manager (ESPM) electronic reporting system. ESPM is known as a useful benchmarking tool, used to compare buildings from multiple organizations, with similar operations, baselines or reference performance levels. Without a means of comparison, it is difficult to determine a facility's operational performance, or to measure and verify performance of energy management initiatives implemented. Utilizing ESPM would provide the data necessary to analyze performance and identify and act on potentially high yield energy management opportunities.

In its current format, data provided to the Ministry includes metrics to compare energy usage, such as facility area, or production (i.e. water, wastewater flow) and average hours of usage. It is recommended that the Ministry verify that ESPM can receive, track and benchmark these various metrics used for comparisons.

As indicated by the Ministry, there is no cost to utilize ESPM. It is anticipated, however, that some training and effort will be required by public agencies to setup ESPM to match current assets. It is recommended that the Ministry provide or facilitate training for public agencies on the use of ESPM to help alleviate any challenges and to streamline the transition.

In 2022, the County began the process of implementing an energy management information system (EMIS) expansion, which is hosted on the EnergyCAP platform. This system was approved and implemented as part of the 2022 capital plan, as part of NI 2022-01 "New Initiative – Automated Building Utility Data Collection and Verification". The EMIS has the capability to generate reports to compare energy performance of buildings within its scope. It does not, however, have access to the information required to compare these buildings with those of multiple other organizations with similar characteristics. By utilizing ESPM, the County would have an additional layer of information at its disposal which would assist in identifying areas to improve the energy performance in its buildings.

The EMIS and proposed ESPM are stand alone systems. Data would be exported from the EMIS database and formatted as required for import into ESPM. This is the same process required for reporting under the current platform; therefore, no additional effort would be required.

Overall, County staff support this proposed change, as ESPM will readily allow for comparison of County buildings with those of similar characteristics from multiple external organizations to further assist in energy management efforts, and aligns with the County's goal of reaching 100% Renewable Energy by 2050.

Transition to Reporting Prior Years' Data

This change involves phasing in the reporting period to prior year's data, as opposed to two calendar years in the past. Starting with a transition year in 2024, two years worth of data (2022 and 2023) will be reported. Commencing in 2025, annual reporting of prior year's data (i.e. 2024) will be the standard. The Ministry has indicated that they will support public agencies in the transition year 2024 for the dual year reporting requirement. There is no change to reporting requirements in 2023, which will include 2021 data.

As noted previously, the County has begun the process of implementing its EMIS. In addition to acting as a database for internal reporting and analysis purposes, this system has a service to pull bills automatically from utility websites as they become available, capturing and tracking cost and consumption data. As this EMIS captures current consumption data for all buildings and activities reported on under this regulation, information for prior years' reporting to the Ministry will be readily available with no additional effort.

The EMIS and the proposed ESPM are stand alone systems, requiring data to be extracted from EMIS and imported into ESPM as required. Being this is the same process used in the current arrangement, no additional effort is anticipated.

Performance metrics for water and wastewater activities, such as flow rates, are also included in the annual reporting requirements. County staff have confirmed that this data is available within the time required, to allow for prior year reporting as proposed.

As multiple years' data would be required in 2024 for the transition year, additional effort may be required for that year's report in order to bring it up to current prior year's data. Considering that data would be readily available and that by completing both years at the same time, duplicated setup and processing efforts could be mitigated and the impact on internal resources should be minimized. Additionally, the Ministry has indicated that they will provide supports to public agencies during the transition year.

County staff support this proposed change as the data required is currently available without additional effort within the proposed timeline, it will allow for more accurate and timely analysis for performance and planning purposes, and it could streamline efforts for internal and external reporting which currently target more current, prior year's data.

Update Prescriptive Elements of the Regulation

This change involves updating prescriptive elements of the regulation such as the exact title of the form, units of measurement, and fields for which data is collected. It will also reference a guide which could provide BPS organizations with detailed information on how to report their building's energy consumption and GHG emissions and could be updated from time to time as needed.

County staff support this proposed change as having additional details will allow for enhanced benchmarking capabilities, allowing for improved energy efficiency analysis and comparisons.

Conclusions

County staff support the proposed amendments to O. Reg. 507/18, as the ESPM reporting platform will provide additional energy benchmarking insights to support the County's energy management efforts with no impact to the County given that current data is available through the County's EnergyCAP EMIS. As such, staff recommend that Council endorse the comments included in this report and its Attachment, and that comments be submitted to the Ministry and shared with Smart Energy Oxford.

SIGNATURES

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Original signed by

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Departmental Approval:

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ATTACHMENT

Attachment 1 – Oxford County Comment Summary (November, 2022)