
ENERGY PERFORMANCE PROGRAM (EPP) GUIDANCE TO EPP PARTICIPANTS FOR M&V IMPACTED BY THE COVID-19 INTERRUPTION

1. CFF & IF PERFORMANCE PERIODS IMPACTED BY COVID-19

This section provides guidance to Energy Performance Program (EPP) Participants on the program's measurement & verification (M&V) procedures for determining energy savings during the current COVID-19 pandemic period. If the participating facility will be closed or operating at reduced capacity or occupancy during the COVID-19 pandemic period, the period of suspension of normal business operation should not be counted or should be adjusted as part of the facility's energy model for determination of energy savings.

Two (2) Options are being offered to CFF or IF EPP Participants to address facility impacts of COVID-19:

Option 1 – Terminate EPP Agreement

- Participants are eligible to receive an incentive for the performance period up to the start of the COVID-19 impact period (March 13, 2020) upon submission of a savings report. A Non Routine Adjustment in this case is not required since the period affected by COVID-19 will not be included within the truncated performance period.

Option 2 – Perform a Non-Routine Adjustment (NRA) for COVID-19 impacts

- In October 2020, the Efficiency Valuation Organization (EVO) released an IPMVP Application Guide on Non-Routine Events and Adjustments¹ to support measurement and verification (M&V) of energy savings projects. This document fills an industry gap related to the identification of Non-Routine Events (NREs) and applying non-routine adjustments (NRAs). It provides specific guidance for practitioners for M&V strategies employing regression-based energy models.
- Participants may make a Non-Routine Adjustment to their building data for the period impacted by COVID-19 and submit their documentation to the technical reviewer according to the timeline in their participation agreement. Any Non-Routine Events (NREs) & Non-Routine Adjustments (NRAs) should be performed in accordance with the

¹ <https://evo-world.org/en/news-media/evo-news/1195-release-of-the-ipmvp-application-guide-on-non-routine-events-and-adjustments>

IPMVP Application Guide on Non-Routine Events & Adjustments October 2020 EVO 10400 – 1:2020. IPMVP Methods #1-9 can be used for EPP NRAs. Method #10 is not appropriate for use within EPP.

- Participants' application of the IPMVP Guide (and the NRA options contained within) must be sufficiently justified based on each facility's specific circumstances in the documentation submitted to the IESO. The IESO and its technical reviewer will review and determine on a case-by-case basis whether to approve the NRA methodology used.

2. 2021-2024 CDM FRAMEWORK EPP BASELINE PERIOD IMPACTED BY COVID-19

This section provides guidance to Energy Performance Program (EPP) Participants on the program's procedures for the establishment of facility baseline that may be impacted by COVID-19 in order to participate in the 2021-2024 EPP Program. Refer to the following guidelines for establishing a defensible baseline:

- In the case where the baseline period contains an 'abnormal' period such as COVID-19, a Non-Routine Adjustment should be made to the Baseline Period in accordance with the IPMVP Application Guide on Non-Routine Events & Adjustments October 2020 EVO 10400 – 1:2020, Section 4.4.1 Non-Routine Events Occurring during Baseline Period. A description of how the baseline was adjusted should be included in the submission to the IESO. NRA methods to address baseline period NREs are limited to:

Method #1 - Omit Data or,
Method #2 - Use Sub-Metered Energy Use or,
Method #3 – Redefine Baseline Model Using New Variables
- In the case where a Non-Routine Adjustment cannot be made for any reason, the EPP Participant may use a continuous 12 months pre-COVID period as the baseline that is representative of a normal business operating cycle, provided no significant operational changes have been made. For example, the participant may use a continuous 12-month pre-COVID-19 period from March 2019 to February 2020 or alternatively January 2019 to December 2019 as the Baseline Period. The Baseline Period should include adjustments for any Non-Routine Event or energy efficiency projects that were implemented within the COVID-19 period, whether a capital improvement or Operation & Maintenance measure, such that the baseline period is truly representative of normal business operation in future.