



**BOMA TORONTO**

**GREEN BUTTON POLICY DOCUMENT**

**PRESENTED TO**

**ONTARIO MINISTRY OF ENERGY**

**AUGUST 2016**

August 5, 2016

Attn. Candace Major  
Manager  
Energy Conservation Policy  
Ontario Ministry of Energy  
77 Grenville St., 5th Floor  
Toronto, ON  
M7A 2C1

Dear Ms. Major,

The Building Owners and Managers Association of the Greater Toronto Area (BOMA Toronto) would like to thank the Ministry of Energy and the Province of Ontario for this opportunity to comment on Ontario's Green Button Initiative.

BOMA Toronto is a not for profit industry association established in 1917, representing over 80% of all commercial and industrial real estate companies across Ontario (with the exception of the Capital region that is represented by BOMA Ottawa). BOMA Toronto's membership includes leading building owners, property and facility managers, developers, corporate facility managers, leasing professionals, as well as service providers that cater to the Commercial Real Estate (CRE) Industry.

BOMA Toronto's mission is to develop, promote and advance best management practices in the Real Estate Industry through advocacy, education and networking.

As a major stakeholder in Ontario's Commercial Real Estate Industry and as the voice of building Owners and Managers (both within Ontario and as a part of the broader BOMA collective nationally, under BOMA Canada), we are fully supportive of Ontario's Green Button Initiative as we believe Green Button is an important tool for promoting compliance to impending Energy and Water Reporting and Benchmarking (EWRB) Regulation, under Bill 135, and for promoting better building performance in general.

We appreciate the invitation from the Ministry of Energy (MOE) to join the policy discussions and provide our feedback. Our aim is to help the MOE by leveraging

the experience and expertise from within our membership and to ensure that the draft policy is fair, practical, and above all, meets our needs.

Thank you in advance for considering this submission. We would be happy to discuss these suggestions with you further, or respond to any questions you may have.

Regards,

***Bala Gnanam***

Director, Sustainable Building Operations & Strategic Partnerships  
BOMA Toronto

*Email copy to:*

***Susan Allen***, President, BOMA Toronto

***Benjamin Shinewald***, President & CEO, BOMA Canada

***Sarah Stinson***, Director, Buildings and Industry Division, Office of Energy Efficiency,  
Natural Resources Canada

***Peter Fraser***, Vice President, Consumer Protection & Industry Performance, Ontario  
Energy Board

## DISCUSSION

Easy access to timely and accurate consumption data is critical to manage and control energy use and to effectively comply with the EWRB regulation. We applaud the MOE for requiring utilities to provide aggregated utility data for each building upon requests from respective landlords or property owners as part of Bill 135.

However, the process for sharing the data should be enhanced to provide increased efficiency and accuracy. Commercial customers should be given the ability to monitor, access and share their consumption data (with approved third-party service providers) in an easy to use, online format, accessible with the click of a button. Green Button (GB) is being adopted by utilities across the continent with a high degree of success, and the Ontario utilities should be required to do the same.

***Recommendation 1: Draft proposal should require all electricity, natural gas and water utilities and unit sub-metering companies to adopt both Green Button standard 'Download My Data ®' (DMD) and 'Connect My Data ®' (CMD) for commercial customers.***

Across the continent it is estimated that over fifty major utilities have adopted Green Button and sixty million utility customers use Green Button to access their energy consumption data<sup>1</sup>, and there are a growing number of energy service providers and application developers offering products, services, and applications

---

<sup>1</sup> U.S. Department of Energy

that use Green Button data. For example, it only took three months for California to go from concept to specification to early adopter implementation, and for London Hydro (the first Canadian utility to adopt GB), they progressed from specification to the commencement of the pilot study in just six months. These examples demonstrate the ease at which utilities could adopt the standard. Furthermore, according to the MOE sanctioned study, close to 85% of the benefit from implementing Green Button is said to come from the Commercial and Institutional (C&I) sector, and simplifying the reporting process under EWRB requirements.<sup>2</sup> With close to 18,000 buildings in Ontario covered under the EWRB regulation, implementation of Green Button would:

- a) Make it effortless for property managers and landlords to comply with EWRB regulation<sup>3</sup>;
- b) Improve the availability of real-time interval data which is critical for the understanding and managing energy use;
- c) Serve as a catalyst to greater customer engagement when combined with innovative applications and standardized consumption data from utilities; and
- d) Help utilities to become consistent across the province in how utility bills are presented to customers (format and content). This would especially benefit many of our member firms who own and manage building across Ontario and receive utility bills from multiple utilities.

---

<sup>2</sup> Ontario Green Button Cost-Benefit Analysis Results, Dunskey Energy, July 2016

<sup>3</sup> Green Button Significantly Simplifies Energy Reporting for Energy Managers, Green Button Alliance posting, June, 2016

***Recommendation 2:*** *Draft proposal should require all electricity, natural gas and water utilities to use uniform billing format and provide consistent content (subject to type of utility) when invoicing its customers; and where applicable provide a single bill containing all three utility types.*

We understand that mandating GB standards for all utilities in Ontario (all at once) may not be practical or even be realistic as it would require a tremendous effort and investment. So it makes most sense to require this for all accounts that currently have interval meters, and provide a reasonable time table to utilities to bring the remaining accounts to standard.

Considering that Ontario has over 500 utilities (electricity, gas and water combined) and their tendencies to keep customer data local to each utility, implementing non-integrated or locally hosted GB platform would be challenging and very costly to rate payers. As such, a single and integrated platform for each utility type hosted by a secure and regulated service provider would not only permit access and sharing consistent across Ontario but would also offer greater scalability and cost efficiency. This approach would also alleviate the burden on local/regional utilities having to continuously keep their systems updated to support Green Button.

***Recommendation 3:*** *The draft proposal should consider implementing Green Button standard through a single and integrated platform for each utility type hosted by a secure and regulated service provider.*

***Recommendation 4:*** *The draft proposal should require/allow utility and application service providers to register their offer of services through a single platform rather than registering separately with each utility.*

Furthermore, in order to keep the discussions and consultations focused and subsequent activities leading to the development, implementation and maintenance of GB standard on schedule, it is critical that the entire process be managed by a single entity. Considering the potential privacy concerns or conflicts of interests, we suggest that entity be the MOE.

***Recommendation 5:*** *The draft proposal should indicate that the entire process of implementation, support and maintenance of GB standard be managed by either MOE or by another single service provider thoroughly vetted and approved by the MOE with adequate oversight and governance.*

We see the ability of the government to roll out Green Button standard in a timely manner as the single biggest potential risk to its success in Ontario. The implementation schedule for the Green Button standard should closely follow that of the EWRB regulation, otherwise there will be a significant gap in the market place and customers are likely to explore alternate means to make reporting easier. This could also lead to local utilities developing and offering their own solutions to meet their customer needs, minimizing the value of Green Button.

It is commendable that some utilities in Ontario have already adopted Green Button and some are voluntarily exploring it and are currently running pilot projects. However, the transition to web-based, digitally available information is moving too slowly. While it makes sense to phase-in implementation we think it is critical that the Coalition of Large Distributors - CLD (including the two major gas

distributors) should be mandated to become GB DMD and CMD compliant by the end of Year 2 of the EWRB implementation (December 2017). This requirement should also be extended to water utilities of large Ontario cities.

***Recommendation 6:*** *The draft proposal should aim to phase-in GB implementations starting with Ontario's CLD and water utilities of large Ontario cities, and mandating compliance by December 2017 – aligned with the end of Year 2 of the EWRB implementation.*

In order for Green Button to fully support the EWRB reporting process, the Energy Star Portfolio Manager (ESPM) also has to become Green Button compliant. In the U.S. the Environmental Protection Agency (EPA) is actively exploring opportunities of ESPM supporting CMD<sup>4</sup>. Ontario should do the same by collaborating with Natural Resources Canada (NRCan).

***Recommendation 7:*** *MOE must work with NRCan to enable ESPM to become Green Button compliant and integrate 'Connect My Data ®' to support EWRB.*

On the question of certification, while it may be used by the Green Button Alliance to recognize utilities for their rapid adoption of the GB standard and its consistent interpretation, we do not see any value as a utility customer since compliance is expected to be neither voluntary nor optional for utilities. Also we suggest that the MOE does not create an environment where GB standard could be interpreted differently by different utilities. All utilities must be held to the same standard so

---

<sup>4</sup> Energy Star: <https://portfoliomanager.zendesk.com/hc/en-us/articles/211697027-How-does-Portfolio-Manager-interact-with-Green-Button-data->

that what data is collected, how it is shared and presented are consistent across Ontario.

***Recommendation 8:*** MOE should create a special working group or a committee consisting of representatives from utilities, customers, and energy service providers to discuss and agree on the interpretation of the Green Button standard. This group could also be tasked with drafting the format and defining the content for utility bills so that customer bills across Ontario will have the same format and content.

In addition, as a means to address any potential customer concerns over privacy issues, there are merits in certifying service providers. This would not only instill confidence in customers who may seek such services but also would enable service providers to develop a wider range of innovative GB solutions to meet the demands from the CRE Industry.

***Recommendation 9:*** The draft proposal should require/allow a formal Green Button certification and seal for service providers, ensuring customers that these service providers have met all the technical and privacy requirements to provide GB solutions.

## CONCLUSION

Implementation of Green Button standard is good for the industry. Although we are living in the age of big data, some argue that privacy around the collection and use of a customer's usage data should be treated as part of their personal information (the notion of customer energy privacy<sup>5</sup>) and therefore should be protected and not shared. This view impedes progress and innovation and does not align with Ontario's vision for the energy future. All privacy concerns raised by various utilities in relation to Green Button, in our opinion, have already been addressed by using the 'Privacy-by-Design'<sup>6</sup> standard and compliance with the Global Privacy Standard<sup>7</sup> to instill trust and confidence<sup>8,9</sup>. Green Button is part of the growing trend of open data policies that promote innovations to stimulate social, political and economic change<sup>10</sup>, contributing to energy efficiency and the overall building performance to pave a path for smart and connected buildings.

As a major stakeholder in Ontario's Commercial Real Estate Industry, BOMA Toronto is fully supportive of Ontario's Green Button Initiative. We believe easy access to utility consumption data through Green Button would not only make it effortless for property managers and landlords to comply with EWRB regulation, but also the availability of real-time interval data would lead to greater

---

<sup>5</sup> Privacy by Design and Third Party Access to Customer Energy Usage Data, 2013

<sup>6</sup> Privacy by Design: The 7 Foundational Principles – Implementation and Mapping of fair Information Practices, Information & Privacy Commissioner of Ontario, <https://www.ipc.on.ca/images/Resources/pbd-implement-7found-principles.pdf>

<sup>7</sup> Creation of a Global Privacy Standard, Commissioner Ann Cavoukian, PhD, Information & Privacy Commissioner of Ontario, <https://www.ipc.on.ca/images/resources/gps.pdf>

<sup>8</sup> Privacy by Design and the Emerging Personal Data Eco System, Information & Privacy Commissioner of Ontario, 2012

<sup>9</sup> Green Button Ensures Utilities and Third Parties Protect Customer Privacy, Green Button Alliance

<sup>10</sup> Understanding Smart Data Disclosure Policy Success: The Case of Green Button, Center for Technology in Government, University at Albany

understanding and management of energy use and subsequently impact the overall efficiency of the building and help drive down costs.

While BOMA could only speak for the Commercial Real Estate Industry, the benefit of implementing Green Button in the residential, institutional, and industrial sectors are well documented in many other jurisdictions in North America, and therefore should be considered in Ontario as well.

We appreciate the MOE engaging BOMA Toronto from the very early stage of this policy and we look forward to our continuous collaboration with the Ministry. Our aim is to help the MOE by leveraging the experience and expertise from within our membership and to ensure that the draft policy is fair, practical, and above all, addresses our needs.

\*\*\*