



Canadian Solar Industries Association
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CanSIA

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Ms Kirsten Walli
Board Secretary
Ontario Energy Board
27th floor
2300 Yonge St.
Toronto, Ontario
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Re: Ontario Energy Board

Distribution Network Investment Planning (EB-2010-0377)
Approaches to Mitigation for Electricity Transmitters and Distributors (EB-2010-0378)
Defining and Measuring Performance of Electricity Transmitters and Distributors (EB-2010-0379)
Regional Planning for Electricity Infrastructure (EB-2011-0043)

Dear Ms Walli,

I am writing on behalf of CanSIA to request participant status and cost eligibility in the above identified proceedings. CanSIA is applying for intervenor status late in the process due to the fact that it has been difficult to determine the specific impacts on solar generators until this point.

The Canadian Solar Industries Association (CanSIA) is the national trade association that represents over 650 solar energy companies throughout Canada and over 500 in the province of Ontario. Since 1992, CanSIA has worked to develop a strong and efficient Canadian solar energy industry with capacity to provide innovative solar energy solutions and to play a major role in the global transition to a sustainable, clean-energy future. CanSIA focuses on being a factual, constructive and collaborative stakeholder and is the trusted and credible voice of the Canadian solar energy industry.

CanSIA submits that it should be eligible for costs on the following grounds:

- (a) CanSIA Represents a Class of Consumers in these Proceedings: New principles, rules and procedures that may result from these proceedings could have material impact on the business conditions faced by solar electricity generators and on the procedures followed by electricity distributors and transmitters in providing services to solar electricity generators.

- (b) It is in the Public Interest to Facilitate Solar Generator Participation: CanSIA's members are building and planning new solar electricity projects in response to OPA procurement programs and consequent contracts, and Ministerial Directives that incorporate provincial policy objectives. Given that the issues in the present proceedings are likely to include "generator issues," the Board should facilitate the participation of solar electricity generators in order to provide the best evidentiary basis for its determination. Many of CanSIA's members are too small to participate individually in a meaningful way in these proceedings. CanSIA's participation facilitates the involvement of such members, and ensures that the Board has before it a comprehensive representation in these proceedings from the solar electricity power generator community.
- (c) CanSIA's Participation Contributes to Hearing Efficiency: CanSIA's representation of its members in such proceedings would be a much more effective and efficient regulatory approach than having each of its members make their own interventions, with attendant duplication and extra costs. CanSIA has participated similarly in other OEB hearings.
- (d) Proper CanSIA Participation Requires Intervenor Funding: CanSIA, like other trade associations such as the Association of Power Producers of Ontario ("APPrO") and the Ontario Sustainable Energy Association ("OSEA"), does not have independent funding sufficient to support well rounded participation.

The above is not an exhaustive list of CanSIA's interest in these proceedings. There may be other issues of interest to CanSIA that arise or develop during the proceedings. CanSIA seeks at all times to retain and reflect the perspective of the solar electricity generation industry as a whole, and to present a balanced view of policy issues affecting the electricity industry and the public at large in Ontario.

Although the Board's Practice Direction on Cost Awards states that generators are normally among the parties not eligible for costs (section 3.05(b)), CanSIA submits that, for the above-noted reasons, including the nature of the issues in these proceedings and their importance to solar electricity generators, the Board make an exception to the general rule that electricity generators are not eligible for costs. CanSIA is essentially asking for the Board to exercise its discretion in the same manner as it did in respect of several recent electricity and natural gas proceedings that had unique impacts on power generators.

We thank you for your attention to this matter and your consideration to allow CanSIA intervenor status and cost eligibility at this late time in the process.

Best Regards,



Wesley Johnston
CanSIA Director of Policy and Research