



Canadian Solar Industries Association  
*L'Association des Industries Solaires du Canada*  
150 Isabella St., Suite 605  
Ottawa, Ontario  
CANADA K1S 1V7

T • 1 (613) 736-9077  
1 (866) 522-6742  
F • 1 (613) 736-8938  
E • [info@cansia.ca](mailto:info@cansia.ca)

**CanSIA**

[www.cansia.ca](http://www.cansia.ca)

February 4<sup>th</sup>, 2013

**RESS, COURIER & EMAIL**

Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

**Attention:** *Ms. K. Walli, Board Secretary*

Dear Ms. Walli,

**Re: Development of a Standby Rates Policy for Load Displacement Generation Board File No. EB-2013-0004**

CanSIA hereby indicates our intent to participate in the above-referenced consultation process.

**1) About CanSIA**

CanSIA is a national trade association that represents over 650 solar energy companies throughout Canada, including over 500 companies that operate in the Province of Ontario. Since 1992, CanSIA has worked to develop a strong and efficient solar industry in Canada with the capacity to provide innovative solar energy solutions and to play a major role in the global transition to a sustainable, clean-energy future. Among CanSIA's members are companies that serve the needs of micro-embedded solar generators through the design, installation, servicing and manufacture of the components of these systems. Accordingly, CanSIA has and represents a strong interest in the consultation process and in any policy changes that may result from it.

**2) Expression of Interest – Nomination Letter**

CanSIA appreciates the opportunity to provide stakeholder feedback through participation in the Ontario Energy Board's ***Load Displacement Generation Working Group (LDGWG) (EB-2013-0004)***, as micro solar PV generators represent the largest share of micro-embedded generation facilities in Ontario. CanSIA has been an active and constructive stakeholder and participant in

Ontario's interconnection policy and technical matters, as Distributed Generation ("DG") becomes increasingly common on many levels throughout society.

CanSIA nominates Paul Luukkonen or other CanSIA representative, to contribute to a standard methodology for the setting of standby rates through participation in the Load Displacement Generation Working Group (LDGWWG).

As the Industry Association representing companies for which the largest number of Load Displacement Generators in the Province can be attributed to, the solar generation sector is the primary generator with an interest in Load Displacement Generation.

Paul is currently the Ontario Policy and Research Advisor for CanSIA and regularly works with multiple stakeholders building consensus on technical and policy matters. He is experienced and knowledgeable regarding the operational characteristics of Load Displacement Generation and its roll in meeting customers' electricity demand, as well as the potential impacts of LDG on the distribution and electricity system in general.

This is in part due to contributions regarding distributed generation financial stakeholder feedback submissions to the Ontario Power Authority and technical submissions to the Ministry of Energy and the Ontario Energy Board regarding the connection of micro embedded generators. Previously Paul worked extensively with distributed generation facilities as part of the Sustainable Technology Evaluation Program (STEP) for Toronto and Region Conservation Authority (TRCA), contributing to the monitoring of PV performance factors, generation forecasting and studying the load profile characteristics of multiple generation and consumption facilities.

### **3) Cost Eligibility**

CanSIA, which does not have independent funding sufficient to support its well-rounded participation requests cost eligibility in this proceeding. CanSIA submits that it should be eligible because it will represent a public interest that is relevant to the Board's mandate, namely the interests of load displacement generators and the solar industry that services the needs of such generators. In particular, paragraph 5 of subsection 1(1) of the *Ontario Energy Board Act, 1998* provides that the Board in carrying out its responsibilities in relation to electricity shall be guided by the objective of promoting "the use and generation of electricity from renewable energy sources in a manner consistent with the policies of the Government of Ontario."

This proceeding concerns micro-embedded generation facilities that are typically owned and operated by small businesses, farmers and individuals. The vast majority of these stakeholders are serviced directly by CanSIA member companies, including manufacturers of the inverters,

racking systems and panels that comprise solar generation facilities, as well as the installers and consultants that assist individuals and small businesses in developing and obtaining approvals and connections for their micro-embedded solar generation facilities. As stakeholders, these types of generators in Ontario are unique in that they are largely unorganized and without a common voice. As such, the interests of directly affected generator customers are unlikely to be adequately represented in this proceeding. However, as direct service providers, CanSIA's member companies have interests that are closely aligned to those of such generators and can therefore, serve as an effective proxy for the interests of PV generation customers in this proceeding. Moreover, as the long-term sustainability of the solar industry in Ontario is directly affected by the decisions affecting micro-embedded generators, it is CanSIA's participation that therefore represents a public interest that is relevant to the Board's mandate. Therefore, consistent with section 3 of the Board's Practice Direction on Cost Awards, CanSIA should be found eligible for costs.

In addition, CanSIA recommends that the Board facilitate participation by providing parties, including CanSIA, with eligibility to claim the costs of experts to provide advice, particularly with respect to the proposed issue of appropriate standby costs for Load Displacement Generators. Aspects of this issue are highly technical in nature and will therefore require CanSIA to draw upon outside expertise in order to best assist the Board.

#### **4) Notices**

Please provide copies of all communications to:

Wesley Johnston  
Canadian Solar Industries Association  
2378 Holly Lane  
Suite 208  
Ottawa, Ontario K1V 7P1

Tel: 613-736-9077 ext. 224 | Fax: 613-736-8938 | [wjohnston@cansia.ca](mailto:wjohnston@cansia.ca)

Yours Truly,

A handwritten signature in black ink, appearing to read 'Wesley Johnston', with a stylized flourish at the end.

Wesley Johnston  
CanSIA, Director of Policy and Research