

June 17, 2013

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Dear Ms. Walli:

Proposed Amendments to the Transmission System Code (TSC) and the Distribution System Code (DSC); EB-2011-0043

We are counsel to the Ontario Electricity Storage Alliance ("OESA") in the above-mentioned matter.

The Ontario Electricity Storage Alliance is a new and evolving organization, representing approximately 18 electricity storage, development, and policy members who have an interest in integral electricity storage projects and policy in the Province of Ontario. OESA's membership includes IESO contracted storage providers, battery, flywheel and frequency regulation technology developers and suppliers, and entities interested in increased efficiency in the Ontario electricity system.

OESA has reviewed the proposed changes to the TSC and the DSC and appreciates the Board's attempts to facilitate advanced and coordinated regional planning in relation to transmission and distribution network investments. In several instances the Board's Notice and the proposed amendments refer to developing the *"most optimal solution(s) to address regional requirements"*. The Board further confirms that such regional requirements *"will not always be limited to transmission and/or distribution infrastructure investments. In some cases, conservation and demand management ("CDM") or distributed generation options may represent potential solutions."* Section 3C.2.2(d) of the proposed changes to the TSC mandate that the OPA determine the appropriate regional planning approach and whether *"a regional infrastructure planning process should be implemented immediately to determine the appropriate investment in transmission and/or distribution facilities to address a need or whether an integrated regional resource planning process should be implemented first for the purpose of also taking the potential CDM and generation solutions into consideration in the assessment"* (Notice p. 7). Similar considerations may also be required in relation to the proposed changes to the DSC.

In each of these instances the Board makes no express mention of the valuable resource that electricity storage may play in finding the most optimal solutions to address regional requirements. Similarly, there is no indication that electricity storage, in addition to CDM and distributed generation, may represent a potential solution that should be considered in any needs assessment and/or the Ontario Power Authority's determination of the appropriate regional planning approach. The OESA therefore respectfully requests that the Board alter the proposed TSC and DSC amendments to expressly include electricity storage as an express alternative to be considered by the Ontario Power Authority and relevant stakeholders in the determination of the most optimal potential solutions to address regional requirements.

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TORONTO: 295795v1

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Thank-you for your consideration of these submissions. Should you have any further questions, please do not hesitate to contact the undersigned.

Sincerely,



Lisa (Elisabeth) DeMarco