

March 22, 2019
Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
27th Floor
2300 Yonge St
Toronto, ON
M4P 1E4

**Re: EB-2018-0287 Utility Remuneration and EB-2018-0288 Responding to DERs
CanSIA Participation and Cost Eligibility Request Letter**

Dear Ms Walli,

The Canadian Solar Industries Association (CanSIA) is writing to the Board to register our intent to participate in Utility Remuneration Board File No. EB-2018-0287 and Responding to Distributed Energy Resources (DERs) Board File No. EB-2018-0288. Based on the Board letter dated March 15, 2019 and the Board's Practice Direction on Cost Awards, CanSIA is requesting cost award eligibility in relation to the above-mentioned integrated consultation initiatives.

Representation and Experts

CanSIA would benefit from subject matter experts to assist in this consultation and is therefore requesting cost eligibility for this proceeding.

Cost Award Eligibility

At this time, CanSIA does not have access to funds that would enable its participation in this initiative.

CanSIA believes that it is eligible for cost award based on Cost Eligibility defined in Section 3 of the Board's Practice Direction on Cost Awards. CanSIA represents a public interest relevant to the Board's mandate (Section 3.03 (b)) and our members are also persons with interests that would be affected by the outcome of the initiative and Board process (Section 3.03 (c)). CanSIA represents generators as well as technology providers who are primarily customers of distribution and may be applicants in other relative proceedings. Although certain members of CanSIA may be ineligible under Section 3.05 (b), CanSIA believes that special circumstances exist to allow it to be eligible for cost award in this process.

CanSIA is a national trade association that represents solar energy companies throughout Canada. Since 1992, CanSIA has worked to develop a strong, efficient, ethical and professional 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 members are customers of distribution utilities in Ontario, and many of our members have applications for distribution connection in development. CanSIA members in the recent past have experienced many challenges associated with constructing and operating distribution connections. Given that the mandate of both initiatives are intended to “facilitate lower costs, better services and more choice for customers by encouraging utilities and other service providers to embrace innovation in operations and the products they offer to consumers”, CanSIA believes that its engagement in these consultations is essential and could have direct impact on its members.

Solar generation technology along with smart grid and energy storage technologies are evolving rapidly. CanSIA believes that distributors will be able to provide increased value to their customers based on the wide range of technology evolution and our members believe that future partnerships and collaboration between solar generation providers and distributors will be a major part of this increased value proposition. In particular, CanSIA members have a significant interest in sector transformation that enables DERs (such as solar and storage), while mitigating any adverse consequences.

CanSIA believes it is eligible for cost award based:

i) Representation of a Class of Consumers:

Solar Generation providers could be subjected to new rules or requirements that could have an impact on their business and the economics of their facilities. Special circumstances therefore exist that would warrant an award of costs in accordance with Section 3.07 of the Practice Direction.

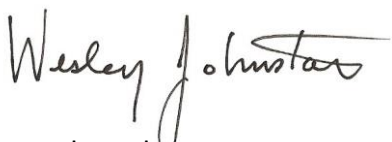
ii) Funding is Required for Proper Participation by CanSIA:

Without intervenor funding, CanSIA effectiveness in the proceedings will be limited. Similar to other associations in the electricity sector, CanSIA does not have independent funding to support participation in the initiative while a cost award would support the ability to participate to our full capabilities.

iii) Public Interest to Facilitate Small Solar Participation:

Many solar developers are too small or are private individuals who would not participate in a meaningful way in this proceeding. CanSIA's participation facilitates the involvement of these members and would ensure that the Board has a comprehensive representation of the thousands of consumers who are considering or have installed solar generation as an intervenor. CanSIA requests to prepare comments on the OEB staff's scoping paper, participate in the stakeholdering meetings, and subsequent initiatives related to these initiatives as will be later defined, and requests that CanSIA be cost eligible for these proceedings.

Sincerely,



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