

March 26, 2019

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

**Re: Examination of Alternative Price Designs for the Recovery of Global Adjustment Costs from Class B Consumers in Ontario (EB-2016-0201)
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 Board File No. EB-2016-0201 with respect to the OEB staff research paper “Examination of Alternative Price Designs for the Recovery of Global Adjustment Costs from Class B Consumers in Ontario” which was published February 28, 2019.

Based on the Board’s Practice Direction on Cost Awards, CanSIA is requesting cost award eligibility with respect to the submission of written comments. CanSIA notes that this OEB staff research paper was not published in the “What’s new newsletter” on the OEB website.

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 is supportive of the goals of this initiative, such as “improving electricity pricing structures” and “empowering customers and giving them greater control.” Given that the cost recovery of Global Adjustment charges will have a direct impact on customers participating in net-metering and load displacement, CanSIA believes that its input with respect to this consultation is essential and could have a direct impact on its members.

CanSIA believes it is eligible for cost award based:

i) Representation of a Class of Consumers:

Solar Generation and customer adopting solar to a new price design 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 research paper, and requests that CanSIA be cost eligible for these proceedings.



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Sincerely,

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