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March 29, 2019

Filed on RESS and Sent via Courier

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

Dear Ms. Walli:

**Re: Utility Remuneration and Responding to Distributed Energy Resources
Consultation Initiation
Board File No.: EB-2018-0287 and EB-2018-0288**

We are counsel to the Distributed Resource Coalition (**DRC**). Please find enclosed DRC's Notice of Intervention requesting participant status and cost eligibility in the above-noted proceeding.

Sincerely,

A handwritten signature in black ink, reading "Jonathan McGillivray", written in a cursive style.

Jonathan McGillivray

cc. All Participants in EB-2018-0287 and EB-2018-0288
All Licensed Electricity Distributors, Natural Gas Distributors and Electricity Transmitters
All Other Interested Stakeholders

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Sched. B, as amended;

AND IN THE MATTER OF the consultation with respect to
the Ontario Energy Board's approach to utility
remuneration;

AND IN THE MATTER OF the consultation with respect to
the Ontario Energy Board's approach to responding to
distributed energy resources (**DERs**);

EB-2018-0287
EB-2018-0288

NOTICE OF INTERVENTION
OF
DISTRIBUTED RESOURCE COALITION
(DRC)

March 29, 2019

A. Application for Late Intervenor Status

1. The Distributed Resource Coalition (**DRC**) hereby requests status to participate in the consultation on the Board's approaches to utility remuneration (EB-2018-0287) and responding to DERs (EB-2018-0288). This notice of intervention is filed pursuant to Rule 22 of the Board's Rules of Practice and Procedure, including Rule 22.05, and the Board's letter dated March 15, 2019. The DRC notes that this notice of intervention is being filed four (4) business days after the original filing deadline as the DRC has been intensely involved in the preparation of expert evidence on related DER matters being considered in another Board proceeding. We ask that the Board exercise its discretion to allow DRC's participation in the above-mentioned proceedings, which fall squarely within the mandate, focus and expertise of DRC. We respectfully submit that allowing DRC to participate at this point would not result in any prejudice to any of the parties and will ensure that the Board is hearing from actual customers that are focussed on DER issues and electric vehicles (EV) as a DER resource.
2. DRC's participation would bring to bear a DER customer perspective and include experience and input on issues including, but not limited to:
 - (a) connection of DERs, including EV-related DERs, to the electricity grid;
 - (b) DERs, including EV-related DERs, as a reliability resource;
 - (c) integration of DERs and EV-related DERs into local distribution system planning and related O&M considerations; and
 - (d) DER and EV-related DER considerations for rate design.

B. DRC and its Interest in the Proceedings

3. DRC is a group of electricity customers and consumers that consists of end-use residential customers, small- and medium-sized commercial and industrial customers, non-profit organizations, and owners' associations that are directly affected by and interested in (i) optimizing existing energy assets, (ii) efficiently facilitating the integration of existing and innovative DERs to achieve customer and grid solutions, and (iii) providing input on direct customer needs and local distribution company opportunities relating to DERs. DRC hopes to further these interests for the benefit of each and all of end-use customers, DER providers, utilities, and the regulatory regime. We respectfully submit that

it is integral for the Board to ensure DER customer voices are both well represented and heard in order to ensure procedural fairness in the above-mentioned proceedings.

4. DRC has a direct and substantial interest in the proceedings in that its members are directly affected by the Board's approaches to utility remuneration and responding to DERs. DRC has a substantial interest in the proceedings, including insofar as they addresses integration of DERs, including EV-related DERs, into local distribution system planning (including O&M considerations) and utility service. DRC hopes to provide the Board with the currently absent, unique perspective of EV/DER residential customers, small commercial and industrial customers, as well as EV/DER-related non-profit organizations, owners, and developers, each of which may be materially affected by the outcome of these proceedings. The DRC will also address the benefits of sector transformation related to DERs.
5. The members of DRC in connection with these proceedings include, subject to further update, the Electric Vehicle Society (end-used electric vehicle electricity customers) and Plug'n Drive.

C. Nature and Scope of DRC's Intended Participation

6. DRC intends to be an active participant in these proceedings and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed. DRC otherwise intends to participate actively in order to test evidence in accordance with the stipulated processes and timelines, and provide argument. It reserves the right to adduce evidence should the Board's procedures provide for same.

D. Costs

7. DRC is, in accordance with s. 3.03(a) of the Board's *Practice Direction on Cost Awards* (the **Practice Direction**), eligible to seek an award of costs as DRC is a party that primarily represents the direct interests of consumers (residential customers, small- and medium-sized commercial and industrial customers) in relation to services that are regulated by the Board. DRC is also, in accordance with s. 3.03(b) of the Practice Direction, eligible to seek an award of costs as DRC represents organizations that have a policy interest in electricity conservation and demand management, implementation of a

smart grid in Ontario, promotion of the use of electricity from renewable energy sources, each of which are components of the Board's mandate and relevant to the proceedings.

8. DRC therefore requests cost eligibility in these proceedings as its comments will serve an important and unique interest and policy perspective relevant to the Board's mandate, which has heretofore not been represented or heard.

E. DRC's Representatives

9. DRC hereby requests that further communications with respect to these proceedings be sent to the following:

Electric Vehicle Society
34 Hopkins Court
Dundas, Ontario. L9H 5M5

Attention: Wilf Steimle
Email: Wilf.Steimle@EVSociety.ca

AND TO

Plug'n Drive
1126 Finch Avenue West, Unit 1
North York, ON M3J 3J6

Attention: Cara Clairman
Telephone: 647-717-6941
Email: cara@plugndrive.ca

AND TO ITS COUNSEL

DeMarco Allan LLP
Bay Adelaide Centre
333 Bay Street, Suite 625
Toronto, ON M5H 2R2

Attention: Lisa (Elisabeth) DeMarco
Telephone: 647-991-1190
Facsimile: 1-888-734-9459
Email: lisa@demarcoallan.com

Attention: Jonathan McGillivray
Tel: 647-208-2677
Facsimile: 1-888-734-9459
Email: jonathan@demarcoallan.com

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
29th day of March, 2019

A handwritten signature in black ink, consisting of a large, stylized 'L' followed by a long, sweeping horizontal stroke that ends in a small arrowhead.

Lisa (Elisabeth) DeMarco
DeMarco Allan LLP
Counsel for Distributed Resource Coalition