

April 12, 2019

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

Dear Ms. Walli:

Re: Request for Intervenor Status and Cost Award Eligibility for the 2019 IESO Expenditure and Revenue Requirement EB-2019-0002

Energy Storage Canada (ESC) is applying for intervenor status in the above stated proceeding and requesting cost award eligibility for the same.

ESC is the national industry association representing the energy storage industry. It is a non-profit, membership-based organization whose mission is to advance the energy storage industry through collaboration, education, policy advocacy and research. Our membership includes technology developers, project developers, research groups, energy consultants and power generators.

The IESO's 2019 Expenditure and Revenue Requirement submission is relevant to the energy storage industry as one of the IESO's stated objectives is to remove barriers to energy storage and to integrate new technologies. In addition, ESC has a strong interest in how energy storage fits into the scope of the IESO's market renewal project and workstreams. We want to ensure that the interests of the energy storage sector are adequately represented in this proceeding.

This is a proceeding with important implications for energy storage and for how Ontario's system operator evolves and incorporates newer technologies. As industry participants in energy storage, ESC's members have a direct interest in these proceedings and their outcome.

The members of the association have unique expertise and experience as both customers and suppliers of energy storage technologies and services. It is important that ESC, on behalf of energy storage interests, have the ability to contribute to these related initiatives.

In accordance with s. 3.03(b) of the Board's *Practice Direction on Cost Awards*, ESC is eligible to seek an award of costs in this proceeding as ESC is a non-profit industry association and it primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding for which cost award eligibility is sought.



ESC requests that a copy of all documents filed with the Board by each party to these proceedings be distributed as follows:

Energy Storage Canada
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Unit C208B
Toronto, ON, M5G 2C8

Attention: Patricia Phillips, Executive Director
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E-mail: pat.phillips@energystoragecanada.org

c.c Laurie Reid

Yours truly,

Patricia Phillips
Executive Director