

August 6, 2019

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, Ontario M4P 1E4

To Board Secretary Walli,

Re: Utility Remuneration and Responding to Distributed Energy Resources (DERs) Consultation Proceedings (the Proceedings) and the Ontario Energy Board Decision on Cost Eligibility dated July 17, 2019 (the Decision) EB-2018-0287 and EB-2018-0288

This letter is being submitted by QUEST, a national nonprofit organization that is driving the development of resilient, affordable, healthy, and prosperous Canadian communities by building awareness of, and support for, efficient, integrated, and localized energy systems.

As the voice of the Smart Energy Communities marketplace in Canada, QUEST is an influencer, connector, and educator that supports governments, utilities & energy providers, the real-estate sector, and solution providers to grow the Smart Energy Communities marketplace. Smart Energy Communities benefit from improved energy efficiency, enhanced reliability, lower costs, and reduced greenhouse gas emissions.

Across 12 years collaborating with a diverse range of allies, QUEST has cemented a reputation as a highly credible, nonpartisan, and business-friendly organization. And it is in this respect that QUEST is submitting this letter, requesting your

> QUEST 350 rue Albert St. Suite / bureau 1220 Ottawa, ON K1R 1A4 Tel/ Tél : 866-494-2770 Fax/ Téléc : 866-494-2770 Web: www.questcanada.org

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Executive Director/ Directeur exécutif, p.int Tonja Leach reconsideration of your decision to not award cost eligibility to any of the DER intervenor groups.

QUEST submits that if the Board fails to grant cost eligibility to these intervening groups, it creates more than a reasonable apprehension of bias against DERs and DER providers. Given the complexity and quickly evolving nature of DER solutions, it is difficult to imagine how the Board can legitimately review and consider the response to DERs and utility remuneration relating to DERs without the full and active participation, high quality information, and member perspectives of DER interests facilitated by cost eligibility.

QUEST submits that the Board should carry through with its intention to seek the input of a broad group of stakeholders on how it should proceed with initiatives to support the evolution of the energy sector. The continued exclusion of all DER providers from the Proceedings through the cost eligibility process would seriously call into question the legitimacy of the Board's process and findings in these Proceedings. QUEST therefore respectfully requests that the Board review and vary its Decision and award cost eligibility for for those DER intervenor groups participating in the Proceedings.

QUEST thanks the Board for considering this letter and we appreciate the opportunity to provide our input to this process.

Yours Sincerely,

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Tonja Leach, Executive Director, QUEST