

August 9, 2019

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

Dear Ms Walli:  
EB-2018-0287 and EB-2018-0288

Notice of Intervention of Paul B. Sommerville

Please find enclosed the Notice of Intervention of Paul B. Sommerville in the above-noted proceeding.

Yours truly,

Paul B. Sommerville, BA LLB  
Consultant/Researcher

1231 Danforth Avenue  
Toronto, Ontario M4J 1M8  
647 967 7498  
Paul.sommerville@sympatico.ca

# ONTARIO ENERGY BOARD

## NOTICE OF INTERVENTION

### **Paul B. Sommerville Consultant/Researcher**

To Ms. Kirsten Walli, Board Secretary

**Re: Utility Remuneration and Responding to Distributed Energy Resources (DERs)  
Consultation Proceedings  
EB-2018-0287 and EB-2018-0288**

#### THE INTERVENOR

Paul B. Sommerville hereby expresses his intention to intervene and participate in the abovementioned proceeding.

Mr. Sommerville's address is:  
1231 Danforth Avenue  
Toronto, ON  
M4J 1M8

647 967 7498  
paul.sommerville@sympatico.ca

I am attaching my Resume by way of introduction.

As my Resume documents, I have broad and deep exposure to the subject matter of the Consultations as a senior executive and Chief Regulatory Officer of a major Electricity Utility, a long serving Member of the Ontario Energy Board, a senior executive of an Energy think tank, and sole or co-author of major analytical reports focused on the issues respecting the accommodation of Distributed Energy Resources in Utility systems in a variety of jurisdictions. (see Emerging Energy Trends: Regulatory Responses to Ontario's Energy Future, Dec 2016 ISBN 978-1-77259-029-6; and Distributed Energy Resources: The Role of Regional Planning, New Benefit-Cost Methodologies and the Competitive Landscape 2019 ISBN 978-1-77259-089-0)

While Executive Director of Mowat Energy Mr. Sommerville convened a stakeholder Conference at MaRS Centre on this subject matter. That work identified a number of significant trends which have important implications for utilities in Ontario. One objective of that work has been to examine whether, and if so, in what ways and to what extent, those trends will affect Ontario's distribution system, its utilities, its ratepayers, and its

energy markets. Mr. Sommerville has also written and sponsored a number of other relevant research papers.

The focus of Mr. Sommerville's work has always been the respective interests of Ratepayers, Utilities, DER developers and system planners in the accommodation of new Distributed Energy Resources. The orderly, predictable, and cost-efficient introduction of DER technologies is a key issue for energy markets and those dependent on their efficiency, durability, and cost.

It is his intention to provide information and analysis associated with the subject consultations based on the available evidence and an understanding of international and national developments in the area.  
He intends to participate fully in the Board's proceeding.

Mr. Sommerville requests that electronic copies of the application and any further Additional supporting materials be sent to :  
Paul B. Sommerville  
Consultant/Researcher  
1231 Danforth Avenue,  
Toronto, ON M4J 1M8  
647 967 7498  
Paul.sommerville@sympatico.ca

## GROUNDS FOR THE INTERVENTION

The Consultations necessarily invoke consideration of a wide variety of significant policy components, including the orderly and economic integration into the Ontario Energy system of new Distributed Energy Resources, the possible creation of new customer classes, and possible inter- class rates and planning issues. Mr. Sommerville believes that his participation as an intervenor will materially assist the Board in its consideration of the many and varied policy and practical elements of the Consultations. The creation of an appropriate framework for the introduction of DER is important for ratepayers, utilities, developers and system planners. Mr. Sommerville's background at Mowat Energy, Toronto Hydro, and the Ontario Energy Board creates a uniquely relevant skill set for his productive professional engagement in the proceeding.

## INTERESTS OF THE INTERVENOR

Mr. Sommerville is intervening in order to support and inform the Board's process in its consideration of the subject matter of the proceeding. Apart from his status as a gas and electricity ratepayer, Mr. Sommerville is uniquely qualified to provide relevant,

experienced, expert and fully objective input into the proceeding. All energy market stakeholders have distinct, and at times divergent interests in the subject matter. Mr. Sommerville's Intervention is unique in that it can provide fully objective and independent input into the process, supported by current familiarity with national and international developments in the area, and deep background in the legal, regulatory, practical, and economic implications of DER dissemination into delivery systems.

#### INTENTION TO SEEK COST AWARDS

Mr. Sommerville regards his participation in these Consultations as a professional engagement supported by his demonstrated experience and expertise in the subject matter. His contribution will far exceed the typical anecdotal input of "citizen interventions".

Mr. Sommerville is requesting an award of costs for his professional participation in this proceeding and believes that he meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure (Section 41) and its' Practice Direction on Cost Awards (Section 3.03).

Mr. Sommerville notes that the actual awarding of costs on a professional basis is always a matter of the Board's discretion, and its post facto assessment of the relative value of the contribution made by any eligible Intervenor.

DATED AT TORONTO, August 9, 2019