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August 26, 2019

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association (OSEA)
Letter Requesting Cost Eligibility
Distributed Energy Resources Connections Review Initiative
Board File No. EB-2019-0207**

Willms & Shier Environmental Lawyers LLP is counsel for OSEA. OSEA intends to participate in the Board's Distributed Energy Resources ("DERs") Connections Review Initiative and seeks cost award eligibility for this proceeding. OSEA may retain an expert to assist.

ABOUT OSEA

OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute to energy conservation and sustainable energy development for Ontario. OSEA aims to ensure funding and rates that encourage conservation and the incorporation of renewable energy. OSEA also aims to provide education about all types of renewable energy technologies.

OSEA's members, both individuals and organizations, are interested in the development of sustainable energy in Ontario as consumers, individuals and citizens of Ontario. OSEA has been an intervenor and awarded costs by the Board in numerous previous hearings, and the Board recognized that OSEA can provide "an important and unique perspective" in EB 2011-0118.

Proceedings that OSEA recently participated in include: the Board's proceedings in 2015 for the Cap and Trade Framework, Cap and Trade Compliance Plans in 2016 and 2017, IESO's 2016 – 2019 Expenditure and Revenue Requirement Submissions, Hydro One's 2018 – 2022 Distribution Rates Application, the 2015-2020 DSM Framework, the DSM Mid Term Review, the Post 2020 DSM Framework, the Advisory Committee for the DSM Guidelines, Enbridge's

Renewable Natural Gas Enabling Program Application, and the Rate Design for Electricity Commercial and Industrial Customers.

NATURE AND SCOPE OF OSEA'S INTENDED PARTICIPATION

OSEA actively participates in Board proceedings and intends to provide meaningful comments on the DERs Connections Review Initiative, and further participate in steps beyond this once determined by the Board. OSEA intends to participate in the Working Group.

COSTS

In accordance with section 3.03 of the Board's *Practice Direction on Cost Awards*, OSEA believes that it is eligible for an award of costs because it:

- a) primarily represents the direct interests of consumers in relation to services that are regulated by the Board, and
- b) primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding about the DER Connections Review.

OSEA can continue to provide an important and unique perspective in the current consultation initiative. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

OSEA'S REPRESENTATION OF CONSUMERS

In accordance with criterion 3.03(a) from the *Practice Direction*, OSEA primarily represents the direct interests of consumers (eg. ratepayers) in relation to regulated services. OSEA's membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA's members include green technology developers, distributors, installers and operators and other service providers. OSEA thereby represents the direct interests of consumers.

OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. OSEA also aims to provide education about all types of renewable energy technologies.

OSEA is a public interest organization that advocates for renewable energy and innovation leading to a more sustainable energy economy. OSEA is not an association for energy generators. OSEA's membership is diverse, and includes small scale distributors and service providers of renewables, and very few large generators. OSEA's mandate includes assisting consumers and their communities to receive the best value for their energy dollars whether

through conservation, efficiency, generation, or otherwise. OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies.

OSEA'S POLICY PERSPECTIVE RELATIVE TO THE BOARD'S MANDATE AND THIS PROCEEDING

OSEA'S POLICY PERSPECTIVE RELATIVE TO THE BOARD'S MANDATE

The Board's mandate is articulated in section 1(1), paragraph 5 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B) and includes promoting the use and generation of electricity from renewable energy sources in a manner consistent with the policies of the Government of Ontario.

In accordance with criterion 3.03(b) from the *Practice Direction*, OSEA primarily represents a public interest relevant to the Board's mandate. As previously stated, OSEA represents the public interest on renewable energy policy matters, and advocates for funding and rates that encourage the incorporation of renewable energy.

OSEA's members have contributed to the development of renewable energy policy in Ontario for over a decade. OSEA has been an active participant in OEB processes since 2007. OSEA is a founding member of the Green Energy Act Alliance which successfully called on the Ontario government to introduce and pass the *Green Energy and Green Economy Act (2009)*.

OSEA'S POLICY PERSPECTIVE RELATIVE TO THIS PROCEEDING

The OEB's stated purposes for the initiatives in this proceeding are to provide comments on barriers to the connection of DERs, including issues such as:

- ◆ the development of regulatory requirements to standardize the connection process, rules and technical requirements
- ◆ rules about cost responsibility for connection of DERs, and timelines for the connection process, and
- ◆ development of solutions to the barriers to the connection of DERs.

In accordance with criterion 3.03(b) from the *Practice Direction*, OSEA represents an interest and policy perspective relevant to this proceeding about the DER Connections Review and has a direct interest in assisting the OEB to achieve the above-stated purposes in this proceeding.

OSEA's public policy perspective is important to the development of a technical framework for DERs. OSEA advocates for sector transformation to a more sustainable energy economy through the use of DERs. OSEA and its members are directly affected by the OEB's regulatory

and technical requirements applicable to DERs, as DERs typically include the use of renewable resources such as solar, wind, waterpower, bioenergy or combined heat and power.

As such, OSEA is interested in the development of regulatory requirements to standardize the DER connection process and technical requirements, as well as development of applicable rules and timelines for the connection process. OSEA is also an advocate for regulatory and technical requirements that address barriers to the adoption of DERs.

COLLABORATION WITH OTHER INTERVENORS

OSEA intends to collaborate and coordinate submissions with other intervenors where possible in order to avoid duplication.

REPRESENTATIVES

OSEA's counsel and consultant in this matter are:

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Yours truly,



Matt Gardner

cc: Dan Goldberger, OSEA
Marion Fraser, Fraser & Company

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