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August 23, 2019

VIA RESS AND 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: Distributed Energy Resources Connections Review Initiative
Board File No.: EB-2019-0207**

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 that reads "Jonathan McGillivray". The signature is fluid and cursive, with the first name being particularly prominent.

Jonathan McGillivray

cc. All Participants in EB-2019-0207
All Licensed Electricity Distributors and Transmitters
All Other Interested Stakeholders
Cara Clairman and Wilf Steimle, DRC

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 initiative to review the
Ontario Energy Board's (the **Board's**) requirements in
regard to the connection of distributed energy resources
(**DERs**) by licensed electricity distributors.

EB-2019-0207

**NOTICE OF INTERVENTION & REQUEST FOR COST ELIGIBILITY
OF
DISTRIBUTED RESOURCE COALITION**

August 23, 2019

A. Application for Intervenor Status

1. The Distributed Resource Coalition (**DRC**) hereby requests status to participate in the Board's initiative to review its requirements in respect of the connection of DERs by licensed electricity distributors (the **DER Connections Review**). The purpose of the DER Connections Review is to identify barriers to the connection of DERs and standardize and improve the connection process where appropriate. It will focus on connection of electricity generation and storage facilities to the distribution system, either in front of or behind the distributor's meter. 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 August 13, 2019.

B. DRC and its Interest in the Proceeding

2. DRC is a group of electricity customers and consumers that consists of end-use residential 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 and connection 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 DER Connections Review.
3. DRC members for the DER Connections Review include, subject to further update, the Electric Vehicle Society (**EVS**) and Plug'n Drive (**PnD**). EVS represents over 1,000 end-use, largely residential, individual electric vehicle (**EV**) electricity customers, which all pay membership fees to have their needs and preferences related to EVs and related DERs represented on matters that directly substantially impact them. EVS has 12 local chapters of electricity rate paying customers in Ontario. EVS is governed to ensure that individual rate payers are informed, consulted, and can independently raise their needs and preferences on matters of direct and substantial interest with the leaders of their local EVS chapters, and all such needs and preferences are communicated to and through the President of EVS. Those customer needs and preferences are aggregated and conveyed

to jointly formulate DRC positions through the President of EVS through regular DRC monthly (or more frequently, if required) teleconference meetings where decisions are recorded and confirmed. In this manner, DRC reflects the public interest in electrified transportation DER matters; it does not assume or suppose it. Further information on EVS, its more than 1,000 individual residential rate paying members, and its programs and activities may be found on its website at www.evsociety.ca.

4. PnD is the authoritative convener of current and future EV customers and acts to provide access to facts and information to electricity and EV customers on electricity and electric mobility issues and choices. PnD works with each and all of electricity/EV customers, vehicle manufacturers, governments, and utilities to ensure that all are afforded best available information in order to make fact-based plans and choices. PnD regularly surveys, and/or collects aggregated information from, the thousands of rate paying customers that come to it through its programs and activities, website (www.plugndrive.ca, through which further detailed information on its programs and activities may be found), and/or Discovery Centre with their questions, needs, and preferences related to electrified transportation DERs. Those customer needs and preferences are aggregated and conveyed to jointly formulate DRC positions through the President and CEO of PnD through regular DRC monthly (or more frequently if required) teleconference meetings where decisions are recorded and confirmed.
5. DRC has been an active, Board-approved intervenor in the recent Toronto Hydro custom incentive rate proceeding (EB-2018-0165), providing the Board with expert evidence on the impact of electrified mobility on the matters at issue in order to inform its decision-making and set just and reasonable rates for a five-year time period. DRC has also been active in the Alectra Utilities' electricity distribution rate proceeding (EB-2019-0018), which includes a 10-year distribution system plan. Further, DRC is an active participant in the Utility Remuneration and Responding to DERs consultation (EB-2018-0287 / EB-2018-0288) with which the DER Connections Review will be coordinated.
6. DRC has a direct and substantial interest in the DER Connections Review in that its members are directly affected by the Board's approach to DER connections. DRC has a substantial interest in the DER Connections Review, including insofar as it addresses barriers to the connection of DERs, standardizing and improving the connection process where appropriate, and connecting electricity generation and storage facilities to the

distribution system, especially insofar as those activities may integrate or benefit from integrating EVs. DRC hopes to provide the Board with the currently absent, unique perspective of EV/DER residential customers and EV/DER-related non-profit organizations and owners' associations, each of which may be materially affected by the outcome of the DER Connections Review. The DRC will also address the benefits of sector transformation related to DERs and DER connections.

C. Nature and Scope of DRC's Intended Participation

7. 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 provide comments, test evidence in accordance with the stipulated processes and timelines, and provide argument/submissions. It reserves the right to adduce evidence should the Board's procedures provide for same.

D. Costs

8. DRC is both cost award eligible and should be granted cost award eligibility pursuant to section 3.03 of the Board's *Practice Direction on Cost Awards* (the **Practice Direction**) on the grounds that:
 - (a) DRC primarily represents the direct interests of a significant and exponentially growing number of consumers (e.g., ratepayers that have electrified mobility DERs) in relation to electricity and electricity distributor services that are regulated by the Board, in accordance with section 3.03(a) of the Practice Direction;
 - (b) DRC primarily represents an interest or policy perspective relevant to the Board's mandate set out in section 1 of the *Ontario Energy Board Act, 1998*, as amended, and to the precise DER Connections Review for which cost award eligibility is sought, in accordance with section 3.03(b) of the Practice Direction;
 - (c) Both of DRC's members have direct access to and reflect the express views of the public interested in electrified mobility DERs, and are therefore among the purest reflections of this public interest in the context of other customer intervenor groups and in accordance with section 3.04(a) of the Practice Direction;

(d) Both of DRC's members primarily represent end-use customers, and both are not-for-profit — and not commercial — entities, advocating on behalf of the public interest that is the explicit subject matter of the DER Connections Review, in accordance with section 3.04(b) of the Practice Direction; and

(e) Neither of DRC's members are otherwise precluded from cost eligibility pursuant to section 3.05 of the Practice Direction.

9. DRC therefore respectfully requests that the Board afford DRC cost eligibility in the DER Connections Review.

E. DRC's Representatives

10. DRC hereby requests that further communications with respect to the DER Connections Review be sent to the following:

Electric Vehicle Society

34 Hopkins Court
Dundas, ON L9H 5M5

Attention: Wilf Steimle
Telephone: 905-841-8163
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

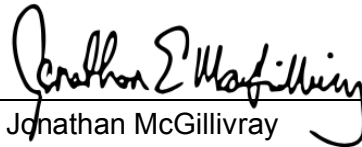
DeMarco Allan LLP

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
23rd day of August, 2019.



Jonathan McGillivray
DeMarco Allan LLP
Counsel for Distributed Resource Coalition