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August 26, 2019

VIA COURIER, EMAIL AND RESS

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

Dear Ms. Walli:

Re: Board File No. EB-2019-0207
Distributed Energy Resources Connections Review Initiative

We are counsel for Ontario Waterpower Association (OWA). Please find attached our Notice of Intervention and Cost Eligibility Request.

Please do not hesitate to contact me if you have any questions.

Yours very truly,

AIRD & BERLIS LLP



Scott Stoll

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Encl.

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ONTARIO ENERGY BOARD

**NOTICE OF INTERVENTION AND COST ELIGIBILITY REQUEST
OF
ONTARIO WATERPOWER ASSOCIATION**

1. Ontario Waterpower Association (“**OWA**”) hereby apply for intervenor status in this proceeding.
2. The OWA is a not-for profit, member based organization promoting the sustainable development of waterpower resources in Ontario. Since 2001 the OWA has been representing the common and collective interests of the waterpower industry. To date membership has grown to over 150 organizations. Our membership includes generators, engineering firms, environmental consultants, legal, project financing and insurance firms, First Nations communities and other organizations, all sharing the common interest of advancing waterpower in Ontario. Further information regarding the OWA may be found on its website: <https://owa.ca/> .
3. The OWA members have 142 generating facilities connected to the distribution system in Ontario. Its members will be impacted by the decisions regarding timing, cost allocation and physical connection requirements.
4. The OWA provides the collective voice for its members in policy development at the federal and provincial levels of government and has taken the lead on developing numerous Best Practices for Community Consultation, partnering with First Nations, environmental assessments and specific environmental matter and industry matters. Most

recently the OWA was involved with the province in an initiative under the *Lakes and Rivers Improvement Act*. Further information on the OWA's policy development may be found at: <https://owa.ca/policy-regulation/> .

5. The OWA has previously appeared and made submissions to the Ontario Energy Board, including on connection matters. In EB-2011-0067, the OWA sought an amendment to Hydro One's license regarding the deposit policy for generator connections to the distribution system.
6. The OWA has retained Scott Stoll of Aird & Berlis LLP as legal counsel. Mr. Stoll regularly appears at the Ontario Energy Board on various matters. A copy of Mr. Stoll's bio is attached to these submissions. For technical information, the OWA intends to rely up its many members who develop, own, design, build and provide equipment for generators and the connections to the distribution system.

Cost Awards

7. The OWA intends to seek an award of costs for its participation in this matter. The OWA has no other funding for participating in this proceeding.
8. The OWA has reviewed the Ontario Energy Board's Practice Direction on Cost Awards and submits it should be eligible for an award of costs.
9. Despite the Section 3.05, but consistent with the intent of Section 3.03, the OWA submits its participation will bring the unique perspective of the waterpower generators to this proceeding. Waterpower has been the backbone of the generation supply mix for several decades and can provide ancillary services such a blackstart capability. The OWA would

note that while its generator members are suppliers of electricity, they do also consume electricity and are customers of distributors. Further, and consistent with the some of the historical elements of the evolution of the connection process, the cost of connecting generating facilities was indirectly paid by consumers through the price of electricity whether it was through a FIT or other contract. As such, the OWA and other participants have the same interest in ensuring safe, reliable and cost effective connection of distribution facilities to the grid.

10. By representing a collective interest, the OWA will assist in bringing efficiency to this proceeding and by providing a perspective not provided by other participants.

Communications

11. All communications in respect of this proceeding should be in English and copied, in electronic form, to:

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ALL OF WHICH IS RESPECTFULLY SUBMITTED

Dated: August 26, 2019

AIRD & BERLIS LLP



Scott A. Stoll - LSUC No. 45822G

*(Counsel for Ontario Waterpower
Association)*

TO: **Ontario Energy Board**
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