

August 26, 2019

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

**Re: Board File Number: EB-2019-0207  
Distributed Energy Resources Connections Review Initiative  
CanSIA Participation and Cost Eligibility Request Letter**

Dear Ms. Walli,

The Canadian Solar Industries Association (CanSIA) is writing to the Board to register our intent to participate in Board File No. EB-2019-0207 with respect to the new initiative to review the Ontario Energy Board's (OEB) requirements in regard to the connection of distributed energy resources (DERs) by licensed electricity distributors (DER Connections Review).

Based on the Board's Practice Direction on Cost Awards, CanSIA is requesting cost award eligibility with respect to the submission of written comments and working group participation.

### **About CanSIA**

CanSIA is a national trade association that represents solar energy companies throughout Canada. Since 1992, CanSIA has worked to develop a strong, efficient, ethical and professional Canadian solar energy industry with capacity to provide innovative solar energy solutions and to play a major role in the global transition to a sustainable, clean-energy future. CanSIA members are customers of distribution utilities in Ontario, and many of our members have applications for distribution connection in development.

### **Representation and Experts**

CanSIA would benefit from subject matter experts to assist in this consultation and is therefore requesting cost eligibility for this proceeding. At this time, CanSIA does not have access to funds that would enable its full participation in this initiative.

### **Cost Award Eligibility**

CanSIA believes that it is eligible for cost award based on Cost Eligibility defined in Section 3 of the Board's Practice Direction on Cost Awards (the Practice Direction) as described below:

- (a) CanSIA primarily represents the direct interests of electricity consumers seeking to invest in solar and "solar plus" solutions (i.e., solar plus energy storage and/or other electricity management solutions) consistent with section 3.03(a) of the Practice Direction. Solar PV and energy storage technologies are the most common type of DERs utilized by customers, including DERs which are installed behind-the-meter of an existing consumer. Customers, including consumers who have installed DERs, are directly impacted by OEB codes, policies and regulations, and will be directly impacted by the Board's decisions related the DER Connections Review. For certainty, these customers are consumers who manage their own energy needs with behind-the-meter equipment.
- (b) CanSIA primarily represents an interest or policy perspective relevant to the Board's mandate and to the DER Connection Review consistent with section 3.03(b) of the Practice Direction. CanSIA can help to ensure that the Board is exposed to comprehensive representation of thousands of consumers and customers who are considering, or have installed, solar PV and energy storage;
- (c) CanSIA submits that its fulsome participation in the DER Connections Review is in the public interest pursuant to Section 3.04(d) of the Practice Direction. CanSIA members work directly with consumers who are seeking to install solar and solar plus solutions and whom will be responsibility for paying for connection services provided pursuant to OEB regulation and codes. It is in the best interest of CanSIA's members to streamline the connection process and reduce connection costs; and
- (d) CanSIA also represent customers of the applicant pursuant to Section 3.06 of the Practice Direction. The Board has previously clarified that generators are customers of distributors, who are the applicant for the purpose of this review. The OEB has previously determined CanSIA is eligible for cost awards in relation to the rate design consultation (for example, EB-2015-0043).

Although certain members of CanSIA may be ineligible under Section 3.05 (b), CanSIA believes that special circumstances exist to allow CanSIA to be eligible for cost award in this process. Many solar developers are too small or are private individuals who would not participate in a meaningful way in this proceeding. Given that the DER connection process is essential for CanSIA members and consumers pursuing solar and solar plus solutions (for example, net-metering and load displacement),

CanSIA asserts that its input with respect to the DER Connection Review is essential. Specifically, this review was initiated pursuant to the OEB's Advisory Committee on Innovation which called for

Sincerely,



Wesley Johnston  
President and CEO  
Canadian Solar Industries Association

Email: [wjohnston@cansia.ca](mailto:wjohnston@cansia.ca)