

December 18, 2019

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

Via email

Dear Ms. Walli

Re: Distributed Energy Resources Connections Review Initiative

Board File #: EB-2019-0207

Although the initial deadline for cost eligibility in the Distributed Energy Resources Connections Review Initiative has passed, it has come to our attention that in the most recent Working Group meeting the lack of consumer representation on it and the proposed subgroups that would explore issues on the technical requirements and connections process was noted. Notably, both subgroups will deal with an element of cost responsibility. The Ontario Chamber of Commerce (“OCC”) in particular was mentioned as a consumer group that may want to participate. Thus, we are writing to seek intervenor status and cost award eligibility in this proceeding on behalf of the OCC.

1. The OCC and its Interest in this Proceeding

The OCC is the independent, non-partisan voice of Ontario business, with a diverse network of 60,000 members. For more than a century it has supported economic growth in Ontario by advocating for business priorities at Queen’s Park. Its members represent all sectors of Ontario’s economy, from innovative small and medium Enterprises (“SMEs”) to established multinational corporations and industry associations. The views of these businesses should be considered in this proceeding.

The OCC’s mandate and objectives, its membership and the constituency it represents, and the types of programs and activities by which it carries out its mandate, are described on OCC’s website, www.occ.ca.

Low-cost electricity is vital for Ontario businesses to remain economically competitive and provide value to their customers. As a result, OCC members seek an approach to energy planning that balances affordability, transparency, and flexibility.

The OCC wishes to actively participate in this proceeding to ensure that any rate changes which the Board approves, in combination with other increases in electricity prices that come as a result of this proceeding, are affordable and capable of sustaining Ontario's businesses.

2. Nature and Scope of the OCC's Intended Participation

The OCC intends to participate actively in this proceeding for the purpose of:

- (a) Assuring that all relevant facts are placed in evidence for the Board's consideration when considering the scope of this consultation; and
- (b) Providing input to assure the appropriate issues and questions have been identified for the Board's consideration.

3. Request for Evidence

The OCC requests that an electronic copy of the evidence upon which the Application is based be provided to its representative. The OCC does not require a hard copy of this material.

4. Request for Cost Eligibility

The OCC intends to seek a cost award in this proceeding on the grounds that its ability to participate is dependent upon a determination that it is eligible for such an award. This is the first time that the OCC is applying for a cost award, but we believe the OCC satisfies all of the requirements set out in the section 3 of Ontario Energy Board's ("OEB") "Practice Direction on Cost Awards" document.

5. Strapolec's Representation of OCC

Strategic Policy Economics ("Strapolec") represents the OCC under the auspices of a written retainer agreement executed by the OCC. Strapolec's mandate is to represent the interests of businesses in those OEB proceedings which may have an impact on the rates which Ontario businesses pay for utility services. Ashley Challinor, Vice President, Policy of the OCC, is the individual with whom Strapolec liaises.

6. OCC Contacts

If the relief sought in this letter is granted, then OCC requests that further communications with respect to this matter be sent to the following individuals. Please take note of the new information highlighted below for ease of reference:

Ashley Challinor
Vice President, Policy
Ontario Chamber of Commerce
2105-180 Dundas Street West,
Toronto ON M5G 1Z8

Tel 647-243-3538
email ashleychallinor@occ.ca

Marc Brouillette
Principal Consultant
Strategic Policy Economics
250 Yonge Street, Suite 2201
Toronto, ON M5B 2L7

Tel (416) 564-4185
email marc@strapolec.ca

Please contact the undersigned if the Board requires any further information in connection with these requests.

Yours very truly

Strategic Policy Economics



Marc Brouillette
Principal Consultant
Strapolec Inc.

cc. Ashley Challinor, OCC