



Lisa (Elisabeth) DeMarco
Senior Partner
Bay Adelaide Centre
333 Bay Street, Suite 625
Toronto, ON M5H 2R2
TEL +1.647.991.1190
FAX +1.888.734.9459
lisa@demarcoallan.com

March 23, 2020

VIA RESS

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Long:

**Re: Hydro Ottawa Limited Custom Incentive Rate-Setting Application for 2021-2025
Electricity Distribution Rates and Chages
Board File No.: EB-2019-0261**

We are counsel to the Distributed Resource Coalition (**DRC**). Please find enclosed DRC's Notice of Intervention in the above-mentioned proceeding.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'L' followed by a horizontal stroke that curves upwards and to the right.

Lisa (Elisabeth) DeMarco

- c. Gregory Van Dusen, Hydro Ottawa Limited
Fred Cass, Aird & Berlis LLP
Cara Clairman, Plug'n Drive
Wilf Steimle, Electric Vehicle Society

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Sched. B, as amended (the **Act**);

AND IN THE MATTER OF an application by Hydro Ottawa
Limited to the Ontario Energy Board for an Order or Orders
approving or fixing just and reasonable rates and other
charges for the distribution of electricity as of January 1,
2021.

EB-2019-0261

NOTICE OF INTERVENTION
OF
DISTRIBUTED RESOURCE COALITION
(DRC)

March 23, 2020

A. Application for Intervenor Status

1. The Distributed Resource Coalition (**DRC**) hereby requests intervenor status in the matter of the application of Hydro Ottawa Limited (the **Applicant**) for various orders pursuant to section 78 of the Act as set out in the Applicant's application filed February 10, 2020 (the **Application**). This notice of intervention is filed pursuant to Rule 22 of the Board's *Rules of Practice and Procedure*.

B. DRC and its Interest in the Proceeding

Distributed Resource Coalition

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 of existing and innovative distributed energy resources (**DERs**), including EVs, to achieve customer and grid solutions, and (iii) providing input on direct customer needs and local distribution company opportunities relating to EVs. DRC hopes to further these interests for the benefit of each and all of end-use customers, the Applicant, DER providers, and the regulatory regime.
3. DRC members for this proceeding 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 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, including its Ottawa-area member, the Electric Vehicle Council of Ottawa, which includes over 150 Hydro Ottawa customers. 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 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 teleconference meetings where decisions are recorded and confirmed.

DRC's Interest in the Proceeding

5. DRC has a direct and substantial interest in the proceeding in that its members are directly affected by the rates, services, activities, and approaches being proposed in the Application. DRC anticipates significant integration of DERs, including EV-related DERs, into the Applicant's grid and customer base during the period covered by the Application. DRC therefore has a direct and substantial interest in the proceeding, including insofar as it addresses the integration and impact of DERs and EVs on local distribution system planning, stations, and distribution; rate design; load forecasting; fleet replacement/renewal parameters; and customer engagement.
6. The Applicant's pre-filed evidence indicates that it is seeking to "remain vigilant and adaptive to the impact electric vehicles (**EVs**) may have on the distribution system", in response to the "increasing growth" of EVs.¹ The Applicant notes that it has undertaken several projects in recent years to promote the use of EVs and to enhance its understanding of the impacts of EVs on the grid.² These projects include, *inter alia*, a residential EV charging pilot (2018), multiple studies examining the impact of direct current

¹ Exhibit 2, Tab 4, Schedule 3, p. 282.

² Exhibit 1, Tab 1, Schedule 13, p. 49.

fast charging (DCFC) EV chargers on the local distribution network, and surveys of local EV users in its service territory.³ In addition, the following other elements of the Applicant's pre-filed evidence are likely to be among those specifically impacted by DERs and EV-related DERs: rate design, load forecasting, fleet replacement/renewal parameters, customer engagement.

7. DRC's intervention would focus on testing evidence and providing argument with respect to the following issues raised in the Application:

- (a) the impact of EV chargers on the local distribution network;
- (b) load forecasting;
- (c) system-level EV impact;
- (d) station-level EV impact;
- (e) distribution-level EV impact; and
- (f) the Applicant's ongoing DER and EV initiatives, studies, projections, and distribution system plan investments.

8. DRC was 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 was also active in the Alectra Utilities' electricity distribution rate proceeding (EB-2019-0018), which included a 10-year distribution system plan. Further, DRC is an active participant in the Board's ongoing Utility Remuneration and Responding to DERs consultation (EB-2018-0287 / EB-2018-0288).

9. DRC hopes to provide the Board with the currently absent, unique perspective of EV residential customers, as well as EV-related non-profit organizations, owners, and developers, each of which may be materially affected by the outcome of this proceeding.

C. Nature and Scope of DRC's Intended Participation

10. DRC intends to be an active participant in this proceeding and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise

³ Exhibit 1, Tab 1, Schedule 13, pp. 49-50.

addressed. DRC otherwise intends to participate actively in order to test evidence in accordance with the stipulated processes and timelines and provide argument. It reserves the right to adduce evidence should the Board's procedures provide for same.

D. Costs

11. DRC is, in accordance with s. 3.03(a) of the Board's *Practice Direction on Cost Awards* (the **Practice Direction**), eligible to seek an award of costs as DRC is a party that primarily represents the direct interests of consumers (residential customers) in relation to services that are regulated by the Board. DRC is also eligible to seek an award of costs in accordance with s. 3.03(b) of the Practice Direction, as DRC represents organizations that have a policy interest in electricity conservation and demand management, implementation of a smart grid in Ontario, promotion of the use of electricity from renewable energy sources, each of which are components of the Board's mandate and relevant to the proceeding.
12. DRC therefore requests cost eligibility in this proceeding as its comments will serve an important and unique interest and policy perspective relevant to the Board's mandate, which has heretofore not been represented or heard.

E. DRC's Representatives

13. DRC hereby requests that further communications with respect to this proceeding be sent to the following:

Electric Vehicle Society
34 Hopkins Court
Dundas, Ontario. 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 March, 2020.



Lisa (Elisabeth) DeMarco
DeMarco Allan LLP
Counsel for Distributed Resource Coalition