September 8, 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: Oshawa PUC Networks Inc.**

 **Application for 2021 Cost of Service Rates**

 **Board File No.: EB-2020-0048**

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



Sincerely,

Lisa (Elisabeth) DeMarco

c. John A.D. Vellone, Counsel, Borden Ladner Gervais LLP

 David Savage, Oshawa PUC Networks Inc.

 Margaret Boland, Oshawa PUC Networks Inc.

 Wilf Steimle, Electric Vehicle Society

 Cara Clairman, Plug’n Drive

**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 Oshawa PUC Networks Inc. (**OPUC**) 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-2020-0048**

**NOTICE OF INTERVENTION**

**OF**

**DISTRIBUTED RESOURCE COALITION**

**(DRC)**

**September 8, 2020**

1. **Application for Intervenor Status**
2. The Distributed Resource Coalition (**DRC**) hereby requests intervenor status in the matter of the application of OPUC (the **Applicant**) for various orders pursuant to section 78 of the Act as set out in the Applicant’s application filed July 24, 2020 (the **Application**). This notice of intervention is filed pursuant to Rule 22 of the Board's *Rules of Practice and Procedure*.
3. **DRC and its Interest in the Proceeding**

**Distributed Resource Coalition**

1. 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 electric vehicles (**EVs**), to achieve customer and grid solutions, and (iii) providing input on direct customer needs and local distribution company opportunities and existing programs 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.
2. 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 and substantially impact them. EVS has 12 local chapters of electricity rate paying customers in Ontario, including many customers in the Applicant’s service area. 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 by way of 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](http://www.evsociety.ca).
3. 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, its 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 by way of regular DRC monthly (or more frequently if required) teleconference meetings where decisions are recorded and confirmed.

**DRC’s Interest in the Proceeding**

1. 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; and customer engagement.
2. The Applicant’s pre-filed evidence recognizes the necessity of “adapting to changing customer demands in terms of DER, EVs and changing customer loading” [Exhibit 2, DSP, Appendix A, p. 160] and has indicated, over the five-year DSP, it will “continue to monitor less predictable load growth trends, such as EV uptake” [Exhibit 2, DSP, Appendix A, p. 78]. The Applicant has undertaken several projects in recent years to promote the use of EVs and to enhance its understanding of the impacts of EVs and DERs on the grid, including, *inter alia*: a survey and study to examine the effects that wholesale migration to EV technology could have on the utility’s infrastructure [Exhibit 2, Appendix K, p. 3]; a small deployment of DERs in partnership with New Energy and Industrial Technology Development Organization (NEDO) of Japan which were studied for the ability to manage demand response [Exhibit 2, Appendix K, p.15]; and developing a business case for the electrification of a local bus fleet [Exhibit 2, Appendix K, p. 4]. 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, and customer engagement.
3. DRC's intervention would focus on testing evidence and providing arguments with respect to the following issues raised in the Application:
	1. the impact of EVs and EV chargers on the local distribution network [Exhibit 2, DSP, Appendix A];
	2. system level impact [Exhibit 2, Appendix K];
	3. load forecasting [Exhibit 2, DSP, Appendix A]; and
	4. the Applicant’s ongoing DER and EV initiatives, studies, projections, and distribution system plan investments [Exhibit 1, Appendix 5; Exhibit 2, DSP, Appendix A].
4. 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 Hydro Ottawa’s custom incentive rate proceeding (EB-2019-0261) and the Board’s ongoing Utility Remuneration and Responding to DERs consultation (EB-2018-0287 / EB-2018-0288).
5. 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.
6. **Nature and Scope of DRC's Intended Participation**
7. 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 addressed. DRC otherwise intends to participate actively in order to test evidence in accordance with the stipulated processes and timelines and provide argument. DRC does not intend to adduce evidence in this proceeding.
8. **Costs**
9. 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.
10. 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.
11. **DRC's Representatives**
12. 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

8th day of September, 2020.

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|  |  | Lisa (Elisabeth) DeMarcoDeMarco Allan LLPCounsel for Distributed Resource Coalition |