

February 6, 2019

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

Via email

Dear Ms. Walli

Re: Integrating Distributed Energy Resources and Utilities Remuneration
Board File #: EB-2018-0287 and EB-2018-0288

Although the initial deadline to apply for cost eligibility in the Integrating Distributed Energy Resources (DER) and Utilities Remuneration consultation has passed, it has come to our attention from our participation in the related DER Connection Review that there is a lack of consumer representation in these discussions. These consultations are highly related to the DER Connections consultation that the OEB has recently granted the Ontario Chamber of Commerce (“OCC”) cost eligibility for. The above referenced files will deal with higher level questions of value and justification of costs. While EB-2018-0287 and EB-2018-0288 have been inactive since last fall, the activities will be resuming on February 20th. The OCC would like to extend its participation to these consultations. 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. Based on your approval of our late cost eligibility application for the DER Connections file, 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

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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