

Ms. Christine Long
OEB Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

April 12, 2021

Re: EB-2021-0118 FEI Comments and Working Group Nomination

Dear Ms. Long:

Pollution Probe strongly supports the direction outlined in the OEB letter dated March 23, 2021 and the need to address pressing issues and lay the foundations for the Distributed Energy Resources (DERs) in Ontario. This approach aligns with the immediacy and drivers outlined in the Pollution Probe letter submitted February 16, 2021¹ and we have avoided repeating those comments in this letter of comment. Utility Remuneration and Responding to Distributed Energy Resources provided an effective overarching (umbrella) to view DER issues from a comprehensive and cohesive perspective. Several other related initiatives are underway (e.g. DER Connections) that have a defined scope and the results feed back into the broader DER initiative to avoid gaps or duplication. To-date, OEB Staff have done an excellent job providing coordination and transparency. The Framework for Innovation (FEI): Distributed and Utility Incentives initiative is well suited to continue as the overarching umbrella initiative for DER and to ensure that the FEI Workstream #1 and Workstream #2, as well as the other subcomponents (e.g. DER Connections, OEB RPPAG, etc.) fit together in an integrated manner.

In addition to case study collection/development, there could be opportunities to test innovative DER models/partnerships on a pilot basis in the short term. DERs are an important component of consumer and community energy options and many municipalities have already targeted DER opportunities as part of their community energy and emissions plans. Validating potential policy models through pilots (e.g. through a Statement of Interest process) that bring all those partners together to deliver DER benefits in a cost-effective manner could be an option to consider. Pollution Probe could support that approach should the OEB be interested. Pollution Probe also notes that the OEB is currently considering pilots² unanimously supported through EB-2020-0091 to leverage local (distributed) energy resources in lieu of traditional utility capital infrastructure. If the right pilots are selected, it could provide holistic community focused opportunities and synergies. Additionally, consideration should be given to coordinate with the innovative IESO DER (including conservation and demand management³) initiatives underway.

Pollution Probe, Clean Air Council (CAC) and Clean Air Partnership (CAP) would like to nominate Michael Brophy as a member of the FEI Working Group. Michael Brophy is an industry expert with almost 30 years of relevant experience including Distributed Energy Resources (DER) from a consumer, utility, policy and municipal perspective. Michael has represented consumers, municipalities and other stakeholders on

¹ EB-2018-0287/0288 PollutionProbe_Comments_DER_20210216

² There was unanimous support for (alternatives to utility capital infrastructure) pilots during the EB-2020-0091 proceeding and the OEB Decision is pending. A comprehensive approach could optimize benefits and share costs.

³ [Local Initiatives](#) | [Save on Energy](#)

issues related to regional planning, integrated resource planning (IRP) and DERs. A nomination letter from CAC/CAP is also attached.

Qualifications include:

- Professional Engineer, Masters of Engineering and MBA
- Over 27 years of experience on energy, regulatory and utility issues in Ontario, including DERs.
- Represents a consumer, community and policy interest directly related to DERs in Ontario.
- Member of the OEB DER Working Group, DER Process Subgroup and RPPAG.
- Provincial policy experience with development of policy and programs to align energy, planning, approvals and execution, including alignment with DER and municipal energy and emission plans.
- Experience in improving the efficiency and effectiveness of utility and regulatory processes in a structured manner.

Pollution Probe is a frequent participant in Board proceedings and a copy of the current Annual Filing can be found on the Board's website at the following location:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/687123/File/document>

Intention to Seek Cost Awards

Pollution Probe is an active participant in EB-2018-0287/0288 and per the OEB letter dated March 23, 2021 is not required to reapply in EB-2021-0118.

Notice

It is requested that further communications with respect to this matter be sent to:

Michael Brophy
Michael Brophy Consulting Inc.
28 Macnaughton Road
Toronto, Ontario M4G 3H4
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Email: Michael.brophy@rogers.com

cc: Richard Carlson, Pollution Probe (via email)

Ms. Christine Long
OEB Registrar, Ontario Energy Board
P.O. Box 2319, 27th Floor, 2300 Yonge Street
Toronto, ON M4P 1E4
Submitted via Pollution Probe

April 9, 2021

Re: EB-2021-0118 Framework for Energy Innovation: Distributed Resources and Utility Incentives

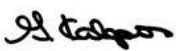
About the Clean Air Council and Clean Air Partnership

The Clean Air Council (CAC) is a network of over 30 municipalities and health units from across the Greater Toronto, Hamilton and Southern Ontario Area who work collaboratively on the development and implementation of clean air and climate change mitigation and adaptation actions. More information on the Clean Air Council is available [here](#). CAC representatives are the municipal change agents within leading climate action municipalities and have been working collaboratively across the region for almost 20 years, including on issue related to energy and Distributed Energy Resources (DERs). Clean Air Partnership (CAP) is a charitable organization whose mission is to support municipalities and their partners to improve air quality, advance active transportation, and take bold climate action through supports such as network convening, research and knowledge transfer and action implementation. CAP serves as the secretariat for the CAC. Energy and effective IRP are a central issue to municipal energy and emissions planning and more effective alignment is critical to meet Ontario's future energy needs in an effective manner.

The Clean Air Council and Clean Air Partnership join Pollution Probe in nominating Michael Brophy to be a member of the Ontario Energy Board's Framework for Energy Innovation Working Group (FEI WG). Michael has worked with CAC, CAP and communities across Ontario on issues relevant to Distributed Energy Resources and community energy and emissions planning. As an independent consultant working through Pollution Probe, Michael has regularly represented Ontario consumers, municipalities and policy interests in relevant proceedings (including EB-2018-0287/0288), the DER Working Group, RPPAG and other relevant initiatives. Michael also has knowledge and expertise from across North America than can help the OEB advance DER in alignment with industry best practices. Inclusion of Michael in the FEI WG would provide a valuable resource to advance and sequence the DER usage and integration workstreams.

Feel free to reach out should you require any additional information.

Best Regards,
Sincerely,



Gabriella Kalapos, Executive Director, Clean Air Partnership
gkalapos@cleanairpartnership.org