



April 14, 2021

VIA RESS

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

Dear Ms. Long:

**Re: Framework for Energy Innovation: Distributed Resources and Utility Incentives
Board File Nos.: EB-2021-0118**

We are counsel to the Electric Vehicle Society (**EVS**) in the above-noted consultation (the **Consultation**). Further to the Board's letter of March 23, 2021, EVS wishes to nominate Cara Clairman and Jonathan McGillivray to the Framework for Energy Innovation Working Group (**FEI WG**) and make select comments on the proposed approach to the work of the FEI WG.

In its March 23, 2021 letter, the Board noted its intent that the FEI WG will represent the full range of interests related to the integration of distributed energy resources (**DERs**) in Ontario and that selections for the FEI WG will be made with a view to achieving a broad and representative membership. It is important that the FEI WG include representation not only from utilities and the DER sector, but also from DER consumers. EVS appears to be one of the only participants in the Consultation that represents end-use DER and electric vehicle (**EV**) consumers.

Nominations

EVS wishes to nominate Cara Clairman and Jonathan McGillivray to the FEI WG.

Ms. Clairman is President and CEO of Plug'n Drive, a non-profit that is accelerating the deployment of EVs to maximize their environmental and economic benefits. In just over three years, Cara has taken Plug'n Drive from an idea to a thriving non-profit, recognized as a leader in the EV space. Ms. Clairman has more than 25 years of experience working in the environmental and sustainability fields, including 12 years working at Ontario Power Generation, initially as OPG's environmental lawyer and later in the role Vice President of Sustainable Development. As Vice President of Sustainable Development, Ms. Clairman was responsible for oversight of OPG's environmental performance and the development and implementation of OPG's sustainable development policies and programs. Prior to joining OPG, Cara spent five years practicing environmental law with Torys LLP. She holds a Bachelor of Laws from Osgoode Hall and a Masters in Environmental Studies from York University, as well as an Honours Bachelor of Science degree from Queen's University.

Ms. Clairman's contact information is as follows:

Cara Clairman

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Mr. McGillivray is counsel to EVS before the Board and has extensive experience in energy regulatory matters and routinely provides advice on complex energy issues. He has specialized expertise in matters involving DERs, EVs, non-wires alternatives, energy storage, hydrogen, and renewable natural gas. Mr. McGillivray has been involved in and contributed extensively to several proceedings and consultations before the Board, including the Utility Remuneration and Responding to DERs Consultations (EB-2018-0287 / EB-2018-0288), the Enbridge Low Carbon Energy Project application (EB-2019-0294), the Enbridge Natural Gas Supply Plan Consultation (EB-2019-0137), and many electricity rates applications with significant DER elements (e.g., EB-2019-0261, EB-2020-0026, EB-2019-0018, and EB-2018-0165).

Mr. McGillivray's contact information is as follows:

Jonathan McGillivray

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Comments on Proposed Approach

EVS understands that the Board has developed two workstreams to organize the near-term work of the FEI WG. First, the Board proposes a 'DER Usage' workstream intended to investigate and support utilities' use of DERs they do not own as alternatives to traditional wires solutions to meet distribution needs. Second, the Board proposes a 'DER Integration' workstream intended to ensure that utilities' planning is appropriately informed by DER penetration and forecasts.

EVS submits that the workstreams, as proposed, may direct the focus of the Consultation toward utilities — and away from consumers and technology providers — in a manner that is inconsistent with the Board's mandate and the goals of the Consultation. The amendments to section 1(1) of the *Ontario Energy Board Act, 1998* require that the Board, in carrying out its responsibilities in relation to electricity, is guided by the objective of facilitating innovation in the electricity sector. EVS respectfully submits that this objective is not focused solely on electricity utilities — it also requires inclusion and consideration of electricity consumers and technology providers and other sector participants and stakeholders.

EVS requests that the Board ensure that the workstreams allow for sufficient attention to consumer choice and the participation of technology providers. EVS also urges the Board to ensure that the workstreams give adequate consideration to the benefits of DERs, including EVs,

in the context of DER integration; mechanisms to compensate DERs for the services they provide to the electricity system; and the need to facilitate market-based solutions that respect consumer choices by increasing transparency and competition.

Sincerely,

A handwritten signature in black ink, appearing to be 'Lisa', with a long, sweeping horizontal stroke extending to the right.

Lisa (Elisabeth) DeMarco

- c. Wilf Steimle, EVS
Cara Clairman, Plug'n Drive