



May 25, 2021

Ms. Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

**Re: Framework for Energy Innovation: Distributed Resources and Utility Incentives
Enel X and Toronto Hydro Nomination for Co-leads of the FEI Working Group
Ontario Energy Board File: EB-2021-0118**

On May 10, 2021, the Ontario Energy Board ("OEB") issued a letter in relation to the Framework for Energy Innovation Working Group ("FEIWG"). The letter invited interested members to put forward their names to serve as FEIWG Lead, a position further described in the accompanying Terms of Reference. The FEIWG Members will select the Lead from among the nominations during the inaugural meeting of the FEIWG in June 2021.

By way of this letter, we are putting our names forward as nominees for Co-Leads of the FEIWG. We respectfully recognize that the OEB letter contemplates a single Lead rather than Co-Leads. However, following discussion with each other and numerous other FEIWG Members, we are of the view that the OEB's objectives for the FEIWG (and the Lead role itself) can be best achieved through a model of collaborative co-leadership by a DER developer and an electricity distributor. As we understand the OEB Objectives and Deliverables set out in the Terms of Reference, which among other things contemplates an "Alternate Lead", the considerations cited by the OEB in the March 23, 2021 and May 10, 2021 letters, the issues raised by parties in the preceding proceedings (EB-2018-0287 and EB-2018-2088), and the multiplicity of challenges that DER policies and on-the-ground implementation entail, it is optimal that the FEIWG be (and be seen to be) co-led by "both sides" of the sector that must increasingly enable DERs.

Truly, all Members must be heard and play active roles for this regulatory initiative to succeed. The OEB assembled an impressive cadre of experts from across the sector, nearly all of whom we know from our extensive work on many files. Those personal and professional connections between the Leads and Members – maximized in a co-lead model – will help the FEIWG get off to a fast, constructive start.

For our part, we both work for organizations that have led in the connection/development of DERs. Both Enel X and THESL have demonstrated throughout regulatory proceedings and technical conferences a sophisticated understanding of the role DERs can play: providing value to the system, and customers. As well, we have worked on a large number of files together for over a decade, and have the mutual respect and trust that is necessary for a co-lead model to succeed. A vivid illustration of our high performance working in creative collaboration was the OEA initiative on DER connections, which produced a template for a more efficient process and protocols, while preserving the safety and reliability of distribution systems. Turning a contentious situation into an agreeable solution is the hallmark of what FEIWG is meant to do.

We will continue to engage our fellow FEIWG Members leading up to the inaugural meeting to discuss this approach, and welcome further discussion with OEB Staff as may be appropriate.

Respectfully,



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Enel X North America



Andrew J. Sasso
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