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June 30, 2021

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Christine Long, Registrar

Dear Ms. Long:

**Re: Board File No. EB-2020-0230
IESO 2020-2021 Expenditure and Revenue Requirement Submission**

Willms & Shier Environmental Lawyers LLP is counsel for the Ontario Sustainable Energy Association (“OSEA”).

OSEA is in receipt of the Independent Electricity System Operator’s (“IESO”) submission for review of its proposed expenditure and revenue requirements for 2020 to 2021.

OSEA seeks intervenor status and cost eligibility in this matter.

ABOUT OSEA

OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute to energy conservation and sustainable energy development for Ontario. OSEA aims to ensure funding and rates that encourage conservation, energy efficiency and the incorporation of renewable energy.

OSEA’s members, both individuals and organizations, are interested in the development of sustainable energy and conservation in Ontario as consumers, individuals and citizens of Ontario. OSEA has been an intervenor and awarded costs by the Board in numerous previous hearings, and the Board recognized that OSEA can provide “an important and unique perspective” in EB 2011-0118.

OSEA actively participates and contributes in Board proceedings and intends to provide meaningful comments on IESO’s expenditure and revenue submission.

COST ELIGIBILITY

In accordance with section 3.03 of the Board's *Practice Direction on Cost Awards*, OSEA believes that it is eligible for an award of costs because it:

- a) primarily represents the direct interests of consumers in relation to services that are regulated by the Board, and
- b) primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding about IESO's expenditure and revenue requirement submission.

OSEA can continue to provide an important and unique perspective in the current proceeding. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

OSEA'S REPRESENTATION OF CONSUMERS

In accordance with criterion 3.03(a) from the *Practice Direction*, OSEA primarily represents the direct interests of consumers (eg. ratepayers) in relation to regulated services. OSEA's membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA's members include green technology developers, distributors, installers and operators and other service providers. OSEA thereby represents the direct interests of consumers.

OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. OSEA also aims to provide education about all types of renewable energy technologies.

OSEA is a public interest organization that advocates for energy efficiency, renewable energy and innovation leading to a more sustainable low carbon energy economy. OSEA is not an association for energy generators. OSEA's membership is diverse and includes small scale distributors and service providers of renewables, and very few large generators. OSEA's mandate includes assisting consumers and their communities to receive the best value for their energy dollars whether through conservation, energy efficiency, renewable energy generation, or by lowering their greenhouse gas emissions. OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies and in fact, is technology agnostic.

OSEA'S POLICY PERSPECTIVE RELATIVE TO THE BOARD'S MANDATE AND THIS PROCEEDING

The Board's mandate is articulated in the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), s. 2, and includes promoting energy conservation and energy efficiency in accordance with the policies of the Government of Ontario.

In accordance with criterion 3.03(b) from the *Practice Direction*, OSEA primarily represents a public interest relevant to the Board's mandate and to this proceeding. As previously stated, OSEA represents the public interest and advocates for methodologies and system planning to achieve energy conservation, renewable energy, and energy efficiencies.

OSEA's mandate on energy conservation and sustainable energy relates to IESO's revenue and expenditure requirement for 2020 to 2021. OSEA interests in this proceeding include understanding:

- ♦ how IESO's proposed timing for energy storage market design changes may affect renewable energy generation
- ♦ the extent that IESO is coordinating with natural gas pipeline expansions to minimize greenhouse gas emissions
- ♦ how IESO is involving municipalities and others in system expansion decisions, and
- ♦ the impact of IESO fees on small renewable generators.

OSEA has participated in the proceedings on IESO's 2016 (EB-2015-0275), 2017 (EB-2017-0150), 2018 (EB-2018-0143), and 2019 (EB-2019-0002) expenditure and revenue requirement submissions.

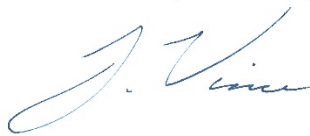
REPRESENTATIVES

OSEA's counsel and consultant in this matter are:

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Yours truly,



Joanna Vince
Partner
*Certified as a Specialist in Environmental Law
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cc: Dan Goldberger, OSEA

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