



Power Advisory  
55 University Ave., Suite 700, P.O. Box 32  
Toronto, Ontario M5J 2H7

July 2, 2021

Christine Long  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, Ontario M4P 1E4

**Re: Joint CanREA, ESC, and OWA Intervention Request: EB-2020-0230 – IESO 2020-2021 Expenditure and Revenue Requirement Application**

Dear Ms. Long,

As market and regulatory advisors and consultants to the Canadian Renewable Energy Association (CanREA), Energy Storage Canada (ESC), and Ontario Waterpower Association (OWA), Power Advisory requests intervenor status and funding for this joint group of non-emitting supplier and customer-focused associations regarding the Independent Electricity System Operator's (IESO's) filed 2020-2021 Expenditure and Revenue Requirement Application (EB-2020-0230) with the Ontario Energy Board (OEB).

CanREA, ESC, and OWA are non-profit associations representing approximately 500 member companies. The majority of these companies have business interests within Ontario's electricity market and the IESO-Administered Markets (IAM), representing approximately 20,000 MW or roughly 50% of Ontario's supply capacity. The mandates for these associations are:

- CanREA is the voice for wind energy, solar energy, and energy storage solutions that will power Canada's energy future and works to create conditions for a modern energy system through stakeholder advocacy and public engagement. CanREA's diverse members are uniquely positioned to deliver clean, low-cost, reliable, flexible, and scalable solutions for Canada's energy needs. CanREA advocates on behalf of its members to: i) benefit Canada's economy and energy future; ii) increase stakeholder understanding that renewable electricity and energy storage are clean, low-cost, reliable, flexible, and scalable solutions for Canada's energy needs; and iii) provide a forum devoted to dialogue, collaboration, stewardship, and growth of the industry.
- ESC is the national association for the energy storage industry in Canada and represents the full supply chain of energy storage and focuses on advancing opportunities and building the market for energy storage through advocacy, networking, and stakeholder education. ESC advances the energy storage industry in Canada through collaboration, education, policy advocacy, and

research by taking unbiased views towards technology and are supported by contributions of our active members.

- OWA promotes the sustainable development of waterpower resources in Ontario and since 2001 has been representing common and collective interests of the waterpower industry. OWA's membership includes generators, First Nations communities, and other companies and organizations, all sharing the common interest of advancing waterpower in Ontario. Waterpower represents the longest standing and majority of Ontario's renewable supply capacity.

Due to many members participating within IAM in addition to participation across all of Canada's electricity markets, jointly, CanREA, ESC, and OWA will provide new and valuable operational and regulatory experience and insights within OEB's proceeding regarding IESO's filed 2020-2021 Expenditure and Revenue Requirement Application.

CanREA, ESC, and OWA look forward to actively and jointly working together within the proceeding and understands the best outcomes for all intervenors and stakeholders are to work towards just and reasonable solutions and decisions. Therefore, CanREA, ESC, and OWA intend to participate within all phases of the proceeding and may submit evidence if warranted.

In accordance with the OEB's Practice Direction on Cost Awards, jointly, we believe that CanREA, ESC, and OWA are eligible to seek intervenor funding through cost awards from IESO. The following are reasons for our rationale regarding receipt of intervenor funding:

- CanREA's, ESC's, and OWA's generator and storage members represent specific classes of IESO customers in accordance with OEB's Practice Direction on Cost Awards;
- By member participation within IAM through supply of electricity and other supply services (e.g., ancillary services, etc.), CanREA, ESC, OWA and their members serve Ontario's electricity customers; and
- Many generator and storage members of CanREA, ESC, and OWA own and operate facilities that are customer-owned or embedded within Ontario's distribution systems; therefore, these stakeholders require clear paths to advocate regarding costs incurred by IESO, in part driven by future directions as specified in IESO's latest Business Plan; and
- Precedent has been set for intervenor funding through cost awards from IESO based on previous IESO Expenditure and Revenue Requirement Application proceedings (e.g., Association of Power Producers of Ontario received cost awards for IESO's 2017, 2017, and 2019 Expenditure and Revenue Requirement Applications).



The following individuals are the contacts for CanREA, ESC, and OWA.

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- Justin Rangooni  
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And consultant to CanREA, ESC, and OWA for IESO's filed 2020-2021 Expenditure and Revenue Requirement Application:

- Jason Chee-Aloy  
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Sincerely,

A handwritten signature in black ink, appearing to read "JCA", written over a light gray circular background.

Jason Chee-Aloy  
Managing Director  
Power Advisory

cc:

Brandy Giannetta, CanREA  
Justin Rangooni, ESC  
Paul Norris, OWA