



Power Advisory
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Toronto, Ontario M5J 2H7

July 16, 2021

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

Re: Supplemental Submission: Response to Procedural Order No. 1 (July 15, 2021) – Joint CanREA, ESC, and OWA Intervention Request: EB-2020-0230 – IESO 2020-2021 Expenditure and Revenue Requirement Application

Dear Ms. Long,

The Canadian Renewable Energy Association (CanREA), Energy Storage Canada (ESC), and Ontario Waterpower Association (OWA) have reviewed the Ontario Energy Board's (OEB's) Procedural Order No. 1 regarding the Independent Electricity System Operator's (IESO's) filed 2020-2021 Expenditure and Revenue Requirement Application (EB-2020-0230).

CanREA, ESC, and OWA are appreciative and thankful for the opportunity granted to provide additional information on its specific interest in this proceeding, and OEB will reconsider the intervention request.

The three associations – CanREA, ESC, and OWA – are the parties jointly applying for intervenor status. If granted intervenor status, Power Advisory will assist these associations that have planned to jointly participate within the proceedings.

CanREA, ESC, and OWA understand that IESO's revenue requirement application is based on a business plan (underpinned by priority initiatives), has been reviewed and approved by the Minister of Energy pursuant to Section 24 of the *Electricity Act*, and as such OEB expects its review of IESO's application as a whole and its discrete elements such as capital and OM&A expenditures, will be a focused review.

The collective experience of CanREA, ESC, and OWA, with assistance from Power Advisory, was referred to in the July 2 request for intervenor status based on a few examples:

- Approximately 50 companies within CanREA, ESC, and OWA operate renewable generation and energy storage facilities as registered wholesale market participants within the IESO-Administered Markets (IAM), therefore have direct insights regarding how IAM is administered, and have actively participated within IESO stakeholder engagement initiatives that directly relate to priority initiatives within IESO's business plan (e.g., Market Renewal Program,

establishing a resource adequacy framework to competitively procure resources to meet Ontario's future supply needs, enabling resources to participate more fully within IAM, and planning for the future to enhance transparency and help market participants make more informed decisions while evolving bulk and regional planning processes) – therefore, on behalf of these members, CanREA, ESC, and OWA have direct interest to participate within this proceeding regarding IESO expenditures to deliver these priority initiatives within IESO's business plan;

- Based on the scope of some IESO stakeholder engagement initiatives (e.g., establishing a resource adequacy framework to competitively procure resources to meet Ontario's future supply needs, enabling resources to participate more fully within IAM), the members within CanREA, ESC, and OWA that are not registered wholesale market participants (which are greater in number compared to members that are registered wholesale market participants) will have increasing opportunities to participate within IAM over time (e.g., enabling distribution-connected resources, etc., to participate within IAM) – therefore, on behalf of these members who typically do not participate within IESO stakeholder engagements, it is very important for CanREA, ESC, and OWA to participate within this proceeding regarding IESO expenditures to deliver relevant priority initiatives within IESO's business plan; and
- All of the above listed priority initiatives from IESO's business plan, relevant to the members of CanREA, ESC, and OWA, have in some manner been in scope within regulatory proceedings to which CanREA (as was the case regarding the Canadian Wind Energy Association (CanWEA), prior to CanWEA amalgamating with the Canadian Solar Industries Association to form CanREA in 2020) was granted intervenor status in BC (i.e., resource adequacy, planning processes), Alberta (i.e., similar components to Market Renewal Program, resource adequacy, enabling resources), Quebec (i.e., resource adequacy, planning processes) and Nova Scotia (i.e., resource adequacy, planning processes) (and Power Advisory provided assistance to CanWEA in BC and Nova Scotia) – therefore, experience and insights into these matters are relevant to all of the above listed key components from IESO's business plan.

As stated in the July 2 request for intervenor status, 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.

Also stated within the July 2 request for intervenor status, CanREA, ESC, and OWA believe they are jointly eligible to seek intervenor funding through cost awards from IESO – following same rationale and precedent of granting intervenor status and cost awards to other similar associations (e.g., Association of Power Producers of Ontario, Ontario Sustainable Energy Association).

In closing, CanREA, ESC, and OWA are thankful for the opportunity to provide supplemental information to provide clarity why these associations should be considered for joint intervenor status and cost awards.



Sincerely,

A handwritten signature in black ink, appearing to read "J. Chee-Aloy", written in a cursive style.

Jason Chee-Aloy
Managing Director
Power Advisory

A handwritten signature in blue ink, appearing to read "B. Giannetta", written in a cursive style.

Brandy Giannetta
Vice President,
Policy, Regulatory, and Government Affairs
CanREA

A handwritten signature in black ink, appearing to read "Justin Rangooni", written in a cursive style.

Justin Rangooni
Executive Director
ESC

A handwritten signature in black ink, appearing to read "Paul Norris", written in a cursive style.

Paul Norris
President
OWA