

Sent by Email and RESS

August 19, 2019

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

Attention: Christine Long, Registrar

Dear Ms. Long:

**Re: Board File No. EB-2021-0106**  
**Updating the CDM Guidelines for Electricity Distributors – Request for Comments**  
**(IESO's 2021-2024 CDM Framework Program Plan)**

---

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

OSEA is in receipt of the Ontario Energy Board's ("OEB's") letter dated August 5, 2021, and staff discussion paper addressing the 2021-2024 Conservation and Demand Management ("CDM") Framework, entitled Updating the CDM Guidelines for Electricity Distributors (the "Discussion Paper").

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 the OEB staff's Discussion Paper addressing the 2021-2024 CDM Framework.

### **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 the OEB staff's Discussion Paper, Updating the CDM Guidelines for Electricity Distributors.

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 (e.g. 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 directly to OEB staff’s Discussion Paper addressing the 2021-2024 CDM Framework.

OSEA has contributed fully to the development of demand management policy in Ontario for many years. OSEA was invited to participate on the Advisory Committee for the Demand Side Management (“DSM”) Guidelines, and is participating in the ongoing proceeding about Enbridge Gas’ Multi-Year DSM Plan and Framework (EB-2021-0002), which addresses CDM-DSM collaboration.

OSEA interests in this proceeding include:

- ♦ encouraging distributors through the CDM Guidelines to enhance engagement with local communities and customers
- ♦ ensuring that timelines for distributor planning activities align with other planning processes that might produce CDM activities (e.g., municipal energy plans)
- ♦ ensuring that benefits to local communities from CDM activities are reflected in system planning assessments (e.g., lower emissions from reduced losses), and
- ♦ promoting coordination of CDM and DSM, and ensuring that planning horizons are sufficient for such coordination to occur and for CDM to align with electrification efforts.

## **REPRESENTATIVES**

OSEA's counsel and consultant in this matter are:

Joanna Vince / Raeya Jackiw  
[jvince@willmsshier.com](mailto:jvince@willmsshier.com) /  
[rjackiw@willmsshier.com](mailto:rjackiw@willmsshier.com)  
Willms & Shier Environmental Lawyers LLP  
1 Toronto Street, Suite 900  
Toronto, ON M5C 2V6  
T: 416-862-4830 / 4827  
F: 416-863-1938

Travis Lusney  
Manager, Procurement and Power Systems  
[tlusney@poweradvisoryllc.com](mailto:tlusney@poweradvisoryllc.com)  
Power Advisory LLC  
55 University Ave, Suite 605 – PO BOX 32  
Toronto, ON, Canada M5J 2H7  
T: 647-680-1154

Yours truly,



Joanna Vince  
Partner  
*Certified as a Specialist in Environmental Law  
by the Law Society of Ontario*

cc: Dan Goldberger, OSEA

Document #: 2003954