



September 14, 2021

VIA RESS

Ontario Energy Board
P.O. Box 2319
3200 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Long:

**Re: Hydro One Networks Inc. ("HONI")
2023-2027 Joint Transmission and Distribution Rates Application
Board File No. EB-2021-0110**

We are counsel to the Distributed Resource Coalition ("**DRC**"). Please find enclosed DRC's Notice of Intervention in the above-noted proceeding.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'L' followed by a horizontal stroke that curves upwards and to the right.

Lisa (Elisabeth) DeMarco

c. Hydro One Regulatory
Charles Keizer, Torys LLP
Arlen Sternberg, Torys LLP
Wilf Steimle, Electric Vehicle Society
Cara Clairman, Plug'n Drive

Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Sched. B, as amended (the **Act**);

AND IN THE MATTER OF an Application by Hydro One
Networks Inc. ("**HONI**") for an order or orders made
pursuant to section 78 of the Act, approving or fixing just and
reasonable rates for the transmission and distribution of
electricity.

EB-2021-0110

NOTICE OF INTERVENTION

OF

DISTRIBUTED RESOURCE COALITION

(DRC)

September 14, 2021

A. Application for Intervenor Status

1. The Distributed Resource Coalition (“**DRC**”) hereby requests intervenor status in the matter of the application of Hydro One Networks Inc. (“**HONI**”) for various orders pursuant to section 78 of the Act as set out in HONI’s application filed August 5, 2021 (the **Application**). This notice of intervention is filed pursuant to Rule 22 of the Board’s *Rules of Practice and Procedure*.

B. DRC and its Interest in the Proceeding

Distributed Resource Coalition

2. DRC is a group of electricity customers and consumers that consists of end-use residential customers, non-profit organizations, and owners' associations that are directly affected by and interested in (i) optimizing existing energy assets, (ii) efficiently facilitating the integration of existing and innovative distributed energy resources (“**DERs**”), including electric vehicles (“**EVs**”), to achieve customer and grid solutions, and (iii) providing input on direct customer needs and local distribution company opportunities relating to EVs. DRC hopes to further these interests for the benefit of each and all of end-use customers, HONI, DER providers, and the regulatory regime. DRC members for this proceeding include, subject to further update, the Electric Vehicle Society (“**EVS**”) and Plug’n Drive (“**PnD**”).
3. EVS represents over 1,000 end-use, largely residential, individual EV electricity customers, which all pay membership fees to have their needs and preferences related to EVs and related DERs represented on matters that directly substantially impact them. EVS has 12 local chapters of electricity rate paying customers in Ontario, many of which serve in HONI’s service territory. EVS is governed to ensure that individual rate payers are informed, consulted, and can independently raise their needs and preferences on matters of direct and substantial interest with the leaders of their local EVS chapters, and all such needs and preferences are communicated to and through the President of EVS. Those customer needs and preferences are aggregated and conveyed to jointly formulate DRC positions through the President of EVS through regular DRC teleconference meetings where decisions are recorded and confirmed. In this manner, DRC reflects the public interest in electrified transportation DER matters; it does not assume or suppose it. Further information on EVS, its more than 1,000 individual residential rate paying members, and its programs and activities may be found on its website at www.evsociety.ca.

4. PnD is the authoritative convener of current and future EV customers and acts to provide access to facts and information to electricity and EV customers on electricity and electric mobility issues and choices. PnD works with each and all of electricity/EV customers, vehicle manufacturers, governments, and utilities to ensure that all are afforded best available information in order to make fact-based plans and choices. PnD regularly surveys, and/or collects aggregated information from, the thousands of rate paying customers that come to it through its programs and activities, website (www.plugndrive.ca, through which further detailed information on its programs and activities may be found), and/or Discovery Centre with their questions, needs, and preferences related to electrified transportation DERs. Those customer needs and preferences are aggregated and conveyed to jointly formulate DRC positions through the President and CEO of PnD through regular DRC teleconference meetings where decisions are recorded and confirmed.

DRC's Interest in the Proceeding

5. DRC has a direct and substantial interest in the proceeding in that its members are directly affected by the rates, services, activities, and approaches being proposed in the Application. DRC anticipates significant integration of DERs, including EV-related DERs, into HONI's grid and customer base during the period covered by the Application. DRC therefore has a direct and substantial interest in the proceeding, including insofar as it addresses the integration and impact of DERs and EVs on: local distribution system planning, stations, and distribution; rate design; load forecasting; fleet replacement/renewal parameters; and customer engagement.
6. HONI's pre-filed evidence indicates that key drivers of its investment plan include the need to integrate DERs. [Exhibit A, Tab 2, Schedule 4, pp. 21-22] HONI is also seeking to transition its commercial fleet to low or zero emission technology, including increasing the rate of EVs from an estimated 5 percent of the renewal forecast in 2020 to 45 percent by 2030. [Exhibit A, Tab 3, Schedule 1, Attachment 1, p. 46] HONI's five-year investment plan also includes installing innovative energy battery and storage solutions [Exhibit A, Tab 7, Schedule 1, Attachment 2, p. 4]. In addition, HONI's Distribution Service Plan indicates \$7M in non-discretionary investments for connecting DERs, [Exhibit B, Tab 3, Schedule 1, Section 3.1/Section3.11] with approximately 3,200 MW of DER already integrated into the distribution system. [Exhibit B, Tab 3, Schedule 1, Section 3.1.2, p. 8] In addition, the following other elements of HONI's pre-filed evidence are likely to be among those

specifically impacted by DERs and EV-related DERs: rate design, load forecasting, fleet replacement/renewal parameters, and customer engagement.

7. DRC's intervention would focus on testing evidence and providing argument with respect to the following issues raised in the Application:
 - (a) the impact of EV chargers on the local distribution network;
 - (b) load forecasting;
 - (c) system-level EV and DER impact;
 - (d) station-level EV and DER impact;
 - (e) distribution-level EV and DER impact;
 - (f) HONI's ongoing DER and EV initiatives, studies, projections, and distribution system plan investments; and
 - (g) other issues as they arise.
8. DRC was an active, Board-approved participant in the pre-Application stakeholder conference. DRC was also active in the recent Toronto Hydro custom incentive rate proceeding (EB-2018-0165), providing the Board with expert evidence on the impact of electrified mobility on the matters at issue in order to inform its decision-making and set just and reasonable rates for a five-year time period. DRC was also active in the Alectra Utilities' electricity distribution rate proceeding (EB-2019-0018), which included a 10-year distribution system plan. Further, DRC is an active participant in cost of service rate proceedings of Burlington Hydro Inc. (EB-2020-0007), Oshawa Power and Utilities' (EB-2020-0048), Niagara Peninsula Energy Inc. (EB-2020-0040), and Halton Hills Hydro Inc. (EB-2020-0026), as well as Hydro Ottawa's custom incentive rate proceeding (EB-2019-0261), and the Board's Utility Remuneration and Responding to DERs consultation (EB-2018-0287 / EB-2018-0288).
9. DRC hopes to provide the Board with the currently absent, unique perspective of EV residential customers, as well as EV-related non-profit organizations, owners, and developers, each of which may be materially affected by the outcome of this proceeding.

C. Nature and Scope of DRC's Intended Participation

10. DRC intends to be an active participant in this proceeding and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed. DRC otherwise intends to participate actively in order to test evidence in accordance with the stipulated processes and timelines, participate fully, and provide argument should the Board's procedures provide for same. It reserves the right to adduce evidence should the Board's procedures provide for same.

D. Costs

11. DRC is, in accordance with s. 3.03(a) of the Board's *Practice Direction on Cost Awards* (the "**Practice Direction**"), eligible to seek an award of costs as DRC is a party that primarily represents the direct interests of consumers (residential customers) in relation to services that are regulated by the Board. DRC is also eligible to seek an award of costs in accordance with s. 3.03(b) of the Practice Direction, as DRC represents organizations that have a policy interest in electricity conservation and demand management, implementation of a smart grid in Ontario, promotion of the use of electricity from renewable energy sources, each of which are components of the Board's mandate and relevant to the proceeding.
12. DRC therefore requests cost eligibility in this proceeding as its comments will serve an important and unique interest and policy perspective relevant to the Board's mandate, which has heretofore not been represented or heard.

E. DRC's Representatives

13. DRC hereby requests that further communications with respect to this proceeding be sent to the following:

Electric Vehicle Society

265 Crawford Street
Orillia, ON L3V 1J9

Attention: Wilf Steimle
Telephone: 905-841-8163
Email: Wilf.Steimle@EVSociety.ca

AND TO

Plug'n Drive

1126 Finch Avenue West, Unit 1
North York, ON M3J 3J6

Attention: Cara Clairman
Telephone: 647-717-6941
Email: cara@plugndrive.ca

AND TO ITS COUNSEL

Resilient LLP

Bay Adelaide Centre
333 Bay Street, Suite 625
Toronto, ON M5H 2R2

Attention: Lisa (Elisabeth) DeMarco
Telephone: 647-991-1190
Facsimile: 1-888-734-9459
Email: lisa@resilientllp.com

Attention: Jonathan McGillivray
Tel: 647-208-2677
Facsimile: 1-888-734-9459
Email: jonathan@resilientllp.com

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
14th day of September, 2021.



Lisa (Elisabeth) DeMarco
Resilient LLP
Counsel for Distributed Resource Coalition