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December 2, 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-2021-0292  
Independent Electricity System Operator/Smart Metering Entity  
2021 Third Party Access Application**

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

OSEA is in receipt of the Independent Electricity System Operator (“IESO”), in its capacity as the Smart Metering Entity’s (“SME”), application for approval to provide third party access to de-identified electricity consumption data to Canadian Governmental Entities (the “2021 Third Party Access Application”).

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 2021-0292.

OSEA actively participates and contributes in Board proceedings and intends to provide meaningful comments on IESO 2021 Third Party Access Application.

### **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 2021 Third Party Access Application.

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 and does not advocate on behalf of energy generators. OSEA's membership is diverse and includes small scale distributors and service providers of renewables, and very few 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 is participating in the ongoing proceeding related to the IESO's 2020-2021 Revenue Requirement (EB-2020-0230). In the settlement agreement for EB-2020-0230, IESO committed to increasing the public availability of planning data.

OSEA's mandate on energy efficient system planning relates to IESO's 2021 Third Party Access Application. OSEA's interest in this proceeding is ensuring that community organizations have adequate access to data for efficient energy planning.

### **REPRESENTATIVES**

OSEA's counsel and consultant in this matter are:

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Yours truly,

A handwritten signature in blue ink, appearing to read 'J. Vince', written in a cursive style.

Joanna Vince

Partner

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

cc: Dan Goldberger, OSEA

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