

Power Advisory

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April 8, 2022

Ms. Nancy Marconi

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

Submitted via RESS and email

**Re: Joint CanREA, ESC, and OWA Intervention Request for Independent Electricity System Operator
2022 Expenditure and Revenue Requirement Application (EB-2022-0002)**

Dear Ms. Marconi

On behalf of the Canadian Renewable Energy Association (CanREA), Energy Storage Canada (ESC), and Ontario Waterpower Association (OWA) (jointly referred to as “REASCWA”), as regulatory advisors and consultants to REASCWA, Power Advisory requests intervenor status and funding for REASCWA regarding the Independent Electricity System Operator's (IESO's) filed 2022 Expenditure and Revenue Requirement Application (EB-2022-0002) with the Ontario Energy Board (OEB). REASCWA is a joint group of non-emitting supplier and customer focused electricity industry associations. REASCWA intervened within IESO's 2021 Expenditure and Revenue Requirement Application.

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 energy 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 2007 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.

The three associations - CanREA, ESC, and OWA - are the parties jointly applying for intervenor status as REASCWA. If granted intervenor status, Power Advisory will assist REASCWA, where the three associations have planned to jointly participate within the proceedings, as they did so within IESO's 2021 Expenditure and Revenue Requirement Application proceeding.

REASCWA understands 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 the 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.

REASCWA looks 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, REASCWA intends to participate within all phases of the proceeding and may submit evidence if warranted. REASCWA understand there is a need to coordinate their participation on common issues and avoid duplication with other supply-side intervenors (as was done with APPRO and OSEA within IESO's 2021 Expenditure and Revenue Requirement Application proceeding).

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 the IESO. The OEB has previously granted cost eligibility to Power Advisory, representing jointly CanREA, ESC and OWA, within IESO's 2021 Application for Revenue Requirement, Expenditures and Usage Fees.¹

The following are reasons for our rationale regarding receipt of intervenor funding:

¹ See letter from Christine E. Long to Mr. Chee-Aloy from dated July 21, 2021, pursuant to EB-2020-0230.

- 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 the 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;
- 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 the IESO, in part driven by future directions as specified in IESO's latest Business Plan;
- Approximately 50 companies within CanREA, ESC, and OWA operate renewable generation and energy storage facilities as registered wholesale market participants within the 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, etc.);
- 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 the 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 the 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
- Precedent has been set for intervenor funding through cost awards from IESO based on previous IESO Expenditure and Revenue Requirement Application proceedings (e.g., APPrO was granted cost awards for IESO's 2017, 2019, 2020/2021 Expenditure and Revenue Requirement Applications, OSEA was granted cost award for IESO's 2020/2021 Expenditure and Revenue Requirement application, REASCWA was granted cost award for IESO's 2020/2021 Expenditure and Revenue Requirement application, etc.).

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

- Brandy Giannetta, Vice-President, Policy, Regulatory and Government Affairs, CanREA, 240 Bank Street, Suite 400, Ottawa, Ontario, K2P 7X4 BGiannetta@renewablesassociation.ca, 647-287-4288;
- Justin Rangooni Executive Director, ESC, jrangooni@energystoragecanada.org, 647-627-7875; and

- Paul Norris President, OWA, 380 Armour Road, Suite 264, Peterborough, Ontario, K9H 7L7
pnorris@ow.ca, 705-747-9686.

And consultant to CanREA, ESC, and OWA for IESO's filed 2022 Expenditure and Revenue Requirement Application:

- Jason Chee-Aloy, Managing Director, Power Advisory 55 University Ave, Suite 700, PO Box 32, Toronto, Ontario, M5J 2H7 jchee-aloy@poweradvisoryllc.com, 476-303-8667.

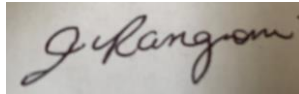
Sincerely,



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