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April 8, 2022

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

Attention: Nancy Marconi, Acting Registrar

Dear Ms. Marconi:

**Re: Board File No. EB-2022-0002
Independent Electricity System Operator's 2022 Revenue Requirement Submission
Application for Intervenor Status**

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

OSEA is in receipt of the Independent Electricity System Operator's ("IESO") application for approval of its 2022 revenue, requirement, expenditures and fees.

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 IESO's 2022 Revenue Requirement Submission.

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 2022 Revenue Requirement Submission.

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's interest in this proceeding includes

- ◆ following up on the IESO's commitments made in the settlement agreement for the IESO's 2020-2021 Revenue Requirement (EB-2020-0230), which OSEA participated in. This includes commitments related to the provision of planning data, and stakeholder engagement practices
- ◆ understanding details about the IESO's proposed Reliable Integration fee for new or modified resources, and whether the fee is reflective of participant size and may act as a barrier to certain participants
- ◆ examining the allocation of the MRP budget, and whether a portion of the budget should be allocated to enabling resources to ensure resource adequacy in light of supply need, and
- ◆ understanding the cost contribution to the IESO's revenue requirement from interconnection projects and system operation integration needs.

REPRESENTATIVES

OSEA's counsel and consultant in this matter are:

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Yours truly,

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

cc: Dan Goldberger, OSEA

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