



June 20, 2022

VIA RESS

Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Marconi,

**Re: Alectra Utilities Corporation (“Alectra”)
Incremental Capital Module (“ICM”) Application for 2023 Electricity Distribution
Rate Charges
Board File No.: EB-2022-0013**

We are counsel to the Distributed Resource Coalition (“DRC”). Please find attached DRC’s Notice of Intervention in the above-noted proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Vollmer".

DT Vollmer

c. Natalie Yeates, Alectra
Charles Keizer, 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 Alectra Utilities
Corporation (“**Alectra**”) to the Ontario Energy Board for an
order or orders approving or fixing just and reasonable rates
and other service charges for the distribution of electricity as
of January 1, 2023.

EB-2022-0013

NOTICE OF INTERVENTION

OF

DISTRIBUTED RESOURCE COALITION

(DRC)

June 20, 2022

A. Application for Intervenor Status

1. The Distributed Resource Coalition (“**DRC**”) hereby requests intervenor status in the matter of the application of Alectra for various orders pursuant to section 78 of the Act as set out in Alectra’s application filed May 16, 2022 (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, consisting of end-use residential customers, non-profit organizations, and owners' associations. DRC’s members 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’s 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. EVS has 12 local chapters of electricity rate-paying customers in Ontario, many of whom live in Alectra’s service territory. EVS’s mandate is to consolidate, represent and advocate for the interests of its members on matters related to DERs, transactive energy, innovation and electrification of transportation. EVS is governed to ensure that individual ratepayers 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 the 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 investments being proposed in the Application. In particular, DRC anticipates that its intervention will focus on testing evidence and providing argument with respect to the following issues where its members maintain an active and ongoing interest:
 - (a) whether Alectra's proposed investments reflect changing and anticipated demands in terms of the new forms of distribution and DERs across the grid that anticipated increases in electrification will entail;
 - (b) whether Alectra has adequately considered lower-cost alternatives that may be better positioned to meet future demands as the use of EVs increases;
 - (c) whether Alectra's proposed approach facilitates or hampers a future transition to increased electrification and what consequences the approach entails for the future viability and cost-effectiveness of services;
 - (d) whether Alectra has adequately considered how the availability of EVs as storage centres might influence the need or lack thereof for existing distribution approaches;
 - (e) whether Alectra has adequately considered the integration and impact of DERs and EVs in general as well as specifically on rate design, load forecasting, and customer engagement; and

- (f) such other issues as may arise and may be relevant to DRC and its members.
6. Alectra's Application makes clear that matters directly relevant to how Alectra will support or not support the use of EVs and DERs and trends towards electrification in general are implicated in the current proceeding. For example:
- (a) Alectra notes that it must "urgently increase investment to address worsening reliability due to deteriorated underground direct-buried cable and related equipment." [Exhibit 3, Tab 1, Schedule 1, p. 3]
 - (b) Alectra further notes that delaying these investments may "result in greater risk of extended outages for affected customers, alongside increasingly reactive, significantly less cost-effective capital expenditures." [Exhibit 3, Tab 1, Schedule 1, p. 6]
 - (c) Alectra indicates that its investment in Line Capacity is paced at a "bare minimum" and that it has "identified investments that will avoid some capacity additions and utilize existing resources more effectively." [Exhibit 3, Tab 1, Schedule 1, p. 7]
7. In addition, Alectra's evidence on topics such as rate design, load forecasting, and customer engagement carry implications for current and future users of DERs and EVs in general, since the decisions that Alectra takes today will affect the viability of the options available to transition to these new approaches going forward.
8. DRC was an active, Board-approved intervenor in Alectra's electricity distribution rate proceeding (EB-2019-0018), which included a 10-year distribution system plan. DRC is currently an active intervenor in Hydro One Network Inc.'s 2023-2027 joint distribution and transmission rate application (EB-2021-0110). DRC was an active intervenor 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. 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. The Board has granted DRC cost eligibility in several Board proceedings, including each of the proceedings referred to above in paragraph 8.
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: Nicholas Daube
Tel: 416-768-8341
Facsimile: 1-888-734-9459
Email: nicholas@resilientllp.com

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
20th day of June, 2022.



Lisa (Elisabeth) DeMarco
Resilient LLP
Counsel for DRC