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February 2, 2023

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

Attention: Nancy Marconi, Registrar

Dear Ms. Marconi:

**Re: Ontario Energy Board File No. EB-2023-0003**  
**Engagement on Distributor Resilience, Responsiveness and Cost Efficiency**

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

OSEA is in receipt of the Ontario Energy Board’s (“OEB” or “Board”) letter dated January 25, 2023 inviting stakeholders to participate in a meeting and provide input on a report commissioned by the OEB about best practices for climate change resilience in Ontario.

OSEA wishes to participate in the stakeholder meeting and seeks 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 consultations, and intends to provide meaningful comments on the OEB's report on climate change resiliency and best practices.

### **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 primarily represents:

- a) the direct interests of consumers in relation to services that are regulated by the Board, and
- b) an interest or policy perspective relevant to the Board's mandate and climate change resiliency.

OSEA can continue to provide an important and unique perspective at the stakeholder meeting. 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. OSEA's membership is diverse and includes small scale distributors and service providers of renewables, and very few large 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 MEETING**

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 matter. 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 mandate relates directly to sector resiliency, responsiveness and cost efficiency in response to climate change.

OSEA interests in this matter include providing input on the role that energy conservation, sustainable energy solutions and low-carbon or renewable energy alternatives play in mitigating the impacts of climate change on energy distribution, and promoting sector resilience and cost efficiency.

## **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: David Katz, OSEA

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