

**Power Advisory**

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April 28, 2023

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

**Re: Joint CanREA, ESC, and OWA intervention request for Independent Electricity System Operator's 2023, 2024, and 2025 expenditure, revenue requirement, and usage fees application (EB-2022-0318)**

Dear Ms. Marconi,

Power Advisory is regulatory advisor and consultant to the Canadian Renewable Energy Association (CanREA), Energy Storage Canada (ESC), and the Ontario Waterpower Association (OWA), jointly referred to as "REASCWA". On behalf of REASCWA Power Advisory requests intervenor status and funding for REASCWA in the matter of the Independent Electricity System Operator's (IESO) 2023-2025 expenditure, revenue requirement, and usage fee application (EB-2022-0318). REASCWA is a joint group of non-emitting supplier- and customer-focused electricity industry associations. REASCWA intervened in IESO's 2021 and 2022 revenue requirement applications.

CanREA, ESC, and OWA are non-profit associations representing approximately 500 member companies. The majority of these companies have business interests in 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 in jointly participating in the present proceeding as the three associations did jointly in IESO's 2021 and 2022 revenue requirement proceedings.

REASCWA understands that IESO's application is based on the business plan that was reviewed and approved by the Minister of Energy pursuant to Section 24 of the *Electricity Act, 1998* 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 in all phases of the proceeding and may submit evidence if warranted. REASCWA understands there is a need to coordinate participation on common issues and avoid duplication with other supply-side intervenors. In accordance with the OEB's Practice Direction on Cost Awards, CanREA, ESC, and OWA 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, for intervention in IESO's 2021 and 2022 revenue requirement applications.

REASCWA submits that it is eligible for cost awards because of the following:

- 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 the IESO's business plan which forms the basis of its revenue requirement application;
- 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.); and
- 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.

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@owa.ca, 705-747-9686.

REASCWA requests that all documents filed with the OEB by parties to this proceeding be served on Power Advisory as consultant to CanREA, ESC, and OWA for the present proceeding, and specifically to:

- Avi Lipsitz, Senior Consultant, Power Advisory  
55 University Ave, Suite 700, PO Box 32, Toronto, Ontario, M5J 2H7  
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Sincerely,



Jason Chee-Aloy  
Managing Director  
Power Advisory