

Intervention Form

Case Number:

EB-2022-0325

Intervenor Name:

Energy Storage Canada

Mandate and Objectives:

Founded in 2016, Energy Storage Canada (ESC) is a not-for-profit organization and the only national trade association in Canada dedicated solely to the growth and market development of the country's energy storage sector as a means of accelerating the realization of Canada's ongoing energy transition and Net Zero goals through advocacy, education, collaboration, and research.

ESC's strategic goals include the following:

- Impact policy and regulatory reform: Maintain engagement with regulators to continue to remove barriers to energy storage deployment in all jurisdictions and engage with energy stakeholders and policy makers to ensure government initiatives favor the deployment of storage.
- Grow and develop industry partnerships: Identify organizations with common goals to collaborate on points of intersection related to the development of Canada's energy sector, particularly in relation to decarbonization and net-zero goals. Look for additional opportunities for the same with existing partners.
- Advocate for initiatives favorable to energy storage.
- Education and engagement: Foster greater awareness and understanding of energy storage technologies, potential applications, and its benefits among energy stakeholders in Canada at all levels of engagement.

Membership of the Intervenor and Constituency

Represented:

ESC's technology-agnostic approach allows for a diverse membership of 85 members representing the end-to-end value chain of the country's energy storage industry including technology and component providers, project developers, energy storage service providers,

power generators, electric utilities, engineering, and construction firms, as well as professional services companies and NGOs.

Programs or Activities Carried Out by the Intervenor:

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.

Governance Structure:

ESC principal authorized representative in proceedings before the Ontario Energy Board is Borden Ladner Gervais LLP (“BLG”), represented by John Vellone and Colm Boyle with support from other BLG associates. BLG will provide support to ESC for this proceeding EB-2022-0325. BLG’s representation of ESC in proceedings before the OEB is pursuant to written retainer agreements.

ESC is governed by a Board of Directors. The Executive Director of ESC, Justin Rangooni, will solicit instructions from its Board of Directors, as well as its members generally, and convey those instructions directly to its legal representative of record in this proceeding.

Representatives:

Justin Rangooni
jrangooni@energystoragecanada.org

John Vellone
jvellone@blg.com

Other Contacts:

Colm Boyle
cboyle@blg.com

Frequent Intervenor Form:

OEB Proceedings:

EB-2022-0318
EB-2022-0002
EB-2020-0230

Issues:

Among ESC's members are owners and operators of Energy Storage Facilities that are directly connected to transmission systems in Ontario. These ESC members pay uniform transmission rates ("UTRs") and are materially impacted by the issues in this proceeding. In particular, issues 5 and 6 in the notice of hearing pertain directly to rates calculated and paid by energy storage facilities under the UTRs. At a high level, the OEB is considering what gross load billing threshold is appropriate for energy storage facilities.

Policy Interests:

There is not a standard issues list for this proceeding and ESC intends to be engaged in all material issues as they arise.

Hearings:

ESC reserves its right to make submission on the form of hearing after interrogatories have been answered.

Evidence:

ESC intends to participate by requesting information with respect to the issues identified above, participating in any requisite motions, testing evidence through the stipulated processes, submitting written interrogatories and providing argument in accordance with the OEB's procedures. ESC does not currently anticipate to file evidence in the proceeding, however it reserves the right to present evidence as it may deem necessary.

Coordination with Other Intervenors:

ESC and APPrO will be jointly represented by BLG to coordinate their involvement as intervenors with similar interests.

Cost Awards:

Pursuant to s. 3.06 of the Board's Practice Direction on Cost Awards, ESC intends to seek an award of costs. In accordance with s. 3.03(a) of the Board's Practice Direction on Cost Awards, ESC represents the interests of energy storage providers in relation to UTRs that are regulated by the OEB. While energy storage is not specifically listed under subsection 3.05b

of the Cost Award Direction, this section does not apply as ESC's members are customers of the applicant.

Language Preference:

N/A