



November 14, 2023

VIA RESS

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

Dear Ms. Marconi,

Re: Generic Hearing
Uniform Transmission Rates
Board File No.: EB-2022-0325

We are counsel to the Distributed Resource Coalition ("**DRC**"). Please find attached DRC's Notice of Intervention and request for cost eligibility in the above-noted proceeding.

Sincerely,

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

DT Vollmer

c. Devin Arthur, Electric Vehicle Society
Cara Clairman, Plug'n Drive
All Other Parties

Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Sched. B, as amended;

AND IN THE MATTER OF a generic hearing to consider
various issues related to Uniform Transmission Rates.

EB-2022-0325

NOTICE OF INTERVENTION

OF

DISTRIBUTED RESOURCE COALITION

(DRC)

November 14, 2023

A. Application for Intervenor Status

1. The Distributed Resource Coalition (“**DRC**”) hereby requests status to intervene in the Board’s generic hearing to consider various issues related to Ontario’s Uniform Transmission Rates (“**UTRs**”) (EB-2023-0325). This notice of participation is filed pursuant to Rule 22 of the Board’s *Rules of Practice and Procedure* and the Board’s Notice of Hearing dated October 27, 2023.

B. DRC and its Interest in the Proceedings

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. 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 Hearing

5. DRC was an active, Board-approved intervenor in Elexicon Energy Inc.'s recent electricity distribution rate proceeding (EB-2022-0024). DRC was an active intervenor in Hydro One Network Inc.'s 2023-2027 joint distribution and transmission rate application (EB-2021-0110) and in Alectra's electricity distribution rate proceeding (EB-2019-0018), which included a 10-year distribution system plan. 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).
6. DRC has a direct and substantial interest in the hearing in that its members are directly affected by UTRs. DRC will focus on seeking to ensure that UTRs support and help facilitate EVs and bi-directional charging in Ontario. DRC's members are particularly interested in the impact of UTRs, the basis for billing renewable, non-renewable and energy storage facilities for transmission, gross load billing thresholds for renewable and non-renewable generation, and related matters on electricity ratepayers that are EV, DER, and energy storage owners and may be uniquely affected by UTRs.

Nature and Scope of DRC's Intended Participation

7. DRC intends to be an active participant in this hearing and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed. DRC intends to participate actively in order to participate in any stakeholder meetings or working groups, file submissions, and/or adduce evidence should the Board's procedures provide for same.

C. Costs

8. 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, small- and medium-sized commercial and industrial customers) in relation to services that are regulated by the Board. DRC is also, in accordance with s. 3.03(b) of the Practice Direction, eligible to seek an award of costs 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 consultation
9. The Board has granted DRC cost eligibility in several Board proceedings, including EB-2022-0024, EB-2018-0165, EB-2019-0018, and EB-2019-0261 referred to above in paragraph 6.
10. DRC therefore requests cost eligibility in this consultation as its comments will serve an important and unique interest and policy perspective relevant to the Board's mandate.

D. DRC's Representatives

11. DRC hereby requests that further communications with respect to the consultation be sent to the following:

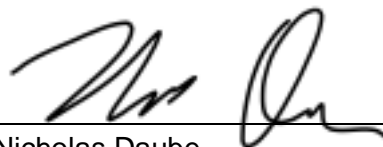
TO ITS COUNSEL

Resilient LLP

Bay Adelaide Centre
333 Bay Street, Suite 625
Toronto, ON M5H 2R2

Attention: Nicholas Daube
Telephone: 1-416-768-8341
Facsimile: 1-888-734-9459
Email: nicholas@resilientllp.com

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
14th day of November, 2023

A handwritten signature in black ink, appearing to read 'Nicholas Daube', written over a horizontal line.

Nicholas Daube
Resilient LLP
Counsel for Distributed Resource Coalition