

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board's
Engagement on Electricity Distribution System Expansion
for Housing Development (the "**Engagement**");

EB-2024-0092

NOTICE OF INTERVENTION
OF
DISTRIBUTED RESOURCE COALITION
(DRC)

March 25, 2024

A. Application for Intervenor Status

1. The Distributed Resource Coalition (“**DRC**”) hereby requests intervenor status in the matter of the Ontario Energy Board’s (“**OEB**”) Engagement on Electricity Distribution System Expansion for Housing Development (the “**Engagement**”). 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 Toronto Hydro’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 Engagement

5. DRC has a direct and substantial interest in the Engagement in that its members are directly affected by policies and decisions concerning connection and revenue horizons related to recovery of expansion costs arising from electricity system expansion, as well as the impact that such policies and decisions will have on rates, services, activities, and investments as they apply to DERs, EVs, and the future adoption of DERs and EVs.
6. DRC anticipates that its participation could lead to questions, general participation, and submissions with respect to the following issues where its members maintain an active and ongoing interest:
 - (a) how current policies and/or proposed changes to policies concerning connection and revenue horizons reflect the increasing and changing demands that new forms of distribution, DERs and EVs, as well as electrification more generally, will entail;
 - (b) how such policies and/or changes could incentivize and/or inhibit the increased adoption of DERs and EVs;
 - (c) whether proposed approaches facilitate or hamper a future transition to increased electrification;
 - (d) whether applicable discussions are based on accurate forecasts for increased DER and EV adoption;

- (e) what impact any proposed changes may have on the cost of increased DER and EV adoption;
 - (f) what consequences proposed approaches entail for the future viability, effectiveness, reliability, and cost-effectiveness of services in general; and
 - (g) such other issues as may arise and may be relevant to DRC and its members.
7. It is also important to note that the Engagement will take place within the larger context of Ontario's energy transition and potential electrification pathways, which are highly relevant to the issues relating to EV and DER adoption where DRC's members offer high levels of expertise and exercise a significant interest.
8. DRC was recently approved as an intervenor in Toronto Hydro's Custom Rate Application for Electricity Distribution Rates and Charges (EB-2023-0195), as well as the Board's generic hearing to consider various issues related to Ontario's Uniform Transmission Rates (EB-2022-0325). DRC was also an active, Board-approved intervenor in Elexicon Energy's application for incremental capital funding in the Veridian and Whitby rate zones (EB-2022-0024), Alectra's recent application for Incremental Capital Module funding (EB-2022-0013), as well as Alectra's electricity distribution rate proceeding (EB-2019-0018), which included a 10-year distribution system plan. DRC was an active intervenor in Hydro One Network Inc.'s 2023-2027 joint distribution and transmission rate application (EB-2021-0110). DRC was also an active intervenor in the 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 was 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 discussions that take place in this Engagement.

C. Nature and Scope of DRC's Intended Participation

10. DRC intends to be an active participant in this Engagement and will act responsibly to coordinate with other intervenors where appropriate. DRC otherwise intends to participate actively in order to ask questions, contribute to discussions, and deliver submissions should the Engagement proceed in a way where such submissions would be helpful to the process.

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: Devin Arthur
Telephone: 705-507-9227
Email: Devin.Arthur@EVSociety.ca

AND TO ITS COUNSEL

Resilient LLP

119 Baby Point Road
Toronto, ON M6S 2G7

Attention: Nicholas Daube
Tel: 416-768-8341
Email: nicholas@resilientllp.com

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
25th day of March, 2024.

Nicholas Daube

Nicholas Daube
Resilient LLP
Counsel for DRC