

Power Advisory

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May 17, 2024

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

**Re: Joint CanREA, ESC, and OWA participation and cost award eligibility request for EB-2024-0126
Transmission Connections Review**

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 cost award funding for REASCWA's participation in the matter of the OEB's Transmission Connections Review (EB-2024-0126). REASCWA is a joint group of non-emitting supplier- and customer-focused electricity industry associations. REASCWA has intervened previously in OEB's proceedings, such as the IESO's 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 2001 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 cost award eligibility status as REASCWA. If granted cost award eligibility, Power Advisory will assist REASCWA in jointly participating in the present policy consultation as the three associations have done jointly in previous proceedings before the OEB, such as IESO revenue requirement proceedings and the IESO's current application to amend licence EI-2013-0066.

REASCWA understands that the purpose of the OEB's review of the Transmission System Code's (TSC) connection procedures is to enhance the effectiveness of connection processes, procedures, and requirements. The OEB's April kick-off letter states "as the connection of new loads and supply resources including energy storage increases, [the OEB] should ensure that the regulatory rules associated with connections in the TSC facilitate and enable those connections."

REASCWA looks forward to actively and jointly working together within the TSC review 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 TSC review. REASCWA understand there is a need to coordinate participation on common issues and avoid duplication with other supply-side intervenors. The OEB has previously granted cost eligibility to Power Advisory, representing jointly CanREA, ESC and OWA, for intervention in IESO 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 primarily represents an interest and policy perspective relevant to the Board's mandate and to this proceeding in accordance with the 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 connect to Ontario's electricity grid; therefore, these stakeholders represent interests and perspectives that require clear paths to comment on potential TSC changes related to connection processes, procedures, and requirements, such as economic evaluation methodology, cost responsibility and cost allocation;
- Members of CanREA, ESC, and OWA operate renewable generation and energy storage have a direct interest and firsthand perspective on how connection processes, procedures, and requirements in the TSC are being administered, as well as how they can be improved to facilitate and enable to the connection of new supply resources.
- Our storage members have a direct interest and perspective to offer on the development of a standardized connection agreement for energy storage, and how energy storage is treated in the TSC more generally, as identified in the OEB's April letter: "Energy storage is not addressed in the TSC, for example there is no standardized connection agreement for energy storage in Appendix One."

The following individuals are the contacts for CanREA, ESC, and OWA:

- Vittoria Bellissimo, President & CEO, CanREA
240 Bank Street, Suite 400, Ottawa, Ontario, K2P 7X4
vbellissimo@renewablesassociation.ca, 613-234-8716;
- Justin Rangooni Executive Director, ESC
jrangooni@energystoragecanada.org, 647-627-7875; and

- Paul Norris, President, OWA
550 Braidwood Ave, Peterborough, Ontario, K9J 1W1
pnorris@owa.ca, 705-741-9686.

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

- Travis Lusney, Director (Power Systems), Power Advisory
55 University Ave, Suite 700, PO Box 32, Toronto, Ontario, M5J 2H7
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- Avi Lipsitz, Senior Consultant, Power Advisory
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Request for Comment: Issues

The OEB requested that stakeholders provide input regarding issues related to transmission connections for consideration in this review. At this time, REASCWA notes two issues for the OEB to consider:

- The TSC does not acknowledge IESO resource procurements; however, given the number of planned procurements (and the changes mandated by FERC through Order 2023 to reduce backlogs for projects seeking to connect to the transmission system), it would appear beneficial to explore how to optimize connection processes and procurement processes in Ontario as part of the TSC review; and,
- The scope of the TSC review excludes discussion of regional planning and coordinating connection provisions with regional planning; however, connection cost responsibility, cost allocation and potentially network cost allocation are directly tied to the outcomes of regional planning, making inclusion of the issue appropriate as part of this review.

Sincerely,



Jason Chee-Aloy
Managing Director
Power Advisory