



May 22, 2024

VIA RESS

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

Dear Ms. Marconi,

**Re: Electric Vehicle Integration (EVI) Initiative
Electricity Delivery Rates for Electric Vehicle (EV) Charging Invitation to
Stakeholder Meeting
Board File No.: EB-2023-0071**

We are counsel to the Distributed Resource Coalition ("**DRC**") in the above-noted EVI initiative. DRC wishes to indicate its intention to participate in the stakeholder meeting scheduled for June 13, 2024, in accordance with the Board's letter dated May 1, 2024. DRC hereby also requests cost eligibility for preparation of and attendance at the stakeholder meeting and for the preparation of written comments on OEB staff's proposal for an electricity delivery rate for public EV charging stations that have a low load factor, which aims to further facilitate the integration of EV chargers with the electricity system (the "**Proposal**"), as provided below.

About DRC

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 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 the EVI Initiative and upcoming stakeholder meeting include, subject to further update, the Electric Vehicle Society ("**EVS**") and Plug'n Drive ("**PnD**").

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.

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 EVI Initiative and the stakeholder meeting

DRC has a direct and substantial interest in electricity delivery rate for public EV charging stations in that many of its members are EV owners and are directly affected by rates that impact EV charging. DRC will focus on seeking to ensure that engagement with relevant stakeholders and the Proposal support and help facilitate EVs, cost-effective charging, and sufficient charging infrastructure across Ontario. DRC's members are particularly interested in the impact of electricity delivery rate for public EV charging stations on electricity delivery costs and demand chargers that may dissuade investments in public charging infrastructure at a time when investments should be increasing to meet current and anticipated EV charging demand forecasts.

DRC's cost eligibility and representative

DRC's cost eligibility. 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, and promotion of the use of electricity from renewable energy sources, each of which are components of the Board's mandate.

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.

DRC therefore requests cost eligibility in this consultation as its participation and comments will serve an important and unique interest and policy perspective relevant to the Board's mandate.

DRC's representative. DRC hereby requests that further communications with respect to the stakeholder engagement be sent to the following:

TO ITS COUNSEL

Resilient LLP

119 Baby Point Road
Toronto, ON M6S 2G7

Attention: Nicholas Daube
Telephone: 1-416-768-8341
Facsimile: 1-888-734-9459

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Daube', with a stylized, cursive script.

Nick Daube

c. Devin Arthur, EVS
Cara Clairman, PnD