

# Elson Advocacy

October 30, 2024

**BY RESS**

**Nancy Marconi**

Registrar

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

**Re: EB-2022-0325 – UTR Generic Hearing**

I am writing on behalf of Environmental Defence to provide reply submissions in this proceeding.

Participants in favour of the proposed changes with respect to issues 5 and 6 are focusing on narrow issues relating to fairness to the exclusion of broader and more important issues relating both to fairness and to provincial policy. The broader fairness issue is whether gross load billing still supports cost causality in the context of a jurisdiction striving to increase generation at an unprecedented pace. The broader provincial policy issue is whether it is appropriate to expand gross load billing to more distributed energy resource facilities despite that running counter to provincial policy.

On October 22<sup>nd</sup> 2024, the provincial government again reiterated the important role that it hopes distributed energy resources will play in Ontario's energy future. It released "Ontario's Affordable Energy Future: The Pressing Case for More Power", which stated as follows:

*Empowering energy consumers to participate in the grid*

Industrial, commercial and residential customers are increasingly leveraging technologies like solar photovoltaic panels, batteries, electric vehicles, thermal storage, smart thermostats and electric water heaters to manage their energy use, reduce their energy costs, and provide back-up power or heat. These small-scale energy systems that generate, store or manage electricity close to where they are used, in homes and businesses, are referred to as distributed energy resources (DER). These DER systems can also be directly connected to the distribution grid and provide energy and other services to local or bulk grid.

Giving customers more ways to participate in the grid, with a focus on creating new ways for families and businesses to save money while reducing province-wide energy demand, benefits us all. As the grid evolves with the increasing

adoption of DER, the policy framework too must evolve to support customer choice and reduce barriers to all types of DER investments that can support local energy needs and improve the efficient utilization of these resources within the energy system.

The provincial government is calling for barriers to DER's to be removed whereas the proposed changes would generally serve to add more. In the very least, the proposed changes should be put on hold until these broader issues around gross load billing can be considered.

Thank you for the opportunity to make these submissions.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', with a stylized, cursive script.

Kent Elson

cc: Parties in the above application