



December 2, 2024

**VIA RESS**

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

Dear Ms. Marconi,

**Re: Consultation on a Capacity Allocation Model for System Expansions to Connect Housing Developments and Invitation to Participate on an Advisory Group  
Board File No.: EB-2024-0092**

The Distributed Resource Coalition ("**DRC**") is writing in response to the Board's letter dated November 21, 2024, in which the Board indicates the initiation of a consultation to develop a capacity allocation model to address issues relating to system expansions for connecting housing developments.

DRC wishes to participate in the Board's Capacity Application Model advisory group ("**CAMAG**"). DRC also requests cost eligibility for preparation and attendance related to the CAMAG as a stakeholder already determined to be eligible for cost awards pursuant to the Board's April 2, 2024 Decision on Cost Eligibility (the "**Decision**").

DRC's engagement in the issues that the consultation will address includes participation in the stakeholder consultations that were conducted as part of the Board's underlying "Report Back to the Minister on System Expansion for Housing Developments".<sup>1</sup>

**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 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 represented at the proposed CAMAG and related stakeholder meetings include, subject to further update, would be the Electric Vehicle Society ("**EVS**") and Plug'n Drive ("**PnD**").

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<sup>1</sup> See list of participants on page 55 of the Report.

EVS represents over 1,000 end-use, largely residential, individual EV electricity customers. EVS has 13 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](http://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](http://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 CAMAG**

DRC has a direct and substantial interest in the policies and mechanisms that impact Ontario's approach to capital investments. In particular, DRC supports infrastructure investments and system expansion policies that promote a fair, efficient and sustainable energy transition. DRC believes that such an approach necessarily calls for the effective expansion and integration of investments in DER and EV-related infrastructure, as well as other investments intended to support Ontario's ongoing energy transition and efforts to increase electrification.

DRC's participation will help ensure that key stakeholder interests are represented, including those of EV owners and DER operators, who play a vital and growing role in the province's energy ecosystem. Expanding electrical infrastructure is critical for accommodating the increased loads from EV charging and DER systems, particularly in new housing developments and retrofitted areas.

DRC intends to support the focus on large-scale developments and multi-party cost-sharing by highlighting how these developments can integrate EV charging and DER systems efficiently, ensuring the financial and logistical needs of all parties are addressed. The rules established under the CAM will directly influence the integration and effectiveness of EVs and DERs in new developments and address the expanding electrical infrastructure essential for accommodating increased loads from EV charging and DER deployment.

EVs and DERs place unique demands on the system while also providing valuable grid services, such as demand response and peak shaving. These contributions are essential to meeting

Ontario's energy demand and supports the efficient functioning of the grid. DRC is interested in ensuring that cost allocation mechanisms account for these factors, promoting an equitable distribution of costs that appropriately recognizes the role of EV and DER stakeholders without imposing disproportionate burdens.

**DRC's Cost Eligibility and Representative**

**DRC's cost eligibility.** As noted above, DRC has been determined to be eligible for cost awards pursuant to the Decision. DRC therefore requests cost eligibility for its participation in the CAMAG as its participation and comments will serve an important and unique interest and policy perspective relevant to the Board's mandate.

DRC does not anticipate funding from other sources in the context of the CAMAG.

**DRC's representative.** DRC hereby requests that further communications with respect to the stakeholder engagement be sent to its representative as follows:

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