
Intervention Form

Case Number:

EB-2024-0115

Intervenor Name:

Distributed Resource Coalition

Mandate and Objectives:

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.

Membership of the Intervenor and Constituency Represented:

DRC's members for this proceeding include, subject to further update, EVS and 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, many of whom live in Hydro Ottawa Limited ("HOL") service territory. EVS is incorporated as a not-for-profit organization. Everything EVS does is guided by 4 core "Objects":

1. Promoting an interest in vehicles propelled by electric power and which may include hybrid power sources.

2. Promoting the reduction of pollution in the air by transportation vehicles, thereby enhancing the natural environment and improving the quality of life.
3. Gathering and disseminating information about EVs.
4. Providing the means of social activity, mutual helpfulness, recreation, and other advantages of membership.

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 is a not-for-profit organization accelerating EV adoption in Canada to maximize the environmental and economic benefits of an electrified transportation sector. PnD's vision is to help Canada achieve its goal of 100% electric vehicle sales by 2035 or earlier.

Programs or Activities Carried Out by the Intervenor:

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. 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 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.

Governance Structure:

EVS member 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.

PnD aggregates and conveys the needs and preferences of rate-paying customers to jointly formulate DRC positions through the President and CEO of PnD through regular DRC teleconference meetings where decisions are recorded and confirmed.

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Frequent Intervenor Form:

OEB Proceedings:

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).

Issues:

DRC has a direct and substantial interest in the proceeding in that its members are directly affected by the rates, services, activities, and investments being proposed in HOL's Application.

DRC anticipates that its intervention will focus on testing evidence and providing argument with respect to the following issues where its members maintain an active and ongoing interest:

- (a) whether HOL's proposed investments and asset management strategy reflect the increasing and changing demands that new forms of distribution, DERs and EVs, as well as electrification more generally, will entail;
- (b) whether HOL's forecasts for increased DER and EV adoption are accurate and reliable;
- (c) whether HOL has adequately considered lower-cost and/or more effective alternatives to meet future demands as the use of EVs increases;
- (d) whether HOL's proposed approach facilitates or hampers a future transition to increased electrification and what consequences the approach entails for the future viability, effectiveness, reliability, and cost-effectiveness of services;
- (e) whether HOL's proposed investment approach preserves optionality in energy transition scenarios where DER and EV adoption proceeds or is capable of proceeding at a more accelerated pace;
- (f) whether HOL has adequately considered how the availability of EVs as energy storage might influence the need or lack thereof for existing distribution approaches and support customer participation in non-wires solutions;
- (g) whether HOLI has sufficiently addressed challenges relating to bi-directional energy flow (V2G and V2H), as well as safety and reliability more generally, relating to the adoption of EVs and DERs;
- (h) whether HOL's Distribution System Plan includes optimal provision for smart grid capabilities and other new infrastructure investments to accommodate customer-owned DERs and EVs;
- (i) whether HOL has adequately considered the integration and impact of DERs and EVs in general as well as specifically on rate design, load forecasting, customer engagement, data collection, and cybersecurity; and
- (j) such other issues as may arise and may be relevant to DRC and its members.

Policy Interests:

DRC primarily represents the direct interests of consumers (residential customers) in relation to services that are regulated by the Board.

DRC represents organizations that have a policy interest in (i) preparing Ontario's distribution system for widespread adoption of EVs and DERs and ensuring adequate and expanded access to EV infrastructure, (ii) electricity conservation and demand management, (iii) implementation of a smart grid in Ontario, and (iv) promotion of the use of electricity from renewable energy sources.

Hearings:

N/A

Evidence:

DRC reserves the right to adduce evidence should the Board's procedures provide for same.

Coordination with Other Intervenors:

DRC intends to be an active participant in this proceeding and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed.

Cost Awards:

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 in section 2 above .

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.

Language Preference:

No.