



EB-2025-0268 — Request for Reconsideration of Cost Eligibility

November 23, 2025

Ontario Energy Board
Attn: Mr. Brian Hewson
2300 Yonge Street
Toronto, ON M4P 1E4

Subject: Request for Reconsideration of Cost Eligibility – EB-2025-0268 (Review of the Valuation of Distributed Energy Resources)

Dear Mr. Hewson,

I am writing on behalf of Screaming Power Inc. to respectfully request that the Ontario Energy Board reconsider its November 21, 2025, decision regarding cost eligibility in the Review of the Valuation of Distributed Energy Resources (EB-2025-0268).

Screaming Power brings a unique combination of consumer advocacy, regulatory experience, and deep technical expertise in energy data governance, areas directly relevant to the Board’s mandate under the Practice Direction on Cost Awards, particularly section 3.03(b). Our participation will materially assist the Board in developing a DER valuation framework that is practical, interoperable, and consumer centric

Grounds for Reconsideration

1. Alignment with the OEB Mandate and Practice Direction

Screaming Power’s work directly advances the Board’s objectives of consumer protection, transparency, and market efficiency.

Our existing role in the market operationalizes consumer data rights under Ontario Regulation 633/21 and the Green Button framework by enabling account holders to access and share their energy data securely. This perspective, focused on data accuracy, consumer authorization, cybersecurity, and interoperable digital systems, is explicitly relevant to the Board’s mandate and falls within the policy perspectives contemplated in section 3.03(b) of the Practice Direction.

2. Established Advisory Role in Provincial Policy and OEB Initiatives

Screaming Power was the primary consultant to the Ministry of Energy in developing the Green Button Regulation and chaired the OEB’s Green Button Working Group.

This work shaped the data access and interoperability standards now relied upon by utilities, consumers, and third parties. Our 25-year history of collaboration with government and the OEB demonstrates a longstanding commitment to public-interest outcomes rather than narrow commercial objectives.



3. Proven Consumer Representation Through Data Custodianship

Screaming Power manages energy data for more than 500,000 customers internationally. We act as a secure, standards-based custodian, enabling consumer-authorized data sharing and supporting data reuse for every rate class.

This role provides a form of consumer representation that is materially different from, and complementary to, traditional intervenor groups. With digitization and DER integration accelerating, the interests of consumers increasingly depend on accurate, accessible, and interoperable data systems. Screaming Power has a recognized history to ensure those interests are represented for everyone's interests

4. OEB-Defined Third-Party Agreements with Ontario Utilities

We hold formal third-party agreements with Ontario utilities under the OEB's Green Button policy and Connect My Data Terms and Conditions.

These agreements confirm our recognized role as a trusted data custodian and reflect an established framework through which we directly support consumers using OEB-approved standards and processes.

5. Prior Contributions to OEB Policy Development

Screaming Power provided detailed submissions to the OEB's DSO Capabilities Consultation (EB-2025-0060), now posted on the OEB website.

These submissions identified critical gaps related to digital interoperability, cybersecurity, consumer consent, and data governance—issues that directly intersect with DER valuation. Continuity of this expertise is vital to avoid fragmented systems and misaligned implementation pathways.

Risk of Consumer Harm if Screaming Power Cannot Provide Appropriate Support

DER valuation and digital data governance involve specialized technical disciplines not otherwise represented among the current intervenor group.

Excluding Screaming Power increases the risk that the resulting framework:

- does not reflect practical realities of data access, consent, and interoperability,
- unintentionally reinforces market structures that limit consumer choice,
- increases implementation costs for utilities and ultimately ratepayers, and
- creates barriers to third-party innovation essential for Ontario's energy transition.

Our equal participation would provide clarity on how DER valuation intersects with consumer authorization, digital standards, and operational data flows, factors that will materially affect the cost, fairness, and feasibility of future DER and DSO models.



Precedent and Fairness

The Board has consistently recognized the value of sector-specific expertise from organizations representing various customer groups. Screaming Power provides a complementary perspective that is not currently represented: independent consumer data governance expertise grounded in technical implementation, support, cybersecurity, and the operational realities of interoperable digital systems.

This perspective is essential to ensuring a robust DER valuation framework that reflects the full diversity of consumer and market considerations.

Commitment to Independence and Public-Interest Participation

Screaming Power does not receive regulated rate recovery, does not own DER assets, and does not participate in DSO or utility ownership structures.

Our work is focused exclusively on enabling secure consumer data access and supporting innovation that benefits all rate classes. We participate in OEB processes with the objective of improving market fairness, transparency, and consumer protection—not to advance commercial self-interest.

We remain fully committed to constructive, evidence-based collaboration with all stakeholders.

Conclusion

Screaming Power respectfully submits that our participation in EB-2025-0268 is essential to ensuring that consumer interests, data interoperability, cybersecurity, and practical implementation considerations are fully incorporated into the DER valuation framework. Granting cost eligibility will allow the Board to benefit from specialized expertise not otherwise present in the proceeding and will support the development of fair, efficient, and consumer-centric outcomes.

We respectfully request that the Ontario Energy Board reconsider its decision and grant Screaming Power cost eligibility for this consultation. We would welcome an opportunity to discuss this matter further at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Michor", with a stylized flourish at the end.

Gary Michor
CEO, Screaming Power Inc.