

January 16, 2026

By email: registrar@oeb.ca

Ontario Energy Board
Attention: Mr. Ritchie Murray, Acting Registrar
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Mr. Murray,

**Re: EB-2022-0325: Comments of Napanee BESS Inc. and Portlands Energy Centre L.P. (collectively, “Atura Power”)
Generic Hearing on Uniform Transmission Rates (UTR) – Phase 2, Issue 5
Implementation of Transmission Charge Exemption for Energy Storage Facilities**

Atura Power appreciates the opportunity to provide comments on the Ontario Energy Board’s (OEB) proposed implementation of transmission charge exemptions for electricity storage facilities, as described in the OEB staff update dated December 10, 2025.

Napanee BESS Inc., owned by Portlands Energy Centre Inc. on behalf of Portlands Energy Centre L.P. (PEC LP) and Ameresco BESS Holding Inc., owns the transmission-connected Napanee Energy Storage facility, a stand-alone battery energy storage system located adjacent to the existing Napanee Generating Station (NGS), wholly owned by PEC LP. The storage facility is scheduled to enter commercial operation in the coming months and will be metered and settled in the IESO-administered market, connected electrically via the NGS high-voltage switchyard to the IESO-controlled grid.

Our comments seek to ensure the final language clearly captures the configuration of transmission-connected storage facilities that are connected to the IESO-controlled grid through customer-owned connection facilities (e.g., generator switchyards).

1. Eligibility for the Transmission Charge Exemption

To avoid inadvertent exclusion of storage facilities that are connected to the IESO-controlled grid through customer-owned connection assets (including generator-owned switchyards) but are wholesale-metered and settled by the IESO, we respectfully request the OEB to add clarifying text that an Electricity Storage Facility need not be directly connected to transmitter-owned assets to benefit from the exemption, provided settlement occurs at a registered transmission delivery point in accordance with the Market Rules. This clarification will ensure that facilities like the Napanee Energy Storage facility or those similarly configured (sharing a common connection point with a generator but fully participating in IESO settlement) are not unintentionally excluded.

On this basis, we respectfully submit that the Napanee Energy Storage facility should be eligible for the transmission charge exemptions established by the OEB. While the facility does not directly connect to the IESO-controlled grid, it is nevertheless electrically integrated into the provincial transmission system through the NGS transmission facilities, and its charging and discharging activities will be fully scheduled, dispatched, and settled through the IESO.

As a result, the facility functions in every material respect as a transmission-connected electricity storage resource for the purposes of the UTR exemption framework.

2. OEB's Prior Determination on PEC LP's Transmission Licensing Status

Importantly, the OEB has previously considered this precise configuration in its response to PEC LP's inquiry regarding transmission licensing obligations associated with the Napanee Energy Storage facility. As reflected in OEB staff's written view:

- The Battery Energy Storage System (BESS) transmission facilities *“will interconnect with the PEC LP transmission system; and the PEC LP transmission system will be used to transmit electricity between the BESS transmission facilities and the IESO-controlled grid.”*
- OEB staff concluded that PEC LP continues to benefit from the transmission licensing exemption under section 4.0.2(1)(d)(i) of O.Reg. 161/99, provided PEC LP does not charge more than its reasonable costs for the transmission of electricity to and from the BESS.
- PEC LP can operate the storage facility pursuant to its electricity generation licence and does not require an additional energy storage licence.

This OEB determination confirms that PEC LP's transmission system is recognized as a conduit to the IESO-controlled grid for the purposes of licensing requirements.

3. Consistency With the OEB's Approach to Regulatory Treatment

Given the prior determination on PEC LP's transmission licensing, we respectfully submit that the Napanee Energy Storage facility should be treated in the same manner as all other transmission-connected storage facilities for purposes of applying the UTR transmission charge exemptions.

To do otherwise would result in an inconsistent regulatory outcome for this facility or those similarly configured that are physically, operationally, and economically indistinguishable from other transmission-connected electricity storage facilities.

4. Request

For the foregoing reasons, Atura respectfully requests that the OEB:

- Clarify that storage facilities connected to the IESO-controlled grid through customer-owned connection facilities constitute “connection to the IESO-controlled grid” for the purpose of the UTR exemption; and,

- Confirm that the Napanee Energy Storage facility or those similarly configured qualify for the transmission charge exemptions applicable to transmission-connected electricity storage facilities under Issue 5 of this proceeding.

We appreciate the OEB's consideration of these comments.

Should you have any questions regarding this submission, please contact the undersigned at margaret.koontz@aturapower.com.

Sincerely,



Margaret Koontz
Sr. Manager, Contracts & Market Affairs

On behalf of:
Portlands Energy Centre Inc. on behalf of Portlands Energy Centre L.P.
and
Napanee BESS Inc.