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**Filed on RESS and Sent via Courier**

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

Dear Ms. Walli:

**Re: Rate Design for Electricity Commercial and Industrial Customers  
Board File No. EB-2015-0043**

We are counsel to Energy Storage Ontario Inc. (“**ESO**”) in relation to the Rate Design for Electricity Commercial and Industrial Customers (“**C/I Rate Design**”) consultation announced by the Ontario Energy Board (the “**Board**”) on May 28th, 2015. ESO hereby requests intervenor status and cost award eligibility in the above-referenced matter. ESO has a direct interest in the C/I Rate Design project as: (i) ESO is the only energy storage industry association in Ontario; and (ii) ESO’s members will be directly and materially affected by the outcome of this proceeding.

ESO is a non-profit, membership-based organization whose mission is to advance the energy storage industry in Ontario through collaboration, education, policy advocacy and research. Its membership includes technology developers, project developers, utilities, research groups, energy consultants and power generators. ESO works closely with other energy storage alliances and associations to push the industry forward.

ESO has a direct interest in the C/I Rate Design proceeding in accordance with the Scope, Objectives and Issues, set out by the Board on May 28, 2015. The Board identifies supporting innovation and leveraging new technology for customers given the evolution of supply as key objectives for the C/I Rate Design project. It also provides that the new rate design adopted by the Board should position distributors for a future in which they will “act more as a service platform offering services such as balancing, power quality, storage, and redistributing power from users connected to their systems”.<sup>1</sup> The members of ESO have clear and unique expertise as both customers and suppliers of energy storage technologies and services. We believe that the rate design solutions as proposed by the Board will be pertinent to energy storage companies going forward and ESO members will thus be directly and materially affected by the

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<sup>1</sup> EB-2015-0043, Letter from the Ontario Energy Board, dated May 28, 2015.

outcome of this process. ESO members also have the direct experience with energy storage that would be useful to the Board in this matter.

In accordance with s. 3.03(b) of the Board's *Practice Direction on Cost Awards*, ESO is eligible to seek an award of costs in this proceeding as ESO is a non-profit industry association and it primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding for which cost award eligibility is sought.

ESO requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, and on the intervenor's counsel, as follows:

**Energy Storage Ontario**

MaRS Cleantech  
Suite 420  
101 College St., Toronto  
Canada, M5G 1L7

Attention: Patricia Phillips, Executive Director  
Telephone: 416-575-8539  
Email: [pat.phillips@energystorageontario.com](mailto:pat.phillips@energystorageontario.com)

**Zizzo Allan DeMarco LLP**

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Please do not hesitate to contact me should you have any questions or concerns.

Yours very truly,



Lisa (Elisabeth) DeMarco

CC: Laurie Reid