

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998 c.15 (Schedule B), s. 78.

**AND IN THE MATTER OF** proposed amendments to the  
Transmission System Code and the Distribution System Code  
to Facilitate Regional Planning.

**EB-2016-0003**

**NOTICE OF INTERVENTION**  
**ENERGY STORAGE CANADA**

**October 3, 2017**

## **A. Application for Intervenor Status**

1. Energy Storage Canada (**ESC**) hereby requests cost-eligible intervenor status in EB-2016-0003 (the **Proceeding**), the Ontario Energy Board's (**Board's**) proceeding regarding proposed amendments (the **Proposed Amendments**) to the Transmission System Code and the Distribution System Code to facilitate regional planning. This notice of intervention is filed pursuant to Rule 22 of the Board's *Rules of Practice and Procedure*.

## **B. ESC and its Interest in the Proceeding**

2. ESC is the only energy storage industry association in Canada. It is a non-profit, membership-based organization that was founded in 2012 as a subgroup of the Corporate Partners Committee under the Smart Grid Forum. Its mission is to advance the energy storage industry in Canada through collaboration, education, policy advocacy, and research. ESC takes an unbiased view toward energy storage technology. ESC's membership includes: (i) technology developers, (ii) project developers, (iii) utilities, (iv) research groups, (v) energy consultants, and (iv) power generators. ESC works closely with other energy storage alliances and associations to push the industry forward.
3. ESC provides the Board with the perspective of energy storage industry stakeholders. The members of ESC have clear and unique expertise as both customers and suppliers of energy storage technologies and services. ESC members will be directly and materially affected by the Proposed Amendments. ESC members also have direct experience with energy storage and its impacts and benefits on electricity distribution and transmission that is likely to be useful to the Board in this Proceeding and will contribute a better understanding by the Board of how the Proposed Amendments will impact energy storage industry stakeholders.

## **C. Nature and Scope of ESC's Intended Participation**

4. ESC intends to be an active participant in the Proceeding and will act responsibly to coordinate with other intervenors where common issues may arise and may be addressed. ESC intends to participate actively by providing detailed comments on the Proposed Amendments.

**D. Costs**

5. ESC is, in accordance with s. 3.03(b) of the Board's Practice Direction on Cost Awards, eligible to seek an award of costs as ESC is a party that primarily represents an interest or policy perspective that is relevant to the Board's mandate and to the Proceeding.
6. The Board has also deemed ESC an intervenor eligible for costs in its proceeding on rate design for electricity commercial and industrial customers (EB-2015-0043).
7. ESC therefore submits that it is appropriate for the Board to award ESC costs in the context of this Proceeding, and hereby requests cost eligibility.

**E. ESC's Representatives**

8. ESC hereby requests that further communications with respect to this proceeding be sent to the following:

**Energy Storage Canada**  
MaRS Cleantech, Suite 420  
101 College St.  
Toronto, ON M5G 1L7

Attention: Patricia Phillips  
Telephone: 416-575-8539  
Email: [pat.phillips@energystoragecanada.org](mailto:pat.phillips@energystoragecanada.org)

AND TO ITS COUNSEL

**DeMarco Allan LLP**  
5 Hazelton Avenue, Suite 200  
Toronto, ON M5R 2E1

Attention: Elisabeth DeMarco  
Telephone: (647) 991-1190  
Facsimile: 1-888-734-9459  
Email: [lisa@demarcoallan.com](mailto:lisa@demarcoallan.com)

Attention: Cary Ferguson  
Tel: 1-888-389-5798  
Facsimile: 1-888-734-9459  
Email: [cary@demarcoallan.com](mailto:cary@demarcoallan.com)

Attention: Jonathan McGillivray  
Tel: 1-888-389-5798  
Facsimile: 1-888-734-9459  
Email: [jonathan@demarcoallan.com](mailto:jonathan@demarcoallan.com)

ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS  
2<sup>nd</sup> day of October, 2017

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long, sweeping horizontal stroke that ends in an arrowhead pointing to the right.

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Lisa (Elisabeth) DeMarco  
DeMarco Allan LLP  
Counsel for ESC