

October 2, 2017

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27<sup>th</sup> Floor  
2300 Yonge St  
Toronto, ON  
M4P 1E4

**Re: Proposed Amendments to the Transmission System Code and the Distribution System Code To Facilitate Regional Planning**  
**Board File No.: EB-2016-0003**

Dear Ms Walli,

Further to the Board notice dated September 21, 2017 and the Board's *Practice Direction on Cost Awards*, we are writing to request intervenor status and cost award eligibility in relation to the above-mentioned consultation initiative. We believe the changes proposed by the Board could have significant impacts for a wide range of customers who have or could have on-site clean electricity generation, and may affect generators in Ontario directly.

**Representation and Experts**

CanSIA proposes to retain an expert to assist with preparation of comments on the expected staff report and other eligible activities as appropriate. CanSIA is therefore requesting cost eligibility for this proceeding.

**Practice Direction and other Funding**

CanSIA currently does not have access to other funding to enable its participation in this initiative.

In accordance with Section 3 of the Board's *Practice Direction on Cost Awards*, CanSIA believes that it is eligible for an award of costs as it represents potentially affected customers as well as a public interest relative to the Board's mandate (s.3.03(b)) and CanSIA members are persons with interests that will be affected by the outcome of the process (2.3.03(c)). CanSIA is an association that represents clean power and solar electricity generation and technology providers, who are often customers of distribution and/or applicants in other related proceedings. As a result, CanSIA submits that special circumstances exist to find that it is eligible for a cost award in this process despite the fact that certain of its members may fall within s.3.05(b) of the Practice Direction.

CanSIA is a non-profit organization representing solar electricity generators in Ontario. CanSIA members are customers of transmission and distribution utilities in Ontario, and many have current connection applications in development or underway.

CanSIA and its members have a significant interest in this consultation initiative.

CanSIA will take steps to co-ordinate with other generator organizations and limit its participation to issues of material concern to generators.

CanSIA submits that it should be eligible for costs on the following grounds:

(a) CanSIA represents a Class of Consumers in this Proceeding: New charges that may result from this proceeding could have material impact on the business conditions faced by generators. Therefore, notwithstanding s. 3.05 of the Practice Direction, special circumstances exist that would warrant an award of costs pursuant to section 3.07 of the Practice Direction.

(b) It is in the Public Interest to Facilitate Generator Participation: CanSIA's members are building and planning new projects in response to Government of Ontario procurement programs such as the Large Renewable Procurement, FIT and microFIT programs, net metering regulations, and potentially through the upcoming Green Ontario Fund programs. Given that the issues in the present proceeding are to some extent generation-related, and likely to be of greatest concern to proponents of small-scale generation, the Board should facilitate the participation of generators in order to provide the best evidentiary basis for its determination. Many of CanSIA's members are too small to participate individually in a meaningful way in this proceeding. CanSIA's participation facilitates the involvement of such members, and ensures that the Board has before it a comprehensive representation in this proceeding from the power generator community.

(c) CanSIA's Participation Contributes to Hearing Efficiency: CanSIA's representation of its members in such a proceeding would be a much more effective and efficient regulatory approach than having each of its members make their own interventions, with attendant duplication and extra costs. CanSIA has participated similarly in electricity hearings.

(d) Full and informed CanSIA Participation Requires Intervenor Funding: CanSIA, like other trade associations such as the Association of Power Producers of Ontario ("APPRO") does not

have independent funding sufficient to support efficient and effective participation in the proceedings and it would not be able to do so absent same.

The above is not an exhaustive list of CanSIA's interests in this proceeding. There may be other issues of concern to CanSIA that arise or develop during the proceeding. CanSIA seeks at all times to retain and reflect the perspective of the solar electricity generation industry as a whole, and to present a balanced view of policy issues affecting the electricity industry and the public at large in Ontario.

On the basis of the foregoing, CanSIA respectfully requests that the Board approve its request to participate as an intervenor, and for the related cost eligibility.

Sincerely,

A handwritten signature in black ink that reads "Wesley Johnston". The signature is written in a cursive style with a large, sweeping initial "W" and a long horizontal flourish at the end.

Wesley Johnston  
Vice President