

February 25, 2019

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

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

Dear Ms Walli,

The Canadian Solar Industries Association (CanSIA) is writing to the Board to register our intent to participate in the Rate Design for Electricity Commercial and Industrial Customer Board File No. EB-2015-0043. Based on the Board letter dated February 21, 2015 and the Board's *Practice Direction on Cost Awards*, CanSIA is requesting cost award eligibility in relation to the above mentioned consultation initiative.

**Representation and Experts**

CanSIA would benefit from subject matter experts to assist in this consultation and is therefore requesting cost eligibility for this proceeding.

**Cost Award Eligibility**

At this time, CanSIA does not have access to funds that would enable its participation in this initiative.

CanSIA believes that it is eligible for cost award based on Cost Eligibility defined in Section 3 of the Board's *Practice Direction on Cost Awards*. CanSIA represents a public interest relevant to the Board's mandate (Section 3.03 (b)) and our members are also persons with interests that would be affected by the outcome of the initiative and Board process (Section 3.03 (c)). CanSIA represents generators as well as technology providers who are primarily customers of distribution and may be applicants in other relative proceedings. Although certain members of CanSIA may be ineligible under Section 3.05 (b), CanSIA believes that special circumstances exist to allow it to be eligible for cost award in this process.

CanSIA is a national trade association that represents solar energy companies throughout Canada. Since 1992, CanSIA has worked to develop a strong, efficient, ethical and professional Canadian solar energy industry with capacity to provide innovative solar energy solutions and to play a major role in the global transition to a sustainable, clean-energy future. CanSIA members are customers of distribution utilities in Ontario, and many of our members have applications for distribution connection in development. CanSIA members in the recent past have experienced many challenges associated with constructing and operating distribution connections. CanSIA believe that adjustments to rate design considered in this initiative could address many of these challenges.

Solar generation technology along with smart grid and energy storage technologies are evolving rapidly. CanSIA believes that distributors will be able to provide increased value to their customers based on the wide range of technology evolution and our members believe that future partnerships and collaboration between solar generation providers and distributors will be a major part of this increased value proposition. Future adjustments to rate design can support or hinder the value proposition of solar generation. This will have a significant impact on CanSIA members and therefore CanSIA has a significant interest in this consultation initiative.

CanSIA believes it is eligible for cost award based:

i) Representation of a Class of Consumers:

Solar Generation providers may be required to pay a new charge that could have an impact on their business and the economics of their facilities. Special circumstances therefore exists that would warrant an award of costs in accordance with Section 3.07 of the Practice Direction.


ii) Funding is Required for Proper Participation by CanSIA:

Without intervenor funding, CanSIA effectiveness in the proceedings will be limited. Similar to other associations in the electricity sector, CanSIA does not have independent funding to support participation in the initiative while a cost award would support the ability to participate to our full capabilities.

iii) Public Interest to Facilitate Small Solar Participation:

Many solar developers are too small or are private individuals who would not participate in a meaningful way in this proceeding. CanSIA's participation facilitates the involvement of these members and would ensure that the Board has a comprehensive representation of the thousands of consumers who are considering or have installed solar generation as an intervenor. CanSIA requests to prepare comments on the Draft Report of the Board, participate in the stakeholding meetings and requests that CanSIA be cost eligible for this proceeding.

Sincerely,



Wesley Johnston

Vice President, CanSIA

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