



September 16, 2019

Submitted electronically via [boardsec@oeb.ca](mailto:boardsec@oeb.ca)

**Re: Board File Number: EB-2019-0207**

**Distributed Energy Resources Connections Review Initiative**

---

Evolugen is Brookfield Renewable's Canadian business. Brookfield Renewable is a global developer, owner and operator of renewable energy resources. Worldwide, Brookfield Renewable businesses and affiliates have a portfolio of 17,400 MW of installed capacity and approximately \$47 billion in assets under management. In Canada, Evolgen owns and operates 33 hydropower facilities and 3 wind farms in Quebec, Ontario and British Columbia, representing 1,770 MW of installed capacity. We continuously evaluate opportunities to expand our role across Canada as an investor, developer and owner/operator.

Evolugen appreciates the opportunity to provide comments on the Distributed Energy Resources Connections Review Initiative. We recommend the following:

- The OEB should adopt and enforce Open Access principles on the distribution level. Incumbent Local Distribution Companies ("LDCs") should provide fair, transparent, and equal access to all Distributed Energy Resources ("DERs") developers that wish to connect to their grids. To be clear, grid access should not be a barrier to entry for DER technologies to access the Ontario market. LDCs should only act as neutral system operators to facilitate independent investors, operators, and developers to compete. Without a level-playing field where individual companies can freely enter, Ontario rate-



payers would be deprived of best-in-class cost-saving DER technologies. For this same reason, Open Access has been implemented at the transmission and wholesale level to discourage preferential treatment that could impede competition. The OEB should enforce the same Open Access principles on the distribution level.

- The OEB and its regulated entities should design, maintain, and evolve market rules, codes, and policies that are predictable, consistent, and stakeholdered. Further, the stakeholdering processes should be transparent, open, and inclusive. Predictability, consistency, and engaging stakeholdering help to maintain investor confidence and their willingness to invest in Ontario.
- The OEB should consider transmission cost avoidance as an incentive for DER adoption and integration. In other words, the OEB should encourage DERs as alternatives to costly transmission upgrades. To this end, the transmission costs avoided by DER projects could be provided as an incentive. The OEB should consider similar initiatives from other jurisdictions (e.g. Alberta's "Option M" and transmission loss credit/charge system).
- The OEB should enable municipalities, universities, school boards, and hospitals, as well as other Commercial and Industrial customers to procure DER solutions that best suit their needs. Again, LDCs should only act as an enabler by providing fair, transparent, and equal access to their network. End-users should be empowered to make local choices with the DER suppliers of their choice.
- Finally, Evolgen wishes to remind the OEB that many existing assets can achieve the same local reliability benefits as DERs. For example, existing hydro facilities can rapidly respond to dispatch, provide ancillary services, and act as storage resources. Wind resources can be bundled with storage technologies to provide flexible, low-cost, and emissions-free energy to the grid. These existing resources have proven operational history, are cost-effective, and do not require the additional investment needed to build new DER assets. They can act as affordable and dependable local resources as both



stand-alone units and in combination with DERs (e.g. paired with storage). As the OEB reviews DERs' integration in the Ontario grid, it should not neglect the utility and potential of existing assets.

Once again, Evolugen appreciates the opportunity to provide comments. We welcome future participation in the Working Group and future stakeholdering processes.

Thank you,

Julien Wu

Senior Manager, Regulatory Affairs, Canada

41 Victoria Street, Gatineau, QC J8X 2A1

T 819.561.2722 ext. 6572 C 819.360.8163

[julien.wu@evolugen.com](mailto:julien.wu@evolugen.com)