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Via email to boardsec@oeb.ca

**Re: Utility Remuneration (EB-2018-0287) and Responding to Distributed Energy Resources (EB-2018-0288)
Written Comment Phase Following February Stakeholder Meeting**

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry. Attached please find a list of PWU employers.

The PWU appreciates the opportunity to provide input on Utility Remuneration and Responding to Distributed Energy Resources September Stakeholder Meeting. The PWU is a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of low-cost energy to the competitiveness of Ontario's economic sectors.

The PWU believes that OEB policy and initiatives should deliver energy at the lowest reasonable cost while stimulating job creation and growing the province's gross domestic product (GDP). We are respectfully submitting our detailed observations and recommendations.

We hope you will find the PWU's comments useful.

Yours very truly,

Jeff Parnell
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Encl.

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Power Workers' Union (PWU)

Utility Remuneration and Responding to Distributed Energy Resources

EB-2018-0287 & EB-2018-0288

The Power Workers' Union (PWU) is pleased to submit comments and make recommendations to the Ontario Energy Board (OEB) regarding the Utility Remuneration and Responding to Distributed Energy Resources (DER) consultation. The PWU is a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of planning for low-cost energy solutions to enhance the competitiveness of Ontario's economic sectors.

On September 17-19, 2019, the OEB held stakeholder meetings to help inform the scope of the consultations. The PWU submitted comments to this September consultation. On February 20, 2020, the OEB convened a second session to summarize the feedback it had received. The OEB synthesized the stakeholder inputs into guiding principles, needs, objectives, issues, and the resultant scope of the DER Integration and Utility Remuneration consultation.

The PWU provided several recommendations as follows:

1. A basis for new DER capacity be established by the demand and supply balance of the province.
2. The total system cost be assured to decline.
3. Utilities be permitted to introduce new DER technologies at their own risk.
4. A definition of DERs be created to capture how they may impact the overall system.
5. Ensure DER decisions are informed by appropriate price signals.

We reiterate that these points remain relevant to the consultation as the OEB moves forward on these matters.

The PWU offers several recommendations in the following six categories in response to the OEB's February 20th consultation and the associated materials it provided:

1. Five overarching **guiding principles** should govern how DER costs are treated, as established by the existing regulatory framework;
2. Language and **terms** be provided that articulate and reflect the guiding principles and interpretation of needs, objectives, and issues;
3. The **needs** underpinning these consultations require confirmation;
4. The **objectives** of the consultations warrant refinement;
5. The **issues** to be addressed by the consultation could benefit from additional focus; and,
6. The **scope** of the consultation must be sufficient to ensure that the objectives can be met.

GUIDING PRINCIPLES

We believe several themes are important to the issues being addressed by this consultation and should form the basis of the guiding principles.

Recommendation #1 - Five overarching principles should govern how DER costs are treated, as established by the existing regulatory framework.

1. DER, and any innovation, should sustain the regulated services levels defined in the Distribution System Code (DSC) on a lowering cost basis for consumers.
2. Any approach that would increase costs should not be eligible for rate-based cost recovery.
3. Cost shifting between ratepayer classes should not occur unless predicated on a beneficiary pays basis.
4. The beneficiary pays principle should apply to all DER deployments and should recover the full impact on total system costs.
5. Decisions and policies must be informed by transparent, evidence-based research and analysis.

While several factors motivate these guiding principles as described in previous PWU submissions, the foremost driver should be that the guiding principles are driven by the mandate of the OEB. The OEB mandate from the Ontario Energy Board Act, 1998, states that the first two board objectives for electricity are:¹

1. To inform consumers and protect their interests with respect to prices and the adequacy, reliability and quality of electricity service.
2. To promote economic efficiency and cost effectiveness in the generation, transmission, distribution, sale and demand management of electricity and to facilitate the maintenance of a financially viable electricity industry.

The first element of this mandate emphasizes “protecting [consumer] interests” and addresses two points:

1. *Interests with respect to prices*

Consumers in all rate classes advocate for low cost electricity now and on an ongoing basis for all rate classes at all times. This means regulated rates for all classes should consistently trend lower. Cost shifting between classes would be a violation of this element of the OEB’s mandate unless predicated on the principle of the beneficiary pays.

2. *Adequacy, reliability and quality of electricity service*

The technical requirements for these mandate elements are established by the DSC and the associated standards and define the levels to which consumers have grown accustomed. Consumers expect that these regulated services will be provided at ever lowering costs.

There is no element in the OEB mandate that refers to “choice” or “value”. The CME and AMPCO stated in their September² submission that consumers do not want “choice” or new “value”, they want an ever-decreasing cost of the electricity services they have been provided historically.

The second element of the OEB’s mandate addresses *economic efficiency and cost effectiveness* to: *Facilitate the maintenance of a financially viable electricity industry*. This second element underpins the OEB’s rigorous rate submission process. The PWU believes it is incumbent upon the utilities to demonstrate that they are cost-effectively and efficiently delivering the *adequacy, reliability and quality of the electricity services*, as defined by the DSC.

¹ Ontario Energy Board Act, 1998, Section 1, as currently amended

² OEB Utility Remuneration and Responding to DER Consultation presentations, September 17-19, 2019

This means that maintaining the financial viability of the electricity industry requires utilities to: ***sustain the regulated services levels defined in the DSC with a focus on lowering costs for consumers.***³

This last point is the fundamental driver for the guiding principles that should form the basis for any DER deployment. To ensure this is achieved, two different paradigms should be recognized and considered:

1. The regulated rate-base; and,
2. The unregulated areas for additional services and “value”.

Consumers subject to the regulated rate-base should not be at risk of bearing costs that may “spill” over from investments made in and or activities related to “unregulated” services. While it is important that electricity stakeholders have the freedom to invest in “unregulated” services they should not negatively impact on the adequacy, reliability, quality and cost of services to regulated rate payers.

USE OF TERMS

A review of OEB staff’s proposed Guiding Principles indicates a need to clarify several terms used in the OEB’s February 20th materials.

Recommendation #2 - Language used to articulate the guiding principles and interpretation of needs, objectives, and issues should be clarified to reflect the proposed guiding principles.

In the context of the regulated rate base, several issues emerge regarding the OEB Staff suggested principles and use of terms.

1. Cost containment

This is not the same as “cost reduction”. Combined with the nebulous definition of “customer value”, these two terms represent undefined cost risks to consumers. Declining rate payer costs should be the guiding principle, not cost containment.

2. Consumer value

The term “value” is not defined. The OEB acknowledged that there is no consensus on how “value” should be defined.⁴ As consumers, the only value to the regulated rate base is decreasing costs for the services they have historically received. The undefined term “value” should not be used in the context of the rate base anywhere in this process.

3. Consumer Choice

In their September submission, the Canadian Manufacturers and Exporters (CME) clearly indicated that consumers in the regulated rate base do not want “choice”. These consumers want lower cost for the services they receive. The CME challenged anyone to

³ For clarity, any rate-based implementation should reduce the bill impacts of total system costs whereby total system cost includes all elements that factor into regulated rate elements of consumer bills. These costs include generation, transmission, distribution and the activities of the IESO. For clarity, regulated elements include the Regulated Pricing Plan (RPP) and the related administration of the Global Adjustment as it applies to all rate classes.

⁴ OEB Utility Remuneration and Responding to DER Consultation presentation, page 30, February 20, 2020

identify who these consumers are that want choice and are willing to pay higher costs for it.⁵ If these consumers can be identified, then unregulated services should be allowed to provide them with this “choice”, **but at no cost to the rate base**.

4. Economic Efficiency and Performance

This guiding principle appears to be a reinterpretation of the OEB’s second objective. The term “long term value” should not be used. The principle should be ever decreasing prices for all rate payers for the services they expect. Additionally, the rationale for the inclusion of the term “safety” is unclear as it is already encompassed within the DSC and Electrical Safety Authority (ESA) standards invoked therein. There should be no trade-off here on reliability and service quality. These are determined by the DSC and consumers expect this to improve as costs are lowered. This lowering of costs while improving service levels should be the explicit objective of innovation in the sector.

5. Optimal Use of Existing Assets

The term “optimal” is not defined. The “optimal” use of existing assets should be defined as the continued use of them until new approaches are determined to be more cost effective. This determination must fully consider the cost implications to rate payers of any stranded asset(s). This is the underlying foundation for any business case. New approaches should transparently and simultaneously demonstrate improvement to the “adequacy, reliability and quality of electricity service” and at a lower cost to all ratepayers. Any new approach that fails this test should not be included in the regulated rate base. If deployed as an unregulated service, fees for the use of those services should include the total system cost impacts in accordance with the beneficiary pays principle.

6. A clear distinction between the use of “Host Customer” vs “Consumers” is required.

In the Needs Summary, “consumers” should be defined as “rate payers”. “Customers that have adopted DER” technologies on their premises should be defined as “Host Customers” or vice versa, to provide greater clarity. Host Customers have no relevance to rate payer costs. Host Customers with DER facilities wishing to offer services to the electricity system should do so in accordance with some form of contractual relationship. This should be based on a well-defined need for these services and that they provide a clear cost benefit to ratepayers.

These recommended improvements to how these terms are used have a direct bearing on how the OEB’s summary of Needs, Objectives, and Issues should be interpreted. As such, appropriate redefinitions and specificity are required not only for the guiding principles but must also be applied to clarifying the intent of the needs, objectives, issues, scope, next steps and subsequent deliverables that emerge from this consultation.

⁵ CME, Response to OEB Utility Remuneration and Responding to Distributed Energy Resources (DER) Consultation, 2019

NEEDS

The OEB materials characterize this consultation as having two distinct parts that are motivated by separate needs:

1. Utility Remuneration is about activities that utilities undertake and how their incentives should be structured so that they make investments in the interest of ratepayers;
2. DER Integration addresses how unregulated DER assets in the marketplace could be best used by the system.

The OEB has provided needs statements that form the underpinnings of the consultation. A consensus on the legitimacy of these need statements is a fundamental prerequisite. Several recommendations are provided to confirm and validate the needs statements and the principles that underpin them.

Recommendations #3: The “Needs” upon which the Utility Remuneration consultation is based require clarification and confirmation.

1. Needs should reflect the low-cost objectives and use of terms proposed and described in Recommendation #2.

The OEB’s proposed need statements would be appropriate assuming that they reflect the afore noted low cost objectives and terms for the guiding principles, the importance of cost/benefits analyses (CBA) for decision making, and, the protection of the regulated rate base.

2. Framework for utility remuneration depends on whether utility DER choices belong in the rate base or are best unregulated.

This distinction is particularly relevant to manage and appropriately allocate evolving risks. For initiatives and investments established to positively reduce ratepayer total bill costs for the same or better services, rate-based utility remuneration models are appropriate. For any other initiatives, there is a need to ensure that the utilities bear all of the risk for any such “unregulated” activities they pursue.

3. Urgency to address utility remuneration must be clearly established via a CBA, absent the distorting influences of the Industrial Conservation Incentive (ICI) and net metering programs.

DERs are currently costly technologies and are expected to remain so except for select and limited applications (e.g. ancillary services such as frequency response).^{6,7} The OEB’s Market Surveillance Panel (MSP) called for a change to the ICI and wrote that “both market efficiency and fairness of the ICI can be enhanced” through various changes to it, including not providing “a private incentive to build on-site capacity that significantly exceeds the cost of centrally procuring grid connected capacity, as is the case with the ICI incentive today”.

As such, the urgency of addressing future DER integration at this time may be overstated.

⁶ Lazard, Levelized Cost of Storage Analysis v5.0, 2019

⁷ Strategic Policy Economics, DER in Ontario, 2018

Recommendations #4: The premise for the needs that underpin the DER integration consultation must be clarified and validated. The needs statements and/or supporting rationale should be more clearly defined, specifically:

1. Consumers are primarily adopting DER to take advantage of the ICI and net metering programs, not for any other energy needs.

The OEB offers that “Consumers are adopting DERs to meet their own energy needs” as the driver for why system planning and control efforts should accommodate DERs. It should be clearly stated that current DER deployment is driven by the ICI and net metering policies. Both violate the recommended guiding principles as they cause cost shifting between ratepayers without providing any net system cost benefit. The excessive cost of current DER deployments is being borne by Class B ratepayers.⁸

The PWU suggests that the OEB consider the rate designs that are resulting in these costly DER deployments and negatively impacting ratepayers before prioritizing approaches that will result in further installations.

2. The needs statements must recognize that there may be an opportunity to take advantage of DER assets, but no clear need has yet been established.

The OEB postulates that utilities may be able to leverage DERs to meet system needs. This may be true. However, concluding that there is therefore “a need to take advantage of DER assets” ignores a fundamental reality. The need will be determined by what a utility requires to continue **to sustain the regulated services levels defined in the DSC on a lowering cost basis for consumers**. While DER options may be available, any such decision should require an evidence-based analysis to demonstrate that there will be a net system benefit and positive outcome for ratepayers.

3. There may be cost reduction advantages to utilities from sharing information through a system needs procurement process that could be satisfied by DER.

The OEB material suggests that coordinated DER deployment can lead to mutual benefits for “host customers” and ratepayers which supports the need to share information.

Firstly, there are no provisions that obligate Ontario’s electricity system to provide host customers with additional value or to share system benefits. The market and procurement process will determine what services are provided to meet system needs. Information sharing should transparently support and facilitate required competitive procurements from DER providers.

Secondly, absent distorting rate designs like the ICI, current analyses show that DER is a high cost solution that is unlikely to offer ratepayer benefits for over a decade.⁹ The OEB conclusion that “DER adoption should be encouraged” is therefore misplaced given the absence of any evidence-based research that establishes DERs provide a benefit to ratepayers.

During the Feb 20th session, stakeholders argued that the material appeared to be more supportive of increasing value for DER proponents and Utilities rather than for ratepayers.

⁸ OEB, MSP Report on the Industrial Conservation Initiative, 2018

⁹ Council for Clean and Reliable Energy, “Renewables-based Distributed Energy Resources in Ontario Part 2: Cost Implications”, 2019

OBJECTIVES

The PWU agrees with the OEB that an overarching objective be that consumers remain appropriately protected and that “customer choice” does not negatively impact others. Impacts to be avoided, as defined in the guiding principles suggested above, include impacts that increase a customer’s bill and/or shift cost to other ratepayers.

The objectives should be rephrased to capture the appropriate definitions and use of terms described earlier (e.g. emphasize cost reduction, not “value” or “cost effectiveness”).

Recommendations #5: It is recommended that two additional objectives be adopted for the Utility Remuneration considerations:

1. CBAs be used to backstop recommended actions regarding DERs with evidence-based decision-making criteria and that such CBAs must demonstrate a lowering of consumer bills for the same or better services; and,
2. New services that come with additional costs and are desired by some customers, who are willing to pay for them, should be unregulated and that the Utilities assume the risk for these undertakings.

Recommendations #6: The objectives regarding DERs should be rephrased to reflect the aforementioned guiding principles:

DER integration should reduce costs to ratepayers, not present new/undefined higher cost value propositions. DER deployments should be based on full and transparent CBAs and business cases that clearly establish the reductions in ratepayer bills that they offer for existing and/or better services. This should include demonstrating that the DER benefits outweigh the costs of stranding any assets based on total electricity system costs.

ISSUES

The issues/set of questions summarized in the OEB materials are appropriate with one caveat: The definition of the desired “outcomes” requires work to achieve greater specificity and alignment with the guiding principles. Several other matters also warrant further discussion:

Recommendations #7: The definition of DER should be formalized, specifically with respect to the system benefits provided, such as dispatchable vs non-dispatchable DER.

1. Dispatchable resources allow the system to determine the optimal use of the resource required to meet the need(s).

Dispatchable DERs are those that can be turned “on or off” by the local utility or the IESO. These are more desirable due to the flexibility they offer, as the IESO has suggested.¹⁰

2. Non-dispatchable DER resources can result in unexpected and challenging operational behaviors that must be managed by the system.

Non-dispatchable DERs, such as roof-top solar, cannot be controlled by system operators. A better understanding of their operational characteristics and how these differ from traditional resources is required for the distribution system planning process. Unanticipated, rapid changes to assumed load behavior can lead to unexpected costs, e.g., residential EV charger deployment may overload some residential feeders. A new rate class may be required to reflect the incremental system costs of managing these new behaviors. There is

¹⁰ IESO Energy Storage Advisory Group, Storage Design Project (SDP): Overview of Interim Design Features

also a need to assume a future scale up to avoid the scenario where early adopters get a free-ride while late adopters pay a disproportionately high sum or are excluded.

The net scale from the proliferation of DER may also have implications for both utilities and the IESO managed bulk system. When such devices get connected, their intended behavior should be identified so that proper full system cost implications can be applied in accordance with the beneficiary pays principle.

Recommendations #8: Establish criteria for determining what should or should not be in the regulated rate base vs. the unregulated rate base.

The rate base does not provide risk funding for unproven innovations nor should ratepayers be expected to assume the risk of paying for these new technologies until the cost and benefits have been clearly established. New and untested innovations belong as unregulated commercial services until benefits are proven to reduce costs on a CBA and business case basis.

Recommendations #9: Define the approach to be used to distinguish how the short- vs. long-term benefits of DER are handled for rate and utility remuneration purposes.

In the near term, some consumers may desire DER enabled services and may be willing to pay the cost. However, the “beneficiary pays” principle may make it exorbitantly expensive for the first users. As the scale of usage increases (e.g. more consumers want the services) these services may become more economical. Until the demand for such services achieves the kind of scale to warrant inclusion in the rate base, the cost of unregulated services, utility remuneration framework for investing in them, the long-term cost implications, and the anticipated pace of deployment must be transparently evaluated to protect other ratepayers.

SCOPE

The scope of the consultation should be clarified to explicitly address all of the objectives and issues presented by the OEB and those previously noted in our submission. There are some additional areas that warrant discussion in upcoming consultations.

Recommendations #10: The scope of the consultations should be expanded to include:

1. Validation of the need for utility remuneration to accommodate DERs by establishing the contextual factors necessary to begin a conversation on revenue requirements and return on investment (ROI):
 - a) What is the view on system needs and benefits related to DERs, expected savings and anticipated costs, and when will these savings become material to ratepayers and outweigh cost risks?
 - b) What current problems are DERs suitable for resolving? What problems are being created by DER solutions? How can these be corrected?
 - c) What current hurdles are preventing the realization of benefits to ratepayers? What future hurdles are anticipated? Timing?
 - d) The PWU believes that DER resources offer limited opportunities for cost benefit to ratepayers at this time, as such the fundamental question of whether they do must be addressed.
2. Develop the business case for articulating utility revenue requirements and acceptable rates of return on these investments.

The level of investment, operational costs and benefits associated with the anticipated scale of DER deployment is of particular importance. All of these factors are germane to the questions regarding the magnitude and materiality of revenue requirements.

An assessment of what should and should not be included in the rate base must be part of the scope as previously discussed. This information is critical in order to address the questions raised by OEB staff.

3. New behaviors by consumers should only be accommodated on a beneficiary pays principle.

From a technical perspective, DER behaviors typically vary from those of traditional loads assumed in distribution system planning and need to be better understood. This behavior variability, whether caused by Behind-The-Meter (BTM) DER storage, ICI load displacement technologies and/or solar net metering, can cause limitations on feeder designs and system response. This principle extends similarly to EV charging stations, whereby there are limits to how many the existing infrastructure can safely support without upgrades.

4. The associated rate design implications, in general, and those from new resources must be addressed within this scope, not be excluded.

Current rate designs mask the true costs of DER and that the costs are being borne by Class B ratepayers, as mentioned earlier. A CBA based long-term framework for DER adoption will be impossible to achieve without considering the impacts incentivizing BTM behaviors has on rates.

The OEB has identified the need to assess the implications of new resources for rules, requirements, and rate setting as being essential elements of DER integration.¹¹ Understanding what the essential characteristics are of these “new resources” is essential to framing the possible rate structure options as well as the total system cost impacts that will be essential for any DER CBAs.

Furthermore, since the ICI is responsible for most DER adoption, it seems prudent to address the policy framework for industrial rates before making sweeping changes to the regulatory system that may or may not be needed if DER adoption is slowed.

5. This consultation should be coordinated with others that the OEB and the IESO have underway at present.

In the February 20th materials, the OEB listed 10 consultations that are proceeding at the OEB and the IESO. There are many interdependent elements among these consultations that represent significant implications for electricity planning, operations, and pricing.

The PWU sees parallels between the concerns expressed in this submission and those made to the DER Connections review. Many of those have been deferred for consideration to this consultation. The factors related to total system cost and cost shifting will impact the DER Connections review consultation, as the OEB proceeds to design minimum requirements for application forms. The content of these application forms, in turn, will be used to drive the conduct of cost impact assessments. Coordinating mechanisms among the OEB managed consultations are not clear.

¹¹ Feb 20th materials, page 53

Similarly, the IESO examination of DERs, e.g., ESAG activities, will provide important information, such as the significance of dispatchable resources, to help inform CBAs and definitions. Co-ordination among all of the OEB and IESO initiatives will be a critical factor for ensuring these respective consultations achieve a successful outcome.

Specific tag points should be reflected in the work plans of all OEB consultations to ensure a uniform baseline of definitions, assumptions and priorities is provided to and considered by the participants in these respective consultations. To do so may require a more formalized parent consultation to achieve this commonality. Absent such co-ordination, the risk increases that the process will be inefficient and lead to unfavorable outcomes.

CLOSING

The PWU is concerned that not addressing these issues represents significant risks to ratepayers reminiscent of the unanticipated cost consequences of the *Green Energy Act* (GEA). Under the GEA, ratepayers became responsible for the cost of new technologies that did not benefit the system, with these increased costs becoming locked into the global adjustment, the driving cost component of all rate payer rates.

The PWU has a successful track record of working with others in collaborative partnerships. The PWU is committed to the following principles: Create opportunities for sustainable, high-pay, high-skill jobs; ensure reliable, affordable electricity; build economic growth for Ontario's communities; and, promote intelligent reform of Ontario's energy policy.

We believe these recommendations are consistent with, and supportive of the objectives for supplying low-cost and reliable electricity in Ontario. The PWU looks forward to discussing these comments in greater detail at the OEB's convenience and working with the OEB and other energy stakeholders to advance innovation across Ontario's electricity system.