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April 14, 2021

SUBMITTED VIA ELECTRONIC MAIL TO REGISTRAR@OEB.CA

Ms. Christine Long
Registrar
Ontario Energy Board 2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Re: Framework for Energy Innovation Working Group – EB-2021-0118

Dear Ms. Long:

Advanced Energy Management Alliance (“AEMA”) welcomes the opportunity to provide you with comments relating to the **Framework for Energy Innovation Working Group – EB-2021-0118**. AEMA is a North American trade association whose members include distributed energy resources (“DER”), demand response (“DR”), and advanced energy management service and technology providers, as well as some of Ontario’s largest consumer resources, who support advanced energy management solutions due to the electricity cost savings those solutions provide to their businesses. These comments represent the views of AEMA as an organization, not any individual company, except as noted below.

AEMA supports Ontario Energy Board’s (“OEB”) path forward for the Framework for Energy Innovation consultation, including the outlined priorities and the creation of a Working Group to engage representatives from the sector. Numerous stakeholders, including members of AEMA, have experience working with utilities and regulators in other jurisdictions to develop and participate in non-wires solution (“NWS”) markets and Distributed Energy Resources integration programs. This is a way to integrate and use DERs, in an efficient and cost-effective way for the benefit of the ratepayers and the distribution system, and AEMA members look forward to bringing their expertise and knowledge to the Working Group.

At this time AEMA does not have any concerns about the proposals; however a clarification is requested on the activity “developing appropriate incentives for distributors to adopt DERs for distribution uses that do not require equity investment by the utility,” that falls under Work-stream #1 – DER Usage. Will incentives include the perusal of compensation frameworks for utilities? This was an identified activity under the Utility Remuneration consultation by stakeholders and is important element of the integration and usage of DERs by utilities.

AEMA also recommends that the OEB use a facilitator for this Working Group similar to the use of one during the three-day stakeholder conference in 2019. A facilitator will ensure a balanced discussion and timely movement through the identified Work-stream priorities. This will enable Board staff to listen and participate.

Although not identified in the Workstreams for the Framework for Energy Innovation consultation, AEMA recommends that the OEB launch an engagement to review the Affiliate Relationships Code (“ARC”). As noted in the OEB’s 2020-2023 Business Plan as well in the comments submitted throughout the Utility Remuneration/Responding to DERs stakeholder process, a review of the ARC will determine whether the regulatory requirements for affiliate relationships are appropriate as the sector evolves.

AEMA appreciates the opportunity to provide this feedback and AEMA members welcome the opportunity to continuing our participation on these issues. Thank you for the consideration.

Best regards,

A handwritten signature in black ink, appearing to read "Katherine Hamilton". The signature is fluid and cursive, written over a light blue horizontal line.

Katherine Hamilton
Executive Director
Advanced Energy Management Alliance

Cc: Sarah Griffiths, Chair, AEMA Canada Committee