

Elson Advocacy

April 14, 2021

BY RESS

Ms. Christine E. Long

Registrar

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Long:

Re: EB-2021-0118 - Framework for Energy Innovation: Distributed Resources and Utility Incentives – Nomination Request

I am writing on behalf of Environmental Defence to request that it be appointed to the Framework for Energy Innovation working group with my representation. Environmental Defence is a leading environmental organization that represents both the public interest in environmental protection and the interests of consumers whose energy bills can be lowered through the cost-effective deployment of distributed energy resources (DERs) as alternatives to traditional infrastructure investments.

Both Environmental Defence and my firm would provide an important perspective based on our experience and qualifications, particularly in relation to workstream #1. Our relevant experience and qualifications include the following:

- On behalf of Environmental Defence, I presented at the stakeholder meeting in the earlier iteration of this process. The presentation focused directly on the workstream #1 issues, including the definition of DER, valuating benefits of DERs, and providing appropriate incentives to utilities.¹
- We provided three sets of detailed comments which also focused on those workstream #1 issues.²
- We actively participated in the DER connections process and took the lead on two priority issues.

¹ Elson Advocacy, Incentivize Innovation, *Environmental Defence Presentation for the Ontario Energy Board Initiatives re Utility Remuneration and Distributed Energy Resources*, Attached.

² Environmental Defence's Phase I Comments on Utility Remuneration and Distributed Energy Resources October 18, 2019 ([link](#)); Environmental Defence's Comments on Board Staff Proposals Utility Remuneration and Distributed Energy Resources, April 30, 2020 ([link](#)); Comments in relation to the February 3, 2021 stakeholder meeting ([link](#)).

- We retained an expert witness in the recent natural gas Integrated Resource Planning proceeding.³ The expert evidence focused on workstream #1 issues in the gas sector, especially in relation to the valuation of the benefits of non-pipe alternatives.⁴ Environmental Defence's expert, Mr. Chris Neme, co-authored the *National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources*.⁵ We also provided detailed submissions on these points.⁶
- In 2014, we were successful in convincing the OEB to direct gas utilities to consider non-pipe alternatives in all facility leave-to-construct applications.⁷ Many of the same principles that arise in relation to DER non-pipe alternatives in the gas sector also apply to DER non-wire alternatives in the electricity sector.
- We have participated in numerous other proceedings in support of DER non-pipe alternatives and have helped to secure additional directions that gas utilities consider these alternatives and formally incorporate these into their planning processes.⁸

In addition to the advocacy at the OEB, Environmental Defence has been highly successful in its public interest advocacy on energy issues. Environmental Defence frequently publishes reports and guides in the area of energy conservation and energy policy. Some publications include:

- *Review of Federal Offset-Based Carbon Pricing System*
- *Comments on the Discussion Paper for an Ontario Low-Carbon Hydrogen Strategy*
- *Yours To Recover: A Progress Report on Ontario's Climate Change Actions*
- *Comments on the Hydrogen Strategy for Canada*
- *Comments on the Draft Equivalency Agreement For The Saskatchewan Methane Regulations*

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⁴ Evidence of the Energy Futures Group, February 19, 2021 ([link](#)).

⁵ NESP, *National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources*, August 20, 2021 ([link](#)).

⁶ Submissions of Environmental Defence, March 31, 2021 ([link](#)).

⁷ EB-2012-0451, *OEB Decision and Order, January 30, 2014*, pp. 46-47 (“Environmental Defence urged the Board to send a signal to the companies that new supply-side investments will not be approved unless all lower cost DSM and/or interruptible service options have been explored and documented. ... In light of the evidence presented, the Board concludes that further examination of integrated resource planning for gas utilities is warranted. ... Pending that review, the Board expects applicants to provide a more rigorous examination of demand side alternatives, including rate options, in all gas leave to construct applications.”) ([link](#)).

⁸ Ontario Energy Board, *DSM Framework*, December 22, 2014, p. 35-36 ([link](#)); EB-2015-0029/0049, *Decision and Order*, January 20, 2016 (2015-2020 DSM Plans), p. 84 ([link](#)); EB-2017-0127/0128, *Report of the Ontario Energy Board, Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020)*, November 29, 2018, p. 20-21 ([link](#)); EB-2020-0192 (London Lines), *OEB Decision and Order*, January 28, 2021, p. 20 ([link](#)).

- *Canada's Federal Fossil Fuel Subsidies in 2020*
- *Comments on the Repeal Of The Green Energy Act*
- *Remarks to Standing Committee Re: Bill 4, The Cap And Trade Cancellation Act*
- *Submission on Bill 32: Access to Natural Gas Act*
- *Submission on the Regulations Respecting Reduction in the Release of Methane and Certain Volatile Organic Compounds (Upstream Oil And Gas Sector)*
- *Submission on the Technical Paper on the Federal Carbon Pricing Backstop*
- *Fixing Canada's Broken Energy Regulator and Making Bill C-69 Climate-Safe*
- *Comments in Response to the Report of the Expert Panel on the Modernization of the National Energy Board*
- *Overhauling the Neb: Energy Regulation for a Clean Economy*
- *Canada's Methane Gas Problem*
- *Building an Ontario Green Jobs Strategy*
- *Ontario's Electricity System, a Backgrounder*
- *Canada's Methane Gas Problem: Why strong regulations can reduce pollution, protect health, and save money*
- *Powering up efficiency to get the conservation framework right*
- *The \$2 Billion Question - How Can Ontario Reinvest Cap-and-Trade Proceeds to Meet its Climate Challenge and Grow the Economy?*
- *What to Look for in the Canadian Energy Strategy*
- *Backgrounder - Coal and Renewable Energy in Ontario*
- *Building Ontario's Green Economy: A Road Map*
- *Ontario Feed-In Tariff: 2011 Review*
- *The Global Clean Energy Jobs Race: Ontario's Opportunity*
- *Blowing Smoke: Correcting Anti-Wind Myths in Ontario*
- *Faces of Transformation: Jobs, economic renewal and cleaner air from Year One of Ontario's Green Energy Act*

- *Falling Behind: Canada's Lost Clean Energy Jobs*
- *Greening Canada's Building: Report Card*

These and other reports can be found at <http://environmentaldefence.ca/reports/>.

I have acted in OEB proceedings for more than 10 years. Environmental Defence has been granted intervenor status and costs eligibility as my client in over 30 OEB proceedings over the past decade.⁹

Environmental Defence would provide an important perspective based on its public interest mandate and our experience and knowledge in relation to DERs and Ontario's regulated electricity systems.

Yours truly,



Kent Elson

⁹ For example, see EB-2012-0064, EB-2012-0337, EB-2012-0394, EB-2012-0410, EB-2012-0451, EB-2012-0459, EB-2013-0053, EB-2013-0099, EB-2013-0321, EB-2014-0134, EB-2015-0029, EB-2015-0043, EB-2015-0049, EB-2016-0004, EB- 2016-0152, EB-2016-0160, EB-2016-0296, EB-2016-0300, EB-2016-0330, EB-2017-0127, EB-2017-0128, EB- 2017-0150, EB-2017-0224, EB-2017-0255, EB-2017-0275, EB-2018-0130, EB-2018-0143, EB-2018-0205, EB- 2018-0287, EB-2018-0288, EB-2019-0003, EB-2019-0082, EB-2019-0137, EB-2019-0247, EB-2019-0255, EB- 2019-0271, and EB-2019-0261.