



Christine Long
Registrar,
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

January 14, 2021

Re: Reliability and Power Quality Review
Ontario Energy Board File Number: EB-2021-0307

Dear Ms. Long:

Thank you for the opportunity to provide comment on the launch of the OEB Reliability and Power Quality Review (RPQR). The Canadian Renewable Energy Association (CanREA) is a national industry association representing over 300 companies in Canada's wind energy, solar energy and energy storage industries including generators, utilities, manufacturers, and service providers. On behalf of our diverse member companies, we advocate for the advancement of modern energy systems through stakeholder advocacy and public engagement.

Here in Ontario and worldwide, there is growing recognition on the part of electric utilities of the potential role for energy storage in improving and enhancing reliability and power quality. CanREA strongly supports greater adoption by Ontario's utilities of energy storage assets and other non-wires solutions in place of traditional grid infrastructure reinforcement to meet reliability and power quality needs.

CanREA welcomes the recognition that there may be a significant gap in reporting between transmitters, host distributors and embedded distributors in terms of delivery point/loss of supply outages, and that there is a need to improve the provision of reliability data to support effective utility planning and rate setting.

One of our priorities for this RPQR engagement would therefore be an enhanced and expanded requirement for utilities to publish this information, and similarly to ensure that customers have easy and secure access to their own reliability statistics to make decisions for their energy needs. Energy storage developers require accurate and detailed data and information on these needs in order to know where to site these assets where they can provide maximum value to the grid. Residential, commercial and industrial customers should also be empowered to pursue their own behind-the-meter (BTM) generation and storage solutions to improve reliability at their premises, with mandated access to the reliability and power quality data they need to support informed decision-making regarding these potential solutions.

In terms of moving to stronger incentives for reliability performance and improving the effectiveness of the assessment on capital plans models, one potential model for further consideration would be the UK regulator Ofgem's Interruptions Incentive Scheme (IIS), a core element of the RIIO (Revenue = Incentives + Innovation + Outputs) performance-based regulation framework. IIS is an incentive for Distribution Network Operators (DNOs) to improve overall the reliability of their networks by reducing the number and duration of interruptions by setting target levels of performance for DNOs to achieve – rewards are provided for DNOs who beat their targets, and penalties apply for DNOs who fail to achieve their targets. This mechanism gives DNOs the flexibility to pursue the most cost-effective solution to meet specific local reliability and power quality needs, including non-wires solutions, ultimately minimizing costs to ratepayers.

Thank you for your consideration of our comments.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N. Gall', with a horizontal line drawn through the signature.

Nicholas Gall
Director, Distributed Energy Resources
Canadian Renewable Energy Association (CanREA)