

Summary of Stakeholder Feedback on the OEB Innovation Handbook

As part of the development of the OEB Innovation Handbook, stakeholder sessions were conducted in January 2023 to gather feedback on a draft version of the OEB Innovation Handbook. The OEB sought input from stakeholders it anticipated would be the primary users of the Handbook, including the [Adjudicative Modernization Committee](#), the DER Connections Working Group as part of the [DER Connections Review](#), and the [Electricity Distributors Association](#).

The OEB appreciates the valuable feedback provided by stakeholders and has considered this input in finalizing the Handbook. The following table provides an overview of comments received and how they informed the final version of the OEB Innovation Handbook.

Is there any information that the OEB could include in the Handbook that would make it more helpful?	
Stakeholder Feedback	How it Informed the Handbook
<ul style="list-style-type: none"> Assess why there appears to be less innovation in the gas sector. 	<ul style="list-style-type: none"> A new introduction has been included in the Innovation in the Gas Sector section of the Handbook.
<ul style="list-style-type: none"> Assess the summary of Enbridge's hydrogen blending project as it seems more positive on the prospective opportunities for hydrogen blending than the OEB decision itself. 	<ul style="list-style-type: none"> The description of the hydrogen blending pilot has been revised.
<ul style="list-style-type: none"> The lead in Section 3 suggests that what follows are all cases that involved some question about whether something was a distribution activity, which may not be the case for all projects. 	<ul style="list-style-type: none"> A new section has been created for projects that did not involve a question about whether an activity being undertaken by a utility was a distribution activity.
<ul style="list-style-type: none"> Make all meetings between OEB staff and entities promoting innovative activities open to the public and include minutes that are posted publicly. 	<ul style="list-style-type: none"> Meeting minutes between OEB staff and entities promoting innovative activities were not within the scope of the Handbook. Please refer to the Innovation Sandbox website for information on confidentiality.
<ul style="list-style-type: none"> Reference the Industry Relations Enquiry (IRE) system as a means to get advice and guidance on legal and regulatory requirements that may impact innovation. 	<ul style="list-style-type: none"> The IRE process is intended to address issues or questions regarding regulatory obligations, non-compliance activities, or current policy and therefore was not included in the Handbook.

<ul style="list-style-type: none"> • Include key words, sub-section of section 71, failed or incomplete OEB decisions or innovation applications, common criteria including explanations and available funding. 	<ul style="list-style-type: none"> • Including failed or incomplete applications or OEB decisions and common criteria was not within the scope of the Handbook.
<ul style="list-style-type: none"> • Include projects that include commercial customers. 	<ul style="list-style-type: none"> • Projects that could apply to commercial customers have been included in the Handbook (e.g. Whole Building Pay for Performance Program).
<ul style="list-style-type: none"> • Information on current and/or planned initiatives, proceedings or consultations that relate to or are expected to shape innovation activities within the sector. 	<ul style="list-style-type: none"> • Current initiatives have been included in the Handbook (e.g. Framework for Energy Innovation). Future initiatives, proceedings or consultations will be explored for future iterations of the Handbook.

Are there examples of innovative activities that the OEB has supported in the past that are missing from the Handbook?	
Stakeholder Feedback	How it Informed the Handbook
<ul style="list-style-type: none"> • The OEB IRP Decision should be assessed as to why the IRP Framework has failed to lead to any IRP alternatives being proposed or implemented. 	<ul style="list-style-type: none"> • An assessment of the IRP Framework was not within the scope of the Handbook.
<ul style="list-style-type: none"> • There is an underlying assumption that all innovative activities are of benefit to ratepayers or to all energy ratepayers. Some innovations may benefit certain ratepayers but could increase costs for other ratepayers. Some innovations may be of no benefit to any ratepayers. 	<ul style="list-style-type: none"> • The intent of the Handbook is to provide awareness of the OEB’s work in this area to date and not assess to what extent innovative activities are of benefit to ratepayers.
<ul style="list-style-type: none"> • Exploring “top down” modeling in the 2019 Achievable Potential Study for conservation and demand management (CDM) and demand-side management (DSM) using Broader Public Sector (BPS) data was an innovation we hope will be taken further. Energy and Water Reporting and Benchmarking (EWRB) data can now support APS estimation for commercial buildings. 	<ul style="list-style-type: none"> • An exploration of a component of the APS was not within the scope of the Handbook.
<ul style="list-style-type: none"> • Include community net metering. 	<ul style="list-style-type: none"> • Community net metering is addressed via government regulation and therefore not included in the Handbook.

<ul style="list-style-type: none"> • Case studies published by utilities. 	<ul style="list-style-type: none"> • Case studies published by utilities are not within the scope of the Handbook.
<ul style="list-style-type: none"> • Include the following projects: Anwaatin and Hydro One Settlement Proposal in EB-2017-0335, EB-2021-0041 London Hydro Inc., EB-2021-0134 Wataynikaneyap Power LP, Halton Hills Climate Change Plan and Hydro Ottawa’s MiGen Phase 2 Pilot Project. 	<ul style="list-style-type: none"> • The Handbook is not intended to be an exhaustive list of all OEB innovation-related activities. The OEB values and acknowledges these suggestions and will closely monitor their progress for potential inclusion in future editions of the Handbook.

Do you have any additional feedback you would like to share?	
Stakeholder Feedback	How it Informed the Handbook
<ul style="list-style-type: none"> • It may be misleading and problematic to label this document a Handbook as it is more of a summary document. 	<ul style="list-style-type: none"> • The OEB agrees that this is a summary. The OEB will continue to refer to the Handbook as the “Innovation Handbook” as this is how the OEB has communicated with stakeholders and the sector more broadly over the course of this fiscal year.
<ul style="list-style-type: none"> • The innovation handbook would serve the LDC community best by being both a one-stop-shop updated in real time, and a milestone marker publishing yearly reports with summaries. 	<ul style="list-style-type: none"> • The Handbook will be updated on an ongoing basis. The OEB welcomes suggestions about what should be included in future versions.
<ul style="list-style-type: none"> • OEB should facilitate a webinar on ‘Innovation Sandbox Updates’ and projects that come through the Sandbox. 	<ul style="list-style-type: none"> • The OEB will be issuing a report in April 2023 that will provide an update on the Innovation Sandbox and will be accompanied by a webinar to facilitate discussion.
<ul style="list-style-type: none"> • Tie the Handbook to the FEI Report. 	<ul style="list-style-type: none"> • The Handbook has been updated to include the Framework for Energy Innovation Report.
<ul style="list-style-type: none"> • Concern that OEB staff is assisting utilities and promoters who stand to profit from innovations in finding innovative ways of getting ratepayers to pay for these innovations. 	<ul style="list-style-type: none"> • The OEB is committed to supporting cost-effective innovation that provides value to customers, as set out in the OEB’s 2021/22 to 2025/26 Strategic Plan.
<ul style="list-style-type: none"> • Regulators are not seen as natural innovators and this compendium can reinforce the internal culture change as well as the external image. Clarity and messaging for other audiences than 	<ul style="list-style-type: none"> • The OEB will take into account other audiences in its Handbook communications.

distributors (customers, DER service providers) would help.	
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How do you expect this resource to be used in your organization?

Stakeholder Feedback	How it Informed the Handbook
<ul style="list-style-type: none"> • Examples of specific projects implemented, and the results of those projects are high value for helping others. The OEB is also going to implement a BCA Handbook to help drive more projects. Including specific examples will be important. • The Handbook can be used for ideas and examples of working with local distributors on innovative approaches to implementing DERs which can lower utility costs and improve reliability. • There is no indication that the OEB Innovation Handbook as currently drafted is intended for use by ratepayers or ratepayer groups. • Depending on the frequency of updates, this resource if executed appropriately could be used for the following reasons: <ul style="list-style-type: none"> – To guide grid-level work to facilitate innovation. – Be used as a reference document for LDCs to use to review active, ongoing, and completed innovation projects. – Gauge the likeliness of approval for innovation projects. – Determining if an innovative proposal is relevant to Section 71 of the OEB Act, and which of the four sub-sections. – Utilized in the instance that an LDC is seeking to understand if a certain activity in the electricity industry is considered distribution, generation, 	<ul style="list-style-type: none"> • The OEB will use these suggestions to inform its communication materials and outreach when the Handbook is published, as applicable.

<p>exceptional, and whether that activity is recoverable through rates.</p> <ul style="list-style-type: none">- Generate ideas of the types of innovative initiatives that distributors might pursue regionally, and by which process these activities are considered for the scope of distribution.• The Handbook would serve as a one-stop knowledge reference for all innovation-related activities being undertaken in the electricity sector. Utilities can learn about different innovative activities that are permitted under the current regulatory framework. The information can be used when considering the deployment of potential innovative solution options within a service territory, which could inform future DSP and TSP plans.	
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