

July 18, 2013

Norton Rose Fulbright Canada LLP
Royal Bank Plaza, South Tower, Suite 3800
200 Bay Street, P.O. Box 84
Toronto, Ontario M5J 2Z4 Canada

Mr. Kirsten Walli
Board Secretary
Ontario Energy Board
27th Floor 2300 Yonge Street
Toronto, ON M4P 1E4

F: +1 416.216.3930
nortonrosefulbright.com

Elisabeth L. DeMarco
+1 416.203.4431
elisabeth.demarco@nortonrosefulbright.com

Assistant
mary.zambri@nortonrosefulbright.com

Dear Ms. Walli:

Board Matter EB-2013-0192

Enclosed please find the Submissions of The Ontario Energy Storage Alliance ("OESA") with respect to the above mentioned proceeding.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Lisa (Elisabeth) DeMarco

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B);

AND IN THE MATTER OF a proceeding commenced on the Board's own motion to consider whether proposed amendments to the licence of the Ontario Power Authority (the "OPA") (EB-2013-0192) intended to reflect the OPA's obligations in the regional planning process, are appropriate (the "Proceeding").

SUBMISSIONS OF

THE ONTARIO ENERGY STORAGE ALLIANCE ("OESA")

July 18, 2013

Norton Rose Fulbright Canada LLP
Suite 3800
Royal Bank Plaza, South Tower
200 Bay Street
Toronto ON M5J 2Z4

Lisa (Elisabeth) DeMarco
Tel: 416-203-4431
Email: elisabeth.demarco@nortonrosefulbright.com

1. We are counsel to the Ontario Energy Storage Alliance (“OESA”) in relation to all aspects of the Proceeding. The OESA is a new and evolving organization representing electricity storage and development, and policy members who have a interest in critical electricity storage projects and policy in the Province of Ontario. OESA’s members include IESO contract storage providers, battery, flywheel and frequency regulation technology developers and suppliers, and entities interested in increased efficiency and optimization of the Ontario Electricity System.
2. The OESA has reviewed the July 4, 2013 submissions of the Ontario Power Authority in relation to its proposed license amendments and the OESA’s responding submissions are organized as follows:
 - (i) General comments
 - (ii) Proposed amendments to promote comprehensive planning and prudent, paced electricity grid infrastructure investment.

(i) General Comments

3. In general, the OESA supports the OPA’s proposed delineation of the regional planning process into iterative five year and twenty year plans. Specifically, the OPA proposes to proceed by way of developing two forms of plans: (i) an Interim Integrated Regional Resource Plan (IIRRP), addressing the electricity needs of a region for a near-term period of up to five years, and (ii) an Integrated Regional Resource Plan (IRRP) which is intended to address the electricity needs of a region in the near-, mid-, and long-term, for a period of up to twenty years. The OPA also proposes specific timelines for the development of each of the IIRRP and the IRRP. The OESA is supportive of this proposed approach.
4. The OPA also highlights the importance of seeking and addressing stakeholder needs in each comprehensive regional planning process (OPA submission lines 24-32). To this end, the OESA respectfully submits that electricity storage providers are, and will increasingly be, important stakeholders that should be expressly included in the amendments. Electricity storage may assist the OPA and the Province in planning and pacing the need for grid infrastructure investments in Ontario and optimizing the efficiency and use of existing generation and other power assets in the Province.
5. The OESA submits that there can be little doubt that stakeholdering will be a very critical part of a thorough and well informed OPA process to regional planning that reflects all of the alternatives required for large and long term investments in transmission and distribution infrastructure, including generation, conservation, and energy storage alternatives. These alternatives will assist decision-makers in pacing and prudently allocating such investments in transmission and distribution infrastructure. It is in this vein, that the OESA submits that the proposed amendments

to the OPA license expressly include a requirement to consider alternatives to transmission and distribution investment, including conservation, generation and electricity storage, through the planning and stakeholding processes.

(ii) Proposed amendments to promote comprehensive planning and prudent, paced investment

6. The OESA respectfully submits that the following amendments should be made to the proposed OPA license in order to ensure that comprehensive plans reflecting reasonable alternatives to pace and plan grid infrastructure investments are considered:

(a) Section X.1 should be amended to reflect the current realities of the expanding use of electricity storage in the Province of Ontario and to facilitate, optimize, and pace prudent grid investments. As a result, the OESA recommends amending the definition of an “*Integrated Regional Resource Plan*” to be:


*“Integrated Regional Resource Plan” means a document prepared by the Licensee that identifies the appropriate mix of investments in one or more of conservation, generation, **energy storage**, transmission facilities and/or distribution facilities in order to address the electricity needs of the region in the near-, mid-, and long-term.*

(b) Section X.2(b) and (c) of the proposed amendments require the OPA to notify the lead transmitter of any investment in “transmission and/or distribution facilities that are required to meet the electricity needs of the region.” The OESA submits that in the spirit of the broader task that the OPA is being asked to undertake in relation to the IRRP (and its proposed IIRRP) and the definition of IIRP, these sections should be amended to expressly require the OPA to inform the lead transmitter of investments in transmission and/or distribution facilities, as well as generation, conservation and storage alternatives to optimize existing investments in the grid. In this manner, we suggest that Section X.2(b) and (c) (starting at line 1, page 4 and line 11) be amended to read: “*The Licensee shall inform the lead transmitter and participating distributors of any investment in transmission and/or distribution facilities **and/or alternatives** that are required per the [Interim Integrated Regional Resource Plan/Integrated Resource Plan, as applicable] ...”.*

7. The OESA appreciates the opportunity to provide these written submissions on the proposed OPA license amendments and looks forward to working together with the OPA and other stakeholders on a truly comprehensive and thorough regional resource planning process. In doing so, OESA submits that energy storage is, and increasingly will be, an important part of the Province’s overall energy infrastructure strategy to enable grid and generation asset optimization and Ontario’s energy regulators to pace and prudently assess investments in electricity infrastructure in a manner that is sustainable for Ontario’s rate payers.

DATED at Toronto, Ontario this 18th day of July, 2013

ONTARIO ENERGY STORAGE ALLIANCE
By its counsel, Norton Rose Fulbright Canada, LLP



Lisa (Elisabeth) DeMarco