

ONTARIO ENERGY ASSOCIATION

NET METERING: ERO 019-2531 & GREEN BUTTON: ERO 019-2564 SUBMISSIONS

NOVEMBER 20, 2020

To shape our energy future for a stronger Ontario.



Ontario Energy Association

ABOUT

The Ontario Energy Association (OEA) is the credible and trusted voice of the energy sector. We earn our reputation by being an integral and influential part of energy policy development and decision making in Ontario. We represent Ontario's energy leaders that span the full diversity of the energy industry.

OEA takes a grassroots approach to policy development by combining thorough evidence based research with executive interviews and member polling. This unique approach ensures our policies are not only grounded in rigorous research, but represent the views of the majority of our members. This sound policy foundation allows us to advocate directly with government decision makers to tackle issues of strategic importance to our members.

Together, we are working to build a stronger energy future for Ontario.

The recommendations contained in OEA papers represent the advice of the OEA as an organization. They are not meant to represent the positions or opinions of individual OEA members, OEA Board members, or their organizations. The OEA has a broad range of members, and there may not always be a 100 percent consensus on all positions and recommendations. Accordingly, the positions and opinions of individual members and their organizations may not be reflected in this report.

The Ontario Energy Association (OEA) is pleased to provide this response to the Ministry of Energy, Northern Development and Mines (the Ministry) on proposed regulatory amendments related to (1) Ontario's Net Metering Regulation to Support Community-Based Energy Systems (ERO: 019-2531); and (2) province-wide implementation of Green Button (ERO: 019-2564).

COMMENTS AND KEY RECOMMENDATIONS

The OEA has reviewed the summary proposals which states that the Ministry is seeking to (1) amend Ontario's net metering regulation that allow for demonstration of community net metering projects; and (2) propose a regulation to require electricity and natural gas distributors to implement Green Button Download My Data (DMD) and Connect My Data (CMD).

The OEA has reviewed these proposals and makes the following key recommendation:

Recommendation. Opportunity to Comment on Draft Regulatory Language

While the postings contain plain language descriptions of the proposed changes, neither include draft regulatory language for the proposed amendments. The opportunity of stakeholders to comment on draft regulatory language is a key part of regulatory design. The absence of draft regulatory language and the details it provides makes it difficult for stakeholders to provide substantive comments on regulatory proposals, especially when dealing with matters as technical and complex as Net Metering and Green Button.

For example, in the case of the Green Button proposal, the posting notes that the government will "require that utilities implement additional features not included in the Green Button standard to help reduce red tape and increase usability for Green Button users," providing only examples of potential features rather than a definitive list of additional features.

Similarly, in the case of the Net Metering proposal, the posting does not provide a definition of what a "community" is for the purposes of participating in a community net metering demonstration project nor does the posting provide details regarding the parameters of the "limited participation in the demonstration (e.g., total number of projects; capacity limits for individual projects and/or all projects)."

The OEA strongly recommends that the Ministry provide stakeholders an opportunity to comment on the draft regulatory amendments regarding both regulatory proposals before the Ministry incorporates them as final regulations. This would allow participants to assess the proposed changes in detail and ensure critical issues are not overlooked and misinterpreted, so that the Ministry can successfully achieve the intended of goals of the proposals.

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