

June 17, 2013

Ms. Kirsten Walli
Ontario Energy Board
PO Box 2319
27th Floor, 2300 Yonge Street
Toronto, Ontario M4P 1E4

Re: Proposed Amendments to the Transmission System Code and the Distribution System Code (EB-2011-0043)

Dear Ms. Walli,

On May 17, 2013, the Board issued notice under section 70.2 of the Ontario Energy Board Act, 1998 (the "Act") of proposed amendments to the Transmission System Code (the "TSC") and the Distribution System Code (the "DSC"). The notice invited interested parties to submit written comments on the proposed amendments by June 17, 2013.

Entegrus Powerlines Inc. ("Entegrus") has reviewed the proposed amendments and is appreciative of the opportunity to provide comments, which are included herein.

Distribution System Code Commentary – Sections 8.1, 8.3, 8.4 and 8.5

An embedded distributor is reliant on a host transmitter in terms of available capacity on jointly shared feeders. Typically, an embedded distributor will serve urban customers by way of the same feeder from which the lead transmitter serves an adjacent rural load. An example of such a facility is the Tilbury Distribution Station ("DS"), which is owned and operated by Hydro One Distribution Networks to serve its adjacent rural customers. Entegrus connects to the Tilbury DS outside the station in order to serve its urban customers residing in the Town of Tilbury.

Entegrus notes that under the proposed amendment to Sections 8.1 and 8.3 of the DSC, an embedded distributor will be required to provide regional planning needs assessment information to the lead transmitter within 30 days. The proposed new Section 8.4 would similarly obligate a distributor to provide the lead transmitter with an update regarding the status of any applicable investments within 30 days. Further, the proposed new section 8.5 of the DSC would require a distributor to identify foreseen material investment needs in transmission facilities within 45 days of a lead transmitter request.

Entegrus supports these proposed additional responsibilities for embedded distributors. However, Entegrus submits that such regional planning information sharing should be reciprocal between the lead transmitter and embedded distributor.

While the proposed amendments to Sections 8.1 and 8.3 contemplate the lead transmitter providing various alternative forms of documentation in support of a distributor's periodic rates applications, Entegrus believes that reciprocal information sharing with common timelines would create a more timely process by which embedded distributors could obtain information from the lead transmitter in order to better serve embedded customers.

Examples of the benefits to embedded distributor customers arising from timely and reciprocal information sharing between the host distributor and embedded distributor are as follows:

- a) *Capacity assessment:* Although embedded distributors share a feeder with their host distributor, it is often challenging to answer requests from existing or prospective customers regarding available capacity because the loading and planned customer connections on the host distributor's side of the feeder are unknown. More timely capacity information would assist customers in making investment or expansion decisions.
- b) *Power quality assessment:* If the host distributor re-feeds the supply points to the embedded distributor, either by supplying the load from another feeder or station, there is no requirement to provide the embedded distributor with new system parameter data (e.g. revised fault levels, source impedances, etc.). This type of detailed information would assist the embedded distributor in assessing the power quality impacts on customers resulting from the system modifications.
- c) *Grid modernization:* Plans to upgrade protection and control or install smart grid technology would be best done in conjunction with planned work. A requirement to share planned upgrade work between host and embedded distributors would make the process more efficient and effective. Currently, embedded distributors communicate these plans to the host distributor, but there is no requirement for reciprocal communication.

In summary, Entegrus submits that the proposed amendments be changed to require timely reciprocal communication between lead / host transmitters and embedded distributors.

All of which is respectfully submitted,

[Original Signed By]

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