

**EB-2011-0043**

**Proposed Amendments to the  
Transmission System Code and  
the Distribution System Code**

**Ontario Power Authority  
Comments**

**June 17, 2013**



1 **Proposed Amendments to the Transmission System Code and the Distribution System Code:**  
2 **Ontario Power Authority Comments**

3 **Background**

4 On May 17, 2013 the Ontario Energy Board (“Board”) issued a Notice of Proposal to Amend a Code (“Notice”).  
5 The purpose of the proposed amendments to the Transmission System Code (“TSC”) and the Distribution  
6 System Code (“DSC”) is to establish a more structured approach to regional planning and to facilitate regional  
7 planning through the redefinition of certain line connection assets and modification of the TSC cost  
8 responsibility rules.

9 The Ontario Power Authority (“OPA”) has actively participated in the events leading up to this Notice. On  
10 May 12, 2011, the OPA provided its input as part of the Board’s first stakeholder meeting on regional planning.  
11 On December 2, 2011, the OPA also provided its input on Board staff’s November 8, 2011 discussion paper  
12 titled, “Regulatory Framework for Regional Planning for Electricity Infrastructure”, and in February 2012, the  
13 OPA provided a description of its regional planning process to Board staff and stakeholders.

14 As part of the Board’s broader Renewed Regulatory Framework for Electricity (“RRFE”) consultation process,  
15 the OPA participated in the Executive Roundtable Meetings during February and March 2012, and presented as  
16 part of the Board’s March 28-30, 2012 Stakeholder Conference.

17 The OPA was also an active member of the Process Planning Working Group (“PPWG”) which developed,  
18 stakeholdered, and produced the “Planning Process Working Group Report to the Board: The Process for  
19 Regional Infrastructure Planning in Ontario”; released in its final form on May 17, 2013.

20 The OPA has a significant interest in this proceeding, given its involvement in the process and its role in  
21 regional planning.

22 **Comments**

23 The OPA fully supports the Board in its initiative to produce a more structured, accountable and transparent  
24 regional planning process in Ontario. The OPA appreciates the opportunity to comment on the proposed  
25 amendments, which are a result of significant engagement with the sector undertaken by the Board.

26 In its Notice, the Board invited interested parties to submit written comments on the proposed code  
27 amendments, and requested that any comments include feedback in relation to the timelines set out in the  
28 proposed code amendments. The OPA agrees with the Board that such timelines are necessary to foster an  
29 efficient and effective process, and that it is important to ensure that the proposed timelines are reasonable.  
30 The OPA’s written comments on two of the timelines in the proposed code amendments are provided below.

31 The proposed code amendment in Section 3C.2.2(f) of the TSC states that a transmitter shall:

32 *(f) where the OPA determines that an integrated regional resource planning process is required*  
33 *for a region, (i) participate in the integrated regional resource planning process as may be*  
34 *reasonably required by the OPA, and (ii) provide the OPA with such information as the OPA may*  
35 *from time to time reasonably require for the purposes of the integrated regional resource*  
36 *planning process within 30 days of receipt of a request by the OPA for the information;*

1 The OPA recommends that the Board revise Section 3C.2.2(f) of the TSC to allow for greater flexibility in the  
2 timeline required for information production, given that a transmitter may, in some cases, require more time  
3 to produce information associated with more complex requests. Drawing from the wording in the Board's  
4 proposed amendments to the licence of the OPA (EB-2013-0192), the OPA proposes that Section 3C.2.2(f) be  
5 revised as follows (revisions in bold font and underlined):

6 *(f) where the OPA determines that an integrated regional resource planning process is required*  
7 *for a region, (i) participate in the integrated regional resource planning process as may be*  
8 *reasonably required by the OPA, and (ii) provide the OPA with such information as the OPA may*  
9 *from time to time reasonably require for the purposes of the integrated regional resource*  
10 *planning process within 30 days of receipt of a request by the OPA for the information, **or a***  
11 ***period of time that the OPA and the transmitter agree upon;***

12 Similarly, the proposed code amendment in Section 8.3.2 of the DSC states:

13 *A transmission-connected distributor shall provide the OPA with such information as the OPA*  
14 *may from time to time reasonably require, for the purpose of supporting regional planning, and*  
15 *shall do so within 30 days of the OPA's request. Where the distributor is a host distributor, the*  
16 *information provided to the transmitter shall reflect any information provided to it by any of its*  
17 *embedded distributors under section 8.3.3.*

18 For the same reasons outlined above, the OPA recommends that the Board revise Section 8.3.2 of the DSC to  
19 allow for greater flexibility in the timeline required for information production. The OPA proposes that  
20 Section 8.3.2 be revised as follows:

21 *A transmission-connected distributor shall provide the OPA with such information as the OPA*  
22 *may from time to time reasonably require, for the purpose of supporting regional planning, and*  
23 *shall do so within 30 days of the OPA's request, **or a period of time that the OPA and***  
24 ***transmission-connected distributor agree upon.** Where the distributor is a host distributor, the*  
25 *information provided to the transmitter shall reflect any information provided to it by any of its*  
26 *embedded distributors under section 8.3.3.*

27 The OPA submits that these revisions would allow for greater flexibility and more reasonable timelines where  
28 necessary.

29 The OPA appreciates the opportunity to provide comments in this matter and looks forward to working  
30 together with transmitters, distributors and other stakeholders in the development of regional plans.