

June 17, 2013

Ms. Kristen Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON - M4P 1E4

Via web portal and by courier

Dear Board Secretary:

**Re: Board File No. EB - 2011- 0043  
Proposed Amendments to the TSC and the DSC - Related to Regional Infrastructure Planning**

The Electricity Distributors Association (EDA) is the voice of Ontario's local distribution companies (LDCs). The EDA represents the interests of 75 publicly and privately owned LDCs in Ontario.

The EDA supports the amendments proposed by the Ontario Energy Board to the Transmission System Code and the Distribution System Code related to implementing policies on Regional Infrastructure Planning, including the changes to the cost responsibility regime; redefinition of certain transmission line connection assets; and changes related to the "otherwise planned" and "refund" provisions. The EDA's comments on the proposed changes are provided below.

We concur with the idea that the 'Planning Process Working Group' will remain in place as the 'Regional Planning Standing Committee' in order to consider the need for revisions to the regional planning process.

The integrated regional resource planning process and the regional infrastructure planning process involve significant information exchange among participants in the processes. The information exchange between participants would be iterative and time-consuming depending on the complexity of system configurations, particularly during the transitional phase before regular regional planning cycles are implemented. This might result in going beyond the proposed timelines. Therefore, we recommend providing flexibility to participants in the planning process to generate and deliver the requisite information by a mutually agreed upon timeline where the proposed timelines cannot be met. The examples of flexibility are given below:

- According to Section 8.3.2 of the proposed DSC amendment, a transmission connected distributor has to provide the OPA with information from time to time as the OPA may reasonably require for the purpose of supporting regional planning within 30 days of the OPA's request. We propose to provide flexibility such that the information is provided to the OPA

within a period of time that the participants (OPA and LDC) agree upon if not possible to do so within 30 days.

- Similarly, according to Section 3C.2.2 (f) of the proposed TSC, a transmitter has to provide the OPA with information from time to time as the OPA may reasonably require for the purposes of the integrated regional resource planning process within 30 days of OPA's request. We propose to provide flexibility such that the information is provided to the OPA within a period of time that the participants (OPA and transmitter) agree upon if not possible to do so within 30 days.

Further, there could be disagreements among participants in the planning process even with all parties working with the best intention. Therefore, incorporating a dispute resolution process in the Distribution System Code would be helpful.

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

Yours truly,

A handwritten signature in blue ink, appearing to read "Teresa Sarkesian", with a long horizontal flourish extending to the right.

Teresa Sarkesian  
Vice President, Policy and Government Affairs  
dp: