

# OTTAWA SOLAR PLANT

- IMBEDED GENERATION -

Comments on the proposed Amendments to the  
DSC as set out in Attachment A of Board File  
No.: EB-2009-0077

Pierre Beaulnes

2009

Cumberland, June 22<sup>nd</sup>, 2009.

Ontario Energy Board.

Comments on the Proposed Changes in Connection Regulations for Renewable Energy Projects. Boards File No.: EB-2009-0077

Dear Madam, Sir,

I am writing this comment following the advice of Mr Gordon Ryckman (see enclosed copy of email). Please note that Mr. Ryckman knows about my project.

The proposed cap per MW was set, based on larger 10 MW projects. The consequence of this is that smaller projects for which connection costs are similar, will receive a much smaller contribution despite similar connection costs. The cost of a six km three phase line will be similar for a 6 MW or a 2 MW project but the 6 MW project will receive three times more money. What is the justification behind such a choice?

In my case, I am working at setting up a 2 MW solar farm in Cumberland, 20 minutes from downtown Ottawa. I received a Connection Cost Estimate (CCE) for my project on May 15<sup>th</sup>, 2009. For a 6.3 km three phase line I will have to pay \$500,000. Normally I would have had to pay at least 6.3 km X \$200,000/km for 1.2 million. In my case the price is lower because the line has been previously paid by another load customer. Being an unforecasted customer, I have to pay only a portion of that line.

So, even if a portion of that line is paid by another customer which actually makes the socialization of my share of that line even more acceptable for a renewable energy project, your cap per MW will amount to only \$180,000. It would be \$540,000 for 6 MW... This is clearly unfair...

*I believe it would be fairer and make more sense to have **a cap per km, a cap that would go down with the number of kilometres**. This would truly **favour embedded generation** i.e. projects that are close to where they are needed.*

An important point: I just want to be sure that, as an unforecasted customer who has recently obtained a CCE but has never applied for a CCRA, I will be eligible to this upcoming socialization of connection costs. Please note that following the start of this one year OPA hiatus for RESOP, I had to file a CCE to keep my place in the queue. The anniversary date of my CIA was December 21<sup>st</sup> 2008. With this CCE, Hydro One has given me another year in the queue.

Please note that, since my project is shovel ready (the line is there and the City of Ottawa new bylaws allows this kind of project on my property), I was told by Hydro One that I would be considered as a legacy project and thus would be in position to apply for a FIT contract with applicable securities which would then be followed by a CCRA a couple of months later and the set up of our 2 MW project in Spring of 2010.

I am looking forward to your comments on the above.

Thank you!

Best regards,

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## RE: Today's Statement from the Chair

De :  **Gordon Ryckman** (Gordon.Ryckman@oeb.gov.on.ca)

Envoyé : 9 juin 2009 18:03:42

À : Pierre Beaulnes (beaulnespierre@sympatico.ca)

Mr. Beaulnes,

You will note that the Board has now issued its proposal to amend the cost allocation rules of the DSC with respect to the connection of renewable generation. This proposal is posed on the Board's web site. See the following direct link.

<http://www.oeb.gov.on.ca/OEB/Industry+Relations/OEB+Key+Initiatives/DSC+-+Connection+Cost+Responsibility>

If you have questions, the contact person for this initiative is Roy Hrab. He can be contacted at 416-440-7745, e-mail [roy.hrab@oeb.gov.on.ca](mailto:roy.hrab@oeb.gov.on.ca). Formal comments may be submitted to the Board Secretary's Office until June 30, 2009.

Regards,

## Gordon Ryckman

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