

March 26, 2010

Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Via RESS and by courier

Dear Board Secretary:

Re: Revised Proposed Amendments to the Distribution System Code re Unforecasted Customers in Cost Responsibility Rules for Connecting Renewable Generators - Board File No. EB-2009-0077

The Electricity Distributors Association (EDA) is the voice of Ontario's local distribution companies (LDCs). The EDA represents the interests of over 80 publicly and privately owned LDCs in Ontario.

The EDA agrees that the cost responsibility rules for connecting renewable generators should address unforecasted customers in order to eliminate the incentives to delay connection requests and avoid contributing to expansion costs.

The EDA consulted with members on the proposed additional clauses under section 3.3.27 of the Distribution System Code (DSC). Although the clauses were technically correct in indicating how to calculate the rebates and expansion costs when an unforecasted customer connects to an existing expansion made after October 2009, members found that it took some time to understand the wording and believed distributors would benefit from a few example calculations to clarify how to determine the rebates, and which accounting entries should be used, particularly for the situation when the unforecasted customer is a renewable generator. Members would request examples of the calculations for review prior to the OEB finalizing the proposed amendments such that additional comments may be provided if required.

In addition, members sought clarification that all of the clauses under 3.2.27 use the same connection horizon as defined in Appendix B of the DSC, which is five years. In other words the rebates are only applicable when an unforecasted customer requests a connection within five years of the previous expansion.

Yours truly,

“Original Signed”

Maurice Tucci
Policy Director, Distribution & Regulation

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