

# Hydro One Networks Inc. - Application by Hydro One Networks Inc. for a six month exemption from the obligations in Section 6.2.6 and 6.2.7 of the Distribution System Code

Board File Number EB-2011-0118

## Letter of Comment

**Submitted:** 2011-06-23

**Submitted by:** Jean-Pierre Pawliw

### Comments

Regarding Hydro One's request for a six month exemption from the required timelines to connect micro-embedded generation facilities to Hydro One's distribution system, and regarding Hydro One's request for an immediate interim stay of obligations from the timelines:

Both requests should be denied for the following reasons:

1. The request does not adequately distinguish between the exemption to Section 6.2.7 but the agreement to uphold section 7.2.3. The distinction between these two paragraphs is unclear (in the context of MicroFIT systems) and there appears to be no reason to uphold 7.2.3 while being exempt from 6.2.7. Further explanation is required as to the impact of the proposal.

2. No alternative timeline has been proposed. This leaves project owners with no commitment as to response, creating complete uncertainty for the proposed project.

3. Further to both 1) and 2), above, this will further exacerbate and undermine the weak consumer confidence in the MicroFIT program and its related bureaucracy.

4. Granting an immediate interim stay of obligations is an implicit acceptance of the primary request. A request should be tested by hearing before it is approved, especially given 1) and 2), above.

I recognize that the program has generated more interest than expected. This certainly needs to be addressed and perhaps extending the referenced timelines is appropriate. However the request, as submitted, does not adequately address the needs and concerns of energy consumers or the industry. We all want this program to succeed, but success depends on transparency and predictability. The requests, as submitted, to not achieve this.

Regards

Jean-Pierre Pawliw