

June 27, 2011

Ms. Kirsten Walli, Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Hydro One Networks Inc.  
Application for Exemption from Section 6.2.6 & 6.2.7 of Distribution System Code  
Board File Number EB-2011-0118**

The Ontario Sustainable Energy Association (OSEA) writes in regard to the above noted matter. OSEA does not support Hydro One's request for a six-month exemption from the obligations in sections 6.2.6 and 6.2.7 of the Distribution System Code (the "Code") or Hydro One's request for an order or order(s) for an immediate interim stay of the obligations specified in sections 6.2.6 and 6.2.7 of the Code. OSEA also objects to Hydro One's request for a written hearing and suggests that an oral hearing is more appropriate as OSEA would want to arrange for experts to address the technical matters that this application raises.

In its submission Hydro One states that "the volume of requests to connect micro-embedded and capacity allocated exempt projects has been well beyond **all expectations** for some time and is not expected to slow down." The Code-mandated timelines for the connection of micro-embedded generators were instituted in response to the amendment to the Ontario Energy Board Act, 1998 ("the OEB Act") that was made by the Green Energy and Green Economy Act, 2009.

OSEA suggests that the Hydro One's experience with the Renewable Energy Standard Offer Program (RESOP) should have prepared it for the volume of applications under the Feed in Tariff Programs. The Minister of Energy asked the Ontario Power Authority in August 2005 to establish RESOP, and Hydro One quickly became a bottleneck for that program which was launched in 2007. The Feed in Tariff Program reversed the sequence of events and now Hydro One is the bottleneck once again.

Hydro One's own submission notes that it had anticipated that certain challenges would be faced by distributors in meeting the timelines. In responding to EB-2008-0102, "Notice of Proposal to Amend a Code" dated May 16, 2008, Hydro One shared with the Board its concerns about unpredictable volumes and the proposed fixed timelines as stated in the Code at the time. Specific mention was given to the timelines in sections 6.2.6 and 6.2.7 of the Code.

OSEA suggests that Hydro One has had almost six years notice to solve whatever problems it has in processing applications and yet it has not. OSEA suggests that a six month exemption will not make much of a difference to address problems that have not been addressed for six years.

Regards,



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