

18 May 2012

Ms. Kirsten Walli, Board Secretary  
Ontario Energy Board

By e-mail and RESS

Dear Ms. Walli:

**Re: EB-2012-0246 Policy Review of Micro-Embedded Generation Connection Issues - GEC & ecoPerth Intervention and Cost Eligibility Request**

1. The Green Energy Coalition (GEC) and ecoPerth hereby request status as participants in this matter and request that they be found eligible for costs.
2. The GEC is comprised of the David Suzuki Foundation, Greenpeace Canada, Sierra Club of Canada and WWF-Canada. All of the GEC's member groups are charitable or non-profit organizations active on environmental and energy policy matters. ecoPerth is a non-profit organization active in promoting sustainable solutions and in particular has facilitated micro-FIT participation in the Perth centred region.
3. We request that documents be sent to counsel at the address below.
4. The groups wish to suggest an additional topic: *The appropriateness of technical constraint rules*. In particular, Hydro One (and presumably other LDCs) has been utilizing a '7% of peak' rule that has severely constrained access to the grid in many areas. The rule is intended to avoid 'islanding' by ensuring that the micro-embedded generation on any feeder is sufficiently below minimum loads such that the voltage drop during a grid outage will ensure shutdown of the generators. The comparable U.S. rule is 15% (being half of the typical minimum load of 30% of peak). The result of a technical study promised by Hydro One to compare the Ontario 7% and U.S. 15% rules has not been reviewed publicly. The U.S. rule is now likely to be raised considerably to account for the non-coincidence of solar generation with local minimum loads – see: <http://www.ilsr.org/overturning-15-rule-expands-distributed-generation-opportunity-california/>

Sincerely,



David Poch