



Representing Ontario's Electricity Distributors

August 10, 2012

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

Via web portal and by courier

Dear Board Secretary:

Re: Proposed Amendments to the Distribution System Code – File No: EB-2012-0301

The Electricity Distributors Association (EDA) is the voice of Ontario's local distribution companies (Distributors). The EDA represents the interests of 75 publicly and privately owned Distributors in Ontario.

The EDA's comments are provided in succeeding paragraphs on the proposed amendments to the Distribution System Code (DSC) in respect of connection cost agreement with large embedded generation facilities requiring transmission upgrades. The EDA's submission has been prepared in consultation with EDA members of the Regulatory Council and the FIT/micro FIT working group.

The distributors are of the opinion that if upgrades to the transmission system are needed in order to connect the large embedded renewable generation facility, it is not feasible to provide cost estimates for those upgrades in time for the generator facility to sign a connection cost agreement within the 9 months time line being proposed by the Board.

To begin with, the EDA understands that many proponents (generation facilities), after receiving their 'Distribution Connection Impact Assessment (Dx CIA)' can take a number of months to submit their applications for a Customer Impact Assessment on the Transmission system (Tx CIA) and System Impact Assessment (SIA). We therefore, suggest that once the Dx CIA is completed by distributors, the proponent should provide the distributor with the requested fees and any remaining information within 60 calendar days to allow the distributor to submit an application for the Tx CIA and SIA. Thereafter, Hydro One Transmission and the IESO are expected to take up to 5 months to complete those two studies.

Then, assuming no transmission upgrades are necessary, distributors and the proponents would require at least 1 to 2 months time to complete contract negotiations before signing the connection cost agreement. Therefore, it is expected that at least up to 9 months of time would be necessary for the applicant to sign a connection cost agreement from the time Dx CIA is completed by the distributor.

However, in the event transmission upgrades are necessary, transmitters (and, in some cases, distributors) are expected to take up to 8 months of time to provide cost estimates for the upgrades. In this case, the applicant would then require about 17 months of time to sign a connection cost agreement from the time Dx CIA is completed by the distributor.

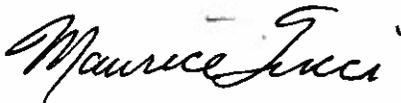
We therefore recommend providing:

- at least 9 months of time, *where transmission upgrades are not necessary* to connect a large generation facility, to sign a connection cost agreement from the time Dx CIA is completed by the distributor, and
- at least 17 months of time, *where transmission upgrades are required* to connect a large generation facility, to sign a connection cost agreement from the time Dx CIA is completed by the distributor

In addition, it should be clarified that the above recommendations apply irrespective of the ownership of transmission assets (i.e. distributor or transmitter owned transmission assets).

We look forward to working with Board staff as necessary in this regard.

Yours truly,



Maurice Tucci
Director, Regulatory and Technical Policy
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