

**EB-2012-0301:
Revised Proposed
Amendments to the
Distribution System Code**

***Ontario Power Authority
Comments***

October 25, 2012



**ONTARIO
POWER AUTHORITY** 

1 **Background**

2 On July 27, 2012 the Ontario Energy Board (“Board”) issued a Notice of Proposal to Amend a Code. The
3 July proposed amendments to the Distribution System Code (“DSC”) were to provide additional time for
4 applicants of large embedded generation (>10 MW) facilities that require transmission upgrades to sign
5 a connection cost agreement (“CCA”) with the distributor for the facility and to maintain their capacity
6 allocation. Specifically, the Board had proposed that the timing for large generation facilities that
7 require transmission upgrades be required to sign a CCA within 9 months of capacity allocation, as
8 opposed to the 6 months currently stated in the DSC.

9 After considering written comments from stakeholders, including those from the OPA, the Board
10 determined that revisions should be made to the proposed July amendments to reflect comments
11 regarding the length of time allowed to sign a CCA. The Board’s revised amendments, dated October 11,
12 2012, propose that where a transmission system impact assessment (“Tx SIA”) is required, the applicant
13 shall have 9 months to sign a CCA; and where transmission upgrades are required, the applicant shall
14 have 17 months to sign a CCA from the date on which the applicant received a capacity allocation for the
15 facility.

16 **OPA Comments**

17 The Ontario Power Authority (“OPA”) continues to support amendments to extend the timeline for
18 signing the CCA following the completion of the Distribution Connection Impact Assessment, which the
19 OPA understands is currently a challenge for parties to meet. The OPA appreciates that the revised
20 proposed timelines will allow transmitters, distributors and generators the appropriate amount of time
21 to perform studies, develop costs estimates and finalize agreements for large embedded generation
22 projects that require a Tx SIA and/or transmission upgrades. As such, the OPA supports the revised
23 proposed amendments.

24 The OPA appreciates the opportunity to provide comments in this matter and looks forward to
25 participating in any further initiatives on this subject.