PETERBOROUGH DISTRIBUTION INC.



1867 Ashburnham Drive, PO Box 4125, Station Main Peterborough ON K9J 6Z5

January 10, 2013

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

Attention: Board Secretary

Re: Board File No. EB-2012-0246

Peterborough Distribution Inc. Comments relating to the Connection of

Micro-Embedded Generation Facilities

In accordance with the Board Staff Discussion Paper posted for comment under Board File EB-2012-0246, I'd like to submit the following comments:

- Q1.1: An Offer to Connect application fee makes a lot of sense to me for the reasons mentioned in the report. We waste a lot of resources every time one of these applications is just pure speculation.
- Q2.2: The 15 day processing period is pretty aggressive. Since we are a small organization one person's vacation can throw a wrinkle in the process. Also, the applications come in at different rates during the year. Since my role is not solely dedicated to microFITs, managing these applications in addition to my other projects can be challenging during the busy periods. I would prefer a 30 day period.
- Q3.1: We are using the standard Appendix E form. I am not aware of any issues with using this form yet.
- Q4.3: The losses associated with these systems are usually less than 0.1 kW based on the systems that I have checked.
- Q4.4: I believe the reason for not charging for load consumption was to simplify billing. We have decided to charge load consumption on FIT projects due to larger consumption.

Q5.2: If they are considering standardizing connection charges across LDC's, they should only consider single phase residential connections. Three phase and/or commercial connections can be highly variable in cost for various reasons.

Q6.2: I am not aware of any upstream upgrades required to accommodate microFIT generation yet.

Q6.4: If upstream upgrades are required in order to accommodate a microFIT, the application should be rejected. It would be uneconomic to upgrade the distribution system in order to accommodate 10kW of generation.

Should you require further information, please contact me at your convenience.

Yours truly,

p.p.

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