



January 26, 2013

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 23109
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: Board Staff Discussion Paper on Issues Related to the Connection of Micro-Embedded Generation Facilities
Board File Number: EB-2012-0246**

Please find attached London Hydro's comments as to the Board Staff Discussion Paper on Issues Related to the Connection of Micro-Embedded Generation Facilities (EB-2012-0246).

If you have any questions as to this comment letter, please do not hesitate to contact me.

Yours truly,

Mike Chase
London Hydro Inc.
519-661-5800 Ext. 5750
E-mail chasem@londonhydro.com

Comments by London /Hydro: Board Staff Discussion Paper on Issues Related to the Connection of Micro-Embedded Generation Facilities

Board File Number: EB-2012-0246

26 Jan 2013

Section 1 – Offer to Connect Process

One of the issues related to the problem of large volumes of applications and much fewer connections has to do with consultants signing up customers (for a fee to the customer) and applying to OPA on their behalf, while the homeowner has not decided yet to proceed.

Another issue that has precipitated larger application volumes is related to leased roofs which was not the original intention of the program. Large commercial companies are installing solar panels on residential leased roofs across the province for free, while taking in significant profits from the microFIT program and paying a flat lease price to the homeowner, which is minimal compared to the earnings from the microFIT program. The program was designed for the single homeowner wanting to invest in green energy and getting a reasonable return on their investment.

Section 2 – Appropriateness of Timelines in the DSC for Micro-Embedded Generation Facilities

If the problem surrounding the volume of applications is solved (the first section) then the timelines listed in the DSC should suffice based on current volumes.

Section 3 – Standard Form Connection Agreement in the DSC

Insurance requirements should be incorporated into the Connection Agreement.

Section 4 – Experience with the Monthly Service Charges

No comment.

Charging for load – some units are more efficient than others. On average a 10kW installation will consume roughly \$10/year worth of kWh; there is the possibility of consumption of power without being charged, we are looking into an example right now where the load was 53kWh in one day. There is also the possibility of theft of power. We have no control of what a customer adds to the circuit. Instead of a province wide fixed charge, they should be charged exactly what they use.

Section 5 – Variability of Connection Charges

Connection Charges – not an issue with London Hydro.

Section 6 – Cost Responsibility in Relation to Upstream Infrastructure Upgrades to a Transmitter or Host Distributor

The 'trigger' should pay, granted it would probably make the project not economically viable, but this is probably an indication that there is already too much generation in the area. There are probably more cost effective areas to connect generation that would not require upstream upgrades.

Further discussion is required.