

EB-2011-0043

**Supplementary Proposed
Amendment to the
Transmission System Code**

**Ontario Power Authority
Comments**

September 9, 2013



1 **Supplementary Proposed Amendment to the Transmission System Code:**
2 **Ontario Power Authority Comments**

3 On August 26, 2013 the Ontario Energy Board (“Board”) issued its *Notice of Proposal to Amend a Code: Supplementary Proposed Amendment to the Transmission System Code* (“Notice”) regarding cost responsibility
4 for new and modified connection facilities.
5

6 In its Notice, the Board indicates that although there was support for the elimination of section 6.3.6 of the
7 Transmission System Code (“TSC”), in its June 17, 2013 submission Hydro One expressed concern regarding the
8 fairness of the Board’s proposed approach to cost responsibility where a new or modified connection facility is
9 intended to provide benefits to both the overall transmission system, as well as a particular connecting
10 customer. The Board further indicates that it sees merit in addressing the issue raised by Hydro One, and
11 proposes to amend the TSC to add new sections 6.3.8A, 6.3.8B, and 6.3.8C, which would provide for an
12 apportionment of cost under these particular circumstances.

13 As proposed, section 6.3.8A reads as follows:

14 *6.3.8A Despite any other provision of the Code, where one or more load customers*
15 *trigger(s) the need for new or modified facilities and the IESO undertakes an*
16 *assessment at the request of a transmitter and determines that the construction or*
17 *modification of transmitter-owned connection facilities that exceed the capacity*
18 *needs of the triggering load customer(s) is a more cost effective means of meeting*
19 *those needs than...*

20 As part of the Ontario Power Authority’s (“OPA”) role in regional planning, the OPA routinely undertakes
21 independent assessments of the alternatives to meet a given power system need, including a comparison of
22 the cost effectiveness of the construction or modification of transmitter-owned connection facilities to that of
23 network facilities. Rather than requiring the involvement of the IESO in undertaking an additional cost-
24 effectiveness assessment for transmission facilities, the OPA believes that it would be more efficient to make
25 use of the analysis already performed by the OPA. The OPA therefore respectfully submits that it is the
26 appropriate party to conduct such assessments. The OPA would benefit from the input of the IESO regarding
27 reliability considerations in completing these assessments and would seek IESO input in this regard. Therefore,
28 the OPA proposes that section 6.3.8A be revised as follows (suggested additions in bold and underlined):

29 *6.3.8A Despite any other provision of the Code, where one or more load customers*
30 *trigger(s) the need for new or modified facilities and the **OPA, in consultation with***
31 ***the** IESO, undertakes an assessment at the request of a transmitter and*
32 *determines that the construction or modification of transmitter-owned connection*
33 *facilities that exceed the capacity needs of the triggering load customer(s) is a*
34 *more cost effective means of meeting those needs than...*

35 The OPA has discussed the Board’s supplementary proposed amendment with the IESO, and it is the OPA’s
36 understanding that its comments are consistent with the views expressed in the IESO’s comment letter to the
37 Board.

38 The OPA appreciates the opportunity to provide its comments on this supplementary proposed amendment to
39 the TSC.