

September 16, 2019

Ontario Energy Board  
PO Box 2319  
2300 Yonge Street, Suite 2700  
Toronto ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

***Board File Number: EB-2019-0207 - Distributed Energy Resources  
Connections Review Initiative***

We are writing in response to your invitation to comment on the questions identified in respect of the above-noted initiative.

**Four Identified Issues**

It is our understanding that Ontario Energy Board (“OEB”) staff has identified the following high level set of issues which may be posing barriers to adoption of distributed energy resources (“DER”):

- The need for standardization and clarity of definitions, terminology and regulatory rules,
- The need for clear rules regarding cost responsibility for connection,
- The need for more detailed and comprehensive timelines for the connection process, and
- The need for appropriate standardization of connection technical requirements.

Kingston Hydro’s comments on the four identified issues are as follows:

- We have not seen standardization or clarity of terms as a barrier to DER deployment in Kingston.
- Rules regarding cost responsibility do generate barriers for connecting DERs to the extent that if a customer cannot realize economic benefit from connecting a DER then they will not do so.
- We have not seen timelines as a barrier to DERs in Kingston.
- We have not seen our technical requirements for connects act as a barrier, we don’t think standardized requirements are a problem as long as they are flexible for varying needs of individual local distribution companies (“LDC”).

## **Four Specific Questions**

In addition, OEB staff has asked for feedback on the following questions:

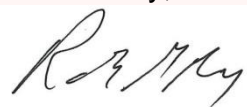
- Are the objectives of the DER Connections Review Initiative clear?
- Have staff identified the right topics for the DER Connections Review and do stakeholders have any specific concerns that they want to identify?
- Are there any proposed solutions that stakeholders wish to identify at this point?
- What is the best approach for development of solutions to the issues identified?

Kingston Hydro's responses to the four specific questions are as follows:

- Yes, the objectives of the DER Connections Review Initiative are clear.
- Generally, it appears the industry in Ontario would benefit from the added certainty which would result from the clarification of the high level issues. Specifically, clarity on the costing associated with DERs is likely going to be the most contentious issue. Some LDCs may have work to do to enable DER connection while some customers siting the DER may not want to be charged make ready costs.
- Kingston Hydro has not identified any proposed solutions at this time.
- Kingston Hydro believes the best approach is a collaborative process to achieve solutions that work for all stakeholders. LDCs do play a very important role in connecting DERs but also must ensure a reliable supply and delivery of electricity to the customers and communities we serve.

We appreciate the opportunity to provide these comments. If you have any questions regarding our comments or would like additional clarification regarding any of our comments, please contact Kevin McCauley, Director, Networking at 613-546-1181, extension 2247 or by email at [kmccauley@utilitieskingston.com](mailto:kmccauley@utilitieskingston.com)

Yours truly,



Randy Murphy, CPA, CA  
Chief Financial Officer