

September 16, 2019

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

Dear Ms. Walli:

**Re: EB-2019-0207 – Distributed Energy Resources Connections Review Initiative – Ontario Energy Board**

On August 13, 2019, the Ontario Energy Board (“OEB”) commenced an initiative to review its requirements in regard to the connection of distributed energy resources (“DERs”) by licenced electricity distributors. The purpose of the initiative is to identify any barriers to the connection of DERs, and where appropriate to standardize and improve the connection process. The review will be focussed on connection of electricity and storage facilities connected to the distribution system, either in front or behind the distributor’s meter. The review is focussed on addressing connection process timelines, connection cost responsibility matters and technical connection requirements for both the distribution system and any requirements of transmitters for connection DERs. The OEB noted that the DER Connections Review will be coordinated with its other review, Responding to Distributor Energy Resources (EB-2018-0288).

In setting out its proposed approach the OEB identified a high level set of issues which may be posing barriers to DER adoption:

- The need for standardization and clarity of definitions, terminology and regulatory rules in respect of DERs;
- The need for clear rules regarding cost responsibility for connection for DERs to ensure fairness to DER customers and all other customers of the distributor;
- More detailed and comprehensive timelines for the connection process to ensure the timelines are well understood; and
- Appropriate standardization of connection technical requirements.

The OEB provided a list of questions related to the review. The Council has a few brief comments to make in response to the OEB’s request for feedback.

**Are the objectives for the DER Connections Review initiative clear?**

The Council believes that the primary objective of the initiative is to identify any barriers to the connection of DERs and where appropriate to standardize and improve the connection process. It appears that the objective is focussed on barriers to the “connection” of DERs, not barriers to the “adoption “ of DERs – which is a much broader issue. It also appears that it will focus on amending the Distribution System Code (“DSC”). The Council believes this is appropriate, as the current rules and requirements in the DSC have effectively become out dated given the emergence of new technological advances. The Council agrees that consistency across the Province is important and the development of

best practices is required. To have consistency will provide more regulatory certainty for DER service providers, utilities and their customers. In all of this the primary focus should be to allow for DERs in the most cost-effective way possible, where there is proven value for customers.

It is somewhat unclear how this process will be coordinated with the broader review (EB-2018-0288) so the Council is of the view that the OEB should indicate to all parties how it intends to undertake that coordination. There will obviously be some issues that overlap.

**Has OEB Staff identified the right topics for the DER Connections Review and do stakeholders have any specific concerns that they want to identify?**

OEB Staff have identified a high level set of issues and the Council is of the view that these are appropriate. Once the working group process begins there may well be further issues added to the list. In addition, once the broader review has advanced, other issues may arise. The Council does not believe that at this point the range of issues should be narrowly prescribed by the OEB.

**Are there proposed solutions that stakeholders wish to identify at this point?**

The Council is of the view that it is premature, at this point to identify proposed solutions. Amending the DSC is a high level solution to address connection barriers, but how that is done should be left to the working group or groups that are established by the OEB.

**What is the best approach for development of solutions to the issues identified?**

The Council supports the proposed approach identified in the letter for moving forward. Once input has been received the OEB will need to set out the scope and approach for resolving these issues. The use of a working group or groups is a good approach given the technical nature of issues being considered. The working group process should be transparent and all stakeholders given the opportunity to provide input at various stages. The OEB should ultimately initiate a Notice of Hearing once the recommendations are translated into amendments to the DSC. This will allow for all parties to comment on the proposed changes to the DSC before they are approved by the OEB and put into place.

Yours truly,

*Julie E. Girvan*

Julie E. Girvan

CC: All parties