



September 16, 2021

Christine E. Long, Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Long,

**RE: ENWIN Utilities Ltd.'s Stakeholder Comments  
Proposed Distribution System Code Amendments  
EB-2021-0117**

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On August 5, 2021, the Ontario Energy Board ("**OEB**") provided notice of proposed amendments to the Distribution System Code ("**DSC**") under OEB File No.: EB-2021-0117, which are intended to reduce the overall timeline and provide clarity and consistency in the process for connecting distributed energy resources ("**DERs**"), and it invited interested stakeholders to provide comments by September 16, 2021.

ENWIN Utilities Ltd. ("**ENWIN**") notes that the OEB has several ongoing consultations related to understanding and addressing the impacts of DERs.<sup>1</sup> As these consultations are in their early stages, there are many unknowns that need to be addressed and resolved before distributors can provide more fulsome comments about the proposed amendments to the DSC. With that said, ENWIN has reviewed the thoughtful comments provided by the Electricity Distributors Association ("**EDA**"), and it is writing to the OEB to indicate its support for the EDA's comments and to provide the following supplemental comments.

ENWIN believes that innovative technologies are the future of Ontario's electricity industry, and it appreciates the importance and benefit of having clear and consistent rules for connecting DERs. However, many smaller or mid-sized distributors like ENWIN have limited staffing resources and must continually balance competing priorities to ensure necessary work is completed while managing costs for customers. As many distributors may not have staff solely dedicated to reviewing DER applications, it may be challenging to meet the shorter timelines proposed. Therefore, ENWIN strongly supports the EDA's recommendation for flexibility in the timelines.

ENWIN also notes that the seven (7) calendar day timeline proposed for reviewing revised application submissions for completeness in the Connection Impact Assessment ("**CIA**") process would be extremely difficult to meet where key employees are absent or occupied

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<sup>1</sup> For example, the Framework for Energy Innovation consultation, the Commercial and Industrial Rate Design Initiative, and consultations with the Independent Electricity System Operator ("**IESO**").

or where there is an influx of applications in a short period of time.<sup>2</sup> In addition, depending on the nature of the initial application and the revisions, revised application submissions may require the same level of review as initial submissions. Therefore, ENWIN proposes that the timeline for reviewing revised application submissions be extended at a minimum to a period of 14 calendar days to be consistent with the timeline for the initial review.

With respect to Connection Agreements, there are undesirable operational consequences to any requirement that distributors enter into Connection Agreements with generators that are third parties providing services behind the meter to a distributor's load customer. For example, distributors cannot take all necessary steps to address operational or emergency issues relating to DERs without the load customer's involvement. In addition, load customers are better placed to be responsible for meeting the obligations required for DER connections, and they can enter their own agreements with generators operating behind the meter without the distributor's involvement.

Therefore, it is ENWIN's position that the amendments to the DSC should provide that, while distributors must enter Connection Agreements with generators that are load customers, they are not required to enter Connection Agreements with generators that are third parties providing services behind the meter to a load customer. Moreover, ENWIN states that Connection Agreements should not require that distributors accept all generation (including fault current contribution) to the maximum capacity, as distributors require the flexibility to manage the dynamic nature of their distribution systems.

Finally, ENWIN notes that it is important to receive clarity about any limits relating to the costs that can be passed through to the customers benefiting directly from DERs. In particular, the proposed amendments and flowcharts appear to contemplate a standard cost for the completion of required studies to be paid by customers up front. However, often actual costs may vary and are passed through to customers pursuant to cost recovery agreements as they are incurred. Therefore, the proposed amendments should allow for variations in how and when distributors recover the costs of the CIA process from customers.

Thank you for considering ENWIN's comments, and please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

ENWIN Utilities Ltd.



James Brown  
Vice President, Hydro Operations

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<sup>2</sup> OEB, Distributed Energy Resources Connections Procedures Version 1.0, [APPENDIX C - DERCP Draft -DER Connections Review draft\\_20210805 \(3\).PDF](#), at page 17.