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September 16, 2021

Christine E. Long
Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto ON
M4P 1E4

Dear Ms. Long,

**RE: EB-2021-0117 Distribution System Code Amendments Consultation
Energy Probe Letter of Comment**

In its notice of August 5, 2021, the OEB invited comments from stakeholders including participants in the EB-2019-0117 initiative on the proposed amendments to the Distribution System Code. The proposed amendments are intended to reduce the overall timeline and provide clarity and consistency in the process for connecting a distributed energy resource (DER) to an electricity distributor's system.

Energy Probe Research Foundation (Energy Probe) was a participant in the EB-2019-0207 Distributed Energy Resources Connections Review Initiative. The following are the comments of Energy Probe on the proposed amendments to the Distribution System Code.

In the August 5, 2021 notice the OEB provided a definition of what is a DER.

Distributed Energy Resource (DER) is an electricity source or sink that is connected to a local distribution system or connected to a host facility within the local distribution system. A DER includes generation facilities, and energy storage facilities.

Energy Probe agrees with the definition and believes that it should not be changed to the definition used by some US jurisdictions as some parties may suggest.

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

While Energy Probe supports initiatives that may make it easier and faster for ratepayers who own DERs to have them connected to the grid, Energy Probe is concerned that unless there are adequate protections in place, this may result in increased costs and reduced reliability for ratepayers who do not own DERs.

Energy Probe has reviewed the proposed amendments and believes that they provide adequate cost and reliability protection for ratepayers who do not own DERs while reducing the overall timeline and providing clarity and consistency in the grid connection process for ratepayers who own DERs. Energy Probe supports the proposed amendments and has no changes.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)