



September 16, 2021

VIA RESS

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Long,

**Re: Ontario Energy Board
Proposed Amendments to the Distribution System Code (DSC) to Facilitate
Connection of Distributed Energy Resources
Board File No.: EB-2021-0117**

We are counsel to Anwaatin Inc. (**Anwaatin**). Anwaatin appreciates the opportunity to provide its comments on the *Proposed Amendments to the Distribution System Code to Facilitate Connection of Distributed Energy Resources* (the **Proposed Amendments**) pursuant to the Board's Notice dated August 5, 2021, and hereby provides these comments on the Proposed Amendments.

Anwaatin is an Indigenous business corporation that works with Indigenous communities in linked energy markets that include Ontario, Quebec, California, and Manitoba. Anwaatin's mission is to ensure that Indigenous communities are afforded reliable and affordable energy and have a central role in energy-related climate change action. Anwaatin's interests are focused on ensuring that Indigenous communities and businesses (i) have access to efficient electricity and natural gas energy solutions for Indigenous communities; (ii) are provided with reliable energy transmission and distribution in order to meet basic needs and facilitate economic development; (iii) address poor electricity reliability and the disparate and adverse impacts that it has on Indigenous communities and Aboriginal rights; and (iv) strengthen distributed energy resources (**DERs**) in Indigenous communities to facilitate their resilience, reconciliation, and efficient electrification solutions to address climate change.

The Proposed Amendments to the DSC may affect the ability of First Nations communities and Indigenous businesses to connect DERs. Anwaatin's comments on the Proposed Amendments seek to support the interests of First Nations and Indigenous businesses that are increasingly choosing to connect DERs, including, *inter alia*, in order to improve energy reliability both on-reserve and within their traditional territories. Anwaatin therefore seeks to provide these comments in support of First Nations and Indigenous businesses that will be navigating the DER connection process as outlined in the Proposed Amendments, as a means to improve access to reliable and modern sources of energy.

Anwaatin generally supports the Proposed Amendments that reduce barriers to DERs, including energy storage, promote economic efficiency and cost effectiveness, as well as those that make the adoption of new technologies more efficient.¹ In addition, Anwaatin is supportive of standardizing the information exchanged between proponents and distributors, making the connection process more efficient and predictable. This includes (i) the standardization of information implementation of the Distributed Energy Resources Connection Procedures (**DERCP**) which is to be incorporated into the DSC and (ii) the early verification process envisioned as part of the DERCP which will streamline and provide greater certainty of the application process while also reducing the time and length of applications by DER proponents. Anwaatin also supports the explicit inclusion of energy storage facilities as part of the DER definition.²

Anwaatin strongly supports the Proposed Amendment to the extent that they improve the preliminary consultation process, including the requirement for distributors to maintain a restrictive feeder list (or interactive tool) that identifies feeders within a distributors system with no capacity for further connections.³ Anwaatin urges the Board to maintain the necessary level of oversight over the restricted feeder lists published by distributors to ensure that they are accurate, transparent, and properly kept up-to-date. Anwaatin supports the wording per DERCP, 4.2(c) in this regard and therefore respectfully proposes the following addition to DSC, 6.2.3(g):

6.2.3 [...]

(g) a list of “restricted feeders” by name and feeder designation that the distributor operates that are known not to have any short circuit capacity to accommodate a distributed energy resource connection. The list must be updated as necessary to capture system reconfiguration or expansions and shall be updated if the system changes or at least every 3 months

Anwaatin further supports the proposed amendment to provide three Preliminary Consultation Reports at no charge, ensuring lower costs and providing greater access to proponents of DERs.

Sincerely,



Lisa (Elisabeth) DeMarco

c. Larry Sault, Anwaatin Inc.
 Don Richardson

¹ OEB Notice of Proposal to Amend Code (EB-2021-0117) (5 August 2021), p. 3.

² *Ibid.*, pp. 3-4.

³ *Ibid.*, p. 8.