



Public Energy Gas Inc.
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September 16th, 2021

Ms. Christine E. Long, Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
P.O. Box 2319
Toronto, ON M4P 1E4

RE: Public Energy's Response to Ontario Energy Board's Notice of Proposal to Amend a Code dated August 5, 2021, titled "Proposed Amendments to the Distribution System Code to Facilitate Connection of Distributed Energy Resources" – File No. EB-2021-0117

Dear Ms. Long:

Thank you for the invitation to provide comments on the proposed amendments to the Distribution System Code (DSC) to facilitate connection of Distributed Energy Resources (DER).

Short Circuit Limitation:

Under section 4.4 of the DER Connections Procedure (DERCP), it states that "the Preliminary Consultation Report will identify:

- i. If there is no possibility of connecting the project due to short circuit limitations
 - a. At the distribution level or
 - b. At the transmission level."

Public Energy believes that additional information related to the short circuit constraint should be included in the DERCP and the DSC. Specifically, Public Energy would like to understand what level of short circuit restriction or threshold would not allow any connection of a DER.

Public Energy recently encountered a short circuit restriction for one of our projects. Initially, Local Distribution Company (LDC) and Transmission Company (TC) denied the connection of this project. Public Energy, however, working collaboratively with the LDC and TC identified a resolution to the short circuit limitation. Therefore, the project that was initially rejected was able to connect.

Transfer Trip:

Additionally, Public Energy believes there should be more transparency with respect to the estimates of additional cost of implementation of transfer trip. Specifically, a detailed, itemized list should be provided to support the estimate.

**Level of Service:**

Over the past two years, Public Energy has encountered inconsistent level of service requirements by LDCs. We believe the DERCP can be improved with a more consistent application of level of service requirements. For example, we've encountered material differences amongst LDCs for requirements related to SCADA and Gross Load Billing (GLB) metering. These requirements should be consistent across the province.

Non-Exporting Classification:

Public Energy believes that a Non-Exporting DER should further be classified into the transition type: i) closed ("make before break"); and ii) open ("break before make"). A DER that has an open transition is never connected to distribution and should not have the same requirements as a project that has a closed transition.

About Public Energy Gas Inc.

Public Energy Gas Inc. is an independent power producer that owns, operates and finances natural gas fired containerized on-site electricity generation units for industrial and commercial customers in North America. Based at the MaRS Discovery District in downtown Toronto, Public Energy innovative containerized approach helps industrial and commercial customers reduce their electricity cost through a variety of generation solutions.

Please let us know if there are any questions. I can be reached via phone at (647) 278-5115 or via email at denis.steyn@publicenergyinc.com.

Yours truly,

A handwritten signature in black ink that reads 'Denis Steyn'.

Dr. Denis Steyn, PhD
Vice Chairman