

Ms. Christine Long
OEB Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

September 16, 2021

Re: EB-2021-0117 Proposed DSC Code Amendments

Dear Ms. Long:

Thank you for the opportunity to provide comment on these proposed amendments to the Ontario Distribution System Code (DSC), per the OEB Notice of Proposal to Amend a Code dated August 5, 2021.

The Canadian Renewable Energy Association (CanREA) is a national industry association representing over 300 companies in Canada's wind energy, solar energy and energy storage industries including generators, utilities, manufacturers, and service providers. On behalf of our diverse member companies, we advocate for the advancement of modern energy systems through stakeholder advocacy and public engagement.

CanREA strongly supports the OEB's stated objective in the DER Connections Review initiative of standardizing and improving the DER connection process in Ontario. While some of these proposed amendments will require further consideration and discussion from the Connections Review working group, we believe that others should be swiftly implemented as they will meaningfully help to remove obstacles to DER connections going forward.

CanREA offers the following comments on the proposed DSC amendments:

Section	Amendment	CanREA comment
Definitions	<i>(Various)</i>	CanREA supports the proposed changes to the definitions
DSC 6.2 Responsibilities to Generators	"Section 6.2 does not apply to the connection or operation of an emergency backup generation facility. or an embedded generation facility that is used exclusively for load displacement purposes at all times. <u>When connected in parallel with the distribution system, an emergency backup generation facility must have a transfer switch that isolates it from the distribution system within 100 milliseconds.</u> "	Given that technical connections details are already well covered by the Technical Interconnection Requirements (TIR) document, we are concerned that including these details within 6.2 may be redundant.
Cost Responsibility for Connection of Generation Facilities and Storage Facilities – DSC 6.2.3	"A distributor shall promptly make available a generation connection information package to any person who requests this package. <u>The package must be made available electronically on the distributor's website.</u> It must also be available in hard copy at the distributor's premises for customers who request it. The package shall contain the following information: [. . .]	Re. (f): The level of detailed required in the protection philosophy document required in the initial CIA application varies significantly across Utilities. Having a standard protection philosophy document in place will reduce "back & forth" between applicant and Utility. The standard document was carefully developed by members of the

	<p>(f) the sample Protection Philosophy as provided in the Distributed Energy Resources Connection Procedures; and</p> <p>(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 at least every 3 months”</p>	<p>technical working group with extensive input from both utilities and DER Developers, and should be utilized.</p> <p>Re. (g): CanREA strongly supports mandating the provision of a restricted feeders list. This will be a significant step forward in terms of improving the efficiency of the connection application process.</p>
Connection of Micro-Embedded Generation Facilities – DSC 6.2.5	<p>“A distributor shall make available a Micro-Embedded Generation Facilities Application, in the form specified in Appendix E, to a person who is considering applying for the connection of a micro-embedded generation facility to the distributor’s distribution system. The Micro-Embedded Generation Application shall be available electronically, on the distributor’s website where available, with a paper copy available at the distributor’s address.”</p>	<p>Reference is made several times to a micro embedded generation facilities application, however Appendix E only contains a MF Connection Agreement. Most utilities currently use some form of a micro-generation facility application typically referred to as Form C. Additional review may be required to reduce confusion between Application and Connection Agreement.</p>
Connection of Micro-Generation Facilities – DSC 6.2.6	<p>“A distributor shall use the process and forms as specified in the Distributed Energy Resources Connection Procedures to process a request for connection of a micro-embedded generation facility.”</p>	<p>CanREA supports this clarification and simplification of section 6.2.6</p>
Preliminary Consultation Information Request and Report – DSC 6.2.9	<p>“A distributor shall make available a Preliminary Consultation Information Request form, in the manner specified in the Distributed Energy Resources Connection Procedures, to a person who is considering applying for the connection of a generation facility to the distributor’s distribution system. The Preliminary Consultation Information Request Form should be available electronically on the distributor’s website and in hard copy at the distributor’s address.”</p>	<p>CanREA supports standardization of the PCIR form to be used by all utilities.</p>
	<p>“A distributor shall provide a Preliminary Consultation Report to a person without charge up to 3 times in a calendar year. The distributor may recover from the person the reasonable costs incurred by the distributor in preparing the information Preliminary Consultation Report for the additional locations Preliminary Consultation Information Request forms beyond the three to be provided at no charge.”</p>	<p>This wording is confusing. Section 6.2.9 as currently worded would have provided this information for connection applicants at no charge, subject to 6.9.1.(b) in its current wording. This amendment does not address the ambiguity of the statement “The distributor may recover from the person the reasonable costs in preparing the Preliminary Consultation Report”. CanREA is not aware of any Utility charging for submission of and reporting back on existing “Form A” documents by</p>

		<p>prospective connection applicants.</p> <p>This proposed amendment was not discussed during the DER Connections Review working group process, and rather than moving forward this ambiguous amendment, CanREA would recommend that it be tabled for discussion during Tranche 3.</p>
Preliminary Consultation Information Request and Report – DSC 6.2.11	<p>“A distributor shall make available a Connection Impact Assessment Application, in the form specified in the Distributed Energy Resources Connection Procedures, to a person who is considering applying for the connection of a generation facility to the distributor’s distribution system. The Connection Impact Assessment Application should be available electronically, on the distributor’s website where available, and in hard copy at the distributor’s address.”</p>	<p>CanREA would regard the use of a standardized CIA form by all distributors as a significant improvement. This eliminates several pieces of information for existing customer accounts.</p>
Mid-sized or Large Generation Facility – DSC 6.2.14A	<p>The distributor shall, within 10 days of initiating a connection impact assessment study, advise in writing any transmitter or distributor whose transmission or distribution system is directly connected to the specific feeder or substation to which the proposed embedded generation facility is proposing to connect. The distributor shall include in the written communication, at a minimum, the proposed in-service date, the rated capacity and type of technology of the proposed embedded generation facility.</p> <p>If the distributor requires a transmitter or host distributor to complete a Transmission System (TS) review study or connection impact assessment, the distributor shall file an application with the transmitter or host distributor for such within 15 days of initiating a connection impact assessment study. A distributor will also inform the transmitter or host distributor in writing on an ongoing basis of any change in status of the project including removing the capacity allocation for the project, material changes in the projected in-service date of the project or placing the project in service.</p>	<p>CanREA views this as a significant step in reducing assessment timeframe where an upstream study must be completed. In the past several Utilities insisted that the initial CIA be completed before going upstream to have Tx study or host Utility CIA completed.</p>
Mid-sized or Large Generation Facility – DSC 6.2.16	<p>In the case of an application for the connection of a mid-sized or large embedded generation facility, once the impact assessment is provided to the applicant, the distributor and the applicant have entered into an agreement on the scope of the project and the applicant has paid the distributor for the cost of preparing a detailed cost estimate of the proposed connection, the distributor shall provide the applicant with a</p>	<p>This is poorly worded. The initial assessment (CIA) contains an estimated cost to connect, whereas 6.2.16 would seem to suggest the applicant must enter into an agreement on the scope of the project (capital cost agreement or capital cost recovery agreement) and then</p>

	<p>detailed cost estimate and an offer to connect by the later of 90 days after the receipt of payment from the applicant and 30 days after the receipt of comments study results from a transmitter or distributor that has been advised requested under section 6.2.14A</p>	<p>request and pay for a detailed cost estimate.</p> <p>We are concerned with how this is written regarding timing of the provision of detailed cost estimate, and will await to see the outcome of the Cost Estimates discussion in Tranche 3 of the DER Connections Review working group process before commenting further.</p>
<p>Mid-sized or Large Generation Facility – DSC 6.2.18</p>	<p>b) <u>applies only to an exporting generation facility</u> if the applicant does not have an executed OPA <u>IESO</u> contract which includes a requirement for security deposits or similar payments, a requirement that the applicant pay a capacity allocation deposit equal to \$20,000 per MW of capacity of the embedded generation facility at the time the connection cost agreement is executed;</p> <p>c) <u>applies only to an exporting generation facility</u> if the applicant does not have an executed OPA <u>IESO</u> contract which includes a requirement for additional security deposits or similar payments, a requirement that if fifteen (15) calendar months following the execution of the connection cost agreement the embedded generation facility is not connected to the distributor's distribution system, the applicant must pay an additional capacity allocation deposit equal to \$20,000 per MW of capacity of the embedded generation facility on the first day of the sixteenth(16th) calendar month following the execution of the connection cost agreement;</p>	<p>CanREA seeks to better understand the background for the deposit and why only it applies for exporting generation facilities.</p> <p>CanREA also wish to better understand the basis for the 15 calendar months provision for a second deposit, whereby the Code advises applications should be submitted if the Developer expects to be in-service within 3 years or 5 years for water base projects. Further discussion on this point is required.</p>
<p>Mid-sized or Large Generation Facility – DSC 6.2.20</p>	<p>"Once the applicant informs the distributor that it has received all necessary approvals, provides the distributor with a copy of the authorization to connect from the ESA and <u>enters into the Connection Agreement</u>, and the distributor receives a copy of the authorization to connect from the ESA, the distributor shall act promptly to connect the generation facility to its distribution system."</p>	<p>(i) the change is correct, ESA issues connection authorization directly to Utility.</p> <p>(ii) there is an issue with "and enters into the Connection Agreement" – in most cases the Utility will not sign the Connection Agreement until the generation facility commissioning is complete and a report issued. This cannot be done until the site is connected to the grid for commissioning purposes, usually with a "temporary connection authorization". This proposed wording should be reviewed, and may require additional changes in the Distributed Energy Resources</p>

		Connection Procedures document.
Mid-sized or Large Generation Facility – DSC 6.2.23	<u>“ Material on the process for connecting a generation facility to a distribution system is set out in Appendix F.4. A distributor shall follow the process as specified in the Distributed Energy Resources Connection Procedures to process a request for connection of a mid-sized or large embedded generation facility.”</u>	CanREA supports this change; the procedure guide can be a useful tool and the OEB can update and publish as required without the need for a formal code amendment process, enabling greater flexibility going forward.
Mid-sized or Large Generation Facility – DSC 6.2.25	A distributor shall ensure that the safety, reliability, and efficiency of the distribution system is not materially adversely affected by the connection of a generation facility to the distribution system. A distributor shall require that new or significantly modified generation facilities meet the technical requirements specified in Appendix F.2 CSA C22.3 No. 9.	CanREA supports this move toward referencing the prevailing CSA standard, rather than a separate OEB standard. This will help to reduce bureaucratic complexity and to avoid potential confusion.

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