

Appendix A: Notice of Proposed Amendments to the DSC

Section	Enel X Comment
Definitions	
1.2	<p>Enel X supports the addition of the proposed definitions and amendments to the DSC.</p> <p>For the definition of distributed energy resource, Enel X recommends that the definition align more closely with the working IESO definition.</p>
Responsibilities to Generators	
6.2.1	Enel X supports the removal of the exemption of load displacement reference.
Cost Responsibility for Connection of Generation facilities and storage facilities	
6.2.31	To ensure that Chapter 3 applies to all projects, Enel X recommends adding “exporting” to the section. “... and are also applicable to <u>exporting</u> and non-exporting connections”.
6.2.3	<p>Enel X supports the availability of a generation connection package including the sample Protection Philosophy and a list of “restricted feeders” by name and feeder designation that are known to have any short circuit capacity to accommodate a DER connection.</p> <p>Enel X supports a discussion occurring in Tranche 3 that will examine the transparency of feeder capacity. This point has been discussed at both the Connections Working Group as well as the Framework for Energy Innovation Working Group.</p>
Preliminary Consultation Information Request and Report	
6.2.9	Enel X supports the development of a standardized initial contact form that will be used by all utilities.
6.2.9.1	Enel X recommends that further discussion is required on the “cost recovery” provisions. Enel X also requests clarification of the wording “to a person without charge up to 3 times in a calendar year”. Is this site specific or company specific?
6.2.11A	Enel X supports the standardization of the CIA application.
Small Embedded Generation Facility	
6.2.12	Enel X supports the development of a DER Connections Procedures document.

Appendix C: Proposed Distributed Energy Resources Connection Procedures (Version 1.0)

Section	Enel X Comment
3. DER Connection Procedures Overview	Enel X supports the recommendation made by Stem in this section. The Wording suggested better reflects project development: c. Project Development d. Build and Energization
4. Preliminary Consultation	
4.2 Restricted Feeder List	There are many reasons why a feeder may be restricted. This should be reflected in the connection procedure versus just 'zero capacity'.
4.3.1 Preliminary Consultation Information Request	Enel X recommends that distributors be required to "submit for review and approval of the OEB"
5. Connection Impact Assessment	
5.1.2 Description	Enel X does not support estimates of +/- 50% of the cost as this is unreasonable and creates financial risk. Cost estimates will be discussed in Tranche 3 of the consultation. For the Detailed Cost Estimate Enel X recommends including specific language on what was signed "...before signing the Connection Capital Cost Agreement" vs. "... before signing a connection agreement".
5.2 Application Forms	If distributors are required to make additions to the template form due to the unique nature of their distribution system, Enel X recommends that the revised form be filed with the OEB. To ensure consistency, if changes are required based on utility amended templates, then OEB review the changes and re-issue a revised template.