

**Appendix E**  
**to**  
**Notice of Revised Proposed Amendments to the**  
**Distribution System Code**  
**December 20, 2021**  
**EB - 2021-0117**

**Comments on Distributed Energy Resources Connection Procedures**

The August Notice proposed the transfer of many details related to connection procedures from the DSC into the newly-established DERCP. Stakeholders broadly supported the creation of the DERCP. The DERCP has been revised to address flow-through changes resulting from the proposed revisions to the DSC as described in the revised Notice. In addition, the DERCP has been revised to address additional stakeholder comments received. Below, the OEB summarizes comments received from stakeholders specifically in relation to the DERCP and indicates how the OEB has responded to these comments including changes in the DERCP where appropriate.

*Consultation Process & Ongoing Maintenance of DERCP (DERCP s. 1)*

A number of stakeholders asked for the establishment or articulation of a mechanism to address changes to the DERCP, albeit with a less formal process than the DSC amendment process.

The OEB acknowledges industry interest in being consulted on future revisions of the DERCP, and intends to initially rely on the DER Connections Review Working Group to solicit feedback on revisions to the DERCP.

A stakeholder recommended distributors be expected to report annually on the DERCP and opportunities for improvement, and that they report on performance against mandated timelines.

The OEB is of the view that a provision requiring reporting on process improvements does not provide regulatory efficiency. Further, issues pertaining to performance reporting will be addressed in future discussions of the DER Connections Working Group related to benchmark reporting.

Stakeholders suggested the OEB take an active role in approving deviations from the DERCP and engage in a discussion regarding application costs.

The OEB notes that it does have an active role in approving deviations from the DERCP by virtue of the proposed amended DSC sections 6.2.6, 6.2.9.1, 6.2.12 and 6.2.23 requiring distributors to follow the process as outlined in the DERCP; deviations from the requirements of DERCP would require distributors to file an exemption request from the applicable DSC provision. Discussions regarding application cost continue in the DER Connections Review consultation.

Definition of Applicant (DERCP s. 2)

A stakeholder suggested the definition for Applicant be modified to indicate the Applicant is the entity connected to the distribution system, rather than the DER owner.

The OEB does not consider a change to be necessary, since the entity connected to the distribution system is considered the customer pursuant to the DSC. The Preliminary Consultation or Connection Impact Assessment processes allows for a developer, DER owner, or consultant to make an application for connection on behalf of a customer. The use of “Applicant” provides the customer the necessary flexibility to accommodate cases where a consultant or developer submits an application on the customer’s behalf.

Definition of DER (DERCP s. 2)

The OEB has included a revised definition for DER, as discussed in the Notice.

Removal of Terms Appearing in DSC (DERCP s. 2)

Definitions already appearing in the DSC were removed from the DERCP.

Treatment of “Storage Facility” (DERCP s. 3)

A stakeholder requested additional guidance on the treatment of a “storage facility”.

The OEB provides revisions in the DERCP to provide clarification on “storage facility” in section 3.

Process Groups (DERCP s. 3)

Stakeholders proposed modifications to better reflect the activities under the process groups presented in section 3 of the DERCP.

The OEB acknowledges the feedback provided and has revised the process groups to provide better clarity.

Preliminary Consultation Information Requests and Web-Based Interfaces (DERCP s. 4.3)

Stakeholders requested flexibility to allow for collection of Preliminary Consultation Information Requests through web-based interfaces.

The OEB accepts the recommendation to allow distributors flexibility to collect Preliminary Consultation Information Requests through web-based interfaces and has revised the DERCP to reflect this.

Cost Estimate Uncertainties (DERCP s. 5.1.4)

Certain stakeholders questioned references to cost estimate uncertainties. Distributor stakeholders expressed concern related to the feasibility of providing detailed cost estimates with lower uncertainties. Stakeholders generally suggested that matters pertaining to cost estimate uncertainties be reviewed in the DER Connections Review Working Group proceedings.

The OEB acknowledges the feedback and has removed references to percent uncertainties, with the expectation these issues will be discussed in the DER Connections Working Group.

*Micro-Embedded Generation Facility (DERCP s. 5.2)*

A stakeholder suggested that the distributor may require additional information not captured in the Micro-Embedded Generation Agreement.

The OEB agrees and has added a note in the DERCP that the distributor may request additional information to facilitate its consideration of the application request.

*CIA Application Forms and Payment Requirement (DERCP s. 5.2)*

A stakeholder suggested that language in 5.2 be modified to indicate that a CIA will be commenced only after payment has been received.

The OEB does not believe such a clarification is required since the requirement for payment is already included in the process descriptions.

*Template Forms (DERCP s. 5.2)*

Distributor stakeholders requested flexibility in use of template forms.

The OEB does not believe there is a need for flexibility in use of template forms as flexibility based on distributor system configuration was incorporated in the design of the forms. The Preliminary Consultation Report allows distributors to provide additional information to the applicant that they deem may facilitate the connection, while the template for the Connection Impact Assessments contains a section where distributors may request any additional information required for the processing of a study request based on unique system characteristics.

*Flowchart Presentation (DERCP s. 5.3)*

A stakeholder suggested moving the process flow charts to the Appendix and clarifying timelines.

The OEB acknowledges the feedback and has amended select references to timelines, but for flow and clarity purposes is not transferring the flow charts to appendices at this time.

*Micro-Embedded Generation Facility Requirements (DERCP s. 5.3.1)*

A stakeholder suggested allowing a distributor to charge an applicant for a CIA in the case where a micro-embedded generation facility is rejected due to an initial capacity constraint.

The OEB does not believe this is necessary as the restricted feeder list should deter applications for connections to feeders with no capacity and the scenario outlined is unlikely as the study and connection cost would be of similar quantum as the installation cost and thus not feasible. The OEB notes that distributors are encouraged to engage in discussions with applicants early to facilitate connections to the distribution system.

ESA provided comments related to interactions with the ESA Plan Review and Inspection processes.

The OEB acknowledges the feedback and has accepted the ESA comments.

*Screening Process for Small, Mid-Sized, and Large Embedded Generation Facilities (DERCP s. 5.5)*

A stakeholder suggested a change in language to indicate that the screening process is intended to serve as an initial review for errors & omissions.

The OEB does not believe this is required, since the DERCP adequately conveys that this is a completeness check.

A stakeholder suggested removing select notes related to reasons why system capacity constraints may be re-checked after a preliminary consultation has been completed.

The OEB does not believe the notes related to reasons why system capacity constraints may be reassessed are restrictive and, per the recommendations of the DER Connections Review Working Group, is keeping the language as-is.

*Small Embedded Generation Facility (DERCP s. 5.6)*

A stakeholder suggested removal of the first sentence since there may be cases where a small embedded generation facility requires the completion of a host distributor CIA.

The OEB agrees and has accepted this change.

*Connection Cost Agreement (DERCP s. 6.2)*

In the section related to Connection Cost Agreements, a stakeholder suggested removing references to Connection Cost Recovery Agreements.

The OEB is not accepting this suggestion, since references to CCRA's are made in relation to connections involving the transmitter, and provide visibility to the applicant in terms of high-level interactions between the transmitter and distributor.

*Connection Build Process (DERCP s. 6.5)*

ESA provided comments on the Build & Energization process as it pertains to ESA processes.

The OEB acknowledges the feedback and has accepted the comments.

#### Other Potential Agreements (DERCP Table 2)

A stakeholder requested modifications to remove references to transmitters for select items.

The OEB accepts most of these comments, but retained a reference to transmitter where required. The OEB has also indicated areas where the Generator is expected to be a party to an agreement.

#### Appendices

The OEB has updated the appendices for technical or administrative changes resulting from addressing stakeholder comments. The sample SLD and protection philosophy have been revised; the CIA application template has been updated in Figures A1 and A2 to clarify the definition of Point of DER Connection; and the CIA Checklist and Guidance Document has been updated.

With regard to CIA Application Form Appendix A, Figures A1 and A2, the OEB notes that it has revised the acronym for Point of DER Connection to “PODC” to avoid confusion with the term “point of connection” which is used in the DSC definition for “connection assets.” In the August Notice, the term Point of DER Connection had been given the acronym POC.