

@)@@January 21, 2022

VIA RESS

Ms. Nancy Marconi
Acting Registrar
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Marconi:

Re: Revised Proposed Amendments to the Distribution System Code to Facilitate Connection of Distributed Energy Resources (EB-2021-0117)

On August 5, 2021 the Ontario Energy Board (“OEB”) issued a Notice of Proposal to Amend the Distribution System Code (“DSC”) to facilitate the connection of Distributed Energy Resources (“DERs”) to local electricity distribution systems. The proposed amendments were developed based on the recommendations and input of the OEB’s DER Connection Review Working Group. The amendments are intended to improve clarity and consistency in the timelines and overall connection process used by Ontario’s electricity distributors across the province in connecting DERs.

The OEB reports that it received broad support for many of the contemplated revisions to the DSC and the establishment of a separate DER Connection Procedures (“DERCP”) document in written stakeholder comments submitted in September 2021. After consideration of comments received, the OEB issued a Notice of Revised Proposal to Amend the DSC (the “Notice”) on December 20, 2021. In its Revised Proposal, the OEB makes clear that it intends to adopt the amendments as they were proposed in the August Notice, except as pertaining to certain elements outlined in the December Revised Proposal.

Alectra is pleased to provide its comments on the revised proposed amendments. The revisions articulated in the December Notice substantially address Alectra’s concerns surrounding the processes required to connect DERs, however, there are some specific elements for which Alectra proposes further amendments in order to enhance clarity and consistency.

COMMENTS

Alectra believes that the revised proposed amendments will materially improve the processes and timelines necessary for the integration of DERs across the province, resulting in enhancements

for all of Ontario's electricity stakeholders. Alectra's comments below are organized consistent with the format of the Revised Notice.

Connection of Micro-Embedded Generation Facilities

- DSC S. 6.2.5

As explained in the Revised Notice, the OEB proposes to amend the wording of section 6.2.5 of the DSC to clarify that the Agreement will serve as the Application for a Micro-Embedded Generation Facility, in alignment with the process outlined in the DERCP. The proposed language in the DSC reads as follows:

6.2.5 A person who is considering applying for the connection of a micro-embedded generation facility to the distributor's distribution system shall complete the applicant portion of the Micro-Embedded Generation Facilities Agreement and submit it to the Distributor, in accordance with the process established in the Distributed Energy Resources Connection Procedures. The Micro-Embedded Generation Agreement shall be available electronically, on the distributor's website where available, with a paper copy available at the distributor's address.

Alectra is concerned that the proposed wording could cause some confusion. As proposed, the language ignores that distributors may be required to assess the available feeder capacity in connecting a project. Alectra understands that the intention is not to address specific procedural issues directly within the DSC. Alectra also observes that section 6.2.6 does establish that distributors would follow the process established in the DERCP, which is helpful. However, Alectra notes that even for micro-embedded projects, distributors will still need to verify that there are no system restrictions or limitations to facilitate the connection.

Section 5.3.1 of the DERCP indicates the following:

Micro-embedded generation facilities are equal to or less than 10 kW and are considered to pose a relatively low connection risk to the distribution system compared to larger generation facilities.

In most circumstances, the impact to the distribution system may be low risk for micro-embedded connections, however, this may not hold true in all circumstances, which may result in a project as proposed having to be rejected. In addition, section 5.2 of the DERCP indicates that no forms are required to facilitate the application, which could also be taken to mean that no further validation is undertaken by the distributor. Alternatively, step 6 of the flow chart in section 5.3 of the DERCP correctly establishes that part of the process as, "Review and make offer to connect (OTC) or refusal to connect with reasons".

Alectra is not suggesting that any further process or forms be required for the connection of micro-embedded generation projects. However, for clarity, Alectra proposes that the language in the DSC simply refer to the DERCP, and that section 5.2 of the DERCP indicate that validation or forms may be required, at distributors' discretion. If adopted by the OEB, the amended language for section 6.2.5 of the DSC would read as follows:

6.2.5 A person who is considering applying for the connection of a micro-embedded generation facility to the distributor's distribution system shall follow the process established in the Distributed Energy Resource Connection Procedures. The Micro-Embedded Generation forms and agreements shall be available electronically, on the distributor's website where available, with a paper copy available at the distributor's address.

- DSC S. 6.2.6

Alectra notes that the DERCP process includes and embeds the use of certain forms to facilitate connection processes. Referring to the DERCP and forms as separate items may be redundant. As a result, it may be more concise to eliminate the redundancy by striking the words, "and forms", as shown below:

"6.2.6 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.

Alectra appreciates the opportunity to provide these comments for the OEB's consideration. Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

Christine E. Long
Vice President, Regulatory Affairs
Alectra Utilities Corporation