

January 19, 2022

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

RE: Distributed Energy Resources (DER) Connections Review, Reference #: EB-2019-0207

Dear Registrar:

As mentioned in our prior submission dated September 16, 2021, Ameresco is supportive of the DER Connections Review process and the OEB's commitment to keep up to date with the industry changes.

In our submission Ameresco provided certain comments to highlight our opinion on certain matters relating to the proposed amendments to the Distributed Energy Resources (DER) Connection's document. We have reviewed the latest proposed amendments and note that many of our previous concerns have been alleviated.

We believe that the work done thus far provides some good changes to the document however, there remain some comments mentioned in our September submission that we feel were left unaddressed and wish to bring to your attention. We think these are important issues and believe these remaining items should be moved back to the working group for further discussion and consideration. We strongly urge you to consider this suggestion and are hopeful that this can be done in a timely manner so that these outstanding items can be resolved quickly.

The following are the items we feel were not adequately addressed and we request that you send them back to the working group for a final discussion.

DSC 6.2.1 Responsibilities to Generators:

6.2.9.1 A distributor shall provide a Preliminary Consultation Report to a person without charge up to 3 times in a calendar year.

Comment: Ameresco requests additional clarification to the wording of "to a person without charge up to 3 times in a calendar year". Is this site specific or can a developer only submit 3 PCRs per calendar year to a local Utility after which charges "may apply"? In addition, "distributor may recover from the developer reasonable costs incurred by the distributor..." Further discussion is required and recommended regarding "cost recovery" provisions

6.2.16: 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 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.

Comment: Ameresco believes the sequence of events noted in section 6.2.16 may be incorrect. The current process is a completed CIA is issued which includes a cost estimate to connect, should an applicant wish to have a more detailed estimate completed, notice is provided to the distributor, payment issued, and detailed estimate is provided with the timeframe noted. The next step should the applicant wish to proceed is to enter into a capital cost agreement or capital cost recovery agreement in the case with Hydro One.

6.2.18: applies only to an exporting generation facility if the applicant does not have an executed OPA IESO 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.

(b) applies only to an exporting generation facility if the applicant does not have an executed OPA IESO 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;

Comment: These provisions were developed in the early days of the Green Energy Act, as developers we need to better understand the rational for these provisions. In addition, why the second deposit 15 months later (applicants are expected to be connected in within 3 years or 5 years for water-based projects) and how the \$20,000 was established. We would recommend removal of this section or include more in-depth discussion by the Working Group in tranche 3 of the DER Connection consultation. In addition, s. 6.2.18 needs additional clarity. It will be important to understand how the fees were determined and why these fees will apply only to exporting facilities. We recommend that the specified capacity reserve charge of \$20,000/MW be removed in the meantime. Also, clarity is required regarding the 15-month payment requirement following the execution of the connection cost agreement.

We appreciate the opportunity to provide these comments to you. We look forward to continuing this discussion with you, your team and participating in the DER Connections Advisory Group.

Respectfully,

A handwritten signature in blue ink, appearing to read "Chris Myers".

Business Development

Ameresco Canada Inc.