



January 21<sup>st</sup>, 2022

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

*Submitted via email: registrar@oeb.ca*

Dear Registrar:

**Re: EB-2021-0117 – Distributed Energy Resources Connection Review**

Enel X is pleased to provide comments on the Notice of Revised Proposal to Amend the Distribution System Code regarding connection of distributed energy resources (DERs) to local electricity distribution systems. As noted in Enel's previous submission, Enel X has been a strong supporter of the DER Connections Review process including proposals to improve connection timelines and provide clarity and consistency in the connection process.

Enel X is Enel Group's global business line offering services that accelerate innovation and drive the energy transition. A global leader in the advanced energy solution sector, Enel X manages services such as demand response for around 6 GW of total capacity at global level and around 100 MW of storage capacity installed worldwide, as well as 195,000 electric vehicle charging points. Enel X has participated in demand response programs in Ontario since 2008 and will have approximately 60 MW of behind-the-meter energy storage batteries under construction or in operations by the end of 2022.

Enel X supports the comments submitted by Ameresco, Stem and Convergent.

Enel X supports the revised proposed amendments, however there are proposed amendments included in submissions filed in September 2021 that have not been addressed in the revised proposed amendments.

<b>Preliminary Consultation Information Request and Report</b>	
6.2.9.1	<p>Enel continues to recommend that further discussions are required on the 'cost recovery' provisions. This should be taken back to the Working Group.</p> <p>Enel 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?</p>



Enel Supports the comments prepared by Larry Herod, Compass Energy Services, on the Connection Procedures and includes the comments below:

**Preliminary Consultation Information Request:**

**Section 2 Project Intent:**

- 1) "Inject energy into the grid under the program"
  - Recommend removal if the three words "under the program".
- 2) "Emergency Backup only when the grid is not available"
  - Most Utilities have separate application form.
- 3) "Form A Complete"
  - Should reference PCIR is complete, no longer using Form A/B/C.

**Preliminary Consultation Information Request:**

- The PCIR example provided is missing 2 key pieces of information, proposed installed capacity & DER type. Would this be considered an incomplete submission?
- Recommend re-do sample PCIR sample.

**Preliminary Consultation Report**

- The PCR request indicates the distributor will assign an ID#, ID# should appear in the report, next to date.
- It would be very helpful if the distributor could include the CIA cost(s) as part of the report.

**Preliminary Consultation Report**

- The PCR example shows no capacity due to restriction at transmission level, no transmission details provided and indicates LDC CIA required.
- Recommend the example be for a project where capacity is available and provide all necessary distributor and transmitter details.

**Connection Impact Assessment (CIA) Application;**

- 1) *"Emergency Backup Generators should use the Emergency Backup Generation Application Form available at"*



- As noted above in PCIR, recommend EG not be part of part of the PCIR form
- 2) *"For Load Displacement or Energy Storage facility connections, the assessment performed by [LDC name] is referred to as a Detailed Technical Connection Assessment (DTCA). For such facilities, the term "CIA" as it appears throughout this Connection Impact Assessment (CIA) Application shall be interpreted to mean "DTCA".*
- This is currently only with Hydro One, is the intent have all distributors use the DTCA reference?
- 3) *For micro-embedded projects (10 kW or less), please fill out [LDC name]'s "Micro-Generation Connection Application (Form C)" available at:*
- In the DER Connection Procedure comment it has been noted there is disconnect between Micro Embedded flow chart and the Micro Embedded Agreement also to be used as the Application.

#### Section C

- 4) *"All agreements (including CCA and DCA)",*
- It may be useful to spell out complete agreement names, not all Applicants are familiar with short forms.

#### Section H

- 5) *On a cut-out from the [LDC name] DOM (Distribution Operating Map) provide the location of the generation facility....*
- For project that are not located at an existing distributor account, is the intent for distributors provide the DOM as part of the Preliminary Report?

#### Section P

- 6) *When there is an upstream LDC, an additional \$10,000+HST will be required for costs associated with this LDC's CIA.*
- This is the Hydro One version. This should be reviewed as applicable fees may vary and as suggested could be provided by the distributor as part of the Preliminary Consultation Report (PCR).

#### **Single Line Diagram (SLD) in Sample CIA**

- The SLD in the sample CIA provides far too much detail for a CIA application. Developers support the need for the right level of detail in the SLD for the distributor to be complete the connection



impact assessment. The example provided has several items that would be available at the time of submission, including whether transfer trip is required.

- This item should be referred back to the Technical Working Group, there must be enough examples around without using the one provided.

If there are any questions, or if further information is required, please feel free to reach out. Enel X looks forward to continuing to participate in the Connections Working Group as it progresses to deal with the Tranche 3 items.

Yours truly,

A handwritten signature in blue ink, appearing to read "S. Griffiths".

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