Canadian Renewable Energy Association | Association canadienne de l'énergie renouvelable

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

January 21, 2022

Re: NOTICE OF REVISED PROPOSAL TO AMEND A CODE (December 20, 2021) – EB-2021-0117

Dear Ms. Long:

Thank you for the opportunity to provide comment on these proposed amendments to the Ontario Distribution System Code (DSC), per the OEB Notice of Revised Proposal to Amend a Code dated December 20, 2021.

The Canadian Renewable Energy Association (CanREA) is a national industry association representing over 300 companies in Canada's wind energy, solar energy and energy storage industries including generators, utilities, manufacturers, and service providers. On behalf of our diverse member companies, we advocate for the advancement of modern energy systems through stakeholder advocacy and public engagement.

As stated in comments on the original code amendment proposal in September 2021, CanREA strongly supports the OEB's stated objective in the DER Connections Review initiative of standardizing and improving the DER connection process in Ontario.

We would note that some of the concerns we had raised in comments on the preceding proposed do not appear to have been addressed, and so we reiterate them here and again urge further consideration and discussion from the Connections Review working group.

CanREA offers the following comments on the proposed DSC amendments:

Section	Amendment	CanREA comment
Cost Responsibility for Connection of Generation Facilities and Storage Facilities – DSC 6.2.3	[. . .] (g) a list of "restricted feeders" by name and feeder designation that the distributor operates that are known not to have any short circuit capacity to accommodate a ~~distributed energy resource connection~~ **generation facility**. The list must be updated as necessary to capture system reconfiguration or expansions and shall be updated at least every 3 months"	CanREA strongly supports the mandating the use of a standardized protection philosophy document and the provision of a restricted feeders list. These steps will help to improve the efficiency of the connection application process and reduce red tape.
Connection of Micro-Embedded Generation Facilities – DSC 6.2.5	"A ~~distributor shall make available a Micro-Embedded Generation Facilities Application, in the form specified in Appendix E, to 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**	This section makes reference to "application portion of the Micro-Embedded Generation Facilities Agreement" – however, in reviewing the agreement it is not clear what the "application portion" refers to.

	it to the Distributor, in accordance with the process established in the Distributed Energy Resources Connection Procedures. The Micro-Embedded Generation Application Agreement shall be available electronically, on the distributor's website where available, with a paper copy available at the distributor's address."	CanREA recommends that the Title should be revised to "Micro Embedded Generation Facility Application/Agreement."
Connection of Micro-Embedded Generation Facilities – DSC 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."	CanREA recommends removing the reference to "forms", as there is only the one Agreement to Connect
Preliminary Consultation Information Request and Report – DSC 6.2.9	"A distributor shall provide a Preliminary Consultation Report to a person without charge up to 3 times in a calendar year. The distributor may recover from the person the reasonable costs incurred by the distributor in preparing the information Preliminary Consultation Report for the additional locations Preliminary Consultation Information Request forms beyond the three to be provided at no charge."	The proposed limit of 3 PCIRs per year per distributor is in CanREA's view unacceptable. This section also mentions "reasonable costs", without clarifying whether these costs would be subject to OEB review/approval. CanREA recommends that this proposed amendment not move forward and instead be further reviewed at the Process Working Group.
Mid-sized or Large Generation Facility – 6.2.13	[. . .] **(c) within 75 days for a mid-sized embedded generation facility when a host distributor CIA is also needed; and** **(d) within 105 days for a large embedded generation facility when a host distributor CIA is also needed.**	CanREA supports this extension to the connection timeline for instances when a host distributor CIA is required
Mid-sized or Large Generation Facility – DSC 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~~ **comments** from a transmitter or distributor ~~that has been advised requested~~ advised under section ~~6.2.14A~~ **6.2.17**	These proposed changes do not address CanREA's previously stated concerns regarding the fact that the initial assessment (CIA) contains an estimated cost to connect, whereas 6.2.16 would seem to suggest the applicant must enter into an agreement on the scope of the project (capital cost agreement or capital cost recovery agreement) and then request and pay for a detailed cost estimate. The wording proposed here does reflect current process, which CanREA understands to be as follows: The completed CIA is issued with a cost estimate; In some cases there may be an option to

		secure a more detailed cost estimate at a cost to the applicant and if this the case it is paid for and completed before a Connection Cost Agreement (Scope of Project) is executed. It is CanREA's understanding that the objective of this amendment is in part to capture that the the distributor has 90 days to complete the detailed estimate, however this is not clear from the current wording. CanREA recommends that this proposed amendment not move forward and instead be further reviewed at the Process Working Group.
Mid-sized or Large Generation Facility – DSC 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;) 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;	CanREA seeks to better understand the background for the deposit and why only it applies for exporting generation facilities. As previously stated, CanREA also seeks to better understand the basis for the 15 calendar months provision for a second deposit, whereby the Code advises applications should be submitted if the Developer expects to be in-service within 3 years or 5 years for water base projects. CanREA recommends that this proposed amendment not move forward and instead be further reviewed at the Process Working Group.
Mid-sized or Large Generation Facility – DSC 6.2.20	"Once the applicant informs the distributor that it has received all necessary approvals, provides the distributor with a copy of the authorization to connect from the ESA and enters into the Connection Agreement, and the distributor receives a copy of the authorization to connect from the ESA, the distributor shall act promptly to connect the generation facility to its distribution system."	(i) the change is correct, ESA issues connection authorization directly to Utility. (ii) there is an issue with "and enters into the Connection Agreement" – in most cases the Utility will not sign the Connection Agreement until the generation facility commissioning is complete and a report issued. This

		cannot be done until the site is connected to the grid for commissioning purposes, usually with a "temporary connection authorization". This proposed wording should be reviewed, and may require additional changes in the Distributed Energy Resources Connection Procedures document.
Mid-sized or Large Generation Facility – DSC 6.2.23	'' ~~Material on the process for connecting a generation facility to a distribution system is set out in Appendix F.1~~. A distributor shall follow the process as specified in the Distributed Energy Resources Connection Procedures to process a request for connection of a mid-sized or large embedded generation facility."	CanREA supports this change; the procedure guide can be a useful tool and the OEB can update and publish as required without the need for a formal code amendment process, enabling greater flexibility going forward.
Mid-sized or Large Generation Facility – DSC 6.2.25	A distributor shall ensure that the safety, reliability, and efficiency of the distribution system is not materially adversely affected by the connection of a generation facility to the distribution system. A distributor shall require that new or significantly modified generation facilities meet the technical requirements specified in ~~Appendix F.2~~ CSA C22.3 No. 9.	CanREA supports this move toward referencing the prevailing CSA standard, rather than a separate OEB standard. This will help to reduce bureaucratic complexity and to avoid potential confusion.

Comments on the DER Connection Procedures documents (Appendix C)

- **Preliminary Consultation Information Request form**
    - Section 2 – "Project Intent":
        - *"Inject energy into the grid under the program"* – suggest we remove the words "under the program" – Not clear what program this would refer to or why it is relevant
        - *"Emergency Backup only when the grid is not available"* – It is our understanding that most utilities have separate application from the PCIR process, in which case this option may not be relevant
        - Reference to "Form A" should be removed and should refer instead to "PCIR complete" (no longer using Form A/B/C)
- **Preliminary Consultation Information Request example**
    - The PCIR example provided is missing 2 key pieces of information (proposed installed capacity, and DER type) and would thus be considered an incomplete submission
- **Preliminary Consultation Report**
    - The PCR request indicates the distributor will assign an ID#, if that is the case the 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 example**

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

- **Connection Impact Assessment (CIA)**

    - *"Emergency Backup Generators should use the Emergency Backup Generation Application Form available at"* – See comment above regarding PCIR Section 2 – "Project Intent":

    - *"For Load Displacement or Energy Storage facility connections, the assessment performed by [LDC name] is a 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?

    - *"For micro-embedded projects (10 kW or less), please fill out [LDC name]'s "Micro-Generation Connection Application (Form C)" available at . ."*: in our DER Connection Procedure comment we have noted there is disconnect between Micro Embedded flow chart and the Micro Embedded Agreement also to be used as the Application. In addition, the flow chart mirrors the process for the old micro fit program, which was closed to new applicants in 2017 and is no longer relevant. CanREA recommends that the entire micro embedded information and flow chart be reviewed at the Process Working Group.

    - *Section C: "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: On a cut-out from the [LDC name] DOM (Distribution Operating Map) provide the location of the generation facility….* For projects 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: "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).

    - The SLD in the sample CIA provide far too much detail for a CIA application, and includes items that would be available at the time of submission, including whether or not transfer trip is required. This item should referred back to the Technical Working Group to find a more appropriate example

Thank you for your consideration of our comments.

Yours sincerely,

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