

January 21, 2022

Ms. Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON, M4P 1E4

Dear Ms. Long:

Re: Notice of Revised Proposal to Amend a Code: Revised Proposed Amendments to the Distribution System Code (DSC) to Facilitate Connection of Distributed Energy Resources (DERs) (EB-2021-0117)

On December 20, 2021, the Ontario Energy Board (OEB) issued a Notice of Revised Proposed Amendments to the Distribution System Code to Facilitate Connection of Distributed Energy Resources (the "December Notice") regarding the connection of DERs to local electricity distribution systems. The OEB noted that these proposed amendments are intended to reduce the overall timeline and provide clarity and consistency in the process for connecting a DER to an electricity distributor's system.

Hydro Ottawa recognizes the role electricity distributors play in supporting the successful implementation of DERs and is pleased to offer comments on this important file.

In the proposed amendments, Hydro Ottawa suggests to remove the capacity allocation exemption¹ as a legacy from the Feed-in-Tariff Program (FIT). In fairness to all applicants and for simplicity to avoid process confusion, unintended outcomes, or additional administration, any DER exporting or non-exporting to the grid above 10kW should be subject to the same process.

Under section *In the Mid-Sized or Large Generation Facility Connection Timelines*² the December Notice proposes amendments to clarify timelines for the completion of select interconnection activities. Hydro Ottawa supports the need for further discussion around flexibility for the proponent by the DER Connections Review Working Group as there are circumstances where extending the deadlines to get projects through to energization may be needed. For example, a capacity allocation removal deadline may change if the applicant's financing is delayed or completion of the Connection Impact Assessment may be delayed as technical details are adjusted between the LDC and applicant.

While the Distributed Energy Resources Connection Procedures (DERCP) has been revised to address flow-through changes resulting from the proposed revisions to the DSC and to address stakeholder

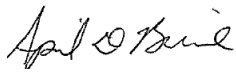
¹ *Ontario Energy Board Distribution System Code, 2020, s. 6.2.4, s. 6.2.8*

² *Ontario Energy Board Distribution System Code, 2020, s. 6.2.13*

comments received, Hydro Ottawa supports having a process put in place once the initial use of the working group to solicit feedback is complete.

Thank you for the opportunity to provide comments on the Revised Proposed Amendments to the Distribution System Code to Facilitate Connection of Distributed Energy Resources. We trust our comments are helpful. Should you have any questions, please reach out to me.

Yours truly,

A handwritten signature in black ink, appearing to read 'April Barrie'.

April Barrie

Director - Regulatory Affairs

Directeur, Affaires réglementaire

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