

Appendix E
to
Notice of Amendments to the
Distribution System Code
March 22, 2021
EB - 2021-0117

Comments on Distributed Energy Resources Connection Procedures (DERCP)

In the pages that follow, for information, the OEB has summarized DERCP-related comments received from stakeholders in response to the December Notice, and provides the OEB's response to these comments including changes in the DERCP where appropriate.

Consultation Process & Ongoing Maintenance of DERCP (DERCP s. 1)

A number of stakeholders asked for the establishment or articulation of a mechanism to address changes to the DERCP, albeit with a less formal process than the DSC amendment process.

As explained in the December Notice, the OEB acknowledges industry interest in being consulted on future revisions of the DERCP, and intends to initially rely on the DER Connections Review Working Group (Working Group) to solicit feedback on revisions to the DERCP. The OEB intends to engage with stakeholders in a way that is tailored to the nature of revisions that may be undertaken in the DERCP.

Stakeholders again suggested the OEB take an active role in approving deviations from the DERCP.

As described in the December Notice, the OEB notes that deviations from the requirements of the DERCP may be subject to approval.

Table with Sample List of Types of Studies (s. 5.1)

A stakeholder suggested that Table 1, which contained a sample list of studies for a given connection request, should be revised, since a Transmitter study is, in the stakeholder's view, required for all small, mid-sized, and large generation facility connection applications. The DERCP has not been revised; as the list of studies in Table 1 is intended only to be a sample. The OEB expects that the specific studies required for a given project would be listed in the Preliminary Consultation Report for that project.

Cost Estimate Process and Uncertainties (DERCP s. 5.1, s. 5.1.4)

Several stakeholders requested additional clarity related to the steps required to obtain a detailed cost estimate. These sections have been revised to provide additional clarity.

Several stakeholders expressed concerns related to the titles of the agreements referenced in relation to obtaining a cost estimate. Consistent with stakeholder feedback, this section has been revised to more clearly distinguish between i) the agreement that may be required to obtain a more detailed cost estimate; and ii) the Connection Cost Agreement, which is required at a later stage in the process. References to the “connection agreement” in section 5.1.4 have also been revised or removed as appropriate and in response to stakeholder feedback.

A distributor suggested that applicants for small generation facilities should not be able to request an estimate that is more detailed than the estimate that is already furnished at the time the CIA is issued to the small generation facility applicant. The DERCP has been revised to clarify that the option of a more detailed cost estimate does not apply to a small embedded generation facility.

A distributor questioned whether it is required to provide a preliminary cost estimate with the CIA for mid-sized and large generation facility applications. The DERCP requires such a preliminary estimate to be provided with the CIA, consistent with utility practice.

Several stakeholders commented on potential cost estimate tolerances and a distributor repeated reservations related to presumptions or expectations that estimates have a defined expected accuracy range. As noted in the December Notice, the OEB revised sections referencing defined cost estimate uncertainties to remove anticipated percentage tolerances, for both the preliminary estimate that accompanies a CIA, and the more detailed estimate that may be obtained at additional cost for mid-sized and large generation facility applications. The OEB understands the Working Group is currently reviewing matters pertaining to cost estimate uncertainty and will review whether further revisions are required after receiving recommendations from the Working Group, if any.

Micro-Embedded Generation Facility (DERCP s. 5.2)

Distributors requested clarity related to whether a distributor would be permitted to use its own intake form(s) to process micro-embedded generation facility applications. The DERCP provided with the December Notice included language to allow distributors to request additional information to facilitate consideration of the application requested. Consistent with this approach, and in response to the additional stakeholder feedback, the DERCP has been further revised to indicate that a distributor may use its own intake form to process a micro-embedded generation facility connection request.

A distributor requested clarity related to whether it would be permitted to reject a micro-embedded generation facility connection request on technical grounds. As described in the Notice, this was already permitted. Additional clarifying language has been added in section 5.2 to further confirm this.

Additional DERCP Flow Chart for Small Facilities Requiring Host CIA (DERCP s. 5.6)

A distributor noted that Figure 4 only shows the case for a small generation facility connecting where a host distributor CIA is not required. This is consistent with the intent of Figure 4, which is specifically for cases involving a “single CIA” as noted in the figure.

A distributor suggested that an additional flow chart be added for the case where a small generation facility seeks to connect to an embedded distributor, in order to show interactions with a host distributor. This may be added in subsequent releases of the DERCP.

Timelines for Mid-Sized and Large Generation Facilities (DERCP s. 5.7)

A distributor noted that a reference to a 90 day study timeline for cases with distribution system reinforcement should be deleted. This has been corrected.

Appendices

Some stakeholders indicated that there was too much detail in the sample Single Line Diagram for the purpose of a CIA application. At this time, the DERCP will not be revised, since the sample Single Line Diagram is for information and does not represent a minimum requirement.

Template forms have been revised in response to stakeholder feedback.