

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 26th Floor Toronto, ON M4P 1E4

Ms. Marconi

**Re: Report of the Framework for Energy Innovation Working Group - Energy Board  
File Number: EB-2021-0118**

In the letter on July 6, 2022, the Ontario Energy Board (OEB) invited interested stakeholders to comment on the FEIWG Report.

The Electrical Safety Authority (ESA) appreciates the opportunity to provide its input to the Report.

Jason Hrycyshyn  
Program Coordinator  
Electrical Safety Authority

General Statement: ESA supports the Working Group and agrees with the Report to the OEB. ESA endorses the continuation of the work of FEIWG members, guests, consultants and OEB staff. ESA believes this work to be vital in transitioning of the electrical system and clarifying the role of the distributors in this evolving sector.

Regulatory: ESA strongly supports increased regulatory clarity in DER usage and DER integration. In addition, ESA agrees with the Report's conclusion that the energy sector is undergoing a significant transition and that the sector should prepare for a high-DER penetration that will have implications for virtually every facet of how electrical energy is provided. With the changes to how electrical energy is provided, ESA encourages a thorough review of regulatory requirements to ensure safety & regulation requirements align are considered in early stages to ensure compliance. In reference to existing codes and standards, ESA has published several bulletins and other documents on this topic. ESA is willing to work with the OEB and industry to ensure information pertaining to safety is readily available.

Information Availability: ESA agrees that stakeholders need sufficient information to be available regarding DERs from type (e.g. inverter, induction, synchronous, supplemental, baseline), function(s), set up requirements & limitations for DER equipment & penetration. ESA supports the concept that this information is required in order to properly plan and operate the electrical system. ESA also believes direction regarding the operation and control of DERs, that distributors do not own, is an important topic that should be included in discussions. It is important to note that all DER installations, not deemed part of the distribution system as outlined in the [ESA Guideline](#), are required to comply with the Ontario Electrical Safety Code (OESC) in terms of inspection, equipment approval, plan review, etc. That would include also the DERs under Utility control.

Use Cases: If the Working Group is looking to include any additional "use cases" or detail the functions of a DER they may wish to review the appendix material in the ESA Guideline on DERs, which can be located at the following link. [Guideline-for-Distributed-Energy-Resources-DER- 2.0.pdf \(esasafe.com\)](#).

Next Steps: ESA is in agreement with the next steps proposed and agrees that the OEB should remain open to utilities developing and seeking approvals for DERs in the interim.

ESA appreciates the opportunity to provide its comments for the OEB's consideration. As well, ESA appreciates the opportunity to continue working with OEB to provide input on regulation and safety requirements. Should you have any questions, please do not hesitate to contact the undersigned.

Regards,  
Jason Hrycshyn  
Program Coordinator – Regulation 22/04  
Electrical Safety Authority