



APPRO
ASSOCIATION OF
POWER PRODUCERS
OF ONTARIO

April 19, 2023

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

By Email

Attention: Nancy Marconi, Registrar

Dear Ms. Marconi,

Re: BOARD FILE NO.: EB-2020-0176 - Notice of Proposed Amendments to the Transmission System Code and the Distribution System Code

We are in receipt of the OEB's March 24th, 2023 Notice of Proposed Amendments to the Transmission System Code and the Distribution System Code. We support the OEB's proposal to amend the Transmission System Code and the Distribution System Code to reflect the Regional Planning Process Advisory Group and the IESO's recommendation to "establish a more formal process to better address EOL asset replacement in the regional planning process to ensure the most cost-effective investments are made to replace major transmission voltage assets at EOL."

In particular, we support a greater emphasis on robust evaluation of supply alternatives (including filing evidence of such consideration) and procuring non-wires alternatives, both in the transmission and distribution systems, as a competitive solution to both maintaining grid reliability and enabling Ontario's electrification and energy transition in a transparent manner.

Non-wires alternatives such as storage facilities and other distributed energy resources can act as the most cost-effective investment to not only provide capacity, energy, and ancillary services—they also require minimal geographical footprint and are less bound by locational constraints.

Thank you,

A handwritten signature in black ink, appearing to read 'David Butters', with a large, loopy initial 'D'.

David Butters
President & CEO

Cc: Chris Cincar (at Chris.Cincar@oeb.ca)