

Via RESS
18 January 2024

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

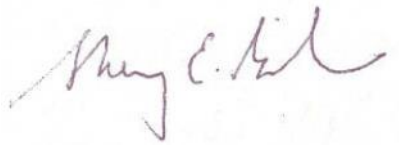
Dear Ms. Marconi,

**Re: Kingston Hydro Corporation _Comments_EB-2019-0207_Distribution
System Code Amendments and EVCCP**

Attached please find comments on the notice of proposal to amend a code (proposed amendments to the distribution system code to facilitate connection of electric vehicle charging infrastructure) received December 15, 2023.

Kingston Hydro's comments are being filed through the OEB's online RESS filing system.

Yours truly,



Sherry Gibson
Manager, Revenue and Regulatory Affairs
regulatory@kingstonhydro.com

**Kingston Hydro Corporation
Comments on the Distribution System Code (DSC) Amendments and EVCCP
EB-2019-0207**

Kingston Hydro appreciates the OEB providing the opportunity for comments on EB-2019-0207 Notice of Proposal to Amend DSC – EVCCP Electric Vehicle Charging Connection Procedures – LDC received December 15, 2023. Kingston Hydro has reviewed the draft documents and amendments to provide the following comments.

1. Kingston Hydro comments on level 3 voltage requirements indicated within the EVCCP:

Kingston Hydro is offering comments on the EVCCP introduction on page 1 regarding Note 1 at the bottom indicating level 3 chargers requiring 480-volt electrical sources. Kingston Hydro is seeking clarification on the OEB's view if the level 3 charger voltage requirement is a suggestion and example or if this 480-volt source will become a regulated requirement. Generally, within Canada the 600-volt sources are common and are stocked and supplied more regularly for distributors. If it becomes a regulated requirement for distributors to supply 480-volt transformers and metering this may include increased needs for the distributor to adjust specifications and stock to reflect this need. Currently, customers have the choice of supplying a customer-owned transformer with 480-volt secondary and distributors may require primary (versus secondary) metering.

2. Kingston Hydro comments on connections:

Many LDC Conditions of Service stipulate one connection per property and a maximum service size (kVA) for medium voltage services (<35kW). Kingston Hydro has recently decided to accept multiple medium voltage connections per property provided the total load of all the medium voltage services does not exceed the maximum service size per property.

3. Kingston Hydro comments on offer to connect (OTC) timelines:

Kingston Hydro is offering comments on the EVCCP offer to connect (OTC) timeline of 60 days total, which includes 15 days for the initial written request communications and 45 days for the remainder of the offer to connect. Kingston Hydro is offering a suggestion that the OTC timeline be amended to more closely mirror the timelines within the DERCP for consistency purposes for customers and distributors. It is suggested that the 15 days initial application be an isolated timeline, with the 60 days beginning after the 15 days communication for the initial applications has completed. In

addition, since the 15 days resets if a completeness check is not passed, it may provide clarity on timing for customers having these timelines as separate occurrences.

4. Kingston Hydro comments on EVCCP forms:

Kingston Hydro is offering comments and suggestions on the EVCCP forms and appreciates the time the OEB has spent on the preliminary forms for comments and review for distributors.

- EVCCP Excel document section 6.01 relating to connection complexity: Kingston Hydro suggests including a fillable line for customers to include their desired connection date, as well as a notes section relating to complexity where distributors can provide comments for the customer relating to complexity/timeline. The format of this section could be similar to the EV ChargeON form that distributors are currently being asked to complete.
- EVCCP Excel document monthly demand request: Kingston Hydro suggests an update to request data on the hourly demand profile outline for a week versus only the monthly peak to assist with distribution system and capacity planning while completing applications. Additionally, it would be beneficial to include a section within these forms on the monthly energy consumption, in addition to the demand profiles, to collect this data for use within economic evaluation/capital contribution calculations.

5. Kingston Hydro comments on age of asset:

Kingston Hydro is offering comments on the age of asset detailed within the EVCCP 6.1.2 relating to Capital Contribution for Connection Assets. Kingston Hydro is seeking additional guidance and feedback if the OEB's life expectancy of various major equipment will be outlined, as this will differ from the finance valuation.