

BY EMAIL and RESS

January 19, 2024

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

Dear Ms. Marconi:

EB-2019-0207 Proposed Amendments to the Distribution System Code to Facilitate Connection of Electric Vehicle Charging Infrastructure – BOMA's Comments

On December 15, 2023, the Ontario Energy Board (OEB) issued a Notice of Proposal to make amendments to the Distribution System Code (DSC) that are intended to create a standardized and streamlined process for connecting non-residential electric vehicle (EV) charging infrastructure to an electricity distributor's distribution system. These proposed amendments are guided by the work of the Distributed Energy Resources (DER) Working Group and the EV Subgroup¹ and aim to improve transparency, consistency and efficiency of EV charging connections. These proposed amendments require licensed electricity distributors to comply with the OEB's Electric Vehicle Charging Connection Procedures (EVCCP), which standardizes many key elements of the EV charging connection process and requirements.

BOMA has reviewed the OEB's proposed amendments to the DSC, the draft EVCCP and the rationale for the changes and is fully supportive of these policy objectives as they align with BOMA's primary interest in this proceeding, which is to streamline adoption of DER and EV charging infrastructure among its members as an important contributor to operating cost savings and reduction of greenhouse gas emissions. BOMA is a member of EV Charging Connections Subgroup and submits that the proposed DSC amendments and the draft EVCCP are consistent with the recommendations advanced by the working group. BOMA believes the costs of implementing these proposed changes will not be significant and can be fully justified by the outlined benefits.

¹ In late 2022, the scope of the DER Working Group was expanded to include the connection of EV charging installations and an EV Subgroup was established to focus on the EV connection issues.

BOMA is pleased to continue to work collaboratively with stakeholders in this proceeding in support of efforts to streamline the process of connecting DERs and EV charging infrastructure.

Sincerely,

A handwritten signature in black ink that reads "Clement Li".

Clement Li

Director, Policy & Regulatory Development

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