

January 19, 2024

DER Connections Review Team  
 Ontario Energy Board (OEB)

Dear DER Connections Review Team:

The Electricity Distributors Association (EDA) appreciates the continued opportunity to provide comments on the third draft of the EV Connections Procedure Document (EVCP), renamed the EV Charging Connections Procedure Document (EVCCP), as part of our ongoing participation in the DER Connections Review’s EV Subgroup. We have been an active participant in the monthly meetings of the EV Subgroup since the current Tranche 5 work began in January 2023.

The EDA represents Ontario’s local hydro utilities, the part of our electricity system closest to customers. Publicly and privately owned utilities, otherwise known as local distribution companies (LDCs), deliver electricity to residential, commercial, industrial, and institutional customers—powering every community in the province. The sector owns more than \$30 billion in electricity system infrastructure and invests more than \$2.5 billion annually in the electricity grid—that is the Power of Local Hydro.

**General comments**

We are pleased to see that the EVCCP is very clear on the timelines and expectations of both LDCs and customers in the load connection process. We recognize and applaud the efforts and dedication of the OEB, Power Advisory, and fellow stakeholders in this consultation process.

Our review of the December 15, 2023 version has led us to the following general comments.

***High volume of PCIRs***

LDCs are concerned about the anticipated volumes of EV PCIRs, due to the recently formalized EV Availability Standard (EVAS) of December 20, 2023. The EVAS explicitly encourages EV automakers to develop and open EV charging projects by 2027—a very short timeline—to earn compliance credits towards EVAS targets. Consequently, we respectfully reiterate our comments of October 18, 2023, where we recommend the following timelines for PCIR responses, based on the number of sites requested by the customer:

<b><u>Number of sites in PCIR</u></b>	<b><u>Number of days to respond with PCR</u></b>
Up to 5	20
Up to 15	30
More than 15	LDC to advise on anticipated response time

Alternatively, we suggest that the EVCCP align with the DER Connections Procedure Document’s (DERCP) treatment of the PCR/PCIR process, which allows for three PCRs per year per customer per project at no cost to the customer. This stipulation would not limit PCIRs to three per year per project, but would help manage the volume of PCIRs while allowing for some cost recovery to increase LDC resources to complete the requests.

***Offer to Connect (OTC) process***

**Forcing LDCs to issue OTCs that are classified as estimates**, to avoid completing a detailed design ahead of issuing an OTC, **does not shorten the amount of time it takes to connect and energize an EVSE project**. It only shifts that amount of time on either side of project milestone (i.e., the OTC). Although an OTC may be issued within 60 days of a complete written connection request, it will not be as precise if provided as an estimate (i.e., not informed by a detailed design). Consequently, an OTC marked as an “estimate” will require more iterations of discussions between the requesting customer and the LDC, without shortening the amount of time to a completed and energized charging station. The process and resource changes required by some LDCs to accommodate issuing OTCs without a detailed design may not be commensurate to the expected efficiency gains of said OTC being issued within 60 days.

Written request	OTC issued as estimate, without detailed design	Detailed design	Civil work	Project energization
Written request	Detailed design	OTC issued as estimate or firm, informed by detailed design	Civil work	Project energization

***Hybrid new loads***

We understand that the EVCCP’s scope is non-residential EVSE connections, but the Document is silent on the treatment of hybrid new connections. For example, LDCs would like to seek clarification on the case of a connection request for a new location of a “big box” store with three Level 2 (L2) chargers for its customers. We seek confirmation from the OEB that this type of new connection would not be subject to the EV PCR-PCIR process, despite having three L2 chargers, as the main purpose of the project is connecting and energizing the “big box” store, rather than the EV chargers. For example, we suggest the following (bolded):

“The EVCCP is applicable to Electrical Vehicle Supply Equipment (EVSE) connections including, but not limited to, non-residential customer applications including Level 2 and Level 3 charging stations such as publicly accessible direct current fast charging stations, workplace charging, charging installations for multi-unit residential buildings and charging

stations used for commercial EV fleets. **The main purpose of the new or expanded connection must be specific to EVSE.**"

### **Feedback on EVCCP draft dated December 15, 2023**

#### ***Comments Incorporated***

We had the opportunity to convey our feedback on the second draft of the EVCP directly to the OEB in a letter dated October 18, 2023. We are pleased to see that our suggestions have been incorporated in the current draft circulated on December 15, 2023, namely:

- Adding the definitions for "Conditions of Service," "connection," "connection assets," and "expansion" as defined in Distribution System Code (DSC) section 1.2;
- Referencing business days and calendar days on process flow charts;
- Confirming that LDCs can continue to receive written requests for connection through their well-established procedures, forms, and methods that are based on their business considerations;
- Acknowledging and clarifying that in the case of customers who do not have flexibility in site locations, the EV PCR step may not be beneficial and only adds additional work; and
- Demonstrating that multiple completeness checks of a customer's written connection request will not count towards the 60 calendar days an LDC has to issue an Offer to Connect (OTC). **We further suggest that the EVCCP include illustrative examples of this concept in action, including both the day count as well as sample calendar dates.**

#### ***Section 4.2 – Meeting Coincident to EVPCR***

We note that the EVCCP's section 4.2 (b) requires that "a distributor shall meet with a customer who requests a meeting coincident with the issuance of an EVPCR or after the customer has received an EVPCR, at no cost." We also note that this is aligned with DSC 6.2.9.1 (b), which requires the same for DER PCRs. **LDCs do not have concerns with this requirement but would like to confirm that the purpose of the meeting would be to clarify what has been written in the PCR** and not, for example, a meeting for the design of the service for EVSE, for which there would likely be a fee.

#### ***Section 5.3 and Figure 3 – Offer to Connect (OTC) Timeline***

We appreciate that EVCCP's section 5.3 reflects the DSC's section 6.1.1 regarding the calendar day requirements for LDCs' responses to a customer's written connection request, namely:

- a distributor shall respond to a customer's written request for a customer connection within 15 calendar days, and
- a distributor shall make an offer to connect within 60 calendar days of receipt of the written request, unless other necessary information is required from the load customer before the offer can be made.

Of LDCs that were able to provide feedback in the given timeline, these requirements have not been an issue for them, nor have they received complaints about them.

EVCCP's Figure 3 describing the process flow for a customer's written connection request shows that an LDC has 60 days to issue an OTC from the day it receives a complete written connection application. Figure 3 designates up to the first 15 days of this timeline for the LDC to verify the completeness of a customer's connection application. **We agree with Figure 3, as it demonstrates that the time it takes for a customer to respond to deficiencies in the application do not count towards the 60-day requirement for an LDC to issue an OTC.** A complete connection application typically requires final drawings (P. Eng-stamped) from the customer, and an OTC cannot be issued without this information. In LDCs' experience, the site plan details are what drives the length of time to issue an OTC to a requesting customer.

### ***Section 6.1 – New or Modification to Connection Asset Only***

Of the LDCs that responded, the items listed in 6.1.1 and 6.1.2 can be provided in an OTC, and most of them are typically included in an OTC already. For example, an LDC noted that although depreciation of aged infrastructure is taken into consideration, the requirement to provide details on asset ages would increase the time to prepare an OTC.

### ***Figures 4 and 5 – Demarcation Points***

One LDC noted that the demarcation point on its system is on the secondary terminals of the transformer, and that it generally does not install LDC cables to customer-owned equipment. We suggest noting on Figures 4 and 5 that the specific demarcation points can be found in an LDC's Conditions of Service.

### ***Section 6.2 – Expansion Without Capital Contribution***

**We suggest the EVCCP clarify that an expansion deposit is not precluded from projects that do not require a capital contribution.** For example, the bolded text below could be added on page 12, or as a footnote:

*“An economic evaluation following the requirements of Section 3.2.1 of the DSC and Appendix B to the DSC shall be performed by the distributor to determine if future revenues from the customer will pay for the capital cost and on-going maintenance costs of the expansion project. If future revenues from the EVSE will pay for the capital cost and on-going maintenance costs of the expansion project, in accordance with DSC Section 3.2.1, no capital contribution is required from the customer for expansion work. **However, such a scenario would not preclude the LDC from requiring the customer to provide an expansion deposit, which covers both the forecast risk and the asset risk related to the expansion and is annually rebated to the customer based on actual demand materialized in a given year. For more details, please see Section 8.**”*

### ***Section 6.2.1 – Information to Be Included in OTC for Expansions Without Capital Contribution***

Several LDCs noted that a Single Line Diagram (SLD) is typically not included with their OTCs. For one LDC, it is because it does not complete a detailed design before issuing the OTC.

### ***Section 6.2.2 – Cost Summary Requirements for OTCs that Have Expansions Without Capital Contribution***

LDCs typically do not include the ages of assets in OTCs for several reasons, including:

- Modifications to connection assets is not typically due to the asset reaching end of life, but to accommodate a customer's needs (e.g., bigger transformer, bigger cables, different location), for which age is not necessarily applicable.
- Existing OTC processes take into consideration the depreciation of very aged infrastructure.

### ***Section 7.2 – Energization***

We suggest including several examples of service conditions. Our comments of October 18, 2023 (pages 4-5) posed the following examples:

- Full payment as required by the OTC
- Signed OTC and Connection and Cost Recovery Agreement (CCRA) (if applicable)
- Signed Operating Agreement (for Primary Connected Customer)
- Coordination/Arc Flash Studies (for Primary Connected Customer)
- Other agreements as required
- Connection Authorization received from ESA
- Inspection of customer-owned civil work required to install LDC's electrical assets
- Customer shop drawings for their electrical assets submitted for LDC's acceptance relating to installation of LDC metering and connection assets
- Final Customer Drawings (e.g., Electrical Site Plan, SLD, Grading Plans, etc.)
- Easements on Title (if applicable)
- LDC and Customer Make Ready Complete

### ***Section 8 – Expansion Deposit Return and Expansion Rebate***

Like our suggestion for Section 6.2, **we suggest that the first paragraph of this section mention that LDCs not be precluded from requiring an expansion deposit for expansions that do not require a capital contribution.** This clarification is particularly instructive to customers looking to connect large EVSE projects and their commensurate theoretical loads, because the expansion deposit, which protects the LDC against the project's forecast risk and asset risk, is rebated back to the customer as their load materializes.

## **Appendix 2 – Offer to Connect Components**

Of the list of components expected to be included in an OTC issued by the LDC to the requesting customer, the following components are not aligned with existing LDC processes:

- **Distributor Work:** without a detailed design, LDCs are unable to include the work that the distributor is expected to complete, including procurement and installation of equipment and information such as easements, permits and approvals that the distributor will obtain. For the same reason, LDCs are unable to provide complete breakdowns of costs for distributor work. We understand that the OEB has strongly suggested that LDCs issue OTCs as estimates. However, significant changes in both scope and costs may require the OTC to be re-issued, in which case the benefits and time efficiencies are unlikely to be realized.
- **Customer Work:** without a detailed design, LDCs are unable to include the work that the customer is expected to complete, including procurement and installation of equipment on the customer side of the ownership demarcation point. For the same reason, LDCs are unable to describe other information such as easements, permits and approvals that the customer is required to obtain. Further it would present significant risk to the LDC to describe the customer's work, since it is not the LDC's responsibility to design it, **nor is it authorized to do so.**

Thank you once again for the opportunity to comment on this proposal. We look forward to continued engagement with the OEB's DER Connections Review Team and other stakeholders on EV connections in Ontario by offering valuable LDC feedback. If you have any questions, please contact Tina Wong, Senior Policy Advisor at [twong@eda-on.ca](mailto:twong@eda-on.ca) or (905) 265-5334.

Sincerely,



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