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Registrar
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Re: Ontario Energy Board Staff Report – Proposed Amendments to the Distribution System Code to Facilitate Connection of Electric Vehicle Charging Infrastructure – OEB File No. EB-2019-0207

Toronto Hydro-Electric System Limited (“Toronto Hydro”) is the local electricity distribution company for the City of Toronto. It serves over 790,000 customers and delivers about 18% of the electricity used in Ontario.

On December 15, 2023, the Ontario Energy Board (“OEB”) issued proposed amendments to the Distribution System Code (“DSC”), intended to create a standardized and streamlined process for connecting non-residential electric vehicle (“EV”) charging infrastructure. The amendments also included the introduction of the Electric Vehicle Charging Connection Procedure (“EVCCP”), which further details connection procedures, timelines, and expectations. The OEB believes that the proposed amendments will facilitate the timely deployment of EV charging infrastructure across the province by removing potential barriers for EV charging service providers that could have materialized from variations in connection procedures among distributors.

Toronto Hydro is an active member of the OEB’s DER Connections Working Group and its subgroups, and is fully supportive of the efforts to streamline and standardize processes for the connection of EV charging infrastructure where it is appropriate and can lead to efficiencies and customer benefits.

Toronto Hydro offers the following additional comments for the OEB’s further consideration:

EVCCP Applicability

The EVCCP are described as applying, among various customer types, to “multi unit residential buildings”. Toronto Hydro suggests that this term be defined or clarified, otherwise it could inadvertently include individual residential homes with more than one occupant or other similar cases (e.g. duplex, triplex, laneway suites, etc) more appropriately considered as individual residential properties (to which the EVCCP expressly does not apply). Toronto Hydro also notes that the term “multi unit residential building” exists in multiple contexts within the energy industry, so caution should be taken to ensure the definition within the EVCCP is clearly defined and not open to interpretation (e.g. mixed use properties, etc).

Customer Expectations

The EVCCP notes on several occasions that “Customers should contact their distributor to understand if their proposed connection may require distribution system modification or addition before proceeding with an EVSE installation”. For completeness of reference materials, and to manage customer expectations, Toronto Hydro suggests that this statement be expanded to include the possibility that customer-side system modifications (e.g. panel/service size upgrades, disconnect switch installations, ducts, etc) may also be required before a connection can be completed.

Timeline for Electric Vehicle Preliminary Consultation Report (“EVPCR”)

The EVCCP requires that distributors must respond to customers within 15 calendar days of receipt of a complete Preliminary Consultation Information Request, using the Electric Vehicle Preliminary Consultation Report form. While Toronto Hydro does not have concerns with the proposed timelines for single site requests, it submits that this timeline should be extended for single party requests covering multiple connection sites. One approach would be to have timeline extension thresholds for this stage of the process based on the number of sites being considered (e.g. for every x number of sites considered, y additional days are added to the timeline).

Alignment between EVCCP and DSC

To ensure consistency between the EVCCP and the DSC, when the Offer to Connect process is referenced in the EVCCP, Toronto Hydro submits that the same language used in section 6.1.1 of the DSC should be reflected in the EVCCP at page 6, section 6 “Offer to Connect” (Step 4). Namely, section 6.1.1 states “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.” This same verbiage should be included in section 6 on page 6 of the EVCCP to strengthen alignment between the two documents.

Toronto Hydro is pleased to continue to work with the OEB and stakeholders revising and updating the connection procedures for EV charging and other infrastructure, and shares in the OEB’s objectives of removing potential barriers and streamlining the connection process for customers.

Sincerely,

A handwritten signature in blue ink that reads "Andrew J. Sasso". The signature is written in a cursive, flowing style.

Andrew J. Sasso
Director, Energy Policy and Government Relations
Toronto Hydro-Electric System Limited

AJS/jl