

BY EMAIL AND RESS

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Ms. Nancy Marconi
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Hydro One Networks Inc.
483 Bay Street
7th Floor South Tower
Toronto, Ontario M5G 2P5
HydroOne.com
Jeffrey Smith
Director, Regulatory Compliance
C 905.399.5721
Jeffrey.Smith@HydroOne.com

Dear Ms. Marconi,

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

In response to the Ministry of Energy’s Letter of Direction issued in 2022 and feedback collected through its Electric Vehicle (“EV”) Integration initiative, the Ontario Energy Board (“OEB”) set out to examine the current load connection process in the Distribution System Code (DSC) and determined that there is a need to improve and streamline the process. In response, the OEB established the EV Charging Connection Procedures (“EVCCP”). On December 15, 2023, the OEB issued a Notice of Proposal (the “Notice”) to amend the DSC by requiring distributors to comply with the EVCCP.

Hydro One Networks Inc. (“Hydro One”) believes that the proposed EVCCP establishes clear outcomes and expectations at each step of the EV Supply Equipment (“EVSE”) facility connection process, which will result in greater consistency in how the process is implemented by all distributors. The EVCCP also expands on the current load connection process to better assist and guide EVSE connection applicants who have siting flexibility. However, certain aspects of the EVCCP require further review and clarification to ensure the connection process is practical and efficient for utilities and customers. Please refer to Hydro One’s comments in Appendix A for further details.

If you have any additional questions regarding Hydro One’s comments or would like to discuss these comments in further detail, please contact Jason Savulak by phone at 647-293-7226 or by email at regulatory@hydroone.com.

Sincerely,



Jeffrey Smith

Appendix A – Hydro One’s Comments

A) Proposed Amendments to the DSC

- Section 6.1.6.1 Requirement

In the Notice, the OEB mentions that Section 2.4.6 of the DSC lists the types of operational practices and connection policies that must be described and explained in a distributor’s Conditions of Service (COS). If the OEB will now require distributors to specify the connection requirements applicable to EVSE facilities in a separate appendix of their COS, this requirement should be stipulated in Section 2.4.6 along with other COS requirements and not as a standalone requirement in Section 6 of the DSC.

When a distributor makes changes to their COS, they are generally required to follow the process described in Section 2.4.8 of the DSC. The process for updating a distributor’s COS typically takes several months. For this reason, distributors usually only update their COS once a year or on an as-needed basis. The OEB should confirm whether distributors are expected to follow the process in Section 2.4.8 for updating their COS to comply with the EVCCP or if distributors will be permitted to simply provide notification of their COS update to their customers.

- Compliance Enforcement Date for Proposed DSC Amendments

In the Notice, the OEB states that the proposed amendments to the DSC will come into force 3 months following the date on which the final DSC amendments are published on the OEB’s website. Hydro One does not believe that 3 months will be enough time to implement some EVCCP processes and requirements, which have not been implemented as a part of the normal load connection process. For example, the EVCCP will require distributors to confirm that an EVSE connection application is complete and accurate within 15 days of receiving the connection request and establish a preliminary consultation process for providing EVSE connection applicants with high-level connection feasibility information where multiple siting options exist. None of these processes have been built into Hydro One’s existing load connection process.

Hydro One will need time to assess and scope out options to effectively implement these processes, which will include developing a customer communication strategy as well as providing staff and call centre training. Furthermore, the work needed to implement these new processes has not been included in the work plans of those lines of business that will be needed to support the implementation. The EVCCP will also require distributors to create a dedicated page on their website that provides information and forms related to the EVSE connection process. Hydro One estimates that approximately 8 months will be needed to implement the new processes required by the EVCCP and create a dedicated EV connection resource webpage.

B) EVCCP Requirements

- Applicability

Section 1 of the EVCCP states that the document is intended to apply to non-residential publicly accessible EVSE facilities and fleet charging stations designed for commercial use. This is further affirmed by statements in the Notice. However, Section 1 later states that the EVCCP also applies to multi-unit residential buildings, which are generally considered residential. To avoid contradiction and ensure consistency in interpretation, the OEB should revise the applicability statement in the EVCCP to clarify that the document would apply to any proposed EVSE facility that is not being installed to serve a single residential customer.

- Figure 1 – Process Flow Diagram for an EVSE Connection

Hydro One has the following comments regarding Figure 1 in the EVCCP:

- There is a minor typo in Figure 1 related to the decision that the EVSE applicant must make on whether to proceed to Step 1 or Step 2. The process should specify “PCIR” instead of “PCR”.
- According to the process flow diagram, a distributor must check that the information provided in an EVSE connection application is complete within the 60-day timeline that the distributor must issue an Offer to Connect (OTC). It is imperative that a distributor be allocated 60 days to properly assess a load connection application and establish the terms and conditions of its OTC. The distributor cannot begin assessing the connection until the distributor deems that the information provided in the application is complete, correct, and sufficient to proceed with its assessment. If a distributor is expected to interface with the customer within the 60-day timeline to confirm that all required connection-related details and information has been provided, the distributor may not have enough time to properly assess the connection. The OEB should revise the process flow diagram to clarify that the timeline for assessing the connection and issuing the OTC (Step 4) would start after the distributor determines that information included in the application is deemed to be complete and the connection assessment can start (Step 3). This is consistent with the DER connection application process.
- In addition to issuing an OTC, Step 4 of the process flow diagram should also indicate that at this stage, the distributor will assess the connection, define connection requirements and provide a cost estimate or firm price for the connection work.
- The process flow diagram is missing a step after Step 4 where the applicant must confirm their acceptance of the OTC.
- It is unclear why a timeline of 5 business days is shown above Step 6. If this is a reference to Section 7.2.1 of the DSC, it should be noted that most EVSE connection applications to the

distribution system will be at voltages greater than 750 Volts and, therefore, Section 7.2.2 of the DSC would apply. The process flow diagram also does not clarify that the service connection requirements only once all service conditions and requirements established by the distributor have been satisfied. To avoid any potential confusion or misinterpretation, Hydro One suggests removing the timelines entirely from the overview diagram and making reference to them, as appropriate, in later sections when each of the steps in the diagram are described in more detail.

- Section 4 – Preliminary Consultation Overview

The EVCCP states that “the purpose of the preliminary consultation is to provide high-level connection feasibility information to a customer who has uncertainties regarding site selection for the EVSE, or those who are unsure about committing to EVSE installations.” Hydro One believes that the sole purpose of the preliminary consultation is to provide EVSE applicants, who have site flexibility, with feasibility information (ie. connection capacity and complexity details) about their siting options. For clarity, Hydro One recommends revising this sentence to read “the purpose of the preliminary consultation is to provide high-level connection feasibility information to a customer who is considering multiple potential site options for their EVSE installation.”

- Section 4.2 – Requirements for Issuing an EV Preliminary Consultation Report (EVPCR)

Section 4.2 of the EVCCP should clarify that a distributor will issue a EVPCR to an EVSE applicant within 15 days of receiving their EV Preliminary Consultation Information Request (EVPCIR) for up to a maximum of 3 site connection options. If the applicant requests information for more than 3 site connection options, Section 4.2 should indicate that the distributor may require more time to issue the EVPCR to the applicant.

The EVCCP states that the EVPCR should identify the estimated capacity at the connection point. Hydro One does not believe that distributors should be required to provide this information to an applicant unless the proposed connection cannot be accommodated within the technical limits of the distribution system. Hydro One recommends that Section 6.01A of the EVPCR template be deleted and that any system capacity limitations be identified in Section 7.01 (potential sizing suggestions).

- Section 5 – Connection Request and Completeness Check

As Hydro One understands, the 15-day timeline in Section 6.1.1 of the DSC for responding to a customer connection request is intended to provide distributors with time to determine whether the information provided by the customer is sufficient to be able to assess the connection. More specifically, the distributor will use this time to confirm whether the information submitted is complete and accurate and if additional information is required to properly assess and review the connection request. For instance, a distributor may determine that a site visit needs to be scheduled to confirm certain information related to the proposed site plan and the location of assets before the assessment can be initiated. During the proposed 15-day screening period, the distributor cannot confirm what modifications or upgrades to the distribution system would be required. These details would be confirmed during the 60-day timeline provided to the distributor to assess the connection and establish the connection requirements in the OTC. Section 5.3 should indicate that within 15 calendar

days of receiving the connection request, the distributor will inform the EVSE applicant of whether their application is complete or if additional information is required by the distributor to proceed with the connection assessment for the purpose of issuing an OTC.

- Section 6 – Issuing an OTC

Hydro One has the following comments related to the requirements for issuing an OTC:

- As previously mentioned in comments in relation to Figure 1, in most cases, a distributor will require the full 60 days to assess an EVSE connection application and provide terms and conditions of the OTC. A distributor should not be expected to allocate time within the 60-day timeline to verify that information submitted in the connection application is complete, correct and sufficient to proceed with the connection assessment. If a distributor needs to verify certain information or confirm details of the proposed site plan with the customer, the distributor should not be hindered by having less time to assess the connection. Consistent with the DER connection application process, the distributor should have up to 60 days to assess the connection and provide the OTC once the distributor deems that the information submitted in an EVSE connection application is complete and accurate.
- The ability to issue an OTC in response to a customer connection request is contingent on receiving all necessary approvals and easements from the designated authorities. Any distributor, who chooses to issue an OTC based on a firm offer, cannot issue an OTC without securing the required low voltage registered easements, municipal consent or other approvals (ie. road/crossing, telecom, species at risk, etc.) from the designated authorities. The need for obtaining approvals and easements applies in the cases of both a simple connection (ie. Lies Along Customer) or a more complex connection that requires an expansion.
- In the case of a Lies Along Customer, a distributor can only issue a “preliminary OTC” if they have not yet received all required approvals or easements for the connection within 60 days of commencing their assessment. Similarly, a customer cannot proceed with their project based on a preliminary OTC because the connection requirements and details are not finalized. Therefore, from both a customer and distributor standpoint, a preliminary OTC has no value in respect of these simple connections. To address this scenario, the EVCCP should clarify that, if a distributor has not received all required approvals or easements to issue an OTC within 60 days for a simple connection, the distributor will inform the EVSE applicant within 60 days that the OTC will be issued once all outstanding approvals are received. In doing so, the EVCCP would avoid forcing distributors to implement an inefficient two-stage OTC process that provides no benefit to the connection applicant.
- For EVSE connections that require a distribution system expansion, a distributor who uses a firm offer approach is also only able to issue a preliminary OTC issued within 60 days. However, there is value in issuing a preliminary OTC in these cases. A preliminary OTC would provide the applicant with an estimate of the connection cost and, if they are interested in proceeding, the

applicant agrees to pay up-front for the cost of designing the connection. Once all approvals and easements are obtained and the design is finalized, the distributor can issue an OTC based on a firm offer price. The EVCCP should clarify that where an EVSE connection requires an expansion and the distributor uses a firm offer approach, the distributor shall issue a preliminary OTC within 60 days and a final OTC once the design has been completed.

- The EVCCP explains that a distributor can choose to issue an OTC based on an estimate or a firm offer. However, further to the points raised above, the EVCCP does not clarify or provide details as to how the process for issuing an OTC differs for both approaches. For example, as mentioned above, if the distributor’s practice is to issue an OTC based on a firm offer, the EVCCP should clarify that the distributor may first issue a preliminary OTC and obtain agreement from the applicant to pay for the cost of designing the connection when the connection requires an expansion. Therefore, the initial OTC will not meet the cost detail requirements set out in Section 6.1, 6.2 or 6.3. Once the design is complete, the distributor will issue a final OTC to the EVSE applicant that reflects the firm offer price for the connection work. To avoid potential confusion or misunderstanding, the estimate and firm offer approaches should be described in greater detail in the EVCCP at the end of Section 6 (page 7) after the three potential connection scenarios are outlined.

- Section 6 – Figure 3

Figure 3 should be updated to reflect the comments above.

In Figure 3, the decision box “Customer’s info complete notice” should be deleted from the process flow. Once the distributor confirms that the connection request application is complete and accurately specified, the next step is to begin assessing the connection application and prepare the OTC. When this step begins, the distributor should notify the applicant.

- Application of Section 3.1.7 and 3.1.7A of the DSC

If the applicant proposing to connect an EVSE facility must pay a capital contribution, the EVCCP requires the distributor to include and factor in the age of any connection assets being upgraded in determining the customer contribution in accordance with Sections 3.1.7 and 3.1.7A of the DSC.

Distributors may not have net book value or age information for certain distribution connection assets that need to be upgraded. To ensure that expectations are clear, the EVCCP should indicate that the net book value and advancement cost of any connection assets that need to be upgraded will be accounted for in determining the customer’s capital contribution, where it is possible to do so. Distributors should specify the terms and conditions regarding the consideration of connection asset upgrades in their OTC.