

# Elson Advocacy

VIA RESS

February 12, 2024

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

Dear Ms. Marconi:

**Re: EB-2019-0207 – Proposed Amendments to the Distribution System Code to Enable Flexible Hosting Capacity Arrangements**

I am writing on behalf of Environmental Defence in relation to the proposed amendments to the Distribution System Code as outlined in the Notice of Proposal to Amend a Code dated January 29, 2024.

Environmental Defence fully supports the amendments as written in Appendices A and B of the Notice. It is important that distributors be able to offer flexible hosting capacity arrangements. Flexible hosting is one of the tools available to distributors to allow greater distributed energy resources to connect to restricted portions of the grid without requiring infrastructure upgrades. This tool clearly cannot resolve capacity constraints fully but it nevertheless can provide concrete benefits and increase distributed energy resource hosting capacity at a low cost. Although the sector is likely not ready for this to be an option that must be provided by all distributors, the proposed changes are certainly a step in the right direction.

Yours truly,



Amanda Montgomery