



May 17, 2024

VIA RESS

Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Marconi,

Re: Transmission Connections Review
Board File No.: EB-2024-0126

We are counsel to the Distributed Resource Coalition ("**DRC**") in the above-noted stakeholder consultation on issues to be considered by the Ontario Energy Board (the "**OEB**" or "**Board**") as it commences a review of the Transmission System Code's ("**TSC**") connection related section (the "**Review**"). DRC submits these comments on issues to be considered during the Review and request for cost eligibility pursuant to the Board's "Kick-off" letter dated April 24, 2024.

About DRC

DRC is a group of electricity customers and consumers, consisting of end-use residential customers, non-profit organizations, and owners' associations. DRC's members are directly affected by and interested in: (i) optimizing existing energy assets; (ii) efficiently facilitating the integration of existing and innovative distributed energy resources ("**DERs**"), including electric vehicles ("**EVs**"), to achieve customer and grid solutions; and (iii) providing input on direct customer needs and local distribution company opportunities relating to EVs. DRC's members for the Review include, subject to further update, the Electric Vehicle Society ("**EVS**") and Plug'n Drive ("**PnD**").

Inputs on issues to be considered

Energy Storage and DERs. DRC welcomes the inclusion of energy storage as an issue for the Review, but it is essential that storage should be considered in a comprehensive way. Accordingly, DRC believes that DERs should be expressly identified as a core element to the issue and, as such, an intended separate issue (or sub-issue under the more general issue of storage) for consideration in order to ensure a comprehensive approach to the subject.

Energy storage will play an increasingly important system benefit in the years ahead. Efforts to decarbonize Ontario's energy sector and incorporate renewable energy sources will almost certainly rely heavily on the availability of cost-effective and reliable storage options.

A comprehensive review of energy storage necessarily includes consideration of DERs and the role DERs will play in Ontario. DERs, including EVs, aggregated batteries and solar, will play an important role as distributed and deployable energy storage systems for use by industrial, commercial, and residential energy consumers at a more distributed and localized level.

Cost responsibility. DRC believes the Review should expressly identify the issue of how responsibilities relating to the costs of DER adoption and integration should be allocated. DRC notes that the Board has already identified a review of cost responsibility in the context of sector changes and new demands.

Given the importance of DER integration to decarbonization efforts, the decentralized and therefore potentially novel cost implications that DER adoption will entail, and the rapid pace with which DER adoption and integration is likely to occur, identifying DER cost responsibility as a separate item will help to ensure that the issue receives the attention that it warrants. Connecting DERs to the transmission system may provide numerous system benefits while also requiring significant upgrades to transmission infrastructure. Providing certainty as to who bears the costs of necessary upgrades to the transmission system to accommodate needed DER connections will enable DER owners and aggregators to determine how and where to pursue opportunities to assist Ontario's grid to provide reliable and dispatchable clean energy when and where it is needed.

Technical requirements. Finally, DRC believes that the review should expressly recognize the broad issue of technical requirements as they relate to DERs, recognizing that effective and efficient approaches to DER integration will be essential to the success of Ontario's efforts to decarbonize its energy sector.

DERs may require specific and unique technical requirements to connect to a transmission system. Connecting and integrating DERs poses unique challenges that should be fully examined as part of the Review. This issue should also include considering safety protocols, synchronization, and interconnection procedures that may differ between and amongst DERs.

The complexity of connecting DERs should not be a barrier to addressing this issue during the Review. In fact, the challenge and importance of ensuring that the TSC fully accommodates the connection of DERs as part of Ontario's energy transition and electrification efforts help to underscore the importance of addressing these more technical questions at the earliest opportunity and in the most open and informed way available.

DRC's cost eligibility and representative

DRC's cost eligibility. DRC is, in accordance with s. 3.03(a) of the Board's *Practice Direction on Cost Awards* (the "**Practice Direction**"), eligible to seek an award of costs as DRC is a party that primarily represents the direct interests of consumers (residential customers, small- and medium-sized commercial and industrial customers) in relation to services that are regulated by the Board. DRC is also, in accordance with s. 3.03(b) of the Practice Direction, eligible to seek an award of costs as DRC represents organizations that have a policy interest in electricity conservation and demand management, implementation of a smart grid in Ontario, and promotion of the use of electricity from renewable energy sources, each of which are components of the Board's mandate.

The Board has granted DRC cost eligibility in several Board proceedings, including EB-2022-0024, EB-2018-0165, EB-2019-0018, and EB-2019-0261.

DRC therefore requests cost eligibility in this consultation as its participation and comments will serve an important and unique interest and policy perspective relevant to the Board's mandate.

DRC's representative. DRC hereby requests that further communications with respect to the Review be sent to the following:

TO ITS COUNSEL

Resilient LLP

119 Baby Point Road
Toronto, ON M6S 2G7

Attention: Nicholas Daube
Telephone: 1-416-768-8341
Facsimile: 1-888-734-9459

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Daube', written in a cursive style.

Nicholas Daube, Resilient LLP, counsel for DRC

c. Devin Arthur, EVS
Cara Clairman, PnD