



Ontario Energy Board  
2300 Yonge Street, 27th floor  
P.O. Box 2319  
Toronto ON M4P 1E4

December 9, 2024

Dear Ms. Marconi,

***Re: EB-2024-0092 – Proposed Amendments to the Distribution System Code to Facilitate the Connection of Housing Developments and Residential Customers***

Northeast Pickering Landowners Group (NEPLG) is pleased to submit these comments in response to the proposed amendments to the Distribution System Code (DSC) to facilitate the connection of housing developments and residential customers. NEPLG is a collection of landowners and developers who own multiple properties in northeast Pickering. NEPLG was started in 2021 with the goal of collectively guiding the development process within this area, namely the Northeast Pickering Secondary Plan (NEPSP). The NEPLG lands consist of a gross area of approximately 1,826 hectares, generally bound by 8th Concession Road to the north, Highway 7 to the south, Lakeridge Road to the east, and Westney Road to the west. At present, approximately 51% of the parcels within the NEPSP participate in NEPLG.

NEPLG submitted comments to the OEB as part of its initial consultation in this matter<sup>1</sup>, and we are pleased that many of our recommendations have been accepted by the OEB and put forward for inclusion in the DSC via these amendments. In particular, lengthening the connection and revenue horizons for housing developments was a major concern of ours, and so we commend the OEB on its proposal to extend these to 15 and 40 years, respectively. As developers, NEPLG has direct insight into the processes and interactions between land development and distribution system expansion and customer connection processes. On that basis we offer the following additional comments to the OEB in respect of the specific amendments to the DSC that the OEB is contemplating:

1. Definition of “housing development”

The OEB proposes to define a housing development as “a project to construct multiple residential accommodations on a piece of land that will be divided into multiple parcels and offered for sale, and that will be comprised predominantly of residential accommodations but may also include public buildings, industrial and commercial buildings or space appropriate for such buildings”

NEPLG recommends that the OEB, in defining “housing development”, make it clear that housing developments comprising multiple pieces of land are also captured by this definition. This is because the NEPLG lands (as described above) comprise multiple parcels owned by multiple developers; while we consider the entirety of the NEPLG lands to be a “housing

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<sup>1</sup> <https://www.rds.oeb.ca/CMWebDrawer/Record/851064/File/document>



development”, it is not clear that the lands *in toto* would be considered as such under the currently-proposed definition.

2. Documentation requirements to qualify for entitlement to a 15-year connection horizon (i.e., clause (c) in the definition of “qualifying housing development”)

The OEB proposes to require that a developer provide a distributor with “an approved plan of subdivision for the housing development; and evidence that the developer owns the land on which the housing development will be built or has written authorization to build the housing development on that land from the landowner”.

NEPLG notes that as part of the land development process, municipalities in which a development is proposed would have already completed the broader official plan amendments for the area, which would in turn specify the proposed uses for the land that is to be serviced (i.e., in this case, housing developments). NEPLG is also not clear as to the relevance of who owns the lands at any given time as it pertains to the ability to obtain a 15-year connection horizon. Overall we believe that the requirements the OEB proposes to add for a developer to obtain a connection horizon of up to 15 years by entitlement (rather than at the discretion of the LDC) are superfluous and add unnecessary red tape to the connection request process, both for the developer requesting the connection and for the LDC that presumably would be expected to verify, in some fashion, the documentation produced by the developer. Instead, NEPLG suggests that the OEB require that developers, to demonstrate their entitlement to a connection horizon of up to 15 years, simply submit an attestation that the lands for which the connection is being requested are a housing development. Should the OEB adopt this request, we would also encourage the OEB to make available to all LDCs a standard template form.

Thank you again for your efforts to ensure that electricity connection processes are aligned with our and the province’s homebuilding efforts.

Sincerely,

**Ore Alade, B.E.S.**

*Delta Urban Inc.*

*On behalf of North East Pickering Landowners Group Inc.*