



December 6, 2024

Sent Via Email <registrar@oeb.ca>

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

Attention: Nancy Marconi, Registrar

**RE: EB-2024-0092 – PROPOSED AMENDMENTS TO THE DISTRIBUTION SYSTEM CODE TO FACILITATE
THE CONNECTION OF HOUSING DEVELOPMENTS AND RESIDENTIAL CUSTOMERS**

We are writing to you as the Group Manager on behalf of the OPA 15 Landowners Group (the “Group”), being a collective of landowners within the 1,800 acres industrial development area in the Town of Bradford West Gwillimbury generally located along Highway 400 north of Fifth Line to Line 9, as illustrated in **Schedule A**.

This letter is provided in response to the Ontario Energy Board (OEB) Notice of Proposal to Amend a Code dated November 18, 2024 (the “Notice”), which proposed amendments to the Distribution System Code (DSC) to facilitate the connection of housing developments and residential customers. The Group has reviewed the proposed changes in the Notice and provide the following comments for your review and consideration:

1. These proposed amendments are specifically focused on “Housing Developments” rather than the Industrial/Commercial Developments. Given the need, and provincial mandate, to promote Residential and Industrial/Commercial properties, the Group would like to see the same terms and conditions being offered to Housing Developments extended to Industrial/Commercial Developments.
2. The OEB is proposing to amend the DSC to extend the Connection Horizon to fifteen (15) years and the Revenue Horizon to forty (40) years. The Group is in support of both these amendments as they should result in a lower percentage of the hydro costs being attributed to the Developer.
3. 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” (this is also applicable to industrial developments). Municipalities in which a development is proposed would have already completed the broader official plan amendments for the area (including potentially extension Secondary Plan processes), which would in turn specify the proposed uses for the land that is to be serviced and development horizon. The OEB proposal to require developers 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, the Group would the OEB to require developers to demonstrate their entitlement to a connection



horizon of up to 15 years through submitting an attestation that the lands for which the connection is being requested to be development.

4. As part of this amendment, the Group encourages the OEB to clearly address financial responsibilities for Transformer Station Works, and to direct the responsibility to the Local Distribution Company (LDC) (ie Alectra, Milton Hydro, Hydro One as applicable).
5. The Group encourages the OEB to address the external expansions to developments in order to protect the investments made by developers to provide hydro capacity at the frontage of their sites. Currently, the first Developer or Developers Group requiring external capacity expansion to a community has to pay in full for that expansion. We believe that a formal cost sharing formula through the LDC would ensure that the Developers are only responsible for their proportionate share of the expansion and that any future connections to that external expansion would be paid for by whomever is connecting to the expansion.
6. The Groups would like the OEB to include a provision in the DSC to account for greater electrical usage in the Revenue Horizon. LDCs are currently implementing new standards that will allow the new hydro expansions to provide more hydro capacity for future EV Chargers and/or reduced carbon heating sources but are using historical usage figures to input into their Economic Evaluation Models (EEM). The result of which is Developers are paying more to mitigate future risk without the possibility of benefiting from the increased electrical demands. There should be a mechanism in place that allows LDCs to determine if larger than historical amounts of energy are being consumed and, if so, to adjust their EEM for the development accordingly.

We believe this is an ideal time to engage with the OEB to discuss these matters, enabling practical and achievable updates to the Distribution System Code (DSC) that reflect the current industry realities.

We look forward to collaborating with the OEB, alongside industry and government partners, to finalize these important matters. Should you have any questions or require further information, please contact the undersigned.

Yours Very Truly,

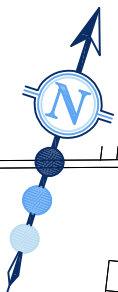
On behalf of OPA 15 Landowners Group Inc.

Mustafa Ghassan, BES, M.Eng-CEM
Delta Urban Inc.

Cc. Mr. Harneet Panesar, Chief Operating Officer, OEB
Mr. Brian Hewson, ice President, Consumer Protection & Industry Performance, OEB
Client

Enclosed. OPA 15 Community Area Ownership Map


SCHEDULE - A-



PARCEL NO.	OWNER
PARTICIPATING LANDOWNERS	
103	103 - ELISE DEVELOPMENTS INC.
106	106 - BOND HEAD PROPERTY EIGHT INC.
110	110 - AVIVTEL ENTERPRISES INC.
120	120 - BOND HEAD PROPERTY SEVEN INC.
122	122 - BOND HEAD PROPERTY TEN INC. (NORTH)
122	122 - BOND HEAD PROPERTY TEN INC. (SOUTH)
124	124 - BOND HEAD PROPERTY TEN INC. (NORTH)
124	124 - BOND HEAD PROPERTY TEN INC. (SOUTH)
201-205	201-205 - HIGHLIGHT MOTOR GROUP
206	206 - HIGHLIGHT MOTOR GROUP
207	207 - HIGHLIGHT MOTOR GROUP
208	208 - HIGHLIGHT MOTOR GROUP
601	601 - WEST GWILLIMBURY POWER CENTRE INC.
808	808 - 2841 MCKINSTRY ROAD
1001	1001 - FMC BRADFORD PARK LANDS LTD.
1101	1101 - 3067 55SIDE HOLDINGS INC.
NON PARTICIPATING LANDOWNERS	
104	104 - SHINNECOCK PROPERTIES INC.
301	301 - WILLIAMS
302	302 - WILLIAMS, RALPH; WILLIAMS, MARILYNNE
401	401 - WILLIAMS, RALPH
402	402- WILLIAMS, SUSAN THERESE; WILLIAMS, JOHN WILLIAM
403	403 - HUSKY OIL OPERATIONS LIMITED
405	405 - 1402829 ONTARIO LTD.
701	701 - CHEN, YEN-PIN; CHEN, WU RUEY-JEN
702	702 - O'ROURKE, GARY BASIL
801	801 - MTO
802	802 - MTO
803	803 - MTO
804	804 - NATELO REALTY INC.
805	805 - NATELO REALTY INC.
806	806 - NATELO REALTY INC.
807	807 - YL HOME INC.
809	809 - PANKIW, FEDIR
810 - 815	810-815 - CAPLINK LIMITED
816	816 - CALIA INVESTMENTS INC.
901	901 - BRADHILL FARMS LTD.
902	902 - 3538 8LINE HOLDINGS INC.
903	903 - GUARDIAREGIA DEVELOPMENTS INC.

LEGEND:

- PROPERTY BOUNDARY
- OPA 15 BOUNDARY
- NON-PARTICIPATING OWNERS



1595 SIXTEENTH AVENUE, SUITE 301
RICHMOND HILL, ONTRAIO, L4B 3N9
TEL: (905) 709-7454
FAX: (905) 709-7400



30 CENTURIAN DRIVE, SUITE 100
MARKHAM, ONTARIO L3R 8B8
TEL: (905) 475-1900
FAX: (905) 475-8335

400/88 DEVELOPERS GROUP
COST SHARING

DESIGNED BY: S.E.M.

CHECKED BY: J.L.B.

SCALE: 1:20000

DATE: NOVEMBER 2024

RELATED OWNERSHIP
FIGURE

PROJECT No:
1267

FIGURE No:
A

File: P:\1267 400-88 Employment Area\Drawings\Cost Sharing\Figs\Schedule Figures\1267CS-OWNS.dwg - Revised by <TFULTON> : Wed, Oct 11 2023 - 1:32pm