



December 9, 2024

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

Delivered via Email

Re: Hydro Distribution Code In Ontario - EB-2024-0092
OEB Notice of Proposal to Amend a Code November 18, 2024

Thank you for the opportunity to provide feedback on the proposed amendments to the Distribution System Code (DSC). We appreciate the Board's consideration of industry stakeholders' perspectives in this important matter.

We strongly support the proposed extensions to both the Connection Horizon (to fifteen years) and Revenue Horizon (to forty years). These amendments represent positive steps toward more equitable cost allocation in development projects. However, we would like to address several critical points that require further consideration:

1. **Scope of Application:** We request that the same terms and conditions proposed for Housing Developments be extended to Industrial/Commercial Developments. As developers of both residential and industrial/commercial properties, we believe consistent treatment across all development types would ensure fairness and market efficiency.
2. **Transformer Station Works:** We urge the OEB to explicitly address the financial responsibilities for Transformer Station Works within the amended DSC. Our position is that these costs should be borne by the Local Distribution Company (LDC).
3. **External Expansion Cost Sharing:** We recommend implementing a formal cost-sharing mechanism through the LDC for external expansions to developments. The current system, where the initial developer bears the full cost of community expansion, requires revision. A proportionate cost-sharing formula would ensure fair allocation of expenses among current and future users of the infrastructure.
4. **Implementation Timeline:** The industry requires a predictable approach with clear pathways for full recovery of all front-ended infrastructure investments. This will enable better planning and more efficient development processes.

We look forward to continuing our collaboration with the OEB, industry stakeholders and government partners to finalize these amendments. Our shared goal is to establish a framework that supports sustainable development while ensuring fair cost recovery mechanisms for all stakeholders.

If you require any clarification or additional information regarding our feedback, please do not hesitate to contact us.

Pat Crosby



**GREAT
GULF**

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