



December 9th, 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 Bond Head Landowners Group (the “Group”), being a collective of landowners within the 200 hectares residential development area in the Bond Head Community in the Town of Bradford West Gwillimbury, 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. 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.
2. 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”. 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.
3. 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, Hydro One, as applicable).



4. The Group encourages the OEB to address the external expansions to developments 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 must 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.
5. 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.

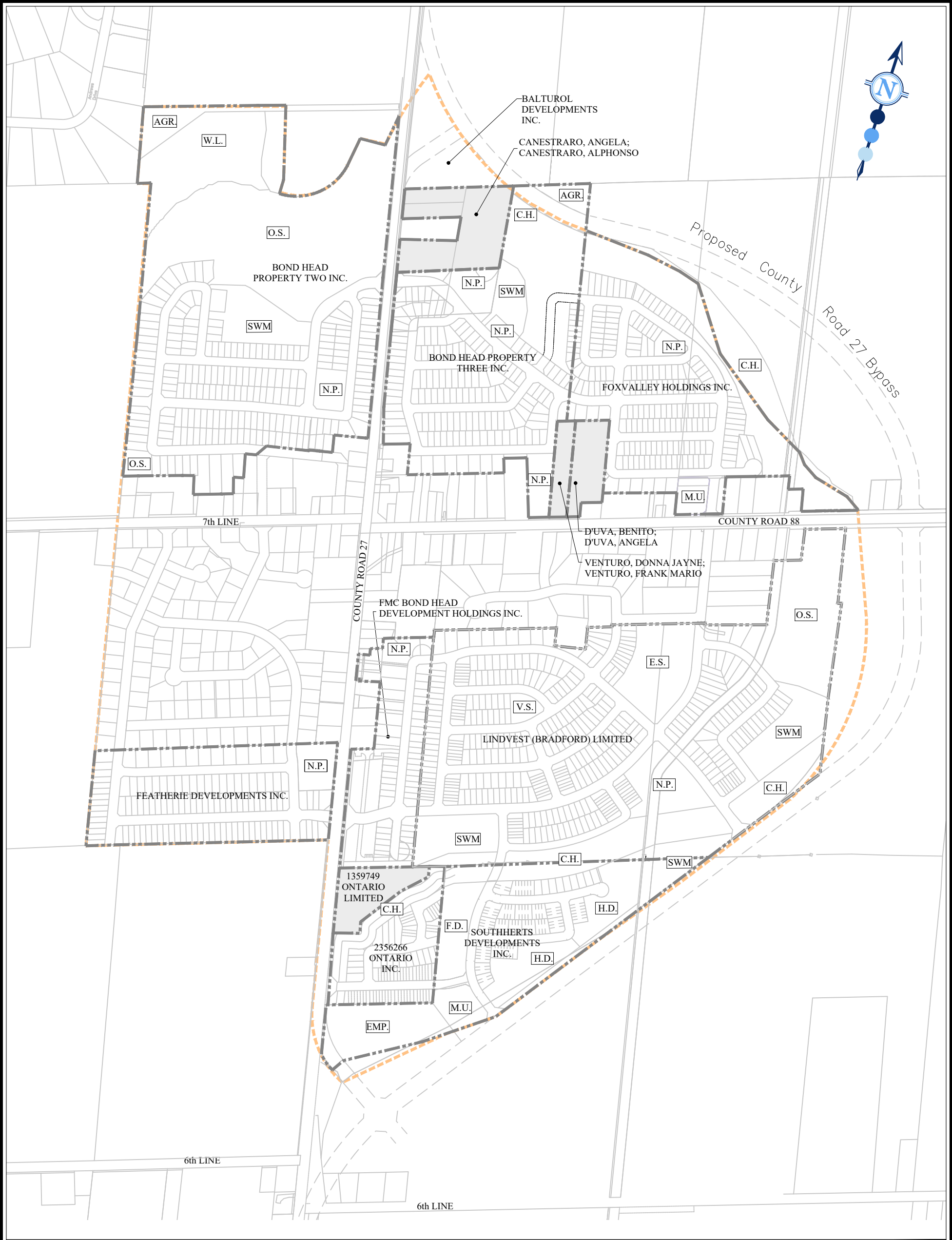
Yours Very Truly,

On behalf of Bond Head Landowners Group Inc.

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

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

Enclosed. Bond Head Community Ownership Map



LEGEND:

	OWNERSHIP BOUNDARY		FUTURE DEVELOPMENT		NON-DEVELOPABLE LANDS
	SECONDARY PLAN AREA		ELEMENTARY SCHOOL		CHANNEL BLOCK
	NON-PARTICIPATING OWNER		HIGH DENSITY BLOCK		AGRICULTURAL
	NEIGHBOURHOOD PARK		MIXED USE BLOCK		WOODLOT
	VILLAGE SQUARE		EMPLOYMENT BLOCK		
			STORMWATER MANAGEMENT POND BLOCK		

NOTES:
ARTERIAL ROAD WIDENING BLOCKS ARE NON DEVELOPABLE BUT NOT IDENTIFIED
ON THIS PLAN.



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

BOND HEAD LANDOWNERS GROUP
COST SHARING

DESIGNED BY:	S.E.M.	CHECKED BY:	J.L.B.
SCALE:	1:7500	DATE:	JULY 2023

OWNERSHIP PLAN
SCHEDULE B

PROJECT No:	FIGURE No:
1333	1.0