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Proposed Amendments to the Distribution System Code to establish a Capacity Allocation Model

Comments and Questions

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- 1) "Under the proposed amendments, the distributor, in consultation with developers, will determine the need for and scope of a CAM." (Page 5, 5th paragraph) and "The OEB acknowledges...that distributors...best position to determine the best approach" (Page 9, last paragraph)

Question: *What process will be in place for developers to appeal the Distributors determination if they do not agree with it?*

- 2) "Should not be applied to when there is only a small group of connections" (Page 7, 2nd Paragraph)

Question: *What does a small group of connections include? On one of our projects, we had one developer with several buildings that could not be sold and built within a 5-year connection horizon. To ensure the expansion costs are recovered, the developer would like to extend the connection horizon to a 10-year or 15-year connection horizon. Would this be applicable?*

- 3) Significant Residential Load Growth, Planned Capacity & Paid Committed Capacity and Agreed Committed Capacity (Page 7, Points a, b and c)

Question: *Do all 3 criteria's need to be met or 2 or any of them for this to apply?*

- 4) "relative line length in proportion to the line length being shared by the customer" (Page 11, 2nd Paragraph) and "OEB will not mandate consideration of line length" (Page 11, 4th Paragraph)

Question: *Do all 3 criteria's need to be met or 2 or 1 of them for this to apply?*

- 5) "equal to their allocated share of the cost of the distributor has paid to finance the project until the contribution has been made" (Page 15, Last Paragraph)

Question: *Is there a standard rate applied and what sort of transparency will there be?*

6) Estimated Costs vs True Up Costs (Page 17, Entire Page)

Question: Will there be transparency with the Costs associated with the CAM? Will developers get access to the scope of works, itemized costing, change orders and reasons for any additional or removal of scope/costs?