



November 17, 2025

Submitted via RESS

Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Re: EB-2019-0207 - PROPOSED AMENDMENTS TO THE DISTRIBUTION SYSTEM CODE

On October 28, 2025, the Ontario Energy Board (OEB) release proposed amendments to the Distribution System Code (DSC) related to streamlining connections for Distributed Energy Resources (DERs).

The OEB's notice indicated changes including increasing the maximum capacity limit for micro-embedded generation, revising insurance requirements, removing a capacity allocation exemption, consistency in the connection impact assessment timeline, and broadening technical standard requirements. The OEB proposes that the amendments to the DSC would come into force on February 1, 2026.

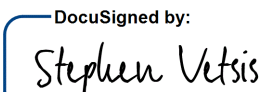
Stakeholders were requested to provide comments by November 19, 2025.

Elexicon Energy participates as part of the OEB's DER working groups and has had the opportunity to provide comments during those meetings. We do not have any further comments on the proposed changes. As part of those working group meetings, Elexicon understands that there are supporting changes to the DER Connections Procedure (DERCP) proposed to also come into force on February 1, 2026.

OEB staff have previously indicated final amendments to the DSC and version 2.1 of the DERCP would be issued in December 2025. The DERCP in particular will require distributors to establish new or streamlined processes and guidance, as well as amendments to existing documents. Given the volume of the anticipated changes and the overlap of the implementation period with the holiday season, Elexicon submits that the proposed implementation timeline is insufficient and requests the OEB consider an implementation date of April 1, 2026 for both the DSC and DERCP changes.

All of which is respectfully submitted.

Sincerely,

DocuSigned by:

Stephen Vetsis

Vice President, Regulatory Affairs & Stakeholder Relations
Elexicon Energy
E-mail: svetsis@elexiconenergy.com
Tel.: 289-388-7053

elexiconenergy.com

Office T (905) 427-9870 T 1 (888) 445-2881 F (905) 619-0210

Customer Care T (905) 420-8440 T 1 (888) 420-0070 F (905) 837-7861

55 Taunton Rd. E.

Ajax, ON L1T 3V3