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

Re: Distributed Energy Resources (DER) Connections – Proposed Amendments to the Distribution System Code to Streamline Connections of DERs (EB-2019-0207)

Toronto Hydro-Electric System Limited ("Toronto Hydro") is the local electricity distribution company for the City of Toronto. It serves over 790,000 customers and delivers approximately 18% of the electricity used in Ontario. Toronto Hydro's customers range from single family dwellings and neighbourhood shops to multi-use skyscrapers, and some of the province's largest commercial, institutional, and industrial facilities. The utility powers non-residential customers from a variety of sectors, including dozens of hospitals and healthcare operations; hundreds of schools, colleges, and universities; data centres; and large industrial and manufacturing facilities. Each of the thousands of multi-unit residential condominium and apartment buildings served by Toronto Hydro can have dozens or hundreds of units behind-the-meter. All told, every day, more than three million people are served by Toronto Hydro's electricity distribution system.

On October 28, 2025, the Ontario Energy Board ("OEB") issued a Notice of Proposal to amend the Distribution System Code ("DSC") related to streamlining processes for connections of Distributed Energy Resources ("DERs"). The OEB's proposed amendments are guided by the work of the DER Connections Review Working Group ("WG") and are intended to lower barriers to DER connections, reduce costs, and improve timelines, fairness, and consistency in connection processes. Toronto Hydro is supportive of these policy objectives and recognizes the importance of this initiative, as articulated in Ontario's Integrated Energy Plan and the Government's related directive to the OEB. Toronto Hydro has reviewed the proposed amendments and, in alignment with its earlier comments at the OEB's WG, offers the following submissions for the OEB's consideration.

Micro-Embedded Generation Facility Definition

The OEB proposes to update the definition of a micro-embedded generation facility to reflect a new limit of 12kW, increased from the previous limit of 10kW, and revise Appendix E of the DSC to include 12kW in both the Micro-Embedded Generation Facility Connection Agreement and Connection Form for Small and Mid-Sized Embedded Generation Facilities sections, replacing the current 10kW reference. Toronto Hydro supports this proposed amendment, as it is a reasonable increase that can be readily accommodated without undue effects on utility connection processes and will help to support customer choice in meeting energy needs.

Other Amendments

The OEB is also proposing several other technical amendments, as follows:

- amending section 9.1 in Appendix E of the DSC to address concerns about changes to a customer's insurance after the connection process is complete by requiring the customer to notify the distributor if the insurance policy no longer meets requirements, as well as the addition of section 9.2, which exempts residential customers with small and medium size DER's from the requirement to obtain commercial general liability insurance
- removing an exemption (in section 6.2.4.2 of the DSC) from the capacity allocation process requirements for embedded generation facilities that are not embedded retail generation facilities, on the basis that the DER connection landscape has evolved significantly since this exemption was first introduced in September 2009
- allowing for an additional 15 days for completion of CIA studies for small DER projects in cases where there is no reinforcement or expansion and where host distributor coordination is required
- amending section 6.2.25 of the DSC to replace the Canadian Standards Association (CSA) standard C22.3 No. 9 requirement with a general provision that DERs must meet all applicable industry standards identified by the distributor.

With regard to the addition of section 9.2, Toronto Hydro requests that the OEB confirm that the definition of "residential" in this context should be read as the "residential service classification" as defined in the distributor's Tariff of Rates and Charges. Otherwise, Toronto Hydro supports these amendments, and broadly agrees with the OEB that these changes will reinforce consistency in the connection process and align with broader policy objectives to support electrification and customer choice.

Toronto Hydro is pleased to continue to work collaboratively with stakeholders in support of efforts to provide customers with greater opportunities to take advantage of DERs, while streamlining the process for connecting DERs and further advancing the objectives noted in the Government's Integrated Energy Plan.

Respectfully,

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