

November 19, 2025

Sent via E-mail

Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Via email: registrar@oeb.ca

RE: File No. EB-2019-0207 – Notice of Proposed Amendments to the Distribution System Code (“DSC”)

The Electrical Safety Authority (ESA) appreciates the opportunity to comment on the above-captioned Notice of Proposal to Amend the DSC. As Ontario’s delegated administrative authority for electrical safety, ESA’s mandate is to regulate and promote electrical safety in the province – including administering the Ontario Electrical Safety Code (OESC), product safety regulation, licensing of electrical contractors and master electricians, and oversight of electrical distribution safety under Ontario Regulation 22/04 Electrical Distribution Safety.

ESA would like to provide comment and recommendation on two of the five proposed amendments to the DSC to highlight safety oversight, regulatory clarity and harmonization.

1. Increase the maximum nameplate capacity for a micro-embedded generation facility by 20%

The proposed amendment expands the definition of a “micro-embedded generation facility” to include those with a nameplate capacity of up to 12 kW. The ESA recognises the rationale: namely, that increased uptake of solar PV, battery energy storage and bi-directional EV systems has resulted in more sites exceeding the prior 10 kW threshold, leading to derating or increased cost/time burdens.

ESA has a threshold for project installations, under the OESC, where any installations within the scope of Section 64 (Renewable energy systems, energy production systems, energy storage systems, and batteries) or bi-directional electric vehicle supply equipment, with an output rating more than 10kW requires a Plan Review submission. The ESA will be reviewing safety data for this size of installation and will also consider

increasing these size requirements with the possibility of alignment with the revised OEB threshold.

5. Broaden technical standard requirements

ESA notes that safety is paramount for all electrical installations and adherence to the OESC remains the law in Ontario. ESA welcomes that the DSC continues to explicitly retain and emphasize clause 6.2.25 Technical Requirements, which requires a distributor to “ensure that the safety, reliability and efficiency of the distribution system is not materially adversely affected by the connection of a generation facility...”.

ESA is generally supportive of OEB expanding the DSC standard references for technical requirements, however, it is important to ensure that such changes do not create confusion regarding the continued applicability and significance of the existing requirements under O. Reg. 22/04 and the OESC as they relate to installations and products. If conflicts between the OESC and certain industry standards that distributors would consider applying as a result of this amendment; it is imperative to recognize that the OESC rules will continue to apply. Hence distributors are encouraged to proactively work with ESA to recognize the needed standards.

Additionally, while the expansion of compliance options available to distributors represents a positive step for the industry, ESA emphasizes that this flexibility must not come at the expense of essential safety requirements or confusion of the requirements. ESA will continue to serve as a resource for distributors in discussions concerning potential standards that may be applied in this context and in determining how to ensure compliance with the associated requirements.

ESA encourages ongoing and continued dialogue with the OEB, ESA and distributors on how best to promote consistency across the province in the application of technical standards; for example, through the creation of additional guidance documents. ESA appreciates the ongoing commitment of the OEB and their stakeholders to collaborate and build safety and consumer protection within the electricity system, especially during a period transition and renewal for electricity grids across the province.

Should you wish to discuss these matters further, we would be pleased to meet with your staff.

Yours sincerely,

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