

**Ontario Energy Board**

2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

November 19, 2025

**Re: Proposed Amendments to the Distribution System Code – Board File No.: EB-2019-0207**

The Atmospheric Fund (TAF) appreciates the opportunity to comment on the Proposed amendments to the Distribution System Code (DSC). We support the Board's goal of streamlining distributed energy resource (DER) connections to improve timelines, reduce costs, and enhance fairness and consistency. These changes are critical to enabling Ontario's transition to a more distributed, electrified, and low-carbon energy system.

We particularly welcome the proposed increase in the maximum capacity limit for micro-embedded generation facilities from 10 kW to 12 kW. This adjustment will help reduce the unnecessary scaling down of projects and better reflect current technology trends. However, even with this increase, Ontario's microgeneration threshold will remain significantly lower than other jurisdictions. As noted in [TAF's review of red tape blocking clean electrification](#), limits in other Canadian provinces are much higher, ranging from 100 kW in British Columbia and Manitoba to 150 kW in Alberta.

The existing limit originates from Ontario's discontinued microFIT program and does not align with today's market realities. Advances in solar and storage technologies mean that larger systems can deliver greater benefits for customers and the grid, yet many projects in Ontario are downsized to avoid more complex and costly connection processes. This creates inefficiencies and limits the potential of DERs.

If the Board is not prepared to implement a larger increase at this time, we strongly encourage a commitment to review the microgeneration limit in the near future, considering best practices from across Canada and Ontario's electrification and overall energy demand needs. A higher threshold would support customer choice and maximize DER adoption, reduce unnecessary costs and delays, and align Ontario with leading jurisdictions and industry standards.

We commend the Board for taking steps to improve fairness and consistency in DER connections and look forward to continued collaboration to ensure Ontario's regulatory framework supports a clean, resilient, and future-ready energy system.

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Sincerely,  
Bryan Purcell



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The Atmospheric Fund  
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### About the Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.