

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

April 29, 2026

EB-2019-0207 OEB Proposed Amendments to the Distribution System Code
Pollution Probe – Comments on proposed amendments to the Distribution System Code

Dear Mr. Murray:

On April 23, 2026, the Ontario Energy Board (OEB) provided notice of proposed amendments to the Distribution System Code (DSC). The proposed amendments include requirements for distributors to share foundational static information regarding Distributed Energy Resources (DERs) with the Independent Electricity System Operator (IESO). The proposed changes also include an updated connection agreement templates in Appendix E of the DSC.

These proposed amendments aim to support IESO activities related to the deployment of DERs, improve customer awareness and ensure consistent disclosure of distributors' information sharing obligations, all of which supports the broader objective of optimizing DER integration across Ontario. The proposed amendments are also responsive to the Minister of Energy and Mines' Directive¹ to the OEB regarding the implementation of the province's Integrated Energy Plan - *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7* (IEP Directive).

Pollution Probe supports the proposed amendments to the DSC which were developed and reviewed in coordination with the OEB's DER Connections Working Group, representing a wide range of utilities and industry stakeholders. The amendments represent ongoing updates required to enable greater coordination and enablement of DERs.

It is important to note that there is a large number of OEB initiatives currently underway to advance DERs (directly or indirectly) as an essential part of the modern energy system. and these DSC amendments represent only one enhancement to support the over-arching outcomes required. The OEB has made significant progress in advancing DERs and removing

¹ [OC-802-2025.pdf](#)

barriers, including through its ongoing DER Connections initiative. Measuring the real outcomes for DERs in each distributors service territory and collectively at a Provincial level, will collectively determine if tangible progress is being realised. It will be important for close coordination and information sharing between distributors and the IESO, particularly as the Province advances the proposed Distribution System Operator (DSO) model.

As the number, value and integration of DERs increase, the system (including distributors and the IESO) will need to become more adept at leveraging options at a local level and in aggregate at the Provincial level. Best practice jurisdiction are already doing this and this is the purpose of advancing the OEB's DSO initiative along with other DER policy advancements, such as DSC amendments. Pollution Probe encourages the OEB to continue to consider opportunities to remove barriers, enhance coordination and increase the level of DERs available to serve Ontario's energy system.

Respectfully submitted on behalf of Pollution Probe.



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