

Andrew J. Sasso
Vice President, Regulatory & Municipal Relations
Toronto Hydro-Electric System Limited
14 Carlton Street; Toronto, ON M5B 1K5
regulatoryaffairs@torontohydro.com



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

Re: Proposed Amendments to the Distribution System Code concerning requirements for distributors to share static information regarding Distributed Energy Resources with the Independent Electricity System Operator (EB-2019-0207) – Comments of Toronto Hydro-Electric System Limited

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 January 8, 2026, the Ontario Energy Board (“OEB”) proposed amendments to the Distribution System Code (“DSC”) intended to inform activities related to the deployment of Distributed Energy Resources (“DERs”) by requiring electricity distributors to share information, upon request, about DERs that are connected to their distribution systems with the Independent Electricity System Operator (“IESO”). The proposed amendments are informed by ongoing work and engagement through the DER Connections Review Working Group and respond to the Minister of Energy and Mines’ directive to the OEB on implementing the province’s Integrated Energy Plan. The amendments are intended to support IESO activities related to DER deployment and to ensure consistent disclosure of distributors’ information-sharing obligations. Toronto Hydro has reviewed the proposed amendments and offers the following brief comments for the OEB’s consideration.

Proposed DSC section 6.6.7a requires distribution utilities to provide the “connecting station and feeder” for any embedded generation facilities and storage facilities connected to its distribution system. While the connecting station of DERs may have an inherent value for system planning and forecasting, Toronto Hydro submits that the connecting feeder offers very limited value, but at a considerable increase in the risk of inadvertently disclosing sensitive customer information. This is particularly a concern with larger customers who are routinely served by dedicated feeders. Station level data is sufficient to meet the IESO’s planning needs and provide meaningful insight into the distribution system, while appropriately balancing the value to the IESO’s processes with the protection of sensitive customer information. In the absence of a clearly defined need for feeder level information, Toronto Hydro suggests that section 6.6.7a be limited to only require the disclosure of the “connecting station”, and not feeder.

Toronto Hydro appreciates the opportunity to provide comment on these proposed amendments and looks forward to further formalizing specific data requirements through engagement with the OEB and IESO within the Enabling Resources Program.

Respectfully,

A handwritten signature in blue ink that reads "Andrew J. Sasso". The signature is written in a cursive, flowing style.

Andrew J. Sasso
Vice President, Regulatory & Municipal Relations
Toronto Hydro-Electric System Limited

AJS/jl