

By RESS

May 14, 2026

Mr. Richard Murray
Acting Registrar
Ontario Energy Board
PO Box 2319
2300 Yonge St., Suite 2700
Toronto, ON, M4P 1E4

Subject: EB-2019-0207 - Proposal to Amend Distribution System Code

Dear Mr. Murray:

Hydro Ottawa appreciates the opportunity to provide its comments regarding the OEB's Proposed Amendments to the Distribution System Code (DSC). Enclosed in Appendix A are Hydro Ottawa's written comments on the proposed changes to the DSC outlined in Appendix A of the letter dated April 23, 2026.

Sincerely,

Signed by:

April Barrie

1E403775748B4CB...

April Barrie

Director, Regulatory Affairs

Directeur, Affaires réglementaires

AprilBarrie@hydroottawa.com

Tel./tél.: 613 738-5499 | ext./poste 2106

Cell.: 613 808-3261



APPENDIX A

Hydro Ottawa has reviewed the Ontario Energy Board's (OEB) amendments to the Distribution System Code (DSC) proposed on April 23, 2026. The amendments require licensed electricity distributors to share "static information" on distributed energy resources (DERs) with the Independent Electricity System Operator (IESO) upon request.

Hydro Ottawa is receptive to the proposed amendments with three notes for improvement. First, the open-endedness of paragraph (e) in section 6.6.7 needs refinement to ensure data-sharing complies with the intent of the letter; second, the utility requests that the OEB provide further guidance for the treatment of existing embedded generators, and finally, the utility suggests limiting IESO requests to quarterly to alleviate administrative burdens.

Furthermore, Hydro Ottawa currently submits embedded generator data to the OEB in accordance with its Reporting and Record-keeping Requirements (RRR). This data is publicly available and can be leveraged by the IESO. To avoid duplication, the utility emphasizes the importance of collaboration between the OEB and the IESO to ensure streamlined reporting requirements.

Hydro Ottawa's comments are structured into three sections, providing its recommendations and reasoning for the three notes described above.

STATIC INFORMATION DEFINITION

The utility recommends that paragraph (e) of section 6.6.7 be clarified to emphasize that static data should be narrowly interpreted as those activities outlined in section 6.6.7, or, in any other case, where the *distributor and the IESO* agree that the data aligns with the purpose of the DSC sharing requirement.

Hydro Ottawa's concern is that paragraph (e) may allow for data requests that fall outside the purpose of this amendment or the implied definition of "static".

(e) any other static information as may be reasonably requested by the IESO for the purpose described above.

The Notice of Proposed Amendments dated April 23, 2026, states, "this requirement is limited to static information, described in the proposed new section 6.6.7 as the fixed characteristics of an embedded generation facility and not real-time or time-varying operational data." However, the DSC itself does not define static information, and it is not contemplated through the aforementioned Notice. This ambiguity may open the possibility of data requests that are noncompliant with the intent of the DSC amendments, given that the intent is within the letter rather than the DSC itself.

To remedy this possibility, Hydro Ottawa recommends that the OEB define “static information” in the DSC as having fixed characteristics, not real-time or time-varying operational data. Hydro Ottawa also suggests removing paragraph (e), “and any other static information as may be reasonably requested by the IESO to support those activities,” and instead suggests that the DSC can be further amended once specific data requirements are developed through the IESO’s Enabling Resources Program (ERP) DER Integration Project.

Should OEB staff disagree with the above suggestion, Hydro Ottawa recommends the inclusion of a dispute resolution mechanism within the DSC. Specifically, the DCS amendment currently states that if a distributor questions whether data requested by the IESO aligns with the purposes set out in section 6.6.7, the distributor may seek clarification from the IESO. In instances where the distributor remains unsatisfied with the justification of the IESO request, for example, the material time and effort to obtain such data, they should be permitted to seek guidance from the OEB before being compelled to respond.

EXISTING EMBEDDED GENERATION TREATMENT

The April 23 letter states that:

“For existing embedded generation facilities, distributors are reminded of their licence obligation to inform their customers of the circumstances under which their information may be disclosed to a third party without consent (including information that is shared to comply with legal and regulatory requirements, such as the DSC, for example). Where a distributor determines that its current practices do not adequately address the new information-sharing requirements, the OEB expects the distributor to take steps to inform its embedded generation customers using such methods as the distributor considers appropriate.”

Hydro Ottawa notes potential difficulty in properly informing embedded generation facilities of the new information-sharing requirements and has concerns about whether its current communication on disclosure is adequate when the amendments include an open-ended data-sharing requirement. Therefore, the utility suggests that the OEB inform distributors of the action they should take if current embedded generation facilities do not wish to have their static data shared.

DATA SHARING FREQUENCY

Hydro Ottawa recommends that restrictions be placed on the number of IESO requests, limiting the frequency to quarterly for distributors, similar to the capacity map.

In its April 23 letter, the OEB states that, “administrative implementation costs for distributors are expected to be minimal since it is expected that distributors already collect the static data to be shared as part of their existing connection process.” However, the utility foresees administrative costs as dependent on the IESO’s number and frequency of new requests, rather than on the availability of data. By limiting the frequency of IESO requests, the OEB will ensure that requests are intentional and protect distributors from undue costs.