

April 19, 2013

File 21816

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Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**Re: Proposed Amendments to the Distribution System Code -  
Connection of Micro-Embedded Generation Facilities to the  
Distribution System (EB-2012-0246)**

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry. Attached please find a list of PWU employers.

The PWU is committed to participating in regulatory consultations and proceedings to contribute to the development of regulatory direction and policy that ensures ongoing service quality, reliability and safety at a reasonable price for Ontario customers.

On December 21, 2012, the Ontario Energy Board ("the Board") issued a Board Staff Discussion Paper ("Discussion Paper") for stakeholder comment that described and examined a number of issues related to the connection of micro-embedded generation facilities including timelines relating to offer to connect and the actual connection of micro-embedded generation facilities, connection charges and upstream cost responsibility. The PWU provided comment on the Discussion Paper.

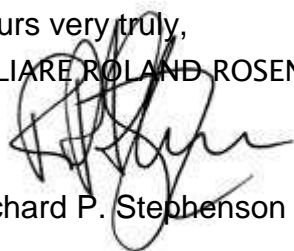
On March 28, 2013, the Board issued a notice of proposed revisions to the Distribution System Code ("DSC").

In the PWU's view the Proposed Amendments add to the clarity and reasonableness of the DSC's provisions related to the process for connecting micro-embedded generation facilities to the distribution system. In particular, the

PWU is pleased that the Proposed Amendments recognize the need to allow distributors reasonable time to offer to connect and to actually connect the facilities. However, the PWU would have liked to see a 90% compliance requirement added to Section 6.2.6 of the DSC (which deals with offer to connect). The PWU believes that the proposed amendments such as the increased timeline for an “indirect” connection where a site assessment is required, the collection of a deposit by distributors, and the Ontario Power Authority’s new microFIT rules and pricing will reduce both speculative and total application volumes to more manageable levels and hence help distributors meet the requirements of the DSC 100% of the time.

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

A handwritten signature in black ink, appearing to read 'Richard P. Stephenson', is written over the typed name below.

Richard P. Stephenson

RPS:jr

cc: Judy Kwik, Elenchus  
John Sprackett, Power Workers' Union

**List of PWU Employers**

Algoma Power  
AMEC Nuclear Safety Solutions  
Atomic Energy of Canada Limited (Chalk River Laboratories)  
BPC District Energy Investments Limited Partnership  
Brant County Power Incorporated  
Brighton Beach Power Limited  
Brookfield Power – Mississagi Power Trust  
Bruce Power Inc.  
Atlantic Power - Calstock Power Plant  
Atlantic Power - Kapuskasing Power Plant  
Atlantic Power - Nipigon Power Plant  
Atlantic Power - Tunis Power Plant  
Coor Nuclear Services  
Corporation of the City of Dryden – Dryden Municipal Telephone  
Corporation of the County of Brant, The  
Coulter Water Meter Service Inc.  
CRU Solutions Inc.  
Ecaliber (Canada)  
Entegrus Powerlines Inc.  
Erie Thames Services and Powerlines  
ES Fox  
Great Lakes Power Limited  
Grimsby Power Incorporated  
Halton Hills Hydro Inc.  
Hydro One Inc.  
Independent Electricity System Operator  
Inergi LP  
Innisfil Hydro Distribution Systems Limited  
Kenora Hydro Electric Corporation Ltd.  
Kincardine Cable TV Ltd.  
Kinectrics Inc.  
Kitchener-Wilmot Hydro Inc.  
Lake Superior Power Inc. (A Brookfield Company)  
London Hydro Corporation  
Milton Hydro Distribution Inc.  
New Horizon System Solutions  
Newmarket Hydro Ltd.  
Norfolk Power Distribution Inc.  
Nuclear Waste Management Organization  
Ontario Power Generation Inc.  
Orangeville Hydro Limited  
Portlands Energy Centre  
PowerStream  
PUC Services  
Sioux Lookout Hydro Inc.  
Sodexo Canada Ltd.  
TransAlta Generation Partnership O.H.S.C.  
Vertex Customer Management (Canada) Limited  
Whitby Hydro Energy Services Corporation

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