



**Response Submission to the Ontario Energy Board**

**Proposed Amendments to the Distribution System Code**

**April 19<sup>th</sup>, 2013**

**EB-2012-0246**

**Canadian Solar Industries Association (CanSIA)**

**[www.cansia.ca](http://www.cansia.ca)**

## **1. About CanSIA**

CanSIA is a national trade association that represents approximately 650 solar energy companies throughout Canada. The majority of these companies operate in the Province of Ontario. Since 1992, CanSIA has worked to develop a strong, efficient, ethical and professional Canadian solar energy industry with capacity to provide innovative solar energy solutions and to play a major role in the global transition to a sustainable, clean-energy future.

## **2. Key Principles**

Power generation utilizing solar irradiance as its fuel source taps a fully renewable resource with an environmentally benign technology. Averting the harmful effects presented by conventional energy projects, solar power generation has considerably less environmental impact than competing renewable technologies. The permitting and connection process is a central gateway to the overall success of green energy generation for Ontario and fundamental to any such process is the need for an alignment between the real impact of distributed generation and sufficient protection of stakeholder interests. Background

The Canadian Solar Industries Association (“CanSIA”) appreciates the opportunity to provide stakeholder feedback regarding the Ontario Energy Board’s “Staff Discussion Paper on Issues Related to the Connection of Micro-Embedded Generation Facilities” as micro solar PV generators represent the largest share of micro-embedded generation facilities in Ontario. CanSIA has been an active and constructive stakeholder and participant in Ontario’s interconnection policy and technical matters, as Distributed Generation (“DG”) becomes increasingly common on many levels throughout society.

## **3. Proposed Amendments to the Distribution System Code**

### ***Section 3.1 of the DSC***

CanSIA supports implementing a standard basic connection charge and recommends that guidance be provided by the OEB to ensure that this definition is met consistently from each LDC. This approach should be standardized to remove uncertainty across different LDC jurisdictions. This would simply include costs associated with installation of a meter and the pre-work (Offer to Connect, etc.). Therefore, a standard amount for and the definition of “basic” connections must be set by the OEB in consultation with LDC’s.

### ***Section 6.2 of the DSC***

CanSIA recognizes the operational flexibility provided to LDCs with respect to timelines of making an offer to connect or providing reasons for refusal based on differences in a connection request from a customer with an existing connection that does not require a site assessment (15 days), does require a site assessment (30 days) or does not occur at an existing connection (60 days).

## ***EB-2012-0246: OEB Micro Embedded Generation Proposed Amendments to the Distribution System Code***

CanSIA wishes to express that it is imperative that any charge related to an offer to connect is provided only in the form of a deposit that will be allocated to the actual costs of connecting the micro-embedded generation facility. CanSIA believes that there should be no additional expense incurred for offers to connect for micro-embedded generators but that it would not be unreasonable for an LDC to charge for the preparation of an Offer to Connect on a fully-refundable basis i.e., as a down payment of sorts on the Connection cost, given that the fees associated with the preparation for an offer to connect are not “in addition to” the LDC’s connection cost.

### **Other Matters**

#### ***Treatment of non-microFIT, micro-embedded generation facilities***

Non-microFIT micro-embedded generators are typically Net-Metered (no additional meter) and, therefore, a second account is generally not created and maintained by the LDC. Although settlement may require some manual intervention based on the capability of the LDC’s settlement systems, this should be considered “normal business” for an LDC. CanSIA believes that additional charges for non-microFIT, micro-embedded generators are clearly not warranted.

LDC’s have generally pushed for microFIT connections to be treated similar to load customer connections. An example of this is seen in the issue of “timelines” related to Offers to Connect, where it has been suggested to apply a 90% compliance level to achievement of associated DSC micro-embedded generator connection timelines by LDC’s – to match load customer connection requirements. Micro-embedded generators that consume electricity should not be treated differently than load customers and should pay TOU, RPP, or HOEP (whichever is applicable) for their electricity consumed – not microFIT rates, in the event the LDC determines the consumption is significant enough to warrant billing.

#### ***The Board’s view that consumption by micro-embedded generation facilities should be incorporated into the monthly service charge***

The Notice states that other than this change to incorporate consumption, the Board is not proposing additional changes to the methodology used to determine the province-wide fixed monthly service charge.

CanSIA seeks clarification that the aforementioned statement is qualified by the statements, “These changes will require a hearing. When the Board initiates a hearing to address these matters, stakeholders will be notified.” CanSIA stresses that this consultation is necessary prior to any changes to the methodology for the fixed monthly service charges.

## Next Steps

CanSIA supports the Energy Board's efforts to improve the interconnection process and to work collaboratively with other stakeholders, obtaining safe, reliable, and innovative solutions for the connection of solar distributed generation. CanSIA looks forward to working with the Board to identify and help facilitate critical improvements required of the interconnection process.

CanSIA strives to be a strong and credible partner to government as it engages in these critical policy making activities. The membership looks forward to working towards making Ontario a cleaner, greener and economically prosperous province for all of its citizens.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'John Gorman', with a stylized flourish at the end.

John Gorman

President, CanSIA

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