



September 16, 2019

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

Re: Consultation on Distributed Energy Resources (DER) Connections Review Initiative
AMPCO Comments on OEB Staff Issues and Questions
Board File No. EB-2019-0207

Dear Ms. Walli:

I am writing on behalf of AMPCO to respond to the Ontario Energy Board's (OEB's) request for comments and feedback from customers on a high level set of issues and questions identified by OEB Staff in its August 13, 2019 correspondence regarding the connection of distributed energy resources (DERs) by licensed electricity distributors.

High Level Issues

- The need for standardization and clarity of definitions, terminology and regulatory rules in respect to DERs
- The need for clear rules regarding cost responsibility for connection of DERs to ensure fairness to DER customers and all other customers of the distributor
- More detailed and comprehensive timelines for the connection process to ensure the timelines are well understood
- Appropriate standardization of connection technical requirements

Questions

- Are the objectives for the DER Connections Review initiative clear?
- Have staff identified the right topics for the DER Connections Review and do stakeholders have any specific concerns that they want to identify?
- Are there any proposed solutions that stakeholders wish to identify at this point?
- What is the best approach for development of solutions to the issues identified?

In AMPCO's view the objectives of the DER Connections initiative are clear and AMPCO supports the need for standardization, clear rules and detailed and comprehensive timelines for the connection process to ensure fairness with respect to cost responsibility and a common understanding in the industry regarding definitions, terminology and regulatory rules related to DERs. Standardization of these key elements will reduce confusion and assist to eliminate barriers to DERs. As a starting point, a clear definition of DERs for regulatory purposes is needed in the sector.

AMPCO suggests adding the following topics to the high level set of issues identified by Board Staff.

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1. The need to align and coordinate with the evolving DER objectives and policy initiatives in Ontario.

DER objectives and policies are evolving in Ontario and there are other OEB consultations underway (Responding to Distributed Energy Resources consultation & Utility Remuneration)¹ that are addressing other policy questions regarding the value of DERs and new DER services. It is AMPCO's understanding the DER Connections Review initiative will be coordinated with the Responding to Distributed Energy Resources consultation. The IESO also has a consultation related to DERs ("Innovation Roadmap"). There is potential for overlap between these initiatives. Adding AMPCO's issue topic above is intended to capture appropriate consideration in the DER Connections initiative of the scope of work currently underway in Ontario related to DER objectives and policies.

2. As set out in other consultations (EB-2018-0297/0288), there must be a clear Customer Focus.

Those who are paying the bills must ultimately receive whatever benefits result. Customers must actually want what it is that they are being asked to pay for.

3. Appropriate consideration of jurisdictional scans and applicability in Ontario.

AMPCO believes it is important for this consultation to be informed by definitions and rules adopted by other jurisdictions related to DERs, cost responsibility, process timelines and technical requirements. There may be opportunities to build on approaches and processes that are working well elsewhere and are applicable in the Ontario context.

4. Appropriate consideration of upstream impacts.

The connection of DERs could have upstream impacts on distribution and transmission systems and customers. This needs to be taken into consideration in this initiative.

5. The need to ensure reliability is not negatively impacted by the connection of DERs.

The connection of DERs should not negatively impact system reliability. This should be assessed as part of this initiative.

6. The need to ensure assets are not stranded.

The connection of DERs can result in stranded assets. This needs to be taken into consideration as part of the cost responsibility and cost recovery process.

7. The Need for a Rigorous Cost / Benefit Analyses

Ontario should not embark on a costly rebuilding of its electricity distribution and transmission systems to integrate DERs without a rigorous examination of costs and benefits. The methodology for doing this must be appropriately stakeholdered.

¹ EB-2018-0287/0288



Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

(Original Signed By)

Colin Anderson
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