

## Meeting Notes

---

DERs Connection Review (EB-2019-0207)  
Working Group Meeting

---

**Meeting Date:** February 16, 2021

**Time:** 9:30am –12:51pm

**Location:** Ontario Energy Board  
WebEX

Attendees:

Name	Organisation
Bob Bralectic	Alectra
Marc Brouillette	CME
Vince Green	CIMA+
Paul Luukkonen	Customized Energy Solutions Ltd. (CES)
Tatjana Dinic	Electrical Safety Authority (ESA)
Kathryn Farmer	Electricity Distributors Association (EDA)
Marty Tzolov	Elenchus Research Associates (For PWU)
Falguni Shah	Elexicon Energy
Kent Elson	Elson Advocacy (On behalf of Environmental Defence) (ED)
Thomas Ladanyi (Tom)	Energy Probe (EP)
Justin Wahid Rangooni	Energy Storage Canada
Ryan Boudreau	Hydro One Networks Inc. (HONI)
Mohab Elnashar	Independent Electricity System Operator (IESO)
Greg Sheil	London Hydro (London)

*These notes are for the Working Group purposes only and do not represent the view of the OEB.*

William Coutts	Ministry of Energy, Northern Development and Mines (MoE)
Mark Thompson	Ministry of Energy, Northern Development and Mines (MoE)
Roy Hrab	Ontario Energy Association
Zeina Dahdouh	Ontario Power Generation
Steve Pepper	Ontario Society of Professional Engineers
Michael Brophy	Pollution Probe (PP)
Richard Laszlo	QUEST Canada
Nishant Gehani	Rodan Energy Solutions (Rodan)
Larry Herod	Stem
Alex Simakov	Sussex
Hani Taki	Toronto Hydro-Electric System Ltd. (Toronto Hydro)
Ryan Holder Catherine Ethier Laurie Reid James Sidlofsky Natasha Gocool	Ontario Energy Board.

*These notes summarize the information provided during the working group meeting and key points of the issues presented in the published materials.*

## **Meeting Agenda**

### **1. Introduction:**

- Welcomed participants and provided instructions on how to participate during the meeting using WebEx.
- Provided a recap of the scope and focus of this initiative. A reminder, the focus on the connection point will help provide clarity when connecting to the distribution system either through the downstream lens on the consumer side or upstream lens to the distribution side.
- Outlined the purpose of the meeting as being:
  - To provide an update on Section 6.2 action item to the Subgroup Members
  - To finalize the recommendations from the Working Group (WG) to the OEB and
  - To discuss Tranche 3 priorities.
- New agenda items were added for discussion:
  - A status update on the DER Remuneration Initiative and Responding to DER consultations

*These notes are for the Working Group purposes only and do not represent the view of the OEB.*

## 2. Tranche 2: Priorities Review

- In review of the priorities, Working Group members were reminded that the recommendations presented at the last meeting, were grouped into four focus areas: Process Front End, CIA Application Stage, Process Back End and Dispute Resolution Process.
- The Working Group was informed that:
  - There were minimal changes made to the recommendations presented on December 8, 2020.
  - The Working Group Report will not be finalized at this time, as work continues throughout Tranche 3.
- It was noted that if recommendations result in a proposal to amend the DSC, stakeholders will have an opportunity to comment and provide additional input during the code amendment process

### Process Front End:

#### **Non-Exporting Screen DSC 6.2.1- Load Displacement Generation (Process Subgroup)**

##### **Draft Recommendation:**

- *The Working Group recommends removing the reference to Load Displacement Generation Facilities in section 6.2.1 of the DSC.*
- *In addition, the applicability of all requirements in Section 6.2 of the DSC to LDGs should be reviewed, as LDGs may need to be treated differently than other embedded facilities in certain respects.*
- *LDCs may still adjust the level of scrutiny in the CIA based on the individual project.*
- *The Working Group recommends further improvement and clarity be provided in the definitions for LDG and Emergency Backup Generation (EBG) facilities.*
- At the last meeting, Working Group members requested the Subgroup Members conduct a review of [Section 6.2](#) to review the consequences of removing the LDG Exemption.
- A table of Section 6.2 revisions and recommendations was presented to the Working Group Members.
  - It was noted this table and all other documents pertaining to this initiative, can be found within the MS Teams Application that is accessible to all Working Group and Subgroup Members.
- Upon review of Section 6.2, the Subgroup Members recommended that Section 6.2.18A should not apply to LDG.
- *For any proponent that executed a connection cost agreement prior to the date of coming into force of this section, but is not yet connected to the distributor's distribution system, the distributor shall notify the proponent of that embedded generation facility, within 60 days of this section coming into force, that a connection cost deposit equal to 100% of the total allocated cost of connection and a capacity allocation deposit equal to \$20,000 per MW of capacity of the embedded generation facility must be paid within 60 days of the distributor's notice as a condition of the applicant maintaining its current capacity allocation.*
  - It was noted that 6.2.18A was established during the FIT program era. It was established as a resource to help with queue squatting. Essentially, if a proponent

didn't have a deposit, the LDC would require a deposit to maintain queue position. As well, if an additional amount of time passed, an LDC would request a further deposit to maintain the queue position.

- The recommendation on Capacity Allocation Term Length is proposed to manage queue squatting

**Discussion Outcome:** Working Group members will review Section 6.2 Review Table and provide any concerns to OEB staff by February 28.

**Action Item:** OEB staff to circulate the revised Working Group presentation and Section 6.2 Review Table to the Working Group Members

### **Screening Process - Application Completeness Check (*Process Subgroup*)**

- *Tranche 2 Draft Recommendation*
  - *Implement the Screening Process Flow Chart*
- *Tranche 1 Recommendation (Approved)*
  - *OEB should **make available** a Screening Process and work toward mandating its use.*
  - *The group agreed that a substantially complete application is one that contains information sufficient to allow a distributor to carryout its connection assessment activities.*
  - *Develop process flow charts with responsibilities, steps, and timing*
- A recap of the screening process recommendation was provided to the Working Group members.
- Working Group Members were reminded that the proposed screening process was created to facilitate LDCs providing a completeness check in a timely manner and advise applications of any deficiencies that prevent processing of the application. This should allow applicants to address deficiencies and start CIA studies expeditiously.
- A member suggested clarifying the language in the screening process flow chart by clarifying what 'substantially complete' means and revising the flow chart

**Discussion Outcome:** The Working Group members agreed to the draft recommendation to implement the screening process.

**Master Study Agreement between HONI and LDC (*Process Subgroup*) was finalized at the previous meeting and not reviewed on Feb 16**

#### ***Draft Recommendation:***

- *LDCs should consider delegating signing authority on study agreements to an appropriate level in their organization.*

#### **Risk Framework (*Technical Subgroup*):**

##### **Draft Recommendation:**

- *Continuing the work from Tranche 2, validate the risk grouping categories for reasonableness. Explore if*

*These notes are for the Working Group purposes only and do not represent the view of the OEB.*

*the risk groupings can be used as a replacement for the existing DSC size categories.*

- At the December 8 Working Group meeting, the WG asked for the Subgroups to identify next steps to carry forward work on the Risk Framework between Tranches 2 and 3.
  - The Subgroups agreed to next steps:
    - Further work on feeder risks in parallel with the following
    - Validate the risk grouping categories for reasonableness
      - Small group to coordinate
      - LDCs volunteer
        - Populate the risk framework for their system
        - For completed CIAs for real projects
          - Put the inputs through the risk framework
          - Compare results from the framework to results of the CIA
    - Explore if the risk groupings can be used as a replacement for the existing DSC size categories
      - TBD
  - It was noted work will continue into Tranche 3
- Discussion Outcome:** The Working Group agreed with the next steps proposed by the Combined Subgroups to carry work on the Risk Framework forward

### **Standardization of Connections Forms (Content) (Technical Subgroup)**

#### **Draft Recommendation:**

- *Provide the templates and proceed with implementing form use*
  - *Preliminary Consultation Application (definition consistency)*
  - *Preliminary Consultation Report (minor change)*
  - *Connection Impact Assessment Application (Form B) as developed by the HONI/LDC groups*
- The Forms are finalized
  - The form is now in an Adobe format that provides the options to be filled out online or printed out and provide as a hard copy to distributors.
  - The form is customizable- LDC's can format the form to include their organization name, logo and other identifying information and
  - 95% of the form is standard and applicable to any LDC, with the option to add additional information at the end of the form.
- Follow-up work should include guidelines, checklist and the sample single line diagram based on previous examples and input from the subgroups.

**Discussion Outcome:** The Working Group Members agreed to the wording of the draft recommendation.

### **Feeder Tools (Technical Subgroup):**

#### **Draft Recommendation:**

- *Require LDCs to publish a list of "restricted feeders" by name and feeder designation that they*

*These notes are for the Working Group purposes only and do not represent the view of the OEB.*

*operated that are known to not have capacity to accommodate a DER connection. The list can be updated as necessary by system reconfiguration or expansions and shall be updated at least every 3 months. The LDC should identify their restricted feeders even if the constraint is caused by an upstream asset that they do not own.*

- A recap of the draft recommendation was provided.
- The recommendation would require LDC's publish a list of restricted feeders that do not have capacity. The feeder list would have a requirement to update the list every 3 months
- However, the restricted feeder list does not preclude the idea of having a dynamic tool, such as HONI's feeder capacity.
- Members were reminded that the restricted feeder list provides an additional signal to proponents where capacity is not available
- Several members suggested that it would help if the OEB provided direction to LDCs as to the format, placement, common wording for the restricted feeder list.
- Another member suggested consideration of a specific dates for the 3-month update of feeder lists for LDCs to meet e.g. Jan 1, April 1, June 1, Sep 1
- Members acknowledged the restricted feeder list is a good resource tool from a proponent's standpoint
- Members were reminded that the potential for more comprehensive capacity tools will be reviewed in the DER Remuneration Initiative

**Discussion Outcome:** The Working Group Members agreed to the wording of the draft recommendation

### **Standardization of Technical Requirements** (*Technical Subgroup*)

#### **Draft Recommendation:**

- *Replace DSC Appendix F.2 in favour of a reference to CSA C22.3 No 9 and a list of other useful resources*
    - *Including the HONI TIR is a guideline (or upper bound) for good utility practice for connection of DERs.*
  - *Request LDCs to specify where they would differ from the HONI TIR for their system or build a repository of examples of projects and resulting technical requirements for their system.*
  - *Require LDCs to provide specific, binding technical requirements for a project as an output of the CIA*
- A recap of the draft recommendation was provided.
  - Members were reminded that the subgroup suggested a replacement of F.2 to reference CSA 22.3.9 as standard in Canada and use HONI TIR reference as a guideline.

**Discussion Outcome:** The Working Group Members approved the wording of the draft recommendation

### **Concurrent CIAs Process: Distributor, Host Distributor and Transmitter** (*Process Subgroup*):

**Draft Recommendation:**

- *Provide further clarity about the Distributor's, Host Distributor's and Transmitter's concurrent CIA processes*
  - *Implement standardized Connection Assessment Application and CIA (also known as DTCA) – CCA/CCRA Processes' changes with recommendation to include the amended changes in the Distribution System Code (DSC)*
  - *Distributors be required to file the application for a transmission CIA with the transmitter within 15 days of a CIA application being complete. The transmission CIA would include the study agreement, the DTCA application, and arrangements for payment to the transmitter. If there is a host LDC, an additional 10 days may be added to the time to advise notify both it and the transmitter.*
- 
- A review of the draft recommendation to the WG was provided.
  - The DSC does not speak to processing of CIAs through multiple parties. During this consultation proponents have noted that some LDC's have not submitted applications to host LDCs/transmitter until completion of the connecting LDC CIA resulting in longer processing timeframes.
  - The DSC requires LDC's to provide notification to a host LDC or transmitter within 10 days that a CIA application has been made.
  - The draft recommendation is that the connecting distributor send the application package to the host LDC/transmitter within 15
  - This draft recommendation would require a DSC amendment:
    - To enable the process to be conducted as nearly concurrently as possible.
    - To include the draft process flow chart for Dual (or multiple) CIAs

**Discussion Outcome:** The Working Group members have approved the wording of the draft recommendation

**Back End Process**

**Capacity Allocation Queue (capacity) Squatting ("sitting in" capacity allocation) and Capacity Allocation Removal (Process Subgroup):**

**Draft Recommendation:**

- *Include code requirement to establish mutually agreed in-service date when entering into a CCA and the project must connect no later than 5 years for waterpower projects or 3 years for all other types of projects from the initial date of application for connection unless both parties have agreed to an extension*
  - *If the proponent does not meet the proposed in-service date the LDC may revoke the capacity allocation at their discretion*
- 
- A recap of the draft recommendation was provided.
  - A member enquired how the process would be impacted if parties agree to an in-service date that is less than 3 years.

- It was noted that the DSC sets out the in-service date as an upper bound. If the parties agree upon an earlier in-service date for the CCA, the request would be fine to move forward.
- To highlight, the recommendation will require a proponent to specify the in-service date. This will ensure some level of commitment to a date for the project going into service.
- A member enquired whether there were any provisions that would not enable the LDC to connect the project within the 3-5 year time frame.
  - It was noted that there were not
- A member questioned if the review of Section 6.2, would impact the recommendation.
- OEB staff noted a holistic review of Section 6.2 will be performed, to replace all references to OPA or Green Energy Act to prevent any hinderances to the draft recommendations.

**Discussion Outcome:** The Working Group approved the wording of the draft recommendation

#### **Connection Cost Agreements and Build Flowcharts**

- *Improved Cost Estimates (recommendation-continue into Tranche 3)*

**Discussion Outcome:** Subgroup members will continue the discussion in Tranche 3 and hope to provide a draft recommendation to the Working Group in Tranche 3.

**Action Items:** No further action items by the Working Group.

#### **Dispute Resolution Process:**

- Some members stated that this is still a priority issue for many proponent association members and it should be carried to Tranche 3 for further work.
- Other proponents said it was not a priority.
- Staff noted that the Working Group were advised in Tranche 1 that where there is not consensus, OEB staff will provide the state of discussions to OEB management for consideration.

**Discussion Outcome:** Item will be put to the Working Group for prioritization in Tranche 3.

**Action Item:** OEB Staff will ensure that the RDER/UR group are aware of the issue. OEB staff will get direction from management on next steps for non-consensus items.

### **3. Tranche 3:**

- The Working Group was presented with a list of Tranche 3 topics for discussions
- For Tranche 3, the Working Group will have to prioritize the remaining issues and provide more problem identification on the issues to ensure that Subgroup time is spend productively.
- A member suggested adding EV Connections to the list of topics to be discussed in Tranche 3.

*These notes are for the Working Group purposes only and do not represent the view of the OEB.*



#### **4. New Agenda Item: Update on Utility Renumeration and Responding to DER**

- A Stakeholder meeting was held on February 3, 2021:
  - LEI and ICF presented their respective studies on the impacts of the pandemic on the energy sector and DER projections for the next 10 years in order to assist the OEB in determining the priority and pacing for these consultations
- Stakeholders are invited to file written comments by February 17, 2021 on:
  - Findings of the studies by LEI and ICF and their implications on the appropriate focus areas and sequencing of next steps in these consultations
  - Near-term priority work streams in respect of the OEB's responses to DERs and any related considerations in respect of the ways utilities are remunerated
- Following consideration of stakeholder input, OEB Staff will develop near-term priority work streams, which will be shared with stakeholders prior to confirmation by OEB.

#### **5. Next Steps and Action Items:**

##### **Action Items:**

1. OEB Staff to email revised presentation and Section 6.2 Review Table to the Working Group
  - a. The Working Group will provide comments back by February 28, 2021
2. OEB staff to get direction from OEB Management on next steps non-consensus items to report back to WG
3. Recommendations:
  - a. Approved recommendations will move to OEB Management for review
4. OEB staff will endeavor to raise problematic edits of the document with the WG before finalization

##### **Next Working Group Meeting: TBD for Tranche 3**