



Phone

705-730-1325 x 1325

Website

www.checenergy.ca

Email

akaramatic@checenergy.ca

92 Caplan Avenue, Suite 629, Barrie, ON L4N 9J2

December 15, 2021

Sarah Heiman
Ministry of Energy, Conservation and Renewable Energy Division
77 Grenville St, 5th Floor
Toronto, ON M7A 2C1

**Re: Supporting Residential Roof-Top Solar and other renewable resources by clarifying eligibility of third-party leasing and financing net metering arrangements
ERO number: 019-4554**

Dear Ms. Heiman,

Attached, please find Cornerstone Hydro Electric Concepts Association's ("CHEC") comments with respect to the Ministry of Energy's invitation to comment on the Supporting Residential Roof-Top Solar and Other Renewable Resources.

CHEC is an association of fifteen (15) local distribution companies (LDCs) that have been working collaboratively since 2000. The comments over the follow pages express the views of the CHEC members.

We trust these comments and views are beneficial to the Ministry's initiative. CHEC looks forward to continuing to work with the Ministry on this matter.

Sincerely,

Original signed by Ashly Karamatic

Ashly Karamatic
Finance & Regulatory Analyst
Cornerstone Hydro Electric Concepts
705.818.4193
akaramatic@checenergy.ca

Attachment A

1. The proposed amendment to O. Reg. 541/05 (Net Metering) is to provide greater clarity on eligibility of a customer who is leasing or financing electricity generation equipment used for net metering. This statement is vague, and clarification is required to understand who will be eligible to connect. A few items to consider, if this is opening the market to third-party installations, are as follows:
 - a. Need to ensure that the customer is supported/protected/kept whole;
 - b. LDCs need to be notified with what is being installed into their plant and a process would need to be put in place to verify that connections are completed as per the Electrical Code and with ESA approvals
 - i.e. a connection impact assessment should be completed (at the cost of the vendor, not the rate payer or LDC) prior to installation;
 - c. Who is going to hold the vendors accountable? Will the Ministry of Energy or the IESO put a program into place to verify the vendors and create an “approved vendors list” for consumers (which would also help satisfy point a. above)?
2. An increase in Net Metering to an LDC’s distribution system will impact planning; this will be required to ensure safety and reliability of their grid. With the bi-directional flow of additional Net Metering “facilities,” the LDC may need to increase their standby electricity, which comes at a cost to the rate payer. Standby charges need to be investigated as Net Metering increases.
3. It will be very difficult and cumbersome to settle Net Metering across LDCs. We recommend Net Metering be restricted to within the same municipalities and served by the same LDC.
4. While single unit Net Metering currently exists in the NorthStar CIS system, potential changes to Net Metering will require system changes and testing. It needs to be determined, upfront, how these costs will be recovered.