

December 15, 2021

Ministry of Energy, Northern Development and Mines
Conservation and Renewable Energy Division
77 Grenville St., 5th Floor
Toronto, ON M7A 2C1

Attn: Ms. C. Rosen

Re: ERO number 019-4554

Consultation on Changes to Ontario's Net Metering Regulation to Clarifying Eligibility of Third-Party Leasing and Financing Net Metering Arrangements

Waterloo North Hydro (WNH) is pleased that the Ministry of Energy, Northern Development and Mines (MENDM) is furthering their development of the net metering program and third-party leasing and financing arrangements to allow greater customer participation in generation and renewables.

Based on WNH's current role in the net metering program we are only provided system and operational information and details about net metering projects. We do not receive information or details such as purchase agreements, financing or lease agreements or operational agreements with third parties, etc., and therefore WNH is not in a position to provide comment on the type of leasing and financing arrangements that should be eligible for net metering. However, WNH does provide the following comments:

- Net metering projects where the equipment used for the purposes of net metering is financed or leased should continue to be considered eligible net metering projects as long as the net metering eligibility requirements set out in section 7 of the Regulation are met
- That any amendments or clarifications to eligibility requirements with regards to net metering equipment being financed or leased:
 - Encourage net metering participation;

- Do not introduce additional application requirements by requiring net-metering participants to provide financing or leasing agreements;
- Do not introduce eligibility requirements where the financing and lease agreements need to meet specific conditions such as specific contract lengths or types of agreements; and
- Do not add additional administrative review requirements such as verifying the type of financing or lease agreement, terms, etc.

Furthermore, WNH encourages the MENDM to include virtual net metering as an option and expand the current community net metering pilot program to allow greater customer participation in generation and renewables.

WNH appreciates the opportunity to provide comments and awaits the proposed changes to the net metering regulation and the chance to provide further comments.

Sincerely,



Rene W. Gatien, P. Eng. MBA, ICD.D
President & C.E.O.