

September 19, 2022

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

Dear Mr. Howse

Re: ERO 019-5855, Ontario Regulation 509-18

Utilities Standards Forum (USF) is a forum of Ontario electricity distributor Members for collaboration and mutual support. Incorporated in 2005, this non-profit has 50 members, and operates Forums that support the Engineering, IT, Regulatory, and Customer Service departments. (Electricity Distributor Member List can be found in Appendix A).

USF is pleased to provide input as the Ontario Ministry of Energy (Ministry) proposes to amend Ontario's Energy and Water Efficiency Regulation ([O. Reg. 509/18](#) under the [Electricity Act, 1998](#)) (Reg. 509). We appreciate that the Ministry continues to work with the electricity industry to understand and support the stakeholders in their ability to meet the regulations. On June 24, 2022, USF and many of its electricity distributors members (LDCs) met with the Ministry along with Electro Federation Canada with its transformer manufacturer membership. Together, we shared the challenges faced to be prepared for Reg. 509 January 1, 2023 implementation timeline. We were pleased to see the August 10, 2022 proposal for an amendment, and recognise the Ministry's continued assistance to the industry through these challenging times.

CSA and DOE

USF would like to clarify that the proposed amendment to Reg. 509, that is an ambulatory reference to the CSA C802.1 standard 'Minimum efficiency values for liquid filled distribution transformers' (CSA Standard), will allow for liquid filled distribution transformers to be compliant with:

- a) The test method and efficiency levels in the CSA Standard, or
- b) The test method and efficiency levels in the U.S. DOE 10 Code of Federal Regulations Part 431, Subpart K, §431.193 (DOE Requirements) for liquid filled distribution transformers.

With the above assumptions in mind, Ontario LDCs that are currently compliant to the CSA Standard 2013 edition will continue to be compliant on an on-going basis.

CSA Revision

In an effort to support the increased efficiency of distribution transformers, the industry will continue to work with CSA to evolve the current edition of the CSA Standard. The purpose of the revision will be to reduce any conflicts between the goals of Reg. 509, and ensure the safety of the public and worker, and providing reliable service are maintained. We will encourage the work at CSA to be expeditious, to result in the publication of the revised edition of the standard as soon as possible.

Thank you for the opportunity to contribute to this initiative. If you have any questions or comments on this submission please refer them to Lori Gallagher at lgallagher@utilitiesstandardsforum.ca or at 519.803.3532.

Sincerely,

A handwritten signature in blue ink that reads "Lori Gallagher". The signature is written in a cursive style.

Lori Gallagher
Executive Director
Utilities Standards Forum

Appendix A

Utilities Standards Forum, list of electricity distributor members as of September 19, 2022.

1. Alectra Utilities Corporation
2. Algoma Power Inc.
3. Atikokan Hydro Inc.
4. Bluewater Power Distribution Corporation
5. Brantford Power Inc.
6. Burlington Hydro Inc.
7. Canadian Niagara Power Incorporated (FortisOntario)
8. Centre Wellington Hydro Ltd.
9. Chapleau Public Utilities Corp.
10. Cornwall Street Railway Light and Power Company Limited (FortisOntario)
11. Elexicon Energy Inc.
12. E.L.K. Energy Inc.
13. Enova Power Corp.
14. Entegrus - Powerlines Inc.
15. EnWin Utilities Ltd.
16. EPCOR Electricity Distribution Ontario Inc.
17. EARTH Powerlines Corp.
18. Essex Powerlines Corp.
19. Festival Hydro Inc.
20. Fort Frances Power Corp.
21. GrandBridge Energy Inc.
22. Greater Sudbury Hydro Inc.
23. Grimsby Power Inc.
24. Halton Hills Hydro Inc.
25. Hearst Power Distribution Company Ltd.
26. Hydro Ottawa Ltd.
27. InnPower Corp.
28. Kingston Hydro Corp.
29. Lakefront Utilities Inc.
30. Lakeland Power Distribution Ltd.
31. Milton Hydro Distribution Inc.
32. Newmarket-Tay Power Distribution Ltd.
33. Niagara Peninsula Energy Inc.
34. Niagara-on-the-Lake Hydro Inc.
35. North Bay Hydro Distribution Ltd.
36. Northern Ontario Wires Inc.
37. Oakville Hydro Electricity Distribution Inc.
38. Orangeville Hydro Ltd.
39. Oshawa PUC Networks Inc.
40. Ottawa River Power Corp.
41. PUC Distribution Inc.
42. Renfrew Hydro Inc.
43. Sioux Lookout Hydro Inc.
44. Synergy North Corp.
45. Tillsonburg Hydro Inc.
46. Toronto Hydro Electric Systems Ltd.
47. Wasaga Distribution Inc.
48. Welland Hydro Electric System Corp.
49. Wellington North Power Inc.
50. Westario Power Inc.