

September 23, 2022

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

Dear Mr. Howse

Re: **ERO 019-5855**

Thank you for the opportunity to review and comment on the proposed amendments to O Reg 509/18. These are the comments of the Electricity Distributors Association (EDA). We represent nearly all of the electricity local distribution companies (LDCs) that operate in Ontario and are the industry's front line for the consumer. Electricity LDCs will be directly impacted by some of these proposed amendments.

We support the proposed amendments that relate to distribution transformers for the following reasons. Firstly, they will provide LDCs with the flexibility to comply with the American Department of Energy test standard or to continue to rely on the Canadian Standards Association's (CSA) test standard. LDCs' materials specifications were developed for the CSA's test standard and LDCs use these specifications when procuring distribution transformers that will operate at voltages that are either:

- commonly used throughout North America,
- commonly used in Ontario and less commonly used in other jurisdictions, or
- unique to Ontario.

As well, if LDCs can continue to rely on the CSA's test standards, they will be better able to manage changes to their supply chain partners because time will be available to use existing vendor/supplier vetting processes. Permitting LDCs flexibility of test standard will eliminate the risk of an LDC either revising or cancelling an existing distribution transformer order. This is especially valuable at the present time when supply chains are experiencing unusual constraints due to exogenous factors (e.g., the pandemic and the ongoing economic impacts, geopolitical issues, etc.).

The ambulatory reference to the CSA test standard is anticipated to relieve government of making further amendments to this regulation that are purely administrative. Because

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Ontario's electricity LDCs are well supported by professionals who maintain fluency with respect to the applicable standards, an ambulatory reference is not expected to either result in or contribute to a risk of using an inappropriate or outdated test standard.

While we support the proposed amendments, it is important to recognize that the LDC's choice of test standard may give rise to other issues. For example, procuring a distribution transformer with a higher efficiency rating may increase its weight. Heavier transformers need appropriately scaled civil and electrical infrastructure (e.g., bigger poles with correspondingly bigger foundations, mounting pads that are thicker and/or have a larger surface area). A transformer whose core is made from higher quality of steel or uses rare earth elements can be expected to cost more. Therefore, LDCs will want to invest prudently so that they can minimize the potential financial impacts on their customers.

Thank you again for the opportunity to comment on the proposed amendments to the regulation. If you have any questions on these comments, please do not hesitate to contact Kathi Farmer, Senior Regulatory Affairs Advisor, at either 416.659.1546 or at kfarmer@eda-on.ca.

Sincerely

A handwritten signature in black ink, appearing to read "Ted Wigdor". The signature is stylized and cursive.

Ted Wigdor
Vice President, Policy, Government & Corporate Affairs