

IESO Engagement

From: Bob Bach
Sent: November 5, 2021 2:51 PM
To: IESO Engagement
Subject: Re: DER Roadmap and Joint Engagement with OEB - Feedback

Daniella: You are welcome to post my comments. on your website, and I have 2 additional items.

First an addition to my comments: For anyone planning to add a DER system who is a customer of HydroOne, their DEG Agreement is very different when it comes to the details of the Net Metering arrangement, especially with respect to the payment schedule. In my view, this dissuades many people from signing up for a DER Agreement, and move instead to having a storage system installed. This results in a loss to the Ontario electricity system of emissions free electricity delivered to nearby loads. I have not seen where Hydro One is permitted to do this in the Net Metering Regulation, and I would be interested to know how this is permitted, as I have some people who already have a system, or are considering having one installed.

Secondly, a question: Do my comments also go to the OEB?

Thank you.

On Fri, Nov 5, 2021 at 1:27 PM IESO Engagement wrote:

Hello Bob, thank you for your feedback. Would you mind if we posted it to our public website as we want to capture all feedback publicly, to ensure we can demonstrate how we considered it in our public response documents.

Thanks again, Daniela
IESO Engagement

From: Bob Bach
Sent: November 4, 2021 11:35 AM
To: IESO Engagement
Subject: DER Roadmap and Joint Engagement with OEB - Feedback

My comments are specific to my experience with a DER Agreement with Toronto Hydro for my Solar PV system.

This system has 25 panels, each rated at 10 kW. I had these installed at the same time as I changed my house heating, cooling, and domestic hot water system, completed on February 15, 2020. I have attached a presentation I have delivered several times to Transform and other community groups..

I applied to Toronto Hydro for a DER Agreement, and they initially offered, based on historical electricity use, a limit of 3.6 kW generation limit. I then prepared a detailed estimate of my annual electricity consumption, and on this basis, they increased the peak generation limit to 7.6 kW.

As a result, on every sunny summer day, I look at the system output on my Solar Edge display and see daily peaks of 7.6 kW, even though the system could produce more..

All the electricity that I generate that is excess to my needs is, first and foremost, totally emissions free, and secondly is delivered to nearby customers mostly on peak, and at the point of their use.

It seems to me that Toronto Hydro's concern in limiting the capacity is to ensure that I cannot generate all my own electricity, at least in the sunnier months, and they would therefore be very limited as to the amount they would be able to charge me.

For my part, I am not concerned at all about whatever cost benefits I might gain, but rather that I could be making a greater contribution to reducing the carbon emissions from our Ontario electricity system, and reducing the overall load on Toronto Hydro's distribution system.

Finally, I would like to encourage as many of my community members in Markland Wood to have solar PV systems installed on their homes, and perhaps enter into a "Community Solar" arrangement as newly defined by the OEB in your latest Net Metering regulations. I realize that your first "Pilot" project is a new development near London, but communities who choose to adopt solar PV "en masse" should surely also be encouraged to do so.

My comments are as follows:

1. Is the intent of the changes to the Net Metering Agreement intended to encourage much greater solar PV uptake across the province, such as the system presentation from Ann Arbor, Michigan presented by TransformTO this past spring ?
2. Are LDCs permitted to restrict the size of any DER system for any reason whatsoever, even though the Net Metering Regulation would seem to limit the amount of electricity they are obligated to purchase?
3. Could a community such as ours, comprising 1260 single-family homes, apply for a "Community DER" system under the current regulation?

It is inherent in these comments that my concern is mainly about our electricity system delivering "emissions free" electricity to the greatest extent possible.

Thank you.

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H. R. (Bob) Bach, P.Eng.

