



Canadian Solar Industries Association
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Independent Electricity System Operator
Attention: Stakeholder Engagement
Station A, Box 4474
Toronto, Ontario
M5W 4E5

Subject: Comments on IESO Recommendations Document Entitled “Stakeholder Engagement SE-57 Embedded Generation Status Update”

The Canadian solar Industries Association (CanSIA) is pleased to provide comments on the IESO’s recommendations and next steps in the document noted above.

The Canadian Solar Industries Association (“CanSIA”) is the national trade association that represents the interests of companies and individuals committed to solar energy. The Association works to strengthen the Canadian solar industry, increase the professionalism of companies, foster domestic and international markets, and promote the use of renewable energies. The Association presently has more than 250 corporate members from across Canada, and more than half that membership operates in the province of Ontario. Our comments are provided below:

Connection Assessment and Approvals Process (CAA):

The Association and its members agrees with the IESO recommendations and further recommends that the IESO mandate cycle-time targets for SIA, CIA and Connection Approval by distribution utilities and transmission utilities. Such time-based targets would reduce the cycle time for project development and would require utility initiatives such as:

Training
Business Process Improvement
Staffing Upgrades/Expansions
Performance Metrics

The economics of renewable energy projects can change quickly over time, as can community support, the availability of equipment and financing, and the designation of transmission zones as green, yellow or orange by the OPA. The risk that unreasonably lengthy delays in the connection assessment process by LDCs, transmitters or the IESO could delay the development of a project indefinitely, or delay it long enough to make the above-noted changes likely, is a

material disincentive to investing in early-stage projects in Ontario. Guaranteed cycle-times would relieve this disincentive.

We look forward to reviewing and commenting on the proposed amendments to market rules and processes required to “facilitate connections to the distribution system while ensuring reliability will be maintained”.

Visibility (Telemetry):

CanSIA agrees with these recommendations subject to the following concerns:

The recommendation directs the various agencies to develop “*an effective and inexpensive means of providing real-time visibility*”. Many renewable generation proponents already have these types of systems in place, so we suggest that the IESO consider including proponent input as well to ensure that the agencies consider the costs and data available from those systems already in operation.

If the IESO is planning to use this information to curtail embedded generation under certain conditions, proponents will need to have a very clear understanding of the criteria to be used to decide who is curtailed. This information will be critical to project economics.

Next Steps:

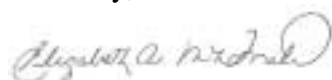
Connection Assessment and Approvals Process – CanSIA agrees with moving forward on the details as soon as possible to help expedite the significant contribution that solar projects can make to the security of supply for Ontario consumers. We look forward to contributing to these discussions on behalf of our members.

Performance Standards – We agree with these next steps and would like to participate in the technical conference. We hope that once the technical conference is over, the Association, in consultation with our members, would still like to be engaged on providing comments to proposed recommendations before they are final.

CanSIA welcomes any changes to the connection process and rules that would help remove the roadblocks currently impairing Ontario’s ability to meet or even exceed its renewable energy objectives. In addition, the cost to our members that have resulted due to the current lack of clarity and overall confusion in the connection process makes it more challenging to improve the value proposition of renewable energy for Ontario consumers.

We thank you for considering our comments and look forward to working together.

Sincerely,



Elizabeth A. McDonald
Executive Director