



Submitted electronically to:

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

November 20, 2020

Dear Ms. Rosen

**Re: ERO number 019-2531
Consultation on Changes to Ontario's Net Metering Regulation to Support Community-Based Energy Systems**

London Hydro is pleased to make the following submission with respect to ERO number 019-2531; "Changes to Ontario's Net Metering Regulation to Support Community-Based Energy Systems"

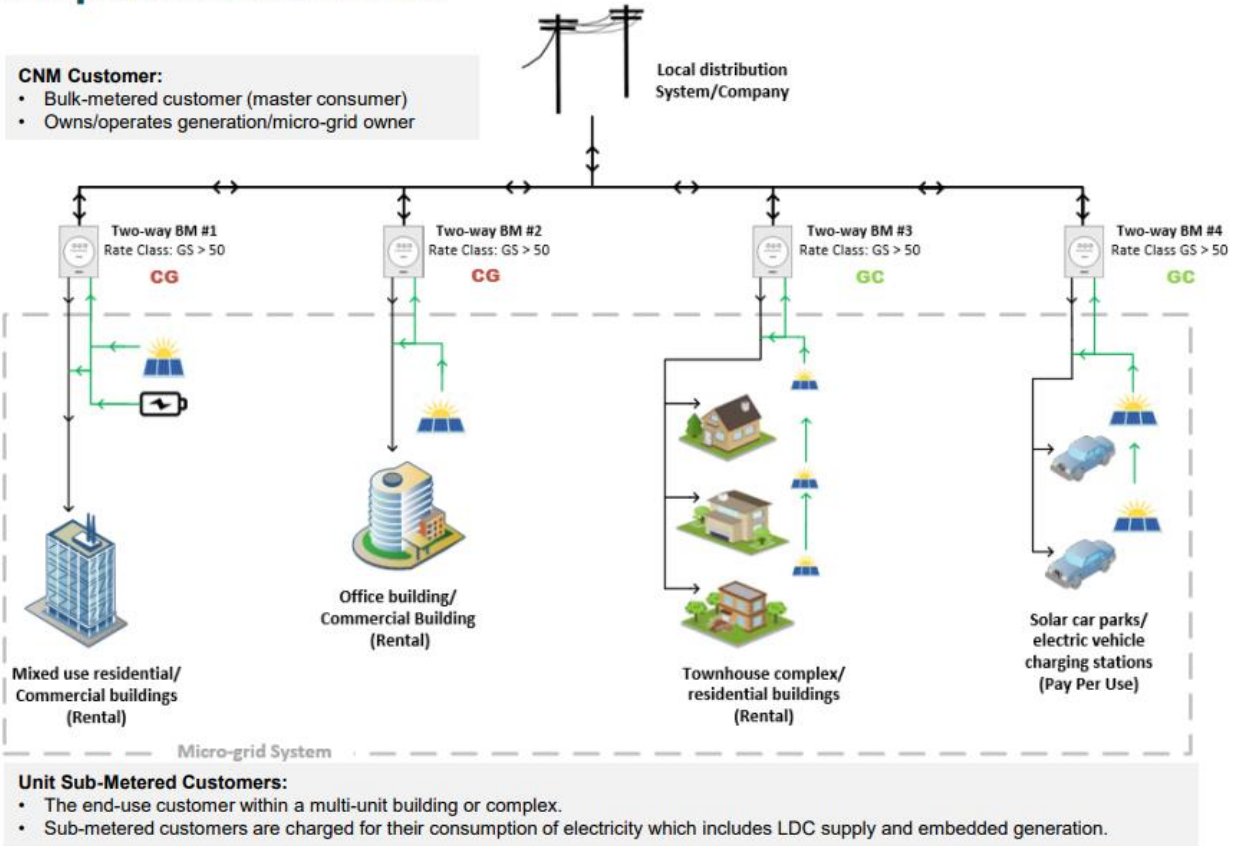
London Hydro is an OEB licenced local distribution company (LDC) with the franchise to distribute electricity to the City of London. London Hydro operates under the various provincial and federal government imposed acts, regulations and directives. As a regulated utility we also operate under the various rules codes and guidelines imposed by the Ontario Energy Board.

London Hydro is a member of the Electricity Distributors Association (EDA) and as such we contributed to the submission presented by them. As the EDA submission is the collective voice of our industry we may not necessarily concur with all points submitted. This submission is intended to be an addendum to that submission allowing London Hydro to expand on various issues raised in that submission and this proposal.

Characteristics of demonstration CNM projects

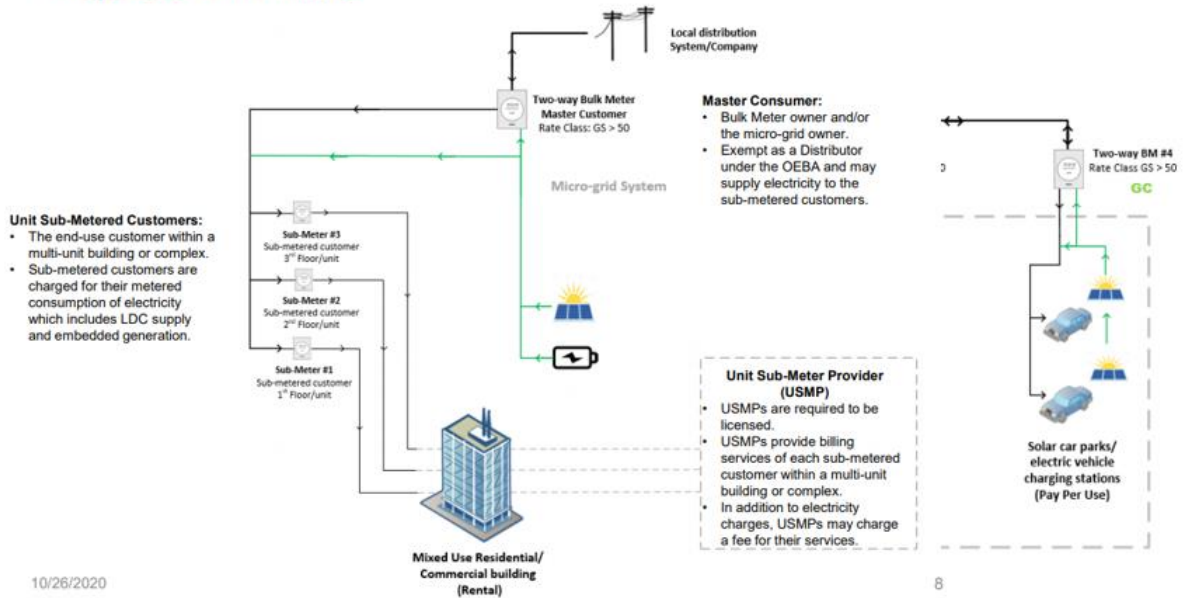
London Hydro is aware of the ministry's concern with respect to definition applied to what will be the characteristics of a CNM demonstration project. More specifically what could encapsulate the definition of "Community" For this London Hydro would like to take the opportunity to propose three different demonstration projects community constructs that could be tabled for consideration.

Proposed CNM Model



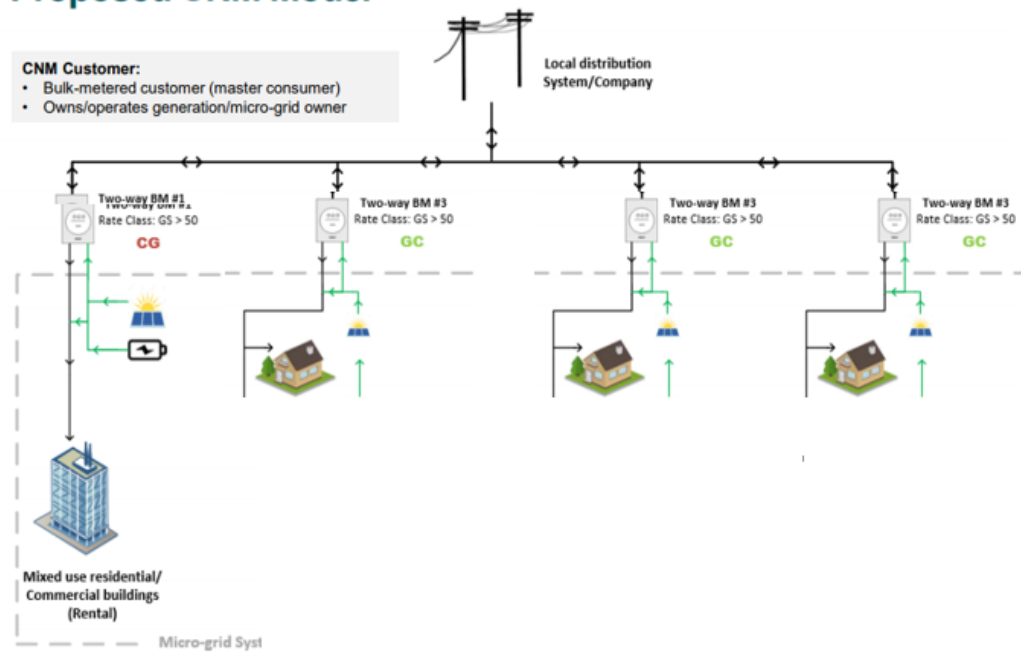
The first project is the West5 development project promoted by Sifton Properties. The diagram above depicts the predominant construct of the West5 development. This project has been termed as a self-contained net zero community. West5 is located in the west end of London. It encompasses several hundred acres encapsulated by 4 major arterial roads. The community is expected to continue to be developed over the next five years to ultimately house 2,000 residential housing units (multires and townhomes), several commercial buildings (being stand alone, strip mall and highrises), and parking structures with and without roof top solar generation. All structures are carbon free state of the art energy efficient. Solar generation is expected to be the principal source of electricity. For London Hydro this location may be deemed CNM. Characteristics will be to have multiple owners sharing solar generation provided by a third party to the community. London Hydro would be the electricity provider and it is expected we will be totalizing multiple bulk net meters. To ensure that net metering generation never exceeds community electricity consumption London Hydro would expect to settle with a many to one invoice delivered to a single settlement agent acting on behalf of the community by presenting a totalized invoice capturing all transactions. It would be assumed the settlement agent would be the responsible party to settle with London Hydro directly.

Proposed CNM Model



The second project could be EVE Park promoted by s2e. The diagram above depicts the predominant construct of the EVE Park development. This project is standalone but located in the same development parcel as West5. The plan is to build a 4 building condominium development with a standalone roof top solar parkade. The condominium will house 84 residential units. A municipal roadway will separate the condominiums located on a single contiguous property from its parkade. This development is expected to be different from West5 in that the condominium is the singular owner of units and generation. London Hydro would be the electricity provider and it is expected we will be totalizing multiple bulk net meters. To ensure that net metering generation never exceeds community electricity consumption London Hydro would expect to settle with a many to one invoice delivered to the condominium corporation acting on behalf of the community by presenting a totalized invoice capturing all transactions. It would be assumed the condominium corporation would be the responsible party to settle with London Hydro directly.

Proposed CNM Model



The third project for consideration could be a low income housing corporation. The diagram above depicts the predominant construct of the low income housing corporation. London Hydro is currently engaged with this corporation promoting an international energy innovation competition project in partnership with NRCAN. What makes this opportunity unique is that it involves a 150 unit high rise and 6 town houses. The units are not located on a contiguous property like the two above examples but separated by municipal roadways not conjoined in direct proximity. Technically in difference to being geographically conjoint the community connection is related to singular corporate ownership. What makes this opportunity intriguing for consideration is that there is a single owner of the units being the housing corporation. Solar panels were provided by NRCAN for all structures. Because of current net metering rules each unit is net metered separately. The tenants of the town houses are responsible for payment of their electricity bills. Thus these tenants will enjoy the benefit of net metering reduced bills, in contrast to the corporation who may be deemed the rightful owner of the generation and entitled to the generation credit. London Hydro would see CNM benefiting the corporation as a whole with CNM benefit going potentially to all low income residents in the way of lower rents or upgraded facilities. To ensure that net metering generation never exceeds community electricity consumption London Hydro would expect to settle with a many to one invoice delivered to the housing corporation acting on behalf of the community by presenting a totalized invoice capturing all transactions. It would be assumed the housing corporation would be the responsible party to settle with London Hydro directly.

Conclusion

London Hydro presents the above for two reasons. One is to provide an example of variation in structure that the Ministry may wish to consider in crafting definitions of community. The other is to suggest London Hydro has three very viable projects that may be suitable for demonstration purposes.

Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M Benum". The signature is fluid and cursive, with the first letter "M" being particularly large and stylized.

Martin Benum
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