Electrical Safety Authority

Proposed Easement to Plan Review Submission Requirements: 10-12 kW
Public consultation feedback and resolution

Description of Change: Proposed Easement to Plan Review Submission Requirements: 10-12 kW		
Submitted by	**Stakeholder Comment**	**ESA response**
LDC	- Increasing the threshold from 10 kW to 12 kW I don't expect to materially change the type of equipment being installed, as systems in this range are already well within established standards and practices. - The primary consideration is behavioural, in that now our customers and their consultants will size systems just below the new threshold to avoid plan review, slightly expanding the range of installations proceeding without that step, and perhaps adding solar and battery into the mix, instead of what is historically just solar. - While there may be a modest increase in edge cases (e.g., service loading or voltage rise), these are generally well managed through existing inverter protections and interconnection requirements. - Aligning with the Ontario Energy Board microgeneration threshold helps reduce regulatory misalignment and improves clarity for customers and industry stakeholders. - Overall, the change represents more of a process adjustment than a shift in safety risk, with low incremental impact anticipated from my perspective.	Thank you for your feedback. Please see published Director's Order.
Public	To the ESA Board and Director, I am writing to express my strong support for the proposed amendment to Rule 2-010 (1)(e) to increase the Plan Review threshold for Distributed Energy Resources (DER) from 10kW to 12kW. This change correctly reflects current equipment standards and achieves necessary harmonization with the Ontario Energy Board (OEB). While I fully endorse the proposal, I would like to highlight an area where the transition could be undermined by current administrative inconsistencies: **1. Modernization of the Residential Fee Schedule**	Thank you for your feedback. Please see published Director's Order. Please refer to the published FAQ's regarding fees.

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	The proposal states that raising the threshold to 12kW is intended to "reduce some of the cost and time required" for these installations. However, the **2026 Electrical Safety Services Fees** (effective April 1, 2026) maintains a distinct change in pricing at the 10kW mark. Currently, Section 8.1.1 and 8.2.1 apply a flat fee (e.g., Code C077) only for wind and solar systems rated **<10kW**. Systems exceeding 10kW—even by a fraction—are immediately shifted to a more expensive and complex "sum of the parts" billing structure (Sections 8.1.2 and 8.2.2), which includes component-based pricing for inverters, rectifiers, and panels. If the Plan Review threshold moves to 12kW while the fee schedule remains anchored at 10kW, the ESA may fail to achieve its goal of "alignment and consistency within the industry". To ensure the intended cost and time savings are realized, the ESA could modify the residential fee schedule to reflect this new 12kW paradigm, allowing systems up to 12kW to access the flat-fee structure currently reserved for smaller solar arrays, for example. **2. Support for Industry Harmonization** As noted in the proposal, the equipment and installation configurations for 10kW and 12kW systems are typically identical. Maintaining a 10kW threshold for either Plan Review or flat-fee eligibility serves as a legacy administrative hurdle that no longer reflects the "current industry trend". By adopting the 12kW threshold across both Rule 2-010 and the associated fee schedules, the ESA will successfully modernize its oversight to match policy priorities and industry expectations.	
Solar, wind or ESS company	This is a no-brainer. The 10kW threshold has *no* technical foundation. It's only justification was the definition in the DSC. If the DSC is changing, the ESA should also change, and no consultation should be required. LDCs are	Thank you for your feedback. Please see published Director's Order.

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Solar, wind or ESS company	responsible for implementing the change as of May 1st; the ESA should also immediately adopt this change. Failure to accept the DSC change as a the only driving factor in this issue is self-important bureaucratic bungling. The 10kW threshold exists ONLY in Ontario. Ontario, and the ESA, are outrageously behind the game on this issue. The change in the DSC is a small improvement for clean energy and a negligible change in terms of electrical safety. It's way past time for ESA to catch up: get this done immediately.	
Solar, wind or ESS company	This is a submission for the public consultation on plan review submissions. In my opinion as a licensed electrical contractor and one of Ontario's premier solar and energy storage installers, the plan review requirement for inverters with an output over 10kW should be lifted to, at minimum, 12kW. Current residential hybrid inverters now have outputs up to 18kW. When considering this increase, we should take into account the industry's rapid change and Ontario's increasing energy needs. The adoption of MIDs (microgrid interconnection devices) increases the safety of interconnecting larger inverters and reduces the requirement for complicated engineering and extensive equipment labelling. Many inverters now offer additional safety measures, such as PCS busbar control. Every other province in Ontario allows the installation of inverters exceeding 12kW without additional red tape or fees. Lifting the plan review requirement from 10kW to 12kW presents no safety concern.	Thank you for your feedback. Please see published Director's Order.

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Solar, wind or ESS company	I would like to show support for this amendment on three levels: 1. A licensed electrical contractor with 17 years experience in the renewable energy industry 2. A member of the Canadian Home Builders Association Net-Zero Technical Committee 3. A homeowner in Ontario The increase in capacity from 10kW to 12kW of generation capacity to trigger the requirement for Plans Review would be a welcome change for the following reasons: 1. Project costs to homeowners - Plans Review typically adds $700+ to the project cost for a homeowner, which is significant in terms of percent of total project cost. 2. Timeline for project delivery - Plans Review typically adds 6-8 weeks to our project timelines for homeowners, slowing down project delivery 3. Standard Equipment Capacities - Standard DER equipment for residential projects are designed at generation capacities of up to 11.4kW or 11.5kW 4. System design has become standardized in terms of components and connections. We are routinely submitting the same design, to include PV array, inverter/battery, etc. for our clients, typically with little to no variation. Plans Review for these projects has become an administrative exercise at homeowner expense, and is not revealing any additional benefit. 5. The change in definition to "microgeneration" by the OEB, and the update to the DSC was meant to facilitate increased adoption of residential DERs to support electrification and aid in achieving energy transformation targets.	Thank you for your feedback. Please see published Director's Order.

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	Raising the Plans Review threshold would contribute to this in a substantial way.	
LEC	Hello, The increase to 12kw is required, with the transition to all in one inverter chargers a 12kw inverter is the smallest inverter we can use to get the desired amount of PV energy processed for our average stand alone off grid solar systems. 12kw is also the minimum size that allows the full passthrough of a 200A service for a whole home battery back up backup system. All the plan reviews I have submitted for renewable energy systems have passed the plan review with no feedback from the plan review process yet cost $700-$1000 each with apparently no added value to the inspection or the end customer. I have submitted two plan reviews for 12kw systems so far in 2026 and have five more to submit this season. The majority of my renewable systems are off grid stand alone systems where there is no possibility of getting connected to the grid. The exemption for off grid stand alone systems should be increased to at least 15KW to include the more capable stand alone inverter chargers. The DIY systems we see installed in this area regularly exceed 12KW and are never inspected let alone see a plan review.	Thank you for your feedback. Please see published Director's Order.
Solar, wind or ESS company	I'm writing to express my support for the proposal to increase the Plan Review threshold for Distributed Energy Resources from 10kW to 12kW. This change is a sensible adjustment that ensures the ESA remains coordinated with the Ontario Energy Board's recent updates to the 'micro' DER threshold.	Thank you for your feedback. Please see published Director's Order.

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	Harmonizing these standards across regulatory bodies will maintain clarity around DER system sizes for industry proponents, and DER customers. By adopting the 12kW threshold, the ESA stays consistent with utilities, simplifying the interconnection process as the province's electrification transition continues. This approach also better aligns with standard DER equipment sizes without compromising system design and safety requirements. Furthermore, I think implementing this change will allow ESA to optimize its Plan Review resources. By refocusing the Plan Review process on larger DER's and more complex installations, the Plan Review group can operate more efficiently and provide stronger oversight where it is most impactful. Removing the Plan Review requirement for small DER's supports the deployment of renewable energy resources in the province, while still upholding the high safety standards for which the ESA is known. I'm pleased to see the ESA's commitment to maintaining industry consistency and supporting a streamlined path for DER integration in Ontario.	

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LDC	Supports the change, because it will help streamline the MicroDER process.	Thank you for your feedback. Please see published Director's Order.
LEC	Thanks for sharing, I've been saying it for several years the threshold should increase. Generally speaking, the most common inverter sizes are 11.5 kW AC output for about 3 years now where there were blocks of BESS assemblies that used to be 5 kW each stacking and increasing the inverter output on that side of the industry. What we now see are system sizes that start at 11.5 kW, however, we commonly see 12 and 18 kW in most cases now in the solar/renewable industry with residential products. I feel like moving to 12 kW is a starting point, but one that will have to be revisited in a year or two and very short sighted. One of my gripes too is we have installed over 400 Tesla Powerwall 2s for Hydro One's grid modernization program in the past few years and what I see as an obstacle is they had 10 kW of AC output from the Powerwall 2 systems installed and want solar. Solar with this system is AC coupled only, therefore, to add any solar of any size that integrates and is controlled by the Tesla Gateway (PCS) counts as an aggregate addition to the base 10 kW AC inverter present on the Powerwall 2 system that triggers ESA plan review. I think BESS and solar should be segmented, with PCS and UL standardized energy gateways, you determine how energy is used and can set zero export limits, panelboard current limits, determine if the battery should come in for energy savings, backup or energy triage applications. For this reason, a blanket AC inverter/BESS inverter addition in many cases are not how the systems are	Thank you for your feedback. Please see published Director's Order.

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	programmed and used. We have ample data to showcase that, there are many different manufacturers and customers using it differently, but there is a constant that solar and BESS should not be grouped together. It handcuffs customers financially with LDC connection impact assessments as well when paired to ESA plan review can add $9,000+HST to the energy project before it begins. That is at the essence of what I run into often and people are constant discouraged when I explain that nuance. If we are truly serious of electrification and removing loads from the grid, we need a higher standard. Hydro One has an excellent pilot ongoing, it's a 12 kW net meter and 20 kW total system size. This means you could net meter 12 kW of solar and self-consume 8 kW, though in Ontario we can't net meter BESS yet, this would be included in the program. I would suggest looking at this standard, I love that it may increase to 12 kW, but that is short sighted in my view.	
Solar, wind or ESS company	To continue electrifying at the increasing rate set by the industry, regulations must continue to adapt and grow with the increasing pace of technology. Plan Reviews add additional time and substantial cost to solar and BESS installations, prompting installers to forego or cancel many potential or ongoing projects in Ontario. The company agrees that increasing the threshold for required Plan Reviews to 12kW would be beneficial to OEM, installers, and customers alike, allowing for greater flexibility and lower deployment costs. We are grateful for our continued partnership and dedication to providing dependable service to our shared constituents. I am available to address any questions or concerns you may have regarding this submission.	Thank you for your feedback. Please see published Director's Order.