

Feedback Form

2024 Annual Planning Outlook – April 23, 2023

Feedback Provided by:

Name: Brittany Ashby

Title: Senior Regulatory Affairs Advisor

Organization: Electricity Distributors Association

Email: bashby@eda-on.ca

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To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark "Confidential".

Following the APO Information Webinar on April 23, 2024, the Independent Electricity System Operator (IESO) is seeking feedback and comments from stakeholders on the items discussed. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by May 7, 2024.

Future Considerations

Topic	Feedback
Do you have any comments regarding information to include in future outlooks?	

General Comments/Feedback

We believe that future outlooks and IESO planning and forecast processes should better reflect the needs and changes occurring at the distribution system level to give a more complete and accurate assessment of Ontario's energy system.

Recommendation 1: We support the report of Ontario's Electrification and Energy Transition Panel call for the Ministry of Energy, working with the IESO, OEB, **LDCs**, municipalities, and gas utilities, to develop a formal and transparent co-ordination framework that sets out the scope and objectives for enhanced planning co-ordination at the bulk, regional, and distribution levels. (emphasis added)

It is clear to us that the energy transition is being driven by the electrification of end-uses by customers at the distribution system level. However, the IESO's planning outlooks and processes remain very much bulk-system and wholesale market participation directed.

Recommendation 2: Given that the key to the energy transition will be fuel-switching by customers, we believe that future outlooks and program developments should better and more proactively identify opportunities for DERs and LDCs (through grid modernization investments that can increase the capacity of the distribution system to manage and accommodate DERs) to efficiently and cost effectively help meet Ontario's electricity system needs (regardless of wholesale market participation).

Further, as the EDA has previously noted to the IESO, DERs are connected to the distribution system. As such, **LDCs are critical to the implementation and integration of DERs** in the electricity system. We encourage the IESO to deepen its coordination with LDCs and DERs, and to integrate their role and involvement to contribute toward meeting local, regional, and provincial energy needs and alleviate the need for potentially more costly bulk-system investments.

As noted in our vision policy paper, [*Solving Grid-Lock: Our Vision for a Customer-Centric Energy Transition*](#), "a lack of coordination in the energy sector hinders the development of a cohesive approach to DER integration (and electrification more broadly), one which would recognize the value of DERs to the customer, distribution system, and bulk system. Moreover, there is a lack of guidance to LDCs regarding grid-enabling investments that would unlock new capabilities while optimizing and maximizing the existing distribution grid to provide overall ratepayer value."