

December 14, 2021

Mr. Colin Campbell  
Engagement Lead, Enabling Resources Program  
Independent Electricity System Operator  
#1600 – 120 Adelaide Street West  
Toronto, ON M5H 1T1  
Submitted via email to: [engagement@ieso.ca](mailto:engagement@ieso.ca)

Dear Mr. Campbell,

**Re: Distributed Energy Resources (“DER”) Potential Study - Coalition of Large Distributors (“CLD”) Written Comments**

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The CLD consists of Alectra Utilities Corporation, Elexicon Energy Inc., Hydro One Networks Inc., Hydro Ottawa Limited, and Toronto Hydro-Electric System Limited. Together, the CLD’s members represent more than 3.6 million, or approximately 70% of electricity consumers located across the province. CLD members are on the forefront of the energy transformation in Ontario and are actively working with customers to enable DER connections while managing the impacts on local grids. The vast majority of DERs currently connected in Ontario are connected to the grids of CLD members.

On November 23<sup>rd</sup>, the Independent Electricity System Operator (“IESO”) and its consultant, Dunsky supported by Power Advisory, presented a draft study plan describing key components of the DER Potential Study including inputs, methodology scenarios and underlining assumptions. The IESO and its consultants have requested stakeholder feedback on the project plan’s approach.

**CLD Comments**

The CLD appreciates the IESO’s efforts to identify emerging DER technologies most relevant to the Ontario context, and assess the technical, economic and achievable potential for these DERs over the next 10-years. The CLD believes the DER Potential

Study is an informative, forward looking exercise that will assist DER integration efforts underway at both the Ontario Energy Board (“OEB”) and the IESO forums. The CLD is supportive of the detailed project plan, and is pleased to offer its feedback.

- The DER Potential Study strives to identify DERs that are cost effective from a system-wide perspective. The CLD believes there is merit in this exercise and supports this informative work.
- The CLD observes the scope of the DER Potential Study is limited to the aggregated province-wide potential of DERs, with select regional considerations. The CLD submits that the parallel work by the OEB’s Framework for Energy Innovation (“FEI”) proceeding will also be essential to understanding the feasibility of DERs at the local level. The OEB’s determination of distribution-level benefits will have important implications in evaluating the overall potential for DERs within an immediately local context and by extension system-wide when those local opportunities are considered in aggregate. Moreover, as value-driven regulatory frameworks are established at the OEB, the CLD expects that the IESO’s results may be further impacted. The CLD therefore believes that the IESO Technical Potential Study is one of a series of steps in this process and that local opportunities that CLD members know will be essential to assessing the technical potential of DERs in Ontario.

## **Conclusion**

The CLD recognizes the IESO staff’s ongoing work in DER integration, and appreciates the opportunity to provide comments. CLD members, as a collective and individually, are excited to partner on this journey.

If you have any questions regarding our comments, please contact the undersigned.



Sincerely,

Kaleb Ruch  
Manager, Government Relations  
Toronto Hydro-Electric System Limited.

Michael Lister  
Alectra Utilities Corporation

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