

Feedback Form

Distributed Energy Resources (DER) Roadmap – June 22, 2021

Feedback Provided by:

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Following the June 22, 2021 DER Roadmap engagement meeting, the IESO is seeking feedback from participants on the DER Roadmap, stakeholder views on the DERs that are most likely to emerge in Ontario, the OEB/IESO joint engagement objectives and proposed process, and finally, on the upcoming OEB/IESO joint targeted call on Enabling Resource. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the June 22, 2021 entry on the [DER Roadmap webpage](#).

Please provide feedback by July 14 2021 to engagement@ieso.ca. Please use subject: *Feedback: DER Roadmap*. To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the [DER Roadmap webpage](#) unless otherwise requested by the sender.

Thank you for your time.

DER Roadmap

Topic	Feedback
Has the IESO identified the right focus areas to deliver on its goal for DER integration?	Yes
Will the near-term initiatives enable the IESO to make timely progress on its goal and focus areas?	This is uncertain. The effort appears primarily focused on enabling participation of DERs in the IESO Markets. While this is important, so too is an effort focused on ensuring there is a tangible and visible relationship between this initiative and the Resource Adequacy Framework – which, for example includes mechanism beyond market participation which could apply to certain DERs (e.g. “Programs”). This is certainly the case for many DER hydro facilities which as the RA “Program” definition notes, provide both electricity and non-electricity benefits to the province. Even within the proposed market construct, there will be a need for longer term commitments to support long-lifespan assets.
Are stakeholders supportive of the approach detailed in the draft DER Roadmap Engagement Plan?	Yes.

DER Roadmap – Stakeholder Views

The IESO is seeking stakeholders who wish to present their views on the DERs that are most likely to emerge in Ontario and how they should be incorporated into wholesale markets. IESO will seek to identify a number of stakeholders to present their views at the September engagement days and will work with stakeholders to coordinate content. Presentations and subsequent stakeholder discussions will provide insight for the DER Market Vision Project.

Interested stakeholders are asked to briefly identify their views below. If stakeholders prefer not to have these initial views on DERs published as part of this broader feedback submission, please email your comments separately to engagement@ieso.ca.

Topic	Feedback
Views on the DERs that are most likely to emerge in Ontario and how they should be incorporated into wholesale markets	Approximately 2/3 of Ontario’s waterpower facilities are connected to the Distribution System – a feature unique to Ontario. There approximately 1,000 unpowered dams in the province, owned an operated by various levels of government (Province-400+, Federal 200+, Conservation Authorities 200+, Municipalities 100+). With the appropriate policy framework, many of these assets have the potential to be retrofitted for small hydro, particularly given the emergence of “Very Low Head” technology in the industry around the world. This potential should be considered as part of the initiative.

OEB/IESO Joint Engagement on DER Integration

Topic	Feedback
Do the proposed OEB/IESO Joint Engagement objectives meet stakeholder needs?	Yes, but joint engagement should extend beyond this initiative. For example, IESO has adopted an “Ontario Zonal Price” model for settlement for market participants with existing contracts. The OEB needs to do the same through an amendment to the Retail Settlement Code.
Will the proposed process for OEB/IESO Joint Engagement enable us to deliver on the proposed objectives?	Uncertain, but it’s a positive step forward.
What are the cross-cutting issues relevant to the OEB/IESO Joint Engagement that there should be focus on/awareness of and why do they matter?	The IESO/OEB and stakeholders should use this opportunity to establish additional priority areas for collaboration (i.e. OZP application)

OEB Innovation Sandbox and IESO Grid Innovation Fund Joint Targeted Call on Enabling Resources

Topic	Feedback
<p>Given the problem statement, recommendations, and opportunity presented today, what barriers to DER integration are best suited to be addressed through the joint call?</p>	<p>Costs for market participation vs. value Alternatives to integration Models for “bundling” (e.g. cascade river systems)</p>
<p>Which kinds of projects designed to address these barriers would be expected to benefit from regulatory support available through the OEB Innovation Sandbox?</p>	<p>Cost benefit analysis Locational Individual Distribution system breakdown of DERs (there may be multiple models as a result)</p>

General Comments/Feedback