

Feedback Form

Distributed Energy Resources (DER) Roadmap – October 20, 2021

Feedback Provided by:

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Following the October 20th public webinar on the DER Roadmap, the Independent Electricity System Operator (IESO) is seeking feedback from participants on the objectives and initiatives proposed for inclusion in the DER Roadmap and the associated timelines, as well as on the format and approach to information sharing. The OEB and IESO are also seeking feedback on the cross-cutting issues for collaboration.

The referenced presentations can be found on the [DER Roadmap webpage](#).

Please provide feedback by November 10, 2021 to engagement@ieso.ca. Please use subject header: *DER Roadmap*. To promote transparency, this feedback will be posted on the [DER Roadmap webpage](#) unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and post responses on the webpage.

Thank you for your contribution.

Objectives, initiatives and timing

| Topic | Feedback |
|---|----------|
| Is the information proposed for inclusion in the DER Roadmap (objectives, initiatives, timing) helpful for stakeholders to understand the progress IESO is making on DER integration? | Yes. |
| Will the identified initiatives enable the IESO to achieve its objectives? | Yes. |

Information sharing

| Topic | Feedback |
|--|----------|
| Is the format/approach to sharing this information helpful for keeping up to date with the progress IESO is making on DER integration? | Yes. |

OEB/IESO Joint Engagement – cross-cutting issues for collaboration

| Topic | Feedback |
|--|--|
| <p>Does this draft list capture the major cross-cutting DER integration issues for collaboration between the OEB/IESO?</p> <p>If not, what other issues related to DER integration should the IESO/OEB collaborate on?</p> | <ul style="list-style-type: none"> • Expanding the role for LDCs: If LDCs become accountable for new functions that help support the implementation of DERs, the OEB will need to determine the mechanisms by which LDCs can recover the costs incurred to fulfill these responsibilities while the IESO will need to revise market rules/communication protocols to increase coordination between LDCs and the IESO. • The OEB/IESO will need to coordinate an approach to developing regulatory guidance that will enable LDCs and the IESO to continue working together while allowing LDCs the flexibility to play a major role in DER integration. Providing clear deliverables and timelines on what areas the IESO/OEB will focus on for collaboration will help facilitate engagement and more meaningful outcomes for stakeholders. • Financial implications: Increased adoption of DERs will require that LDCs change their approach to planning and operating the distribution system. The changes may increase costs, beyond those currently collected from customers through either rates or the existing connection process. The OEB and the IESO need to support LDCs to ensure the appropriate compensation mechanisms are in place for LDCs to support DERs. • While each LDC is responsible for its own service territory, the Ontario power system is a highly interconnected and complex infrastructure. Coordination and collaboration between the distribution and transmission system will be required to realize the full system benefits of DERs. |

General Comments/Feedback

LDCs can effectively own and operate and host DERs and may become distribution system operators in the future. LDCs are best positioned to maximize the value and benefits of DERs to distribution systems and to the customers served by those systems. LDCs are uniquely able to coordinate the

dispatch of DERs, either at the device specific level or in aggregate to manage power flows so that customers are served safely, reliably and at the lowest sustainable cost.

LDCs will work with their customers, DER proponents and other third parties, and utilize their own assets, including DERs, to benefit all parties.

We encourage the IESO to explore all options that foster the responsible adoption of DERs, whether connected to the IAM or a distributor's infrastructure. LDC's need a voice at the table as DER regulations are developed to ensure the safe and reliable operation of our distribution systems.