

Feedback Form

OEB/IESO Joint Engagement on DER Integration – May 26, 2023

Feedback Provided by:

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Following the May 26, 2023 OEB/IESO Joint Engagement session, the Ontario Energy Board (OEB) and the Independent Electricity System Operator (IESO) are seeking feedback from participants on the joint engagement in general as well as the updates to the list of cross-cutting issues presented.

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

Please provide feedback by June 26, 2023 to engagement@ieso.ca. Please use subject header: *OEB/IESO Joint Engagement*. To promote transparency, this feedback will be posted on the [DER Roadmap webpage](#) unless otherwise requested by the sender.

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

Thank you for your contribution.

OEB/IESO Joint Engagement

Topic	Feedback
<p>Are there additional potential cross-cutting issues related to DER integration that should be considered for collaboration between the OEB/IESO? If so, do you have suggestions on how these issues could be addressed at future sessions?</p>	<p>The approach is a narrow collection of activities, but more comprehensive integration and engagement needs to enable DERs (or leverage existing DERs) adequately appears to be missing. DERs done right bring more benefits at a lower cost.</p>
<p>Given the scope of work, are there any specific initiatives or concerns that should receive focused attention?</p>	<p>There is additional low hanging fruit that does not appear to be covered. Many of these issues have been identified and agreed to by the OEB and/or IESO over the last few years. There is a need to connect these dots better. Recommend consulting with OEB RPPAG and DER Connection Working Groups to solicit specific input. FEI Working Group has been discontinued by the OEB , but if it is restarted, it could also be an option.</p>

General Comments/Feedback on Joint Initiatives

These initiatives are being conducted as individual initiatives and better integration across initiatives is required. There are several initiatives (and related regulatory proceedings related to real projects or integration with the grid) going on that should be linked in.

General Comments/Feedback on OEB DER Activities

The view and consideration of DERs through these initiatives is largely based on the historical context of a uni-directional grid and central generation model. This considered DERs (including CDM) as a cost and drain (LDCs don't consider the DER contribution since they do not control them = old school thinking) to the system rather than a cost-effective resource. This assume that rate payers pay for everything, even when integration with broader energy and emission planning would reduce or share costs to reduce rate payer costs and increase overall benefits. The energy transition and unlocking the benefits of DERs will require moving away from old school thinking and finding ways to embrace more innovative, integrated and future oriented regulatory frameworks.

DER potential by stakeholders other than LDCs is significant. Incentives need to look at how to incent those stakeholders and ensure that LDCs remove roadblocks and promote this approach. Better consultation and alignment with community energy planning moves planning and implementation closer to local communities. This is true for both electricity and natural gas and should be done jointly. The OEB/IESO endorsed the RPPAG Report which included the need to significantly enhance

alignment/communication between energy planning/operation and municipal energy planning. Integrated consultation was planned for 2023 and is still pending.

General Comments/Feedback for the IESO DER Activities

Recommend that Brattle Group undertake interviews/consultation with specific groups to identify the gaps so they can either be included in the analysis or flagged as gaps for future consideration. Requesting input through existing groups such as the OEB IRRP and DER Connections Working Group would be an efficient manner to collect relevant input from a broad range of industry stakeholders that have been dealing with these specific issues.

Also need to remember that incentives are not just financial. For example, every regulatory (e.g. rate case or Leave to Construct) Decision issued by the OEB including comments and conditions) carry as much (or more) weight than DER financial incentives. When the OEB makes it clear that more is needed, utilities act. Setting clear expectations and reinforcing them is more cost-effective. LDCs have repeatedly said that if the OEB tells them to do something, they will do it and that they can't decide to do it be themselves without OEB direction.