Feedback Form

Draft Assumptions for the 2026 eDSM Achievable Potential Study– April 22, 2026

Feedback Provided by:

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Date: May 7, 2026

To promote transparency, feedback submitted will be posted on the 2026 Provincial eDSM Achievable Potential Study engagement page unless otherwise requested by the sender.

Following the April 22nd engagement session on modelling and assumptions for the Achievable Potential Study, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on input assumptions. The webinar presentation, recording, and draft measure input assumption files can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by **May 7, 2026**. **If you wish to provide confidential feedback**, **please submit marked "Confidential".** Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Draft measure inputs assumptions

Please provide comments in the "Stakeholder Feedback" column of the Demand Response, BTM Solar Storage, and Thermal Energy Storage input assumptions workbooks.

Energy Storage Canada (ESC) appreciates the opportunity to provide feedback on the draft input assumptions for the 2026 Achievable Potential Study (APS). The comments below reflect ESC's updated analysis of the Demand Response, Behind-the-Meter (BTM) Solar + Storage, and Thermal Energy Storage (TES) workbooks, as well as broader considerations relevant to modelling achievable demand-side potential in Ontario.

ESC has intentionally provided feedback that is distinct from our earlier submission, reflecting new developments, additional stakeholder insights, and evolving market conditions. Please the Excel files with specific stakeholder feedback.

Broader development and trends relevant to potential modelling

Topic	Feedback
Beyond feedback shared in the Input Assumptions spreadsheets, do you have any input on broader developments and trends that may impact eDSM achievable potential, such as technology cost trajectories or expected impacts of recent regulatory changes concerning DER interconnection.	• Beyond the feedback provided in the Input Assumptions spreadsheets, ESC would highlight several broader developments that may influence achievable eDSM potential over the planning horizon: • Commercial and industrial behind the meter (BTM) storage is expanding rapidly across Ontario, driven by electrification, operational resilience needs, and increasing peak demand. This growth is reshaping customer load profiles and creating new forms of dispatchable flexibility that should be reflected in system planning assumptions. • Recent and ongoing regulatory and interconnection developments are expected to further accelerate DER deployment. Work related to DER valuation, the OEB's new DER focused directives, and emerging interconnection process improvements are collectively reducing barriers and enabling a wider range of customer sited resources to participate in system services. • Hybrid flexibility resources are becoming more prevalent. Storage is increasingly being integrated with EV charging, thermal systems, and advanced building automation. These combined systems can provide multi hour flexibility and coordinated load shifting, and should be considered in achievable potential estimates as they become more common across the province.

Macro input assumptions

Topic	Feedback
Do you have any feedback on the proposed approach for the escalated avoided capacity costs for scenario 4 i.e. +50% adder to the 2026 APO avoided capacity costs	• ESC supports the use of escalated avoided capacity costs but recommends testing a scenario where avoided capacity costs rise beyond 50%, given tightening capacity conditions and recent capacity auction outcomes. • The APS should also include a scenario where storage is compensated for firm capacity, consistent with emerging market design discussions.

General Comments/Feedback

Energy Storage Canada appreciates the opportunity to provide feedback on the draft assumptions. ESC's primary concern is that the current modelling framework may understate the achievable potential of behind-the-meter storage by focusing too narrowly on small systems and single-use applications. ESC recommends that the APS fully incorporate commercial and industrial BESS, reflect the growing prevalence of hybrid DR-plus-storage solutions, and model storage as a multi-service asset. Incorporating third-party ownership models, ITC stacking, and affordability provisions will further ensure the APS reflects realistic deployment pathways and produces a more accurate and policy-relevant assessment of Ontario's demand-side potential.