Feedback Form

2026 Provincial eDSM Achievable Potential Study – September 16, 2025

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the "insert engagement webpage" unless otherwise requested by the sender.

Following the 2026 Provincial eDSM Achievable Potential Study introductory webinar held on September 16, 2025, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on draft assumptions development, use of study results, and study scenarios and sensitivities. Broader feedback is also welcome, including on the draft objectives, scope, approach, timing, and high-level engagement activities. The webinar presentation and recording can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by **September 30, 2025**. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Assumptions development

Topic	Feedback
Are there any policy/market/technology considerations IESO and Cadmus should be aware of to inform the development of draft assumptions?	ESC welcomes the inclusion of the following eDSM measures in the 2026 eDSM APS: behind-the-meter standalone battery storage; behind-the-meter battery storage integrated with generation e.g., solar; and heating and cooling thermal storage, across all customer sectors. The capital costs of these technologies continue to decrease since previous APS. Also, the overall regulatory and compensation frameworks for DERs are currently on the cusp of change to more appropriately reflect their system value (as per OIC 802/2025, para. 11). As such, further value-proposition and cost-effectiveness improvements are imminent. Within this context, ESC looks forward to contributing to the development of draft assumptions for these measures. In particular, the definition of use-cases will be an important conversation where individual measures can simultaneously provide benefits to the bulk- and non-bulk levels (see General Comments/Feedback for additional commentary on use-cases).

Use of Study Results

Topic	Feedback
Do stakeholders envision using the APS results for additional purposes, and if so, how?	No comment

Scenarios and sensitivities

Topic	Feedback
Beyond the three identified demand scenarios, are there additional sensitivities IESO should consider exploring in further analysis?	No comment

General Comments/Feedback

Please see below additional context on how energy storage can provide eDSM and Beneficial Electrification.

1. Reduce peak electricity demand

1.1 Uni-directional demand response (i.e., on-site load displacement). BTM batteries can respond to time-of-use rates and/or other demand response / dispatch signals, by charging off-peak and discharging to on-site load during on-peak hours. Thermal energy storage can time-shift thermal energy end-uses to off-peak hours in response to time-of-use rates, and/or other demand response / dispatch signals.

1.2 Bi-directional demand response (i.e., on-site and feeder load displacement). BTM batteries can also discharge to the grid during on-peak hours when storage capacity exceeds on-site load to displace feeder load.

2. Reduce electricity consumption.

While storing electricity for later use can result in roundtrip efficiency losses on the demand-side, reducing peak electricity demand on transmission and distribution equipment can reduce line losses on the supply-side. Also, inverters are capable of improving power factor and quality and can thereby deliver further efficiency and conservation gains on both the supply- and demand-side.

3. Addressing Growing System Needs

In addition to the bulk system-level benefits that demand-side and distributed energy storage can provide by reducing peak electricity demand and reducing electricity consumption, the deployment of energy storage can increase flexibility, reduce congestion, and defer or delay other infrastructure investments at the non-bulk system level (i.e., non-wires solutions).

4. Beneficial Electrification

"Beneficial Electrification" (i.e., fuel-switching from fossil fuels to electricity with a lower emissions intensity) is most "beneficial" when the resultant load growth does not have adverse or unintended consequences at the bulk- and non-bulk levels (i.e., the resultant load is coincident with when the required generation, transmission and distribution capacity is most available, and vice versa). The deployment of energy storage to better align the coincidence of demand and load growth with the availability of the required generation, transmission and distribution capacity should be considered an integral element of "Beneficial Electrification".