

Stakeholder Feedback and IESO Response

2026 Provincial eDSM Achievable Potential Study

Following the December 9, 2025, Update on the Provincial eDSM Achievable Potential Study webinar, the IESO invited stakeholders to provide comments and feedback on the materials presented by January 9, 2026.

The presentation materials and stakeholder feedback submissions have been posted on the 2026 Provincial eDSM Achievable Potential Study engagement webpage for this engagement. Please reference the material for specific feedback as the below information provides excerpts and/or a summary only.

Data Inputs & Measures

Stakeholder Feedback

Oshawa Power recommended including behind-the-meter (BTM) wind resources in the study scope; exclusion limits opportunities for cost-effective solutions and policy alignment.

If BTM wind remains excluded, assign same incentives as solar projects of similar size to allow market-driven adoption.

IESO Response

Thank you for this feedback. Behind-the-meter wind presents particular challenges to credibly model in a study with zonal granularity due to how exceptionally locational-specific wind production potential is, especially for small-scale resources. Incorporating wind would require significant increases to the scope, budget, data sources, and timeline of the study to incorporate credibly. In the absence of broader stakeholder interest in including behind-the-meter wind, it is challenging to justify making the significant changes to the project required to include this measure.

For clarity, the inclusion/exclusion of a measure in the Achievable Potential Study will not impact the eligibility in the 2025-2036 eDSM Framework's "Stream 2" mechanism for cofunding LDC-led eDSM programs. While incentive structures are

	determined through program design processes outside the APS; we will share this recommendation with the relevant IESO teams for consideration.
Oshawa Power also recommended considering the installation of suite metering for bulk-metered multi-unit residential customers as a measure as it supports significant conservation outcomes.	Based on previous program experience and evaluation results under prior eDSM frameworks, particularly issues around freeridership and the authority of tenants to implement energy efficiency measures, the IESO is declining to include suite-metering as a measure in the study.
The Ottawa Renewable Energy Co-Operative (OREC) recommended not restricting solar capacity to roof space only; many commercial/industrial sites have additional non-roof areas suitable for solar installations.	Based on current policy, the IESO's eDSM solar incentives are limited to non-ground mounted installations providing load displacement. The IESO is working with Cadmus to understand how best to capture technical potential from installations on non-roof areas that are still within policy eligibility. Note: stakeholders broadly interested in small-scale solar (and wind) are encouraged to follow the IESO's parallel engagement regarding the Local Generation Program .

Methodology and Stakeholder Engagement

Stakeholder Feedback	IESO Response
<p>OREC recommended that for the Economic Potential modelling, energy from behind-the-meter solar and storage resources should be valued at the retail rate applying at the time of energy production, with the impacts of any policy producing variance with retail rate compensation be considering as part of the Achievable Potential modelling.</p> <p>OREC also suggested that assumptions for solar and storage valuation reflect net metering at full retail rates, not reduced rates after application of the Ontario Electricity Rebate (OER)</p> <p>OREC expressed interest in discussing customer choice modelling and other methods that will be</p>	<p>Thank you for this input. There are couple points worth elaborating. The purpose of the Economic Potential modelling is to identify the subset of Technical Potential that is cost-effective from a system perspective, reducing overall costs to ratepayers. To this end the Economic Potential modelling will value behind-the-meter DER energy production based on forecasted system avoided costs for energy and capacity. This approach does consider differences in energy and capacity value based on time of production and is aligned with standard industry practice for Achievable Potential Studies. Customer economics impacting adoption are considered as part of the Achievable Potential customer adoption modelling. IESO is investigating</p>

<p>used to estimate achievable potential, and highlighted the relevance of regulatory barriers, particularly for solar and storage measures. In particular, OREC expressed interest in:</p> <ul style="list-style-type: none">• Assumptions for technical potential (capacity limits).• Valuation methodology for economic potential.• Treatment of policy options in achievable potential estimates.	<p>the feasibility of modelling time-varying rates with Cadmus.</p> <p>Reflecting current policy, the study will include the impact of the OER) in the retail rate inputs for the Achievable Potential modelling. This is important to ensure the accuracy of the Achievable Potential results in the current policy context. The IESO may explore the impact of higher/lower rates (due to removal of the OER or other factors).</p> <p>The IESO appreciates OREC’s interest in discussing the achievable potential modelling and has extended invitations to OREC and other DER developers and DR aggregators to join a targeted engagement meeting to discuss modelling of DER and DER measures. The IESO also notes the participation of the Ontario Energy Board in study’s external Advisory Group, in part to advise, on regulatory developments that may impact achievable potential.</p> <p>The IESO would like to note that, per policy, Ontario customers can participate in eDSM program solar incentives or the Net-Metering Program but not both. Reflecting the purpose of the 2026 eDSM Achievable Potential Study (e.g. informing 2025-2036 eDSM framework budgets, targets, and portfolio design, informing analysis of incremental eDSM programming as non-wires option in regional planning), the study scope is limited to eDSM program potential.</p>
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