

# Feedback Form

## Enabling Resources – April 21, 2021

### Feedback Provided by:

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Date: May 12, 2021

Following the April 21, 2021 webinar on Enabling Resources, the IESO is seeking feedback from participants on the analysis, prioritization and sequencing approach and outcomes, the engagement plan objectives, and additional stakeholder inputs and considerations. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the April 21, 2021 entry on the [Enabling Resources webpage](#).

**Please provide feedback by May 12 2021 to [engagement@ieso.ca](mailto:engagement@ieso.ca).** Please use subject: *Feedback: Enabling Resources*. To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the [Enabling Resources webpage](#) unless otherwise requested by the sender.

Thank you for your time.

## Analysis and approach

Topic	Feedback
Are there resource enablement opportunities missing from this analysis?	<p>While the EDA has not identified any specific omissions at this time, we note that the IESO identifies a broad category of DERs without providing details about the specific scope of changes. We acknowledge that the IESO will be building on the IESO Innovation White Paper series on DERs, and that the IESO is proposing the development of a DER Roadmap as part of this engagement as well. We seek further information of any other IESO initiatives that engage DERs.</p> <p>We note that the IESO has identified that enabling DERs “requires the development and implementation of a Transmission-Distribution interoperability framework”. We request that the IESO provide more detail about the goals, objectives, specific outcomes desired for such a framework and the alternatives to such a framework. As this could be a complex topic (e.g., device dispatch, coordination of control infrastructure, whether directly connected or embedded) we suggest that the IESO convene a working discussion with LDCs at the earliest possible opportunity, to address unaddressed and outstanding issues from the IESO’s past work on this issue.</p>
Is the prioritization and sequencing approach sound and is there clear alignment between the approach and the analysis presented today?	<p>The EDA is generally supportive of the IESO’s approach for prioritization and sequencing. We propose that when opportunities to reduce costs are identified that the IESO will promptly take steps to realize them (e.g., by upgrading IESO tools and processes).</p>

## Additional input

Topic	Feedback
Do stakeholders have additional information or comments on input assumptions for consideration (e.g. limited resource life after contract expiration, additional contribution to meeting local system needs?)	The EDA makes no comment at this time.
Do stakeholders agree with the prioritization outcomes?	The EDA concurs that DERs are a high-priority issue.
Are there any additional timing considerations IESO should be aware of (e.g., time-sensitive resource re-investment decisions)?	We note that LDCs are planning their distribution systems and investing in them on an ongoing basis. It will be critical for the IESO to engage with LDC system planners as the IESO develops its plans to enable DERs and/or other distribution-connected resources.

## Engagement Plan

Topic	Feedback
Are stakeholders supportive of the objectives and approach detailed in the draft Enabling Resources Engagement Plan?	As noted above, the IESO identified the need to develop a Transmission-Distribution interoperability framework concurrent with the development of the IESO's approach to enabling DERs. We add that the IESO should be transparent with respect to the alternatives to any interoperability proposals. As this is expected to be a significant undertaking requiring coordination and collaboration with LDC members, we suggest that the engagement plan transparently outline the process for engaging with LDCs.

## General Comments/Feedback

EDA is supportive of this initiative, and we look forward to next steps of the engagement. As a general comment, with respect to all the enablement opportunities we observe that there is a need to clearly outline the relationships between the technologies and options. For example, energy storage may be distribution-connected (a DER) and may also be located behind the meter and

support customer participation in DR. We also support the IESO's recognition of local system benefits so that infrastructure is well coordinated and investment is appropriately prioritized.