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Frank D'Andrea
Vice President, Reliability Standards and Chief Regulatory Officer

BY EMAIL

May 12, 2021

Independent Electricity System Operator
120 Adelaide St. W. #1600
Toronto, ON M5H 1T1

Re: IESO Enabling Resources – April 21, 2021 Webinar

The Independent Electricity System Operator (IESO) hosted a webinar on April 21, 2021 on their Enabling Resources stakeholder engagement. The IESO has indicated that they are seeking feedback from participants on the analysis, prioritization and sequencing approach and outcomes, the engagement plan objectives, and additional stakeholder inputs and considerations.

Hydro One recommends that the IESO engage with transmitters and distributors, including Hydro One, to ensure that time is allotted to understand the technical requirements to enable resources and develop foundational frameworks that are required to enable the efficient operation of newly enabled resources (i.e. a robust interoperability framework). Please find our detailed comments below.

Hydro One appreciates the opportunity to provide feedback and the IESO's consideration of its comments.

Sincerely,

A handwritten signature in cursive script that reads "Frank D'Andrea".

Frank D'Andrea

Feedback Form

Enabling Resources – April 21, 2021

Feedback Provided by:

Name: Frank D'Andrea

Title: Vice President, Reliability Standards and Chief Regulatory Officer

Organization: Hydro One Inc.

Email: [REDACTED]

Date: May 12, 2021

General Comments/Feedback

Hydro One appreciates the opportunity to provide comments. Enabling a wider variety of resources to participate in the IESO markets or provide market services requires greater coordination between the IESO and LDCs.

In its presentation, the IESO identifies that enhanced participation of DERs requires development and implementation of a Transmission-Distribution interoperability framework, which represents a significant undertaking. The IESO and LDCs have been working towards such a framework through the Grid-LDC Interoperability Standing Committee and the completion of this work is a necessary building block to enabling distribution-connected resources to participate in the market. Hydro One recommends that the IESO's Enabling Resources work plan ensures that sufficient time is afforded for this foundational work so that the necessary functionalities are in place to enable success.

In addition, Hydro One recommends that the IESO work with OEB staff, transmitters and distributors as they develop the enablement framework for each resource type to understand and plan for technical requirements to allow these facilities to operate to support market and system needs while protecting the operating integratory of the transmission and distribution system. Additional factors can affect proponent's experiences, including the type of connection assessments required and any updates to connection agreements for modified facilities as well as the types of charges and rates that proponents would be subject to.