

# Feedback Form

## Enabling Resources Program (ERP) – Distributed Energy Resources (DER) Integration Project

Meeting Date: April 22, 2026

### Feedback Provided by:

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Following the **April 22, 2026**, engagement session, the Independent Electricity System Operator (IESO) is seeking feedback on the items discussed during the webinar. The presentation and recording can be accessed from the engagement web page.

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by **May 6, 2026**.** If you wish to provide confidential feedback, please submit it as a separate document, marked "**Confidential**." Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

## ERP's DER Integration Project

Please provide any feedback or comments on the updates provided for the DER Project, including:

Topic	Feedback
DER Project Overview	<p>EDA members are broadly supportive of enabling greater DER participation in the wholesale market. However, <b>there is a need for greater clarity on the problem statement, scope, and intended outcomes of this initiative.</b></p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• EDA requests that the IESO clearly articulate:               <ul style="list-style-type: none"> <li>○ What specific system or market problems this initiative is intended to solve</li> <li>○ What capabilities are currently missing (e.g., visibility of DERs, dispatchability, participation in procurements)</li> <li>○ What success looks like in both the near and long term</li> </ul> </li> </ul> <p>Without this clarity, there is a risk that discussions become overly broad rather than focused on actionable outcomes.</p> <p>There is also a strong need to define the scope boundaries of this work:</p> <ul style="list-style-type: none"> <li>• Which DER types, market services, and participation models are in scope</li> <li>• How this initiative interfaces with existing efforts (e.g., prior TDWG work, ongoing procurements and eDSM, etc.)</li> </ul> <p>EDA emphasizes that DER coordination cannot be viewed solely through the lens of the wholesale market. A narrow focus risks overlooking:</p> <ul style="list-style-type: none"> <li>• Distribution system constraints and operational requirements</li> <li>• The value of local flexibility and non-wires solutions</li> <li>• Existing regulatory obligations under the OEB</li> </ul> <p>A clearly defined "<b>north star</b>" is needed to guide decision-making and avoid fragmented or duplicative efforts.</p>
DER Data Sharing Plan	<p>EDA recognizes that data sharing is foundational to any form of DER coordination and emphasizes the need for two-way coordination on DER integration between IESO and LDCs.</p> <p>Key feedback includes:</p> <ul style="list-style-type: none"> <li>• Greater clarity is required on:               <ul style="list-style-type: none"> <li>○ What data the IESO requires, and for which specific purposes</li> <li>○ What data gaps currently exist from the IESO's perspective</li> </ul> </li> </ul>

- How that data will be used across operational, market, and planning functions
- Data sharing must be considered across distinct coordination layers, for example:
  - Operational coordination (e.g., real-time visibility, dispatch feasibility)
  - Market coordination (e.g., participation, scheduling, settlement interactions)
  - Economic coordination (e.g., enabling value stacking)
- There is a need to define:
  - Roles and responsibilities for data provision, validation, and use
  - Appropriate governance and data-sharing frameworks, including privacy, cybersecurity, and commercial considerations

Overall, **EDA supports a pragmatic approach to data sharing with LDCs, but stresses that data requirements must be clearly tied to defined use cases and outcomes desired.**

IESO's DER  
Technical Sessions

**EDA appreciates the opportunity to participate in technical discussions and views these sessions as valuable for building alignment.**

To ensure these sessions are as productive as possible, we recommend:

- Anchoring the discussion with a clearly defined problem statement and use cases, rather than exploratory discussions without clear direction
- Clearly identifying where input is being sought vs. where decisions have already been made
- Leveraging prior work (e.g., through earlier working groups such as TDWG)
- Clearly explaining how input from technical sessions will be used
- Providing feedback loops to demonstrate how stakeholder input is influencing outcomes

EDA looks forward to being a constructive participant at these sessions.

### General Comments/Feedback

EDA remain committed to working in a constructive and collaborative partnership with the IESO and our member LDCs to advance DER integration in a manner that supports both wholesale market objectives and the safe, reliable operation of the distribution system.

From the LDC perspective, there is an important underlying problem that would benefit from clearer recognition and framing within this initiative. LDCs are required, under OEB policy, to consider Non-Wires Solutions in distribution system planning and investment decisions. At the same time, the IESO is actively contracting with DERs through both market mechanisms and programmatic channels, including existing contracts and newer initiatives such as Peak Perks, HVAC DR, and LGP. These resources are increasingly being dispatched or influenced by the IESO, in some cases outside of traditional market signals.

This situation creates a coordination challenge. LDCs do not consistently have visibility into when and how DERs connected to their systems are dispatched or activated by the IESO. At the same time, the IESO lacks full visibility into distribution system conditions or local operational constraints. As a result, there is a growing need for two-way coordination to ensure that DER participation in IESO programs and markets does not create unintended impacts on the distribution system, and that distribution system needs and constraints are appropriately reflected in DER dispatch and participation.

**In this context, LDCs also see value in continued alignment across related initiatives, including IESO procurements and DER programs, as well as OEB policy frameworks. Ensuring coherence across these areas will help avoid fragmented signals to DER providers and support more efficient integration overall.**

EDA appreciates the opportunity to contribute to this work and values the ability to participate directly in technical sessions. We look forward to continuing to work collaboratively with the IESO as this initiative progresses, and we would welcome the opportunity to serve as a sounding board for emerging ideas and approaches.

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