

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 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>ESC appreciates the continued evolution of the DER Integration Project and the IESO's efforts to advance a functional, non prescriptive framework that can operate across multiple future DSO models. The shift toward defining what data and coordination are required, rather than who must perform each function, is a constructive approach that preserves flexibility as the OEB's DSO Roadmap progresses. ESC supports the IESO's focus on near term implementation using existing tools, but encourages the IESO to ensure that interim design choices do not inadvertently constrain future DER participation models. In particular, ESC recommends that the DER participation framework explicitly accommodate behind-the-meter (BTM) storage of all sizes, including larger commercial and industrial systems. Multi-MW BTM storage projects are already being developed across the province, and their capabilities and potential contributions should be appropriately reflected in the participation model rather than excluded from scope. As DER penetration increases, the participation model must be capable of supporting value stacking, including wholesale market participation, local flexibility services, and non wires solutions. ESC encourages the IESO to continue clarifying how the DER participation model will interface with other IESO procurements and programs to avoid conflicting requirements or duplicative processes.</p>

Topic	Feedback
DER Data Sharing Plan	<p>ESC supports the IESO’s prioritization of data sharing for operational reliability and planning visibility. The IESO is prioritizing three categories of data: static planning data, bi-directional operational visibility, and shared operational coordination protocols, ESC agrees these are foundational. However, ESC recommends that the IESO: (1) Right size data requirements to avoid imposing unnecessary administrative or cost burdens on LDCs and DER providers. (2) Standardize data formats and exchange mechanisms to avoid bespoke bilateral arrangements that slow registration and increase uncertainty. (3) Clarify the scope and granularity of data required for DER/A participation, including update frequency, materiality thresholds, and retention policies. (4) Ensure that data sharing requirements do not become a barrier to participation for smaller DERs or aggregated portfolios. ESC also encourages the IESO to explicitly consider how data sharing requirements will evolve as the OEB’s DSO capabilities work advances. The DER Integration Project should remain aligned with the OEB’s regulatory direction to avoid conflicting expectations for LDCs and DER providers.</p>

Topic	Feedback
IESO's DER Technical Sessions	<p>ESC strongly supports the IESO's plan to hold targeted technical sessions and encourages the following topics to be prioritized early: (1) Wholesale metering and telemetry alternatives for small DER contributors. ESC appreciates that the IESO has acknowledged stakeholder interest in options such as inverter-based metering and LDC revenue meters. Practical, cost-effective metering solutions are essential for enabling aggregation of smaller BTM storage, EV chargers, and flexible loads. (2) Operational coordination across the transmission–distribution interface. ESC supports the IESO's intent to develop functional coordination protocols, but recommends that the IESO provide more clarity on how conflicting operational signals will be resolved in real time. Some projects have encountered challenges under LT2 deliverability assessments, influenced in part by gaps in alignment between LDCs and the IESO. ESC encourages the IESO to explore mechanisms for conditional approvals or operational constraints rather than outright project failures. (3) Value stacking and settlement considerations. ESC supports the IESO's commitment to enabling DERs to participate in both the IESO-Administered Markets and local programs. Technical sessions should clarify how settlement, performance measurement, and revenue allocation will work for DERs participating in multiple programs simultaneously. (4) Aggregator enablement and contributor eligibility. ESC recommends that the IESO explicitly address how third-party aggregators will be enabled to participate, including the treatment of BTM storage of any size. Aggregators play a critical role in mobilizing private capital, developing customer pipelines, and enabling participation for customers who cannot self-finance DERs.</p>

General Comments/Feedback

ESC appreciates the IESO's thoughtful response to stakeholder feedback and the clear commitment to transparency, alignment with the OEB, and iterative design. As the DER Integration Project moves into its design phase, ESC offers the following overarching recommendations:

- Ensure the participation model accommodates BTM storage of all sizes, including large industrial systems. These resources represent a significant portion of Ontario's emerging DER pipeline and should not be excluded from the participation framework.
- Enable third-party aggregators to participate fully in the DER/A model. Aggregators bring private capital, customer acquisition capabilities, and operational expertise that can accelerate DER deployment and reduce ratepayer costs.
- Maintain alignment with the OEB's DSO Roadmap to avoid duplicative or conflicting requirements for LDCs and DER providers.
- Clarify the Market Coordinator function and how responsibilities will be allocated across different TD coordination models. This will be essential for risk allocation and operational predictability.
- Prioritize practical, standardized data sharing mechanisms that minimize administrative burden and reflect the varying readiness levels of LDCs.
- Provide clear implementation timelines and sequencing, enabling DER providers to plan investments, customer acquisition, and technology deployments with confidence.

ESC looks forward to continued collaboration with the IESO, LDCs, and sector partners as Ontario advances toward a more flexible, distributed, and reliable electricity system.