Feedback Form

Enabling Resources Program (ERP) – Distributed Energy Resources (DER) Integration Project – Data Sharing Design

Meeting Date: October 16, 2026

Feedback Provided by:

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Following the **October 16, 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 **October 30, 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 your feedback and comments on the information presented this engagement which included the following topic areas:

LDC-to-IESO Operational Visibility

Topic	Feedback

How does having an activation materiality threshold in "MW" or "% loading of transformer station" affect the effort on the LDC end to provide this information? **Why is the IESO asking:** To inform how IESO should stipulate the Materiality threshold	Alectra believes that establishing materiality thresholds based exclusively on transmission-oriented metrics such as MW or percentage loading at a transformer station may not adequately reflect distribution system realities. While such thresholds may be appropriate from a bulk-system planning and operational perspective, distribution system impacts often arise at significantly more granular levels, including individual feeders, feeder sections, voltage regulation equipment, distribution transformers, and localized areas experiencing congestion or reliability concerns. From an LDC perspective, providing information against MW-based or transformer station thresholds may be technically achievable; however, doing so does not necessarily identify situations where a DER activation creates meaningful operational impacts on the distribution network. As a result, the effort associated with providing such information may be less significant than ensuring the information accurately reflects actual distribution system constraints. Alectra notes that the proposed materiality trigger of 15 MW or 10% of transformer station loading may not adequately capture circumstances where DER activations create significant localized impacts on the distribution system. Distribution system constraints frequently emerge at levels well below these thresholds and may be associated with specific feeders, feeder sections, voltage regulation equipment, or localized areas experiencing congestion. Alectra recommends that materiality assessments incorporate both transmission-

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	level and distribution-level considerations. The framework should provide flexibility for distributors to identify circumstances where a DER activation may be operationally significant, even if bulk-system thresholds are not exceeded.

Based on LDC capabilities today, are LDCs able to provide the following proposed distribution equipment information for DER assets participating in local NWS programs, when the NWS has a material impact on the IESO-controlled grid (ICG): • feeder name • bus name • station name For aggregated information: • Resource type • Capacity (MW) • Location (substation / TDI) If LDCs do not have the capability to provide any part of this information, please specify which information is unable to be provided, and what investment (e.g. tool upgrade, etc.) would be required to enable the LDC to provide this information. **Why is the IESO asking:** To better understand current LDC capabilities.	Alectra generally has the capability to provide feeder, bus, and station information for DER assets participating in local Non-Wires Solutions (NWS) programs. However, the availability, consistency, and quality of this information may vary depending on system configuration, data management practices, and the specific characteristics of individual DER programs. For aggregated information such as: • Resource type • Capacity (MW) • Location (Substation/TDI) Alectra believes this information can generally be provided for many programs and use cases. However, implementation details remain important. If reporting requirements evolve toward increasingly granular operational and locational visibility, additional investments may be required to support data integration, aggregation functionality, real-time monitoring capabilities, and system interfaces between market platforms and utility operational systems. The IESO should recognize that the ability to provide information today should not be interpreted as support for expanded ongoing reporting obligations without consideration of implementation costs, operational complexity, and cost recovery mechanisms. Furthermore, information requirements should be standardized across the province to avoid the creation of multiple utility-specific

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	processes, interfaces, and reporting methodologies.

In order for LDCs to maintain TDI applicability for local NWS programs, is there any information that LDCs require from the IESO? **Why is the IESO asking:** To better understand how to support LDCs and maintain TDI applicability.	Yes. To effectively maintain reliability and operability across Transmission Distribution Interfaces (TDIs), LDCs require more than activation notifications. Distributors require timely, actionable, and ongoing operational information that supports both planning and real-time decision-making. Information requirements include: • Day-ahead and real-time visibility into DER schedules. • Expected resource availability. • Dispatch instructions impacting local DERs. • Resource activation status. • Changes to operating conditions that could affect distribution system operations. • Forecasted utilization of DER resources. • Information regarding distribution-connected resources participating in multiple markets or services. • Dynamic operating limits affecting participating DERs. • Notification of significant changes to the composition of DER aggregations operating within a TDI where those changes may alter distribution system impacts despite no change in aggregate market capacity. Access to a website or dashboard can support situational awareness but is not a substitute for operational coordination. Information must be delivered through mechanisms that support active operational decision-making

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	and allow distributors to proactively assess reliability impacts before issues emerge. Alectra believes information exchanges should support a common operational picture for both the IESO and LDCs rather than providing only partial visibility to either party.

Initial plan for the notification mechanism is to utilize phone calls to the IESO control room and use of the IESO's CROW tool. Do stakeholders have any feedback on this approach? **Why is the IESO asking:** To better coordinate operational visibility by the stakeholders	Alectra recognizes that phone calls and CROW may provide a practical interim solution. However, they should not be viewed as a long-term coordination framework for DER integration at scale. The proposed approach introduces a significant asymmetry in communications requirements. The ERP framework expects distributors to provide structured and proactive notifications through CROW and direct communications with the IESO Control Room. Conversely, distributors appear expected to obtain much of the corresponding operational information through a website or targeted notifications. As DER participation grows, this approach will become increasingly difficult to scale and will create operational inefficiencies for both the IESO and LDCs. Alectra recommends the development of an automated, bidirectional operational communications framework that supports: • Real-time and day-ahead information exchange. • Distribution operating restrictions. • Resource availability updates. • Dispatch acknowledgements. • Emergency operational interventions. • Confirmation of actions taken. • Conflict resolution between transmission and distribution requirements. Direct control-room-to-control-room coordination was a key outcome of previous

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	TDWG discussions and remains essential for long-term success.

Static Data Sharing – Transmission-Distribution Interface (TDI)

Topic	Feedback

What distribution-level criteria should the IESO take into consideration when identifying a TDI? **Why is the IESO asking:** To ensure effective integration of the TDI Framework	TDI identification should consider a broad range of distribution system factors and not be limited solely to transmission system impacts. Relevant factors include: • Feeder loading constraints. • Transformer loading limitations. • Voltage regulation requirements. • Protection coordination considerations. • Planned outages and switching configurations. • DER concentration levels. • Available hosting capacity. • Local system reliability risks. • Operational flexibility requirements. • Geographic concentration of DER resources. In addition, the IESO should recognize that resources connected under the same TDI may have significantly different operational impacts depending on their location within the distribution system. As a result, TDI-level visibility alone may not always provide sufficient understanding of local system constraints. The framework should also recognize that aggregators may modify the mix of individual DER resources participating within a TDI over time while maintaining the same aggregate capacity. Although the TDI assignment and aggregate MW contribution may remain unchanged, the selection of different resources within the same TDI could materially alter feeder loading patterns, voltage impacts, operational constraints, and hosting capacity considerations. Consequently, reliance solely on TDI-level thresholds may not provide sufficient assurance that

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	distribution system impacts remain unchanged. The coordination framework should therefore support the ability to consider contributor-level information and dynamic operating conditions where necessary.
Are there any challenges that LDCs foresee facing when recommending the initial TDI assignment? **Why is the IESO asking:** To understand LDC capabilities in supporting the development of TDIs	Several challenges may arise. First, TDIs may not accurately reflect localized distribution constraints that exist downstream of the station interface. Consequently, a TDI designation that appears appropriate from a transmission perspective may not adequately represent operational realities within the distribution network. Second, DER portfolios are likely to evolve over time. Changes in resource mix, penetration levels, network configuration, and local flexibility market participation may alter the suitability of initial TDI assignments. Third, insufficient coordination between wholesale and local market frameworks could create conflicting obligations for participating DERs and complicate the process of maintaining accurate TDI designations. To address these challenges, the framework should support periodic reassessment and modification of TDI assignments as operational conditions change.

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Is there any static data does the LDC may need from the IESO to help support distribution system reliability and operability across the TDI? **Why is the IESO asking:** To ensure effective integration of the TDI Framework	Yes. To support planning, operations, and coordination activities, distributors would benefit from access to certain static information including: • Resource registration information. • Resource characteristics and capabilities. • TDI assignment methodology. • Market participation status. • Aggregation structures. • Resource service commitments. • Operating constraints relevant to market participation. • Points of interconnection and relevant locational information. • Contact and coordination information. Access to standardized information will improve situational awareness, support operational planning, and reduce the need for manual information gathering activities. The information requirements should be developed collaboratively with distributors to ensure that information exchanges address distribution operational needs, rather than focusing solely on bulk system requirements.

General Comments/Feedback

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Introduction

Alectra supports the IESO's objective of enabling broader Distributed Energy Resource (DER) participation in Ontario's wholesale electricity markets. Increased DER integration can provide significant value to customers, improve system efficiency, and support Ontario's evolving energy transition objectives. We appreciate the extensive work undertaken by the IESO to advance the Expedited Resource Program (ERP) and acknowledge the efforts to engage distributors and other stakeholders throughout the process.

However, Alectra believes the success of DER integration will depend on establishing a robust, scalable, and collaborative coordination framework between the IESO and Local Distribution Companies (LDCs). While the proposed ERP framework contains several positive elements, we remain concerned that the current design does not sufficiently build upon the significant technical and collaborative work previously completed through the Transmission-Distribution Working Group (TDWG), may inadvertently predetermine outcomes currently under consideration through the Ontario Energy Board's (OEB) Distribution System Operator (DSO) consultation, and does not yet provide LDCs with the operational authority and coordination mechanisms necessary to maintain distribution system reliability.

The following comments are intended to be constructive and collaborative and are provided in the spirit of helping establish a durable, efficient, and scalable framework that supports both wholesale market participation and distribution system reliability.

Build Upon the Existing TDWG Foundation

Alectra is concerned that the current ERP proposal does not sufficiently demonstrate how previous TDWG deliverables have been incorporated into the proposed design.

The TDWG represented several years of collaboration involving the IESO, LDCs, aggregators, and other stakeholders. Significant effort was invested to establish common operational principles, technical requirements, coordination processes, and a shared vision for DER integration.

The sector should leverage this work rather than creating parallel coordination approaches that may ultimately require additional redesign and investment.

Alectra encourages the IESO to clearly identify which TDWG recommendations are being adopted, modified, or deferred and to re-establish a collaborative technical working process with distributors to advance implementation.

Maintain DSO Model Neutrality

A key principle established through TDWG was the importance of creating a coordination framework that remains effective regardless of the DSO model ultimately adopted in Ontario.

Alectra remains concerned that the current ERP approach effectively embeds a particular allocation of responsibilities between market participants, distributors, aggregators, and the IESO while the OEB's DSO consultation remains ongoing. The proposed coordination arrangements appear to place primary responsibility on aggregators to coordinate between wholesale market participation and distribution system requirements, effectively establishing an aggregator-led coordination framework. While this may ultimately prove to be an appropriate model, it closely resembles a Dual Participation construct and risks prejudging outcomes currently under consideration through the OEB's DSO consultation process.

Implementing coordination arrangements that effectively operationalize a Dual Participation model in advance of the OEB process could create path dependency and necessitate costly redesign if an alternative coordination framework is ultimately adopted. Accordingly, the ERP framework should remain sufficiently flexible to accommodate a range of potential DSO models and future policy outcomes.

The coordination architecture should therefore remain flexible and model-neutral, allowing future policy and regulatory decisions to be accommodated without requiring significant redesign of systems, interfaces, or operating procedures.

Leverage the Emerging Local Flexibility Market Coordination Platform

The Local Flexibility Market (LFM) initiative being advanced by Alectra, Hydro One, Toronto Hydro, and Hydro Ottawa is already developing coordination capabilities aligned with many of the principles established through TDWG.

This platform is intended to support functions such as:

- DER registration.
- Availability management.
- Scheduling.
- Dispatch coordination.
- Service stacking.
- Operational visibility.
- Coordination between wholesale and local market activities.

Alectra believes the IESO should actively engage with LFM participants and evaluate how the common coordination platform currently being developed by Alectra, Hydro One, Toronto Hydro, and

Hydro Ottawa could be leveraged as a foundational coordination mechanism for ERP implementation. Many of the capabilities required to support wholesale and local market participation, including DER registration, availability management, scheduling, dispatch coordination, operational visibility, and service stacking, are already being incorporated into the platform design. Rather than simply pursuing interoperability between multiple coordination solutions, the sector should seek to leverage a common coordination platform wherever practical in order to reduce duplication, improve standardization, lower implementation costs, and accelerate implementation timelines.

Establish Clear Operational Authority for Distribution Reliability

Alectra continues to have significant concerns regarding the dispatch and activation of distribution-connected resources without a clearly defined mechanism for distributors to manage impacts on their networks.

While the IESO may not directly operate distribution infrastructure, dispatch instructions and resource activations can materially affect feeder loading, voltage profiles, transformer utilization, and overall distribution reliability.

Accordingly, distributors must have clearly defined authority to:

- Communicate operating limits.
- Restrict resource operation when necessary.
- Override dispatch in emergency circumstances.
- Trigger curtailment actions where reliability is threatened.
- Resolve conflicts between transmission and distribution requirements.

The framework should also clearly establish the processes through which distributors exercise this authority. This includes defining how operating limits will be communicated, the timelines within which aggregators and DER operators must respond to distributor instructions, the treatment of conflicting transmission and distribution operating directives, and the escalation protocols applicable during emergency operating conditions.

The framework should further clarify accountability and liability where a resource fails to comply with distributor-imposed operating limits or where market dispatches contribute to distribution reliability concerns. Responsibility for maintaining distribution system reliability must be supported by corresponding authority, response obligations, and clearly defined operational procedures.

Responsibility for maintaining distribution reliability must be accompanied by corresponding operational authority and coordination capabilities.

Move Beyond Visibility to True Operational Coordination

Visibility of resource activity is valuable, but it is not equivalent to operational coordination.

A successful DER integration framework should support proactive coordination by providing distributors with sufficient information and lead time to assess impacts, optimize their systems, and avoid unnecessary restrictions.

Without these capabilities, distributors may be forced into reactive interventions that reduce DER utilization and diminish the value of market participation. The objective should be a coordinated framework in which both the IESO and distributors have the information, tools, and authority necessary to optimize outcomes for customers and the broader electricity system.

Conclusion

Alectra strongly supports the continued integration of DERs into Ontario's wholesale electricity market and appreciates the IESO's efforts to advance this important initiative. To maximize the long-term success of ERP, we encourage the IESO to build upon the substantial foundation established through TDWG, maintain neutrality with respect to future DSO models, leverage emerging coordination capabilities being developed through the Local Flexibility Market, and establish a comprehensive bidirectional coordination framework that provides distributors with the visibility, authority, and operational tools necessary to maintain distribution system reliability.

A collaborative, scalable, and technology-enabled coordination model will ultimately provide the greatest benefit to electricity customers while supporting the efficient participation of DERs across both wholesale and local electricity markets.