Feedback Form

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

Meeting Date: October 16, 2026

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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

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	A fixed MW threshold is simpler for LDCs to apply, particularly through manual processes. A threshold based on a percentage of station peak requires each LDC to know the annual peak of stations it may share with other distributors or that are owned by a transmitter. The EDA recommends that the IESO publish, for each load-serving station and multi-station transmission-distribution interface (TDI), the MW value that triggers notification (the greater of 15 MW or 10% of annual peak), updated annually. LDCs would then compare their NWS activity against a single MW figure. The EDA considers the thresholds for LDCs to notify the IESO of NWS-related activations reasonable at this time. Please also clarify how notification works where several LDCs share a station or TDI and their combined NWS activity exceeds the threshold while each individual LDC's activation does not.
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:	Members with NWS programs indicate they can generally provide station, bus and feeder information for participating DERs, along with aggregated resource type, capacity and location, based on the normal (designed) system configuration. Mapping to the real-time switched configuration is less mature; some LDCs are working toward it, but it typically requires

• 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.	integration of GIS, outage management or ADMS tools. Capabilities vary across LDCs, and no single timeline applies. The required tools are typically planned and funded through each LDC's Distribution System Plan, which the OEB reviews as part of a five-year rate cycle. For most LDCs, real-time mapping is therefore a medium-term capability tied to a future rate application, although LDCs with planned NWS initiatives are likely to develop it sooner. Two practical points: • **Resource type for mixed aggregations.** Where an NWS procures flexibility from a mix of generation, storage and demand response, the aggregation will not have a single resource type. The IESO should allow a "mixed" type or a breakdown by type. • **Purpose of each field.** The IESO should explain how each field will be used, so LDCs can confirm the requirement is proportionate. Real-time configuration should not be required until automated tools are in place. The EDA recommends these requirements be finalized through a joint technical working group.
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. LDCs need: • TDI definitions and unique identifiers, mapped to stations, buses and associated LDCs, and notice of any changes. • Contributor-level information for IESO-dispatched and IESO-activated DERs in the LDC's territory: civic or premise address, connection point, resource type, capacity, program and commitment period, together with dispatch and activation data. This is needed to map

	resources to TDIs accurately and to protect distribution reliability. TDIs may reasonably be defined broadly to support aggregation, but that should not limit the granularity of information available to LDCs (e.g., IESO-to-LDC). A local need at a specific station or feeder may involve only some contributors within a TDI, so LDCs need contributor-level visibility to identify which resources can provide a local service.
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	The EDA understands the logic of starting with existing tools; Control Room Operating Window (CROW) is already used by many LDCs for outages and info slips. However, manual phone calls and CROW entries are burdensome and will not scale as DER activity grows. • **Plan to automate.** The IESO should commit to a transition plan, with timelines, to automated, two-way, system-to-system exchange. LDCs are already developing and testing a shared platform that could support this. LDCs and the IESO should jointly lead tool development and training building on tools that are already under development. • **Reciprocity.** The design asks LDCs to push structured notices to the IESO control room by set deadlines, while much of the IESO's information for LDCs will be posted on a webpage. A webpage improves awareness, but it is not a substitute for direct communication with LDC control rooms. Notifications should be direct and reciprocal, with acknowledgements. • **Process details.** Please confirm that LDCs can update or withdraw info slips when activations change or are cancelled; whether the IESO will acknowledge

	receipt; how info slip data is used in IESO forecasts and schedules; and how LDCs that do not currently use CROW will be given access and training.

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 boundaries should be decided jointly by the IESO and each affected LDC. The EDA recommends a technical working group to develop the criteria. Relevant distribution-level criteria include: • **Station ownership and supply arrangements.** Stations may be owned by an LDC or a transmitter, or shared, and feeders from one station bus may serve several LDCs. Transformer stations that solely supply an LDC station may warrant specific treatment. • **Normal and alternate supply.** Load transfer capability between stations, and the normal upstream and downstream connectivity, based on electrical connection rather than geography. • **Embedded distributors.** How embedded distributors are reflected in TDIs, and how coordination with host distributors will work. • **Operational visibility.** Whether the LDC has metering or SCADA visibility at the relevant level. TDIs should be as broad as reasonably practicable while preserving contributor-level granularity for local NWS needs (see our response on TDI applicability above).

Topic	Feedback
	Governance. Please confirm whether TDIs will be defined in the market rules or the market manuals, and how disputes and periodic re-assessments will be handled. Examples of less obvious TDIs (multi-station, shared stations, embedded distributors) would help LDCs understand the framework.
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	Yes. The main challenges are: • **Changing configuration.** Switching, planned outages and load transfers change which TDI a resource is electrically connected through. A clear change-management process is needed, including when assignments must be updated and how temporary changes are communicated. • **Designed versus real-time state.** Many LDCs can map each DER to a TDI based on the system's normal configuration, as recorded in their mapping systems. Most cannot yet track, in real time, when switching, outages or load transfers temporarily move a DER to a different station or TDI. Initial TDI assignments should therefore be based on the normal configuration, with temporary changes handled through the change-management process noted above. • **Shared stations and embedded distributors.** It is unclear which LDC recommends the assignment where stations or feeders are shared, or where an embedded distributor is involved.
Is there any static data does the LDC may need from the IESO to help support distribution system reliability and operability across the TDI?	Yes. Subject to appropriate confidentiality and access arrangements, the EDA recommends the IESO provide:

Topic	Feedback
Why is the IESO asking: To ensure effective integration of the TDI Framework	• TDI definitions, identifiers and mappings, and the MW notification threshold for each station and TDI. • A register of IESO-contracted, program-enrolled and market-participating DERs and DERAs electrically connected within each LDC's territory, with contributor-level detail: resource identifier, responsible aggregator or market participant, civic address and connection point, technology, nameplate and registered capacity, import and export capability, program enrolment, enrolled capacity and commitment period. • Bulk system limits, transfer capacities and known constraints (thermal, voltage, stability) at each TDI. • Advance notice of planned transmission and station outages that affect a TDI. • IESO load and generation forecasts at transmission nodes, to support distribution planning and NWS alignment. The IESO and LDCs should agree on the required data, update frequency and format through the technical working group.

General Comments/Feedback

The EDA appreciates the IESO's changes in response to LDC feedback, in particular contributor-level notifications for Virtual HDR resources, the commitment to map DERs to TDIs, and the DER Activity webpage. Timelines and implementation details will be important.

The EDA also wishes to highlight several overarching concerns.

First, the IESO's proposed aggregator-led coordination arrangements **effectively default to a Dual Participation model,** while, through the TDWG, the IESO did not explicitly favour Dual Participation over the Total DSO or Market Facilitator model. Moreover, we wish to point out that the OEB's DSO consultation remains underway. **Defaulting to a Dual Participation model risks predetermining regulatory outcomes and creating unnecessary future costs.**

Second, the IESO should recognize the approximately three years of significant collective technical effort and investment through the TDWG, which established common coordination principles, functional requirements and operational protocols, and should **build on these outcomes rather than duplicate that work**.

Third, **the EDA advocates for a single, standardized, model-neutral coordination architecture integrated with IESO systems**, leveraging the coordination capabilities already being developed through Local Flexibility Markets rather than establishing parallel arrangements.

Fourth, the design should draw a clearer distinction between an LDC requesting operational support and an LDC having enforceable authority to manage distribution constraints, restrict or override dispatch, and maintain system reliability.

Fifth, operational coordination must address the asymmetry between IESO and LDC information-sharing obligations, recognize that visibility is not the same as coordination, and acknowledge that transmission-level materiality thresholds do not adequately reflect distribution constraints.

Finally, **without these changes, the sector risks duplicating systems, interfaces and investments, particularly if it subsequently adopts a different DSO operating model.**

The EDA offers the following additional comments.

IESO-to-LDC operational visibility

- **Design status.** The IESO-to-LDC design is presented as final. Please explain the process for determining when a design is final and how later feedback will be considered.
- **Definitions.** Please define "relevant" DER operational information (slide 19). Please also confirm that "system-activated" means an out-of-market activation where the resource does not submit offers, and "dispatched" means a resource that submits offers and is dispatched when it clears the market.
- **Market-dispatched resources.** The notification framework covers system-activated resources only. LDCs need comparable visibility of market-dispatched DERs and DERAs on their systems. Please confirm when the TD Coordination design will provide this, and confirm that existing Virtual HDR activation notices will continue.
- **Host LDCs.** Please confirm whether "host LDC" includes embedded distributors as well as directly connected LDCs.
- **Minimum information.** IESO-to-LDC visibility should include, at a minimum: dispatch or activation status, dispatched MW, timing and duration, program, available capacity (MW and, where relevant, MWh) and telemetry where available. Information on resource performance after activation would also be useful, recognizing this may be difficult in real time. These lists reflect LDCs' current understanding and are not exhaustive. Data requirements should be developed jointly, be fit for purpose, and be revisited as needs become clearer.

Coordination principles

- **Distribution reliability.** During emergencies and outages, LDC operational actions must take precedence over market dispatch and activation signals. For planned outages, the process for coordinating conflicting instructions and schedules must be developed jointly with LDCs (for

example, through the technical working group recommended below), consistent with this principle. LDCs plan and carry out outages on their own systems and are best placed to identify where conflicts will arise.

- **Build on the TDWG and align with the OEB.** As noted in our Market Integration submission, the data sharing design should build on the TDWG coordination protocols and remain neutral to the outcome of the OEB's DSO consultation. Slide 33 states that the TDI framework facilitates future DSO functionality; please clarify what functionality is meant.
- **Technical working group.** Several questions in this engagement (TDI criteria, data requirements, notification tools) need detailed technical work. The EDA recommends a joint IESO-LDC technical working group, including transmitters and embedded distributors, and would be pleased to help organize member participation.