Feedback Form

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

Meeting Date: October 16, 2026

Feedback Provided by:

Name: Jacob Godfrey

Title: Corporate Planner

Organization: PowerShare

Email: [redacted]

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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	A fixed MW threshold would be straightforward to apply through manual processes in NWS programs. A threshold based on a percentage of station peak load would require additional validation or some automation, but the incremental effort should be manageable at the minimum viable product stage.
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.	Yes, PowerShare believes that LDCs should generally be able to provide the requested information. One consideration is the treatment of resource type for aggregated resources. For example, where a local energy market or NWS program procures flexibility from a mix of generation, storage and demand response resources, an aggregation exceeding the materiality threshold may not have a single resource type. More broadly, PowerShare would encourage the IESO to consider whether this information exchange could support a richer set of distribution-system attributes over time. While the proposed information provides a reasonable starting point for operational visibility, the framework could also create an opportunity to progressively improve transmission-distribution coordination and enable more sophisticated coordination of DERs and local flexibility as participation grows.

Topic	Feedback
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.	PowerShare supports defining TDIs as flexibly and broadly as reasonably practicable, while respecting system boundaries and operational constraints. TDIs should encompass the largest reasonable downstream area, allowing LDCs to support aggregation opportunities across the widest feasible territory. Unnecessarily narrow boundaries, such as a single TS where a broader TDI would be operationally appropriate, could unduly restrict the pool of potential participants. Broader TDI boundaries should not, however, limit the granularity available to LDCs for local NWS programs. A localized need at a specific TS or feeder may call for an NWS from individual DER contributors or a subset of a DERA, rather than from the aggregation as a whole. LDCs therefore need contributor-level visibility to identify which DERs are located within the relevant area and can provide the required service. This would preserve the scale of broader aggregations while enabling targeted participation in localized NWS programs. It also provides an additional rationale for Distribution Level Settlement (DLS) for distribution-connected generators; please refer to PowerShare's October 15th Market Integration feedback for further discussion.
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	

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	The concept of a TDI being an organizing level is well received. In general, TDIs should be defined as broadly as reasonably practicable, while remaining operationally meaningful to the system. Broader TDIs would provide aggregators with a larger geographic and resource base from which to form aggregations. Defining TDIs too narrowly, such as at the level of an individual TS, could unnecessarily limit the pool of eligible resources and reduce the viability and diversity of potential aggregations. A further consideration is that TDI boundaries should respect an LDC's ability to address more localized NWS needs. While a DERA may participate as an aggregation across a broad TDI, an LDC may identify an NWS need at a specific TS or feeder that is relevant to only some of the DERs within that aggregation. The framework should therefore enable LDCs to identify and, where appropriate, distinguish individual DER contributors or subsets of a DERA that are capable of providing the required local service, rather than requiring the DERA to be treated as a single indivisible resource. This would allow TDIs to remain broad enough to support aggregation scale while preserving the granularity required for distribution-level NWS procurement and operation. Additionally, the TDI hierarchy in the October 16th presentation needs clarity of the position of the LDC: **Zone > TDI > LDC > TS > Feeder > DER** As presented, it reads like the LDC territory is a classifier for sub-TDI zones before transmission stations. This treatment would suggest that when multiple LDCs are present at a TS that there would be duplicate TS entries under each LDC present at that TS. For example, Essex Powerlines and Hydro One would each list Leamington TS as a child node. **Zone > TDI > TS > Feeder > DER** Another method is moving to a purely infrastructural definition of the hierarchy with assignments of LDCs to relevant nodes. LDC assignments could be made at the feeder level as the lowest hierarchy level with a

Topic	Feedback
	mandatory population, since it is possible for zero DER nodes to exist on a given feeder. DERs/DERAs would each be tagged with their LDC. This assignment structure will also be useful to ensure that notices/dispatches can be targeted to hierarchy level and cross-visible to assigned parties. For example, if EPL activated a material quantity of NWS flexibility it could post a notice to the TS which can get routed to the IESO at the TDI and other distributors at the TS. This structure could also serve as latent coordination between LDCs sharing a TDI. A future example being a day where the aggregated NWS activity at a TDI exceeds materiality thresholds but individually each LDC does not. There are additional benefits to having a single representation of a given TS or feeder in the T-D coordination framework.

Topic	Feedback
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	PowerShare believes initial TDI assignment should be a relatively straightforward exercise in grouping stations or zones according to their upstream and downstream electrical connectivity, rather than geographic proximity alone. These groupings should support the broadest reasonable aggregation territory while respecting system boundaries and operational constraints. The main clarification needed is how the IESO expects temporary load transfers or switching between TDIs, if possible, affect these assignments. If the initial requirement is limited to notifying the IESO of material NWS activity against the applicable TDI, this should be manageable through manual processes. As coordination develops, however, NWS dispatch and reporting will need to account for changes in electrical connectivity that affect a resource's TDI assignment. Clear expectations for when assignments must be updated and how temporary changes should be communicated would help LDCs support both initial implementation and future coordination.

Topic	Feedback
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. PowerShare would welcome a shared static reference dataset that supports LDC reliability assessments, local NWS planning and mutual T-D coordination. Relevant information would include: • TDI definitions and unique identifiers, with mappings to the applicable zones, stations and buses, associated LDCs, and the normal upstream/downstream connectivity used to establish each assignment. • A register of distribution-connected market resources and DERAs within each LDC's territory, including resource identifiers, the responsible aggregator or market participant, connection locations, and their assigned TDI. • Registered resource characteristics, including technology type, nameplate and registered capacity, and import/export capability. • Enrolment in Capacity Auction, demand response, DSM or other IESO-administered programs, where applicable, including the participating resource or site, enrolled capacity, commitment term and standing participation conditions. Resource- and site-level information should be shared with the relevant LDC under appropriate confidentiality and access arrangements. PowerShare sees this as an opportunity to establish a useful foundation for progressively richer, mutual T-D coordination rather than limiting the exchange to minimum reporting requirements.

General Comments/Feedback

Kindly refer to PowerShare's submission on the October 15th Market Integration presentation for additional context and discussion on T-D coordination.

About PowerShare

PowerShare Inc. is a growing collaboration of eleven Ontario local distribution companies working together to develop and operationalize Distribution System Operator (DSO) capabilities and Local Energy Markets (LEMs). Building on practical experience with distributed energy resource (DER) integration and local flexibility, PowerShare provides a shared-services model through which member utilities can develop common strategies, tools and operating approaches for DER coordination, local flexibility procurement and broader DSO readiness. By pooling expertise and creating scale across multiple service territories, PowerShare is intended to help LDCs remain central to an increasingly distributed electricity system while supporting customer participation, grid reliability, affordability and Ontario's growing electricity needs.