Feedback Form

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

Meeting Date: October 15, 2026

Feedback Provided by:

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Title: Chair

Organization: Ontario Rivers Alliance

Email: [redacted]

Date: 30 October 2026

Following the **October 15, 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:

Front-of-the-Meter DER/A Participation Model

Topic	Feedback
Do stakeholders have any questions or clarifications required on the DER/A requirements to participate in the IAM? **Why is the IESO asking:** To confirm a shared understanding and maintain consistency in messaging related to DER/A requirements.	The Ontario Rivers Alliance (ORA) has one request. The Independent Electricity System Operator (IESO) lists gas generators among the distributed energy resources in scope. ORA asks the IESO to report, as aggregations form, how much of their capacity is gas-fired and how much is renewable or storage (Recommendation 3, under General Comments).

Wholesale Market Settlements – Front of Meter DER/A

Topic	Feedback
Please provide feedback on the potential impacts of this approach, including any barriers, risks, or unintended consequences that could affect DER participation in wholesale markets under a DERA framework. Please provide examples, evidence, or supporting materials that address this trade-off, including how the proposed approach ensures fair treatment of DERs relative to directly connected resources; avoids inappropriate cost shifting or cost avoidance among participants; and maintains efficient market participation while minimizing unnecessary administrative and settlement burdens. **Why is the IESO asking:** The IESO's proposed participation model is technology-agnostic and enables multiple	One consequence needs a closer look. The IESO says that batteries inside an aggregation will not receive the exemptions storage can otherwise receive from some Global Adjustment costs and transmission charges. That may discourage batteries from joining aggregations. ORA asks the IESO to assess and publish this effect before the design is final (Recommendation 2, under General Comments).

Topic	Feedback
resource types to participate within a single aggregation. This is intended to lower barriers for smaller DERs and facilitate access to wholesale markets. While some technologies have provisions to exempt certain costs (e.g. energy storage may be exempt from certain GA costs/applicable transmission tariffs), DERA-connected resources will not be eligible for technology-specific exemptions as the IESO is taking a technology-agnostic approach. This pragmatic approach balances implementation and ratepayer value.	
Is there any feedback on the IESO's proposal to settle with the MP (aggregator) and not the individual DER contributors? **Why is the IESO asking:** To avoid compensating a DERA twice for the same service, the IESO will act as the settlement agent for a DERA that is registered to participate in the IAM. When participating in the IAM, a DERA signals to the IESO that a portion of its service is intended to meet local distribution system needs/non-wholesale program requirements, or where it deviates from dispatch due to conditions outside of the IESO's control, the IESO shall continue to settle the DERA against the dispatch signal sent to the resource and the response that the IESO measures at the aggregate level. Isolating the services delivered or withheld in response to different stakeholder's needs from a single aggregate's measurement poses a significant technical challenge. To ensure that the wholesale market remains balanced and financially neutral, the IESO expects the aggregator to settle with the relevant stakeholder or distributor for the portion of the service that it has offered to other programs or is unable to deliver in response to an IESO dispatch.	ORA defers to aggregators and distributors on this question.

Topic	Feedback
In the illustrative example on slide 21, where a FTM DER/A is simultaneously offering services both to the bulk and distribution grid during any given interval: *Distributor* What information would the distributor need from the IESO for the distributor to settle with the DER/A for the distribution portion of the service? *Market Participant / Aggregator* In addition to currently available information from the IESO, what additional information would the market participants/aggregators need to accurately settle downstream with the DERA contributors? What challenges do participants/aggregators see with settling individual contributors for performance when the aggregate response to the IESO dispatch involves inefficient or directionally divergent scheduling of underlying contributors? **Why is the IESO asking:** Building on the previous question, the IESO proposes to settle with the DER aggregate owner and expects that the aggregate owner will settle with individual DER contributors for their portion of the service. The IESO does not intend to control and will not have visibility into individual DER contributor's response but will only consider the aggregate's response when settling with the DERA.	ORA defers to distributors and aggregators on this question.

Wholesale Metering – Front of Meter DER/A

Topic	Feedback
Do you foresee any concerns or challenges with adopting the proposed metering implementation approach for FTM DERs directly connected to the distribution system (reference Slide 38)?	ORA defers to distributed energy resource operators and aggregators on metering. ORA supports the IESO's aim of keeping metering costs low for small facilities while protecting the accuracy of settlement.

Topic	Feedback
Are there any barriers that DER operators, aggregators, or any other DER stakeholders will face if required to utilize wholesale metering installations for each of the DER contributors that contribute to a front-of-the-meter aggregation? If so, please describe the barrier in as much detail as possible, including: • Why it is a concern or challenge. • Any business, operational, technical, or financial impacts. • The specific needs or requirements that would help address the concern. • Potential solutions or alternative approaches that could mitigate the issue. • How your proposed solution would benefit DER operators, aggregators, customers, and the broader DER stakeholders and existing market participants. Your feedback will help us better understand implementation considerations and identify practical approaches that support reliable market participation while minimizing unnecessary burden on stakeholders. Besides the IESO, will other entities need access to the meter readings to support their activities? If so, explain a preferred measurement source (i.e., direct meter read), intended usage, read frequency, etc. **Why is the IESO asking:** For FTM DERs that plan to participate in the wholesale market, either on their own or as part of a DER aggregation, the proposed approach builds on existing wholesale metering requirements and *market rules* already used for *embedded generators*. This provides a familiar and practical path forward for implementation. By leveraging established processes, DER owners and aggregators can more easily manage metering registration, metering data collection,	

Topic	Feedback
and ongoing compliance throughout the life of their assets. In addition, Market Rules Chapter 6, Section 4.6 provides flexibility for *embedded generators* with a capacity below 2 MVA. For example, these *facilities* may be able to use a standalone meter – either main *meter* or alternate *meter* - and may be subject to reduced testing and emergency preparedness requirements. These provisions can help lower both upfront and ongoing metering costs while continuing to meet market requirements. We welcome feedback on whether this approach is practical for your organization, any challenges you foresee, and opportunities to further reduce barriers while maintaining metering accuracy, reliability, and compliance. Please share any suggestions for improving metering data access, clarifying stakeholder roles and responsibilities, streamlining processes, or introducing additional data, controls, or alternative metering approaches. We are also interested in ideas that would support the successful implementation of FTM DERs today while enabling the continued growth and scalability of DER integration in the future.	

General Comments/Feedback

The Ontario Rivers Alliance (ORA) is a grassroots not-for-profit organization with a mission to protect, conserve and restore Ontario rivers. We speak for the people who live on them, fish them, paddle them and pay for the power taken from them.

ORA supports opening Ontario's wholesale electricity markets to aggregations of distributed energy resources.

1. Small, local and quick to build:

Distributed energy resources are small generators and batteries connected to local distribution systems rather than to the high-voltage transmission grid. The Independent Electricity System Operator (IESO) proposes to let them be grouped into aggregations of between 1 and 20 megawatts (MW) that can sell energy and operating reserve into its markets.[1] The IESO will settle each aggregation as a single resource, using the payment model it is building for batteries.[1]

Small solar, wind and battery projects sit close to the homes and businesses that use their power, so they need little new transmission. They can be built far more quickly than large generating stations, and none of them requires damming a river. Opening the market to them adds competition and gives ratepayers more choice.

ORA Recommendation 1: That the IESO proceed with wholesale market access for aggregations of distributed energy resources.

One part of the design may work against storage. The Global Adjustment is the charge on electricity bills that pays for contracted and regulated generation. The IESO notes that "*energy storage may be exempt from certain GA costs/applicable transmission tariffs*", but that resources in an aggregation "*will not be eligible for technology-specific exemptions*".[2] A battery owner may therefore earn more by staying out of an aggregation than by joining one.

ORA Recommendation 2: That the IESO assess and publish, before the design is final, how the loss of storage exemptions inside an aggregation will affect the participation of batteries.

The resources in scope include solar, wind and batteries, and also "*gas generators*".[1] The public should be able to see what kind of supply this program actually brings onto the grid.

ORA Recommendation 3: That the IESO report each year the capacity of participating aggregations by technology, including gas-fired, renewable and storage resources.

Conclusion:

Distributed energy can deliver power faster, closer to where it is used, and without another dam. Because it is built close to the people who use it, it also saves ratepayers the cost of long, expensive transmission lines. ORA asks the IESO to open the door to it, to keep storage on an even footing, and to report what comes through.

Respectfully submitted,

Linda Heron
Chair, Ontario Rivers Alliance
[redacted]

Endnotes:

1. Independent Electricity System Operator, Enabling Resources Program, Distributed Energy Resources Integration Project, Market Integration, engagement presentation, 15 October 2026, slides 16, 25 and 33. **https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/erp/ERP-DER-20261015-Presentation.pdf**
2. Independent Electricity System Operator, Enabling Resources Program, Distributed Energy Resources Integration Project, Market Integration, feedback form, 15 October 2026, Wholesale Market Settlements, first question. Top of this form.