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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Date: October 30, 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.	Rodan Energy Solutions supports creating a DERA resource type and the IESO's choice to build on existing market constructs. However, Rodan is concerned that the combined aggregation requirements will limit which battery assets can be aggregated in practice. Contributors must share a common TDI and be served by the same LDC, and by default each load serving station is its own TDI. As a result, batteries connected at different stations cannot be combined, even when they are hosted by the same LDC. Because each DERA must also be at least 1 MW, smaller batteries at a station may not reach the minimum size on their own and would have no route to the wholesale market. The session noted that the TDI framework allows multiple stations to be grouped where operational needs or opportunities exist. Rodan asks the IESO to publish the initial TDI list well before registration opens, set out the criteria for multi-station TDIs, and allow wider aggregation boundaries where no transmission or distribution constraint is present. Rodan would like to confirm whether a DERA will be eligible to participate in the Capacity Auction. Because behind-the-meter (BTM) resources are excluded from this design, Rodan would welcome further information or an engagement session from the IESO covering the BTM participation model.

Topic	Feedback

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 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.	Rodan supports adapting the SMSR settlement framework. However, the IESO notes that storage may be exempt from certain GA costs and applicable transmission tariffs, and that DERA resources will not be eligible for these exemptions. Because the IESO is keeping the 1 MW minimum, a battery below 1 MW can only participate through a DERA. The same battery technology would therefore be treated differently depending on its size and participation pathway. This reduces the value of participation for exactly the smaller batteries the DERA model is meant to enable. Rodan recommends that the IESO reconsider this treatment for storage. Every contributor will have its own registered wholesale meter, so the IESO will already have contributor-level data that could support applying storage exemptions within a DERA. At minimum, Rodan asks the IESO to assess applying these exemptions to DERAs made up entirely of storage.

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.	Rodan supports the IESO settling with the aggregator rather than with individual contributors, as this gives aggregators the flexibility shown on slide 22. However, the IESO states that where a DERA deviates from dispatch because of conditions outside the IESO's control, including service provided to the distributor, it will still settle against the IESO dispatch signal. It expects the aggregator to recover the difference from the distributor. The October 16 Data Sharing session also identified managing FTM DERA dispatch for emergent LDC needs as a scenario that can occur. In these cases the aggregator carries the financial exposure, but recovery depends entirely on its arrangement with the LDC. Rodan asks the IESO to work with LDCs, and the OEB where needed, to ensure a clear recovery mechanism exists. Rodan also asks the IESO to provide interval-level records of TD coordination events so that aggregators can support these claims. The session also showed that an LDC can reserve DERA capacity by having it offered at a very low price (-$2,000/MWh in the example, described as representative only). The examples only covered prices of $0/MWh or higher. If the price falls below zero while capacity is reserved, the aggregator would pay the market for energy delivered to meet a distribution need. Rodan asks the IESO to clarify how aggregators are expected to manage this exposure, and whether mechanisms other than price-based reservation will be considered.

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	Because value stacking will be addressed in a separate engagement, Rodan asks that it take place before the settlement design is finalized.
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.	To settle accurately with contributors, aggregators need contributor-level, validated 5-minute meter data, with estimated or edited intervals flagged, delivered on the same timeline as the preliminary settlement statement. They also need DERA settlement amounts broken down by charge type and interval, so that balancing and OR claw-back charges can be traced to specific intervals. Recalculated statements should identify which contributors' data changed. Slide 22 shows one battery charging while another discharges to meet a 2 MW dispatch. The DERA is settled on the net 2 MW, while one battery injected 3 MW and the other withdrew 1 MW. Allocating revenue, charging costs and any aggregate-level charges among contributors requires contributor-level data. Rodan supports leaving allocation to the aggregator's contracts. Rodan asks the IESO to confirm that a charging battery's withdrawals are settled only within the DERA and are not also charged separately as load.

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)? 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	Yes. Requiring a wholesale metering installation for every contributor is the most significant barrier in the proposal. The purpose of a DERA is to bring sub-1 MW resources to market, yet each contributor would face the fixed costs of a registered installation: metering equipment, communications for daily IESO collection, registration, metering service provider fees and ongoing testing. These costs do not scale with resource size, so they weigh most heavily on the smallest contributors. The section on flexibility for facilities below 2 MVA helps but still requires a registered installation at each site. Where an LDC revenue meter already exists at the point of connection, a second wholesale meter would duplicate an existing measurement point. Rodan recommends two measures. First, allow an existing LDC revenue meter at the point of connection to be used as the wholesale data source, where it meets Measurement Canada requirements and can provide 5-minute data. Second, simplify registration for aggregations. Because each battery needs its own registered meter, a DERA with many small batteries means many separate meter registrations. Rodan asks the IESO to allow similar battery sites to be registered using a standard package, and to make it simple to add a new battery to an existing DERA. These measures lower entry costs and speed onboarding, while keeping the IESO's metering principles of Measurement Canada compliance, traceability and

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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, 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.	financial neutrality, which Rodan agrees should not change. On access to meter data, the aggregator needs direct read access to each contributor's meter, at least daily and ideally near real time. This is needed to manage dispatch compliance, settle with contributors and verify statements before filing a Notice of Disagreement.

General Comments/Feedback

Rodan supports ERP's objectives and its incremental approach. Because the current design covers FTM resources only, Rodan would welcome further information or an engagement session from the IESO on the behind-the-meter participation model. The IESO has also stated that value stacking will be addressed in a separate engagement. Rodan asks that this engagement come before the settlement design is finalized, since stacked IESO and LDC services directly affect DERA settlement. The 1 MW minimum, the single-TDI and same-LDC rules, per-contributor wholesale metering and the absence of storage

exemptions each narrow the pool of resources that can form a DERA. Rodan recommends that the IESO track participation after launch and commit to a scheduled review of aggregation boundaries, metering requirements and exemption treatment.