Feedback Form

Enabling Resources Program (ERP) - Storage and Co-located Hybrid Integration Project

Phase 2 - Regulation Service Design

Meeting Date: October 15, 2026

Feedback Provided by:

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Date: October 30, 2026

Following the **October 15** 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.

Stakeholder Feedback:

Feedback Question	External Feedback
Please provide feedback on this session and any input on the engagement process for future sessions.	Energy Storage Canada (ESC) appreciates the continued engagement on the Enabling Resources Program and the level of detail provided regarding the proposed regulation service framework. The session provided greater clarity on how the IESO intends to integrate storage resources into regulation service while accounting for state-of-charge management, resource performance, and operational reliability. Building on previous engagements, ESC encourages the IESO to continue providing practical examples and implementation-focused guidance as the design advances. This approach has been valuable in helping participants understand the operational impacts of proposed changes and will be particularly important as work progresses on settlements, procurement, and uplift exemptions. ESC appreciates the IESO's ongoing responsiveness to stakeholder feedback and commitment to further engagement.

Feedback Question	External Feedback
Please provide feedback on the eligibility requirements.	ESC supports the proposed approach to enable storage resources to participate in regulation service as dispatchable Single Model Storage Resources (SMSRs). This represents an important step in expanding opportunities for storage resources to provide reliability services and contribute to system operations. ESC also encourages the IESO to maintain a longer-term pathway toward broader participation, including distribution-connected storage resources where operational and jurisdictional considerations can be appropriately addressed. As regulation requirements increase, maximizing access to capable resources will support reliability and competition.

Feedback Question	External Feedback
Please provide general feedback on the participation model.	ESC generally supports the proposed participation model and the IESO's efforts to design a framework that reflects the operational characteristics of storage resources. The proposed model appropriately recognizes the unique characteristics of energy-limited resources while enabling participation across multiple reliability services. As implementation progresses, ESC encourages the IESO to continue prioritizing predictable and transparent operational frameworks that provide participants with confidence regarding scheduling, resource obligations, and performance expectations. A clear and operationally workable framework will support both reliable operations and continued investment in storage resources across Ontario.

Feedback Question	External Feedback
Please provide feedback on the energy reservation approach of the participation model.	ESC appreciates the IESO's recognition that storage resources require energy reservations in addition to power capability reservations in order to reliably provide regulation service. The proposed approach appropriately reflects the operational realities of energy-limited resources and supports sustained service delivery. Consistent with previous feedback regarding state-of-charge considerations, ESC encourages the IESO to continue assessing reservation requirements to ensure they remain appropriately calibrated and reflective of actual operating conditions. Striking the right balance between reliability requirements and market participation opportunities will help maximize the value storage resources can provide to the system while maintaining operational flexibility.
Please provide feedback on enabling simultaneous regulation service and operating reserve participation for all resources.	ESC strongly supports the proposal to enable simultaneous participation in regulation service and operating reserve. The ability for storage resources to provide multiple services reflects their operational capabilities and can improve overall system efficiency. This proposal is consistent with broader ERP objectives to better integrate storage resources into Ontario's market and operational frameworks. Enabling participation across multiple reliability services can help maximize system value while increasing flexibility available to operators.

Feedback Question	External Feedback
Please provide feedback on the resource selection process of the participation model.	ESC supports the IESO's objective of ensuring that regulation service resources are capable of delivering reliable performance. The proposed resource selection process appropriately recognizes the importance of reliability in meeting regulation requirements. ESC encourages continued transparency regarding resource selection criteria, methodology, and performance considerations. Participants benefit from clear signals regarding the factors that influence selection decisions, which supports efficient operational planning and long-term investment decisions. ESC also welcomes the IESO's indication that alternative approaches, including cost-based considerations, may continue to be evaluated as the framework evolves.

Feedback Question	External Feedback
Please provide feedback on the performance evaluation.	ESC supports the principle of performance-based evaluation and agrees that regulation service providers should be assessed based on their ability to respond accurately to dispatch instructions and regulation signals. As implementation details are developed, ESC encourages the IESO to maintain a transparent and predictable performance framework, including clear communication regarding performance thresholds, testing requirements, and any implications for resource capability ratings. Consistent with previous feedback on settlement and operational transparency, visibility into performance assessment methodologies will help participants validate outcomes and support continuous improvement.

General Comments/Feedback

ESC appreciates the IESO's continued efforts to develop market and operational frameworks that recognize the unique characteristics of storage resources. The proposed regulation service design is an important milestone within the ERP and represents a meaningful step toward unlocking the reliability, flexibility, and fast-response capabilities of Ontario's growing storage fleet.

ESC is encouraged by the IESO's continued commitment to stakeholder engagement and its responsiveness to feedback received through previous ERP consultations. As additional work progresses on settlements, procurement, and uplift exemptions, ESC encourages the IESO to continue prioritizing transparency, predictability, and operational practicality. These principles will be important to ensuring the framework supports reliability objectives while maintaining confidence for market participants investing in and operating storage resources in Ontario.