

# Feedback Form

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

Meeting Date: November 19, 2025

### Feedback Provided by:

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Following the **November 19, 2025**, 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](mailto:engagement@ieso.ca) by December 3, 2025.** 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.

## General ERP Feedback

### Engagement Process

Topic	Feedback
Feedback on the overall engagement process and approach being utilized for this project	The overall process is acceptable, directionally this initiative fits with the evolving market construct and will provide a structure and a defined path for BTM DER participation in the IESO markets. At present many of the individual elements are already established, but they are not connected/aggregated into a specific policy.

## DER Participation Model

Topic	Feedback
<b>DER participation</b> Do you currently have resources interested in accessing the wholesale markets today?  Please specify the resource type (e.g., storage, combined heat and power, etc.) and the MW capacity.	Yes, we manage assets that would be interested in accessing the wholesale markets today. They are battery energy storage solutions.

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<p><b>DER aggregation</b></p> <p>What would be the general characteristics of the DER aggregations you could form to participate in the wholesale markets?</p> <p>Please specify the size, geographic footprint, and resource composition of the aggregation.</p>	<p>Edgecom has a market facing vertical EMS solution that is able to monitor and control BTM assets. Our current customer base is commercial and industrial. The single point of connection issue identified in the call will definitely be a limiting factor in determining the size of an aggregation. Most of our customers are located in the Toronto zone, however, we have clients located throughout the Province. Our aggregations will likely be from 1 MW to 10 MW in size. We do not anticipate aggregating residential clients, however, it is possible in the future that we could provide a back-office solution to help manage a residential aggregation.</p>
<p><b>Metering requirements</b></p> <p>If alternative metering requirements for small contributors to an aggregation allow for the use of utility grade revenue meters, would this benefit your business case?</p>	<p>Operating costs to manage smaller assets become prohibitive relative to the currently available revenue/savings streams. Alternate metering requirements would definitely benefit the business case for small contributors.</p>

## Data Sharing and Coordination

The following questions are of particular interest to DER Aggregators and Local Distribution Companies (LDCs)

Topic	Feedback
Do you foresee any potential impacts from registering additional relevant distribution equipment with the IESO, solely for situational awareness?	If the process is well defined and streamlined there should be minimal impact on projects over 2 MW. Smaller projects are more negatively impacted by metering and verification requirements and any additional capex/opex associated with requirements for situational awareness. It could be a barrier to market entry.
Do you have concerns with authorizing confidential data sharing between the IESO and distributors, if necessary to support system reliability and/or facilitate market participation?	No, we do not have concerns regarding data sharing. However, it is a concern if the utility wants to control the operation of your asset subsequently impacting your business or your host client site business.
Feedback on proposed data sharing and coordination mechanisms (Slides 27-31)	No concerns with the idea of bi-directional data sharing and the need for visibility. However, responsibility if contributor bearing the cost for this capability, it may be a barrier to entry for aggregations of small contributors.

## General Comments/Feedback

Most utilities (perhaps all Ontario utilities) while obligated to, do not currently offer split billing. I assume contributors would be split billed or is it anticipated that the utilities will bill IESO costs and settlements on their LDC invoice? If a contributor elects to participate will their bill cycle move to a calendar month bill cycle? Gross Load billing appears to not be a universal construct within LDC rate schedules, will this be addressed within the IESO/OEB overall planning?