

# Feedback Form

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

Meeting Date: November 19, 2025

### Feedback Provided by:

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Date: 2025-11-27

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	Click or tap here to enter text.

## 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.	Click or tap here to enter text.
<b>DER aggregation</b> What would be the general characteristics of the DER aggregations you could form to participate in the wholesale markets?  Please specify the size, geographic footprint, and resource composition of the aggregation.	Click or tap here to enter text.

Topic	Feedback
<b>Metering requirements</b> 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?	The cost of implementing a traditional IESO metering installation is certainly a participation barrier for small generators. Alternative metering options, such as utilizing the LDCs revenue meter, would be beneficial.

## 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?	Click or tap here to enter text.
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?	Bi-directional T-D coordination is viewed as a positive advancement of the tools used to control Ontario's grid.
Feedback on proposed data sharing and coordination mechanisms (Slides 27-31)	Click or tap here to enter text.

## General Comments/Feedback

Thanks to the IESO for their time engaging on this material. However, I expected more innovation on participation eligibility. EEC has been participating in the IAMs with aggregated dispatchable generation for 15 years. The only incremental change here is that the IESO will allow the aggregation of

resources with different Owners. Otherwise, all eligibility requirements align with existing rules.

EEC is happy to see that alternative metering options will be explored.

EEC would recommend:

- Allowing a distribution connected generator to only use the telemetry they have with their LDC, and the IESO receives that telemetry from the LDC via the T-D coordination data. That way the Resource doesn't need to maintain two telemetry streams and ensures the LDC and IESO have the same real-time data.
- If a generation resource is participating in a local market (DSO) for which its capacity is also available to the IESO, then the resource only needs to file outages with the local market. Outage details would be communicated to the IESO by the LDC via the T-D coordination data.
- IESO Market Rule 0.6, Section 4.6 details the eligibility requirements for participants to qualify for standalone IESO metering (based on nameplate size or kWh/year). Perhaps these requirements can be leveraged to determine when an embedded generator can participate using their LDC revenue grade meter.
- Allow aggregation of dispatchable resources that are connected within the same Electrical Zone, not simply sharing a single connection point.

EEC is looking forward to the advancements this engagement has the potential to produce.