Feedback Form

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

Meeting Date: November 19, 2025

Feedback Provided by:

Name: Andrew Thiele

Title: Vice President, Policy and Government Affairs

Organization: Energy Storage Canada

Email: [redacted]

Date: December 3, 2025

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 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	ESC strongly supports the intent of the Enabling Resources Program (ERP) Distributed Energy Resources Integration Project (DERIP) to address the market access issues that impede the full potential and role of dispatchable DERs (including distributed energy storage) cost-effectively meeting system needs. The proposals outlined during the November 19 engagement session represent a strong starting point for a workable framework, that could then be augmented over time post-implementation. As it relates to the engagement process and approach, ESC would welcome the inclusion of estimated timelines for implementation of the new participation model in the next steps, to establish a common end-point for stakeholders (and enable discussion thereof). ESC recommends the inclusion of stakeholder sessions in the agenda dedicated to the following topics: • solutions to revenue-grade metering and telemetry for smaller DERs; • considerations related to privacy and data sharing; and • enabling the participation of DERs in the IAM, that also participate in other procurements, programs and markets. • These stakeholder sessions are described later in this submission.

DER Participation Model

Topic	Feedback
DER participation 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.	• N/A
DER aggregation 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.	• N/A
Metering requirements 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 use of inverter data for settlement is essential for scaling-up the aggregation of smaller DERs. • A requirement for metering on each DER would mean additional hardware, installation time, and customer acquisition cost. • And, standards exist to provide assurance (e.g., IEEE 1547-2018, that is currently undergoing revision). • ESC would welcome a working session on this topic as part of the ERP DERIP engagement plan. In addition to perspectives of IESO and LDCs, DER Providers and OEMs could share their experience from other jurisdictions.

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?	• N/A
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?	• ESC would welcome a working session on this topic as part of the ERP DERIP engagement plan. Knowledge-sharing from subject matter experts on considerations related to privacy and data sharing would be beneficial.

Feedback on proposed data sharing and coordination mechanisms (Slides 27-31)	• In relation to the question "Feedback on proposed data sharing and coordination mechanisms (Slides 27-31)" ESC would welcome a working session on operational coordination between the IESO and LDCs. That coordination will be critical to the success of all distribution-connected assets that want to participate in the IAM, including not only DER/A resources, but also resources that are being solicited by the IESO under the Long Term Procurement mechanisms. Resources that participate in the IAM will be responding to DAM and RT market signals and IESO dispatch instructions. However, there may be situations where (a) operational constraints at the distribution system level do not manifest as appropriate LMP price signals or (b) where the DER operator could make decisions that make sense in the IAM context but that would exacerbate distribution level issues. For example, if storage is connected to a feeder that is experiencing peak loading, that storage can help the feeder loading issue if it discharges (which would be the expected behaviour) but would exacerbate the issue if it charges (which would generally should make sense but could theoretically happen). Some of our members report that this exact scenario is already creating issues under LT2(c-1) because of incomplete coordination between the IESO and LDCs. When asked to assess projects under the Deliverability Test, LDCs believe that are not permitted by the IESO to provide a "conditional pass" for project - i.e., a pass on the condition that the project be subject to operational limitations determined by the LDC (e.g., no charging during peak load hours). The LDCs therefore believe their only option is to fail projects that could overload feeders - even if only in narrow and unusual circumstances. This overly conservative connection assessment paradigm will kill projects that could deliver a net benefit to the distribution system and to the bulk

Topic	Feedback
	transmission system. It is therefore a major barrier to DER adoption - whether under LT2 or a new DER/A framework. But the issue can be solved through improved coordination between the IESO and LDCs. That coordination must begin with how Deliverability is assessed (including under LT2). It must also encompass how the IESO and LDC share information about operating constraints and how conflicting IAM and LDC dispatch instructions are resolved. ESC would be pleased to help gather member perspectives and insights to inform this work stream. We recommend that it be prioritized, including before running Deliverability under LT2(c-1).

General Comments/Feedback

- DER participation in the IAM, and also in other procurements, programs and markets, will maximize their value stack capture, thereby increasing their competitiveness and cost-effectiveness. ESC would welcome a working session on this topic as part of the ERP DERIP engagement plan once the OEB DSO Capabilities Roadmap and OEB DER Valuation consultation processes are more advanced. This session would enable continuity on related discussions from those process into the ERP DERIP process.

- ESC understands that LMP poses a barrier to aggregating DERs at a higher-level than a "single connection point to IESO-Controlled Grid (ICG)". Has IESO considered alternatives to the approach as proposed? If yes, ESC would welcome additional information in the next stakeholder session about the options considered and assessed, and the opportunities and challenges that they pose. Also, what is the rationale for the 20 MW limit on total aggregation size? If aggregations are limited to a "single connection point to IESO-Controlled Grid (ICG)", what is the advantage of limiting the total aggregation size?

- Many LDCs and DER Providers are currently collaborating on the development of pilot projects to advance distributed energy storage as non-wires solutions. ESC would welcome it in a future stakeholder session if IESO were to share priority areas related to the aggregation of DERs and participation in the IAM that would benefit from research, development and demonstration to inform ongoing work in this area.