Feedback Form

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

Meeting Date: November 19, 2025

Feedback Provided by:

Name: Jacob Godfrey

Title: Project Coordinator

Organization: Essex Power Corporation

Email: [redacted]

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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 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 approach of targeted engagement with LDCs is supported, as well as the approach on this DER-specific subproject of the ERP. Continue providing timely access to information and opportunities for feedback.

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.	As a rate-regulated Distributor, Essex Powerlines (EPL) does not own any resources interested in accessing the wholesale market. It does however, have two other streams of potential interest: 1. Customers expressing interest in the continuation of EPL's Local Energy Market (LEM) project PowerShare[1] also noted that 'stackable' or parallel access to the Wholesale Market is a major enabler for additional energy-related investments such as incremental DER capacity or personnel and/or training. Typical individual DER sizes in PowerShare ranged from 50kW-500kW, most participants requiring aggregation to meet current IESO proposed ERP eligibility. High DER sizes ranged up to 4MW. 2. Future LDC-owned DERs could offer capacity/energy/ancillary services from Non-Wire Solutions (NWSs) outside base hours or outside fulfilled base scenarios. For illustration, a Battery Energy Storage System (BESS) approved for alleviation on a constrained feeder provides peak shaving and voltage support locally. In hours where feeder constraints are resolved, the battery can discharge into the IESO real-time energy market or participate in other programs during off-peak periods. This activity is subject to OEB approval of operating envelopes and/or pricing schemes of any market activity. Provided for illustration purposes only.

[1] A Grid Innovation Fund Project. Made possible through the financial support of the Independent Electricity System Operator.

Topic	Feedback
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.	Noting that EPL would not be the market participant or aggregator in the proposed participation model, we rely on the experience from our PowerShare GIF project. The typical DER was a responsive load, likely reflective of any area with medium-sized businesses or major chains. These resources often provided <100kW flexibility. Smaller businesses showed interest in energy market activity but faced challenges with low bandwidth for program operations and low inherent flexibility (as a cause of their small load). Another class of highly sophisticated and motivated DERs within the PowerShare GIF project was greenhouses. Locational to Leamington-Kingsville, participants and prospective participants in the project offered typically 100kW to multiple MWs of load flexibility. Some candidates expressed interest in exporting generation from CHP resources if export capacity was available.
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?	Drawing from the experience recruiting and onboarding business to the PowerShare GIF project, the primary enabler for <1MW DERs was the ability to use existing utility grade metering. A common refrain from prospective participants was the high cost of metering or telemetry requirements being a barrier to prior attempts to offer energy services. It would undoubtedly be a benefit to most business cases for DERs in the proposed eligibility bracket.

Data Sharing and Coordination

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

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Do you foresee any potential impacts from registering additional relevant distribution equipment with the IESO, solely for situational awareness?	Registering additional relevant distribution equipment with the IESO for situational awareness can be a positive step toward enabling DERs to participate in both local and wholesale market programs. Enhanced visibility supports system reliability and market efficiency, especially as DERs and non-wires solutions become more integral to Ontario's electricity sector. However, it's important that this increased situational awareness is developed collaboratively with LDCs, respecting their operational expertise and local authority. There is a risk that, if not carefully managed, these measures could lead to unintended oversight or future steps that encroach on the distributor's role. The ERP Team's assurances in the November 19 webinar that these steps are intended to foster deeper integration and partnership with LDCs are encouraging and should remain central as the program evolves. Ultimately, the success of this approach depends on maintaining clear boundaries and co-developing protocols with LDCs, ensuring that data sharing and equipment registration serve to strengthen, rather than complicate, the relationship between the IESO and distributors. This will help build trust and maximize the benefits of DER integration for all stakeholders.

Topic	Feedback
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 concerns with confidential data sharing between IESO and LDCs beyond base concerns of security and relevance of shared information.
Feedback on proposed data sharing and coordination mechanisms (Slides 27-31)	We are supportive of the assertion on slide 27 that *"there is an increasing need for enhanced bi-directional data sharing and operational coordination between the IESO, LDCs, and DER providers"* and that this ERP initiative will build on the TDWG protocols.

General Comments/Feedback

The ERP DER Integration Project is a thoughtful and incremental approach to enabling DERs in local and wholesale markets/programs. The targeted engagement with LDCs and the focus on distribution-connected aggregations is supported, and continued timely access to information and feedback opportunities is appreciated.

Key Strengths

Collaboration and Partnership
The emphasis on deepening integration and partnership between the IESO and LDCs respecting the operational expertise and local authority of distributors is critical. Building on TDWG protocols and defining bi-directional data sharing protocols for operational coordination is a prudent step.

Support for Stackable Programs
The recognition that DERs should be able to participate in both local and wholesale market programs without unnecessary barriers is a major enabler.

The presentation's references to stackable or parallel access to markets are aligned with feedback from participants in the PowerShare GIF project.

Practical Participation Models
The proposed eligibility criteria for DER aggregations, including size, geographic footprint (single-nodal aggregations), and resource composition, are supported by experience from PowerShare. The flexibility to aggregate smaller resources and the consideration of alternative metering requirements are especially important for broadening participation to distribution-connected assets.

Areas for Continued Attention

Role of DSOs
Through the next steps of the ERP and beyond, it is important to maintain clear boundaries and co-develop protocols that ensure LDCs remain central to local reliability and planning. Any steps to register additional distribution equipment for situational awareness should be collaborative, with safeguards to prevent unintended oversight or encroachment on distributor roles by higher order systems (host distributors or IESO).

Building on TDWG and Sector Experience
The ERP initiative's commitment to building on TDWG protocols and sector experience is welcomed. Continued engagement with stakeholders to define operational protocols around the "5Ws" (Who, What, When, Where, Why) of data coordination rather than focusing strictly on tools is suggested.

Summary
Overall, the ERP DER Integration Project is moving in the right direction. To maximize its impact, the IESO should continue to prioritize collaboration with LDCs, support stackable participation models, and maintain transparency in data sharing and operational coordination. By co-developing protocols and respecting the evolving roles of DSOs and regulated DERs, the program can deliver meaningful benefits for reliability, market efficiency, and customer value.