Feedback Form

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

Meeting Date: November 19, 2025

Feedback Provided by:

Name: Chinedu Okeke

Title: Specialist, Energy Markets

Organization: Rodan Energy Solutions Inc.

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	Rodan appreciates the structured and transparent engagement approach the IESO is taking for the DER Integration Project. The early release of the foundational participation model, paired with opportunities for feedback at key design stages, gives the clarity needed to assess internal project timelines, customer onboarding strategies, and technology investments. Rodan also values the emphasis on collaboration between the IESO, distributors, and aggregators. This will be an essential foundation for enabling DER value while avoiding conflicting operational signals across the T&D interface. Continued clarity on implementation sequencing, timelines, and future enhancements will help stakeholders better plan resource development pipelines.

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.	While at this early stage we have not fully assessed our contributor portfolio for aggregated wholesale market participation, we tentatively estimate potential interest in participation in excess of [200] MW.
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

Topic	Feedback
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?	Yes, Rodan works closely with a wide range of commercial and industrial customers, many of whom have DERs that are technically suitable for aggregation but cannot justify the cost of full wholesale-grade metering. Allowing alternative metering hardware for small contributors reduces capital barriers, accelerates onboarding timelines, and makes it feasible to include DERs such as small BESS units, EV chargers, and flexible loads that currently fall below the cost-effectiveness threshold. This strengthens the business case for forming aggregations made up of either a single DER technology or a mix of different resource types, giving more flexibility to portfolio design, increasing the diversity of services available, and broadens participation among customers who would otherwise remain on the sidelines. This is especially important for constrained regions where DER flexibility offers high system value.

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?	Rodan sees both operational benefits and practical considerations. Enhanced visibility into distribution equipment can improve forecasting, congestion management, and operational coordination, which ultimately supports reliable delivery of DR, DER, and storage services. That said, registering additional equipment may introduce administrative complexity, especially if LDCs vary widely in their readiness or data maturity. Rodan's suggestion is that any new requirements be standardized, automated where possible, and avoid being an additional hurdle that delays market registration timelines. If implemented consistently across LDCs, the improved situational awareness would be positive.

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?	Rodan supports responsible data sharing between the IESO and LDCs, provided that privacy safeguards, scope limits, and clear use cases are defined. There is increasing interdependence between wholesale and distribution operations, especially with storage, DERs, and flexible load providing both bulk and local system value. The concern is ensuring that shared data is used solely for operational reliability and market coordination and not for creating barriers to customer participation. A standardized framework with clear protections, retention policies, and transparency around access would alleviate these concerns while enabling the situational awareness needed to maintain reliability.

Topic	Feedback
Feedback on proposed data sharing and coordination mechanisms (Slides 27-31)	Rodan supports the direction outlined in Slides 27–31, particularly the move toward bi-directional visibility, automated notifications, and clear protocols for local vs. bulk reliability prioritization. Publishing anticipated DER activity by zone and enabling LDCs flexibility on dispatches during verified reliability events reflects the practical realities of T&D coordination. However, implementation must minimize manual intervention and avoid creating multiple conflicting communication pathways. Ensuring that the floor/ceiling price signals and notice-of-activation processes are consistent across LDCs will be critical for maintaining predictable market performance and avoiding inadvertent penalties or dispatch failures.

General Comments/Feedback

Rodan strongly supports the IESO's vision of unlocking DER value through the foundational participation model and improved T&D coordination. As both a DR market leader and a DER enablement partner, Rodan sees significant opportunity for Ontario to expand flexible capacity while managing peak demand, local constraints, and system reliability. To fully realize this potential, Rodan encourages the IESO to prioritize: Clear and consistent registration processes to avoid delays at the LDC level, Practical M&V and metering requirements that account for real-world customer constraints, Timely implementation schedules that allow aggregators to plan acquisition, development, and technology deployments, Ongoing coordination with the OEB, especially on distributor readiness and data responsibilities. Rodan is committed to working collaboratively with the IESO and LDCs to bring reliable,

dispatchable DER flexibility to the Ontario grid in a manner that supports system needs, market efficiency, and customer value.

Rodan also echoes the following comments submitted by Energy Storage Canada:

- We understand 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, we 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?

- 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. We 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.