

# 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	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?	Click or tap here to enter text.

## 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?	Click or tap here to enter text.
Feedback on proposed data sharing and coordination mechanisms (Slides 27-31)	Click or tap here to enter text.

## General Comments/Feedback

- Premature Adoption of a Dual Participation DSO Model:** The IESO appears to be advancing a “Dual Participation DSO” model despite not explicitly naming it in the proposal. The material includes several elements that mirror this model, which is concerning given the strong and well-documented opposition from LDCs through the Transmission-Distribution Working Group process. By moving forward in this manner, the IESO is effectively pre-empting the OEB’s ongoing DSO consultation, scheduled to continue into 2026, and is stepping outside its appropriate role by advancing a model that has not been endorsed through regulatory channels.

This lack of alignment with the sector's collaborative consultation processes is problematic and risks undermining trust and transparency.

- **Insufficient Clarity in IESO Presentation Materials:** The presentation materials lack sufficient detail to allow LDCs to fully understand the operational and regulatory implications of the proposed requirements. For example, the IESO indicates that LDCs must register distribution-level equipment "for visibility purposes only," but does not clarify what this visibility entails, how it will be used, or why such data is required. Similarly, the requirement for LDCs to submit "aggregated local DER participation information" is presented without a rationale, leaving stakeholders unable to assess the necessity, scope, or potential impacts of this obligation. Without clearer explanations, LDCs cannot meaningfully evaluate the proposal or understand the intended outcomes.
- **Asymmetrical Operational Responsibilities Placed on LDCs:** Several elements of the proposal suggest that IESO operational needs are being prioritized over LDC needs, without a corresponding balance of responsibilities. The IESO, for example, would issue automated notifications to LDCs when activating DERs for bulk-system purposes, yet LDCs would be required to provide advance notice to the IESO when activating DERs for local needs. This creates an asymmetry in expectations that places additional burden on LDCs while reducing reciprocal transparency from the IESO. Such an imbalance could complicate local system operations and does not reflect a fair or coordinated approach to DER activation.
- **Integration with existing and planned LDC-led DR programs:** Many LDCs, Toronto Hydro included, are expanding their own DR programs and local flexibility initiatives to manage growing system needs. ERP design should avoid creating parallel processes that compete with, duplicate, or complicate these local programs. Coordination in this area is necessary so provincial and local DR efforts reinforce, rather than work against, each other.
- **Operational Realities in Dense Urban Distribution Systems:** In dense urban systems, such as in Toronto, routine feeder switching and short-duration outages make DER availability and performance unpredictable and highly variable throughout the day. Any wholesale market design must account for this volatility, or aggregators will face performance risks they cannot control. The ERP framework should explicitly recognize these operational realities so participation requirements remain practical. Furthermore, aggregators and customers should not be financially penalized for uncontrollable distribution-level operational activities, and LDCs should not inherit liability for market impacts. Clear rules are needed to allocate these risks fairly and transparently. Otherwise, LDCs and aggregators could face unmanageable performance expectations, and the entire ERP design could be viewed as unworkable.