



Via email: [engagement@ieso.ca](mailto:engagement@ieso.ca)

December 9, 2020

IESO

**RE: Submission, Part II, IESO White Paper Series: Exploring Expanded DER Participation in the IAMs**

To Whom it May Concern,

BHC Canada Incorporated (BHC) is pleased to support the general direction of Part II of the IESO White Paper Series: Exploring Expanded DER Participation in the IAMs, released November 19, 2020.

It is critical that the IESO consider a number of external factors affecting the timing of enabling DERs, and BHC is pleased to read the inclusion of FERC Order 2222 in that consideration. DER-enablement is not going away, and the IESO's decision to review, assess and meet the timely needs by prosumers, should be applauded.

In addition, the IESO identifies secondary barriers to enabling of DERs, being telemetry requirements and availability of system data between transmission and distribution systems. As BHC looks out at potential impacts of enabling DERs, BHC sees the opportunity to aggregate data from disparate DER systems and generate key insights for the IESO, LDCs and other market participants.

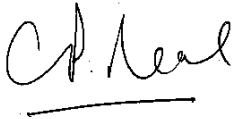
BHC envisions a scenario where prosumers' and consumers' generating assets and their facilities' behaviour data will produce greater amount of energy data than the current LDC traditional systems. The Alternative Telemetry Sources are extremely valuable to grid optimization, and BHC intends to take part in pilots to demonstrate the ability to aggregate data and generate relevant insights.

Finally, over the last 20 years, BHC and BHC Global have developed extensive expertise in successfully designing, implementing, and upgrading SPL and Oracle Utilities suite of products at over 30 client sites ranging in size from approximately 26,000 end customers to over 4.3 million customers. Wearing the customer's hat, BHC sees a need to have LDCs respond accordingly through their CIS to meet the needs of prosumers and consumers, alike,

and the data generated from these disparate DER sites will form the basis of many shifts within LDCS including a wider-encompassing CIS.

BHC thanks you for your time and consideration of its submission.

Sincerely,

A handwritten signature in black ink that reads "Chris Neal". The signature is written in a cursive style and is underlined with a single horizontal line.

**Chris Neal**

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