

# Feedback Form

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## Transmission-Distribution Coordination Working Group (TDWG) – November 9, 2022

Feedback Provided by:

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Date: November 29, 2022

## Specific Questions for Comment/Feedback

Topic	Feedback
<p data-bbox="181 283 831 352"><b>DER Market Vision and Design Project - T-D Coordination Foundational Questions</b></p> <p data-bbox="181 388 909 529">Are the IESO’s recommendations for T-D coordination appropriate for foundational models? Do any recommendations involve risk for distributors that would inhibit DER(A) participation in wholesale market?</p>	<p data-bbox="933 283 1510 441">In developing foundational models, Toronto Hydro encourages the IESO to reconsider factors that risk inhibiting DER(A) participation in wholesale markets.</p> <p data-bbox="933 483 1510 955">At present, the proposal excludes local distribution companies (“LDCs”) as market participants on the basis of “regulatory clarity”. Toronto Hydro cautions the IESO from presuming LDC participation is currently prohibited, and notes its GIF Dual Participation project was approved by the Ontario Energy Board, in part, because it helps manage the capacity of the grid. Foundational coordination protocols should reflect the possibility that LDCs can and do act as market participants.</p> <p data-bbox="933 997 1518 1354">To the extent that the proposed participation by distributors requires consideration and interpretation by the OEB, Toronto Hydro requests that exercise take place prior the Market Design phase. Any such conclusion by the IESO without this interpretation would be premature and may inhibit DER(A) participation in wholesale markets.</p>
<p data-bbox="181 1432 738 1501"><b>Hydro One’s Distribution-Distribution Coordination</b></p> <p data-bbox="181 1537 755 1570">Any feedback on Hydro One’s presentation?</p>	

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<p data-bbox="180 163 917 235"><b>Conceptual T-D Coordination Protocol for Dual Participation Model</b></p> <p data-bbox="180 268 917 373">Does the draft conceptual T-D protocol for the Dual Participation model presented provide the opportunity for sufficient coordination among parties?</p> <p data-bbox="180 407 917 478">Are there any gaps/concerns with the draft T-D protocol presented?</p>	<p data-bbox="917 163 1524 361">Toronto Hydro notes it is not clear how the draft conceptual protocol would apply if the LDC was the market participant (i.e. DER/aggregator) and encourages the IESO to make this clarification.</p> <p data-bbox="917 407 1524 638">Additionally, the IESO has indicated a T-D protocol will be discussed in early 2023 for the Total DSO model. To this point, will the Dual Participation model be evaluated against the Total DSO model? If so, will this be done before the protocol is finalized?</p>

## General Comments/Feedback