

Feedback Form

Transmission-Distribution Coordination Working Group (TDWG) – June 16, 2023

Feedback Provided by:

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Date: July 7, 2023

Following the June 16th Transmission-Distribution Coordination Working Group meeting, the IESO is seeking feedback on a number of questions related to transmission-distribution coordination.

Please provide feedback by July 7, 2023 to engagement@ieso.ca. Please use subject header: *TDWG*. To promote transparency, this feedback will be posted on the [TDWG webpage](#) unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and provide responses at the next TDWG meeting. Thank you for your contribution.

Specific Questions for Comment/Feedback

Topic	Feedback
<p data-bbox="181 226 803 294">General Feedback on Terms of Reference, Deliverables and Work Plan</p> <p data-bbox="181 331 755 436">1Any general feedback on the proposed (1) Terms of Reference; and (2) Deliverables and Work Plan documents?</p>	<p data-bbox="933 226 1518 420">NSWG is pleased to see many of the suggested changes to the Terms of Reference, Deliverables and Work Plan documents has been adopted by the IESO in the next iteration.</p> <p data-bbox="933 430 1518 493">There are some areas where NSWG still has comments.</p> <ul data-bbox="982 504 1518 1732" style="list-style-type: none"><li data-bbox="982 504 1518 735">- We are unclear why the IESO needs one week to publish meeting notes, particularly when asking for comments from the working group members. Meeting notes should not require such a long time to publish.<li data-bbox="982 745 1518 934">- It is unclear why meetings will not be recorded for ability to review discussion and commentary. At the very least, online only meetings should be recorded through Teams.<li data-bbox="982 945 1518 1732">- NSWG continues to believe that distribution visibility investments or framework should be the first deliverable for the TDWG to determine. In other words, what are the minimum requirements each LDC should establish to be capable of monitoring their distribution system in as close to real-time as possible. This is required for both wholesale market participation and distribution service activation. Perhaps most importantly, visibility investments may take many years and must be started now if they are to be available in time for the IESO and LDCs to access DER service capabilities. Visibility is applicable to both the dual participation and total DSO models

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<p>Transcription of Meetings</p> <p>Should TDWG meetings be recorded and/or transcribed?</p>	
<p>Proposed Deliverables</p> <p>Are the deliverables too ambitious?</p> <p>Will we as a working group be able to deliver?</p>	<p>NSWG believe the deliverables are achievable within the 2024 timeline. NSWG continues to believe that the implementation timeline overall is too long and is seeking an earlier total system deliverable so Ontario can realize the full benefits of DERs.</p>
<p>Other Deliverables</p> <p>Are there any deliverables (or components of deliverables) that should be added in? Are there any deliverables (or components of deliverables) that are unnecessary and can be de-prioritized?</p>	<p>NSWG believes that the TDWG should determine what visibility requirements are needed within the distribution system and a plan to engage regulatory processes to ensure all LDCs are supported in making the appropriate investments to support DER participation in wholesale markets and offer distribution services. At this time, there is limited ability for LDCs to access distribution services from DERs and this is a risk of over paying by rate-payers who can only use traditional wires investments.</p>
<p>Deliverable Leads</p> <p>Are you interested in leading the development of any of the deliverables or participating in sub-groups related to any them? If so, please specify the deliverable of interest and why you are well suited for it.</p>	<p>No</p>
<p>T-D Coordination Models</p> <p>Are there any other T-D coordination models that should be investigated? If so, why do you think it may be appropriate in the context of the operation of the Ontario electricity system?</p>	<p>NSWG has no suggestions on T-D coordination models.</p>
<p>Workshop</p> <p>Was the in-person and virtual hybrid meeting format helpful for the purposes of the group workshop?</p>	<p>NSWG found the in-person very helpful for fostering discussion, building relationships and allowing ideas to be developed. We would welcome more in-person meetings in the future.</p>

General Comments/Feedback

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NSWG believes that there is a broader policy discussion that should be occurring with respect to how DERs are expected to offer their services in the future. In particular, wholesale market participation is primarily about real-time efficiency and outage management (i.e., determining which resources to dispatch based on demand and transmission system conditions) while distribution services are more about fixed costs and capital investments. The difference objectives can influence how DER services are prioritized and the near-term investments required to access DER benefits for both objectives.

Due to Ontario's hybrid market structure, investment in DERs primarily require long-term service agreements, either from the IESO or from other entities (e.g., LDCs, large customers). At the moment, there is limited opportunity for LDCs to access long-term funding for the portion of provincial capacity value that a DER investment would provide. The Capacity Auction only offers short-term funding (i.e., 6 month commitment periods). This is a barrier that must be addressed so that LDCs can access distribution services from DERs while recognizing the value the Ontario system would have for the deployment of DERs.