

IESO Feedback Form

Transmission-Distribution Coordination Working Group (TDWG) – March 28, 2024

Feedback Provided by:

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Date: April 18, 2024

Following the March 28, 2024 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 April 25, 2024 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:

Deliverable A: Distribution Reliability Overview

Are there any other distribution reliability considerations important for T-D coordination?

Deliverable B2: Telemetry Requirements for Distributed Energy Resources

Are the proposed telemetry requirements for DER/As reasonable? Please explain any challenges and suggest solutions to overcome them.

Are there any telemetry pathways, other than those mentioned in the deck, that can be utilized to meet the telemetry requirements for DER/As?

What entity is best positioned to serve as a Telemetry Aggregator and why?

What data is required to represent losses or electrical distances of DER/As in EMS, and where should the data come from? Please suggest possible approaches.

DELIVERABLE A:

The NSWG understands that the Ontario Energy Board (OEB) continues to work with its DER Connections Working Group to enhance DER connections and operations to improve the effectiveness and efficiency of DERs within the distribution system.

NSWG believes that transparent planning data and information disclosure is critical to addressing system issues and enhancing reliability for all customers. This openness and transparency is a required ingredient to enable innovation and cost savings for Ontario customers.

NSWG recommends that reliability data by station feeder be published in a secure manner for customers and DERs to assess and determine potential options to improve. This is particularly important to allow the widest range of options to be developed before solutions are proposed and assessed. This information could be linked to capacity hosting maps to help customers, utilities and DER providers determine optimal locations for capacity expansion and reliability investments.

DELIVERABLE B:

The NSWG supports enhanced visibility of the distribution system and of DERs potential to perform critical reliability and market services for the IESO-Administered Markets (IAM) and distribution system.

That being said, the telemetry requirement changes proposed by the IESO raise a number of concerns and questions that must be addressed immediately to allow or smooth transition in a meaningful way.

First, the proposed changes by the IESO include no description of the reasoning for the new capacity thresholds and performance requirements. Further, the potential benefits and associated costs have not been presented or discussed. Without at least an overview of the reasoning along with the expected net benefits to the wholesale market and distribution system it is not clear why these changes are being proposed. The NSWG strongly recommends that the IESO provide reasoning and their initial assessment of the benefit and costs of moving

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	<p>the threshold for DERs to 100 kVA as soon as possible before any further discussion takes place on telemetry changes.</p> <p>Second, upgrades to telemetry requires investment at each DER location and potentially within the distribution network’s telecommunication system. It is not clear who will be responsible for the cost of these upgrades. In addition, the IESO was not clear on whether the telemetry upgrades would only be applicable to new DER connections or if this would be mandated for all existing DERs. Further, the IESO has not clarified if DERs are located behind-the-meter would require the same telemetry upgrades.</p> <p>Third, an understanding of the implementation schedule is required to understand the pace of change that would be required. The NSWG would appreciate if the IESO indicated a preferred timeline for implementation of telemetry upgrades for both DERs and distribution system operators to enable the benefits of DERs.</p> <p>Until these issues have been addressed the NSWG is not in a position to comment on further details of the proposed telemetry changes (e.g., the telemetry aggregator, calculation of losses, etc.)</p>

General Comments/Feedback:

The NSWG strongly requests again examples of how existing DERs that participate in the IESO-Administered Markets are treated with respect to the issues being discussed within the TDWG. This was an initial request at the start of the TDWG over a year ago. The explanation of current ad-hoc market participation processes would be a helpful foundation for any changes being proposed through the TDWG. Please include this as an agenda item for the next TDWG meeting.

The NSWG would like to understand what action items and investments are expected to be made by the IESO and distributors to enable DER participation by 2026 (for impacted distributors). The IESO has executed contracts for DER resources through the E-LT procurement and are expected to execute more through LT1 procurements. Both of those contracts require Suppliers to be market participants. NSWG wants to ensure that distributors and the IESO are prepared to meet the requirements for DERs.