

# Feedback Form

## Electricity Demand Side Management (eDSM) Framework – April 24, 2025

### Feedback Provided by:

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Following the April 24, 2025 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [Electricity Demand Side Management \(eDSM\) engagement page](#)

To promote transparency, feedback submitted will be posted on the Electricity Demand Side Management (eDSM) engagement page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark “Yes” below:

- ☐ Yes – there is confidential information, do not post
- ☒ No – comfortable to publish to the IESO web page

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by May 8, 2025.** Please use subject: Feedback: eDSM Engagement Session

## 2025-2027 Program Plan

Topic	Feedback
What considerations should the IESO keep in mind as we implement the 2025-2027 Program Plan?	<p>Hydro One is encouraged by the funding and opportunity provided to Local Distribution Companies (LDCs) to drive deeper customer engagement to increase participation and awareness of the Save on Energy programs, and to design and deliver local LDC programs to address distribution and bulk system needs.</p> <p>LDCs understand our customers' needs and preferences as well as the needs of our local distribution systems. This enables LDCs to deliver on the provincial eDSM mandate to cost-effectively meet system needs and provide customers with opportunities to manage their costs.</p> <p>LDC are best positioned to deliver Stream 2 programs targeting local distribution system needs given our ability to identify and implement programs to defer distribution system investments. To further support the development of enhanced regional programming, funding should be made available for LDCs to conduct upfront Stream 2 program development activities, including market assessments, and operational design to create cost-effective opportunities for local eDSM programs.</p> <p>For Stream 1 program, LDCs can help target eDSM programming to provide greatest customer and system benefit. If the IESO intends to maintain the Local Initiatives Program (LIP) in Stream 1 while Stream 2 programming emerges, careful coordination will be required to avoid duplication, as it is plausible that regional needs (the focus of LIP) and local needs (the focus of Stream 2 programming) could overlap. The IESO should proactively engage LDCs in areas where LIP initiatives are sought to avoid creating inadvertent barriers to future Stream 2 programs, in the shared goal of maximizing the value of eDSM programming for customers.</p>

## Additional Opportunities

Topic	Feedback
The IESO intends to increase the scope and scale of its DSM programming over this longer-term framework – where do you see opportunities that should be considered in the next three to six years	<p>Affordability (and the cost of power) remains a top concern among our customers. In future DSM plans, the IESO may consider moderate income programming to support affordability challenges more broadly.</p> <p>Enhanced coordination between LDCs and the IESO across all programs will deliver greater benefits to our system, and ultimately the customer. This is particularly critical as eDSM increases support for demand response (DR), behind-the-meter (BTM) DERs such as solar and battery storage, and beneficial electrification programs. These programs can have significant impacts on distribution system operations and, in the case of BTM generation, may rely on LDCs' OEB regulated processes.</p> <p>It is also important to ensure that program rules do not create market confusion and are aligned across current policies. For example, the rules of the Home Renovation Savings Program (HRSP) prevent participants from using incented equipment (such as BTM solar incentive) for net-metering purposes in the future. However, as per the OEB's Distribution System Code, LDCs do not currently have the authority to deny a customer request for net-metering. The IESO should work with the OEB and LDCs to consider how best to address these types of circumstances.</p> <p>Looking ahead, the 2025-2027 DSM Plan identifies Commercial HVAC DR as a new program to be funded in 2026. As with residential DR, there may be opportunities where enrolled resources can provide stacked benefits to the local distribution system in addition to the bulk system. To fully unlock these stacked benefits – and to maximize ratepayer value - LDCs require real-time visibility and control of DR resources. We encourage the IESO to involve LDCs in the program design process to ensure these opportunities are not missed.</p> <p>With an expanded scope of future programs, LDCs also require greater flexibility with respect to non-duplication requirements for Stream 2 programs to deliver effective, targeted solutions for local needs. This will help enable the framework to deliver on its mandate of cost-effectively meeting system needs.</p>

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How would you like to be involved? Are there specific topics or initiatives related to DSM that you would like to provide feedback on in future?	The savings achieved and opportunities available through the eDSM Framework have significant impacts on the electricity system – at both the distribution and transmission levels – and on customers who rely on their LDC to provide services integral to the success of the eDSM framework, particularly with regards to DERs. Hydro One looks forward to ongoing and increased partnership with the IESO through IESO-LDC eDSM Working Groups, LIPs, Stream 2 programs, and through early-stage collaboration in the design of new Stream 1 programs or measures – particularly those involving DERs, DR, and/or beneficial electrification. For example, early-stage involvement for programs requiring connection impact assessments will reduce customer confusion and ensure LDCs’ are resourced to support these anticipated activities.

## General Comments/Feedback

Hydro One is encouraged by the government’s commitment to an enduring eDSM framework as a tool to increase participation of customers and to meet system needs. With electricity demand in Ontario now projected to grow approximately 75% by 2050, the need for and value of comprehensive eDSM programming has never been greater. LDCs will be critical to the success of this framework across all program Streams. Hydro One encourages the IESO to continue to grow its partnership with LDCs throughout the 12-year term of the Framework. The Stream 2 funding to accelerate LDC-led eDSM programs is a positive step towards building a more efficient and optimized electricity grid at both the local and bulk level, that will be able to nimbly meet changing customer needs as the Energy Transition unfolds. Hydro One looks forward to partnering with the IESO on the eDSM Framework to provide affordable energy solutions to our customers.