

Feedback Form

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

Feedback Provided by:

Name: Robert Petro

Title: Energy, Infrastructure, & Environment Coordinator

Organization: Ontario Greenhouse Vegetable Growers (OGVG)

Email: [REDACTED]

Date: May 8, 2025

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 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?	Plan development must include a pathway for significant energy resources at the lowest achievable cost. Ensuring pathways from SaveOnEnergy programs to wider market participation is essential to ensure costs remain low and adequate incentives exist to maximize market participation. Ensuring capacity payments remain in effect is the only way to allow generators to ensure they can reasonably cover the capital costs associated with generation and remain solvent.

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	A significant untapped opportunity continues to exist within the greenhouse sector which continues to grow at an annual rate of 5% per year. Leveraging the “Strong commitment to collaboration across the sector”, specifically, closer collaboration with Enbridge and providing a role for LDCs, will allow the agrifood sector to move to the more economical fuel, self generate energy as needed while ensuring a strong commitment to the environment and carbon management. As large users of natural gas and experts in thermal management, greenhouse operators are in a unique position to leveraging loads (lighting) and generating (combined heat and power) assets. IESO’s understanding of the hybrid role available from greenhouse farms will serve both grid stability and food security in Ontario.

Topic	Feedback
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?	OGVG members would like to remain involved with any load displacement opportunities as well as generation opportunities that may arise from their unique position using both electricity and natural gas. Greenhouse farms are vast and unique with OGVG representing farms ranging in demand from 10s of kW to 10s of MW. We would like to remain involved and provide feedback on any commercial, industrial, and especially agricultural DSM initiatives. As carbon dioxide is a critical input to the greenhouse sector, any program affecting the balance of natural gas or CO2 is imperative.

General Comments/Feedback

IESO has engaged the greenhouse sector on multiple occasions with great success and the collaborations have resulted in accelerated adoption of technologies to reduce demand on the electrical grid. The SaveOnEnergy program's incentives for LED have been widely successful, reducing energy demand by 400 kW per acre on average while supporting high production. Other programs including solar photovoltaic (PV), behind-the-meter, and load displacement have been more successful with more uptake than expected indicating the ongoing opportunity from the greenhouse sector. Supporting the energy efficiency programs and energy investment in the greenhouse sector will ensure economic sustainability for farms, food security for Ontario, along with a robust energy grid for all Ontarians.