

# Stakeholder Feedback and IESO Response

## 2026 Provincial eDSM Achievable Potential Study

Following the February 27, 2026, Provincial eDSM Achievable Potential Study focused engagement webinar on Demand Response, Solar/Storage, and Thermal Storage modelling and input assumptions, the IESO invited stakeholders to provide comments and feedback on the materials presented by March 13, 2026.

The presentation materials and stakeholder feedback submissions have been posted on the 2026 Provincial eDSM Achievable Potential Study engagement webpage for this engagement. Please reference the material for specific feedback as the below information provides excerpts and/or a summary only.

### Data Inputs & Measures

#### Stakeholder Feedback

Voltus Energy Canada suggested that tiered demand response participation with different response speeds, notice periods, and purposes (economic vs. emergency) could better match customer capabilities, based on successful examples in other markets like PJM. They noted that customers have different preferences, pointing out that most hourly demand response activations in summer 2025 were economic, and that some customers want only rare emergency events while others want frequent opportunities to earn revenue. Overall, they recommended that the achievable potential study model a tiered structure, as it could increase overall demand response participation while maintaining reliability and capturing more cost-effective flexibility.

#### IESO Response

The IESO appreciates the feedback on the value of tiered demand response participation structures. In recent years, the IESO has introduced two Demand Response opportunities, Peak Perks and the new Commercial HVAC DR program, through its eDSM frameworks to better reflect different customer capabilities, and is continuing to work to explore options for wholesale market participation beyond the existing Dispatchable Load and Hourly Demand Response models through the Enabling Resources Program. Reflecting the primary objectives of the 2026 eDSM Achievable Potential Study (e.g. informing budget and target setting for the 2025-2036 eDSM Framework), the study is focused on the types of DR opportunities that may be best addressed through programs instead of wholesale market participation (i.e. temperature sensitive or

	otherwise seasonal loads, less responsive “capacity DR”)
The Ottawa Renewable Energy Co-Operative (OREC) stated that the study should not constrain solar technical potential by limiting systems to roof space, since many commercial, industrial, and rural residential customers can also use ground mounted solar to fully offset their demand.	The IESO appreciates the detailed feedback. Based on current policy, the IESO’s eDSM solar incentives are limited to non-ground mounted installations providing load displacement, and the study’s modelling aligns with this limitation to ensure the usability of study results.  Note: stakeholders broadly interested in small-scale solar (and wind) are encouraged to follow the IESO’s parallel engagement regarding the Local Generation Program.
Energy Storage Canada (ESC) recommended including BTM storage systems of all sizes in the study. Larger C&I batteries can deliver meaningful demand reductions at both the distribution and bulk system levels and are increasingly attractive to large customers pursuing electrification and energy management.  ESC said focusing only on small residential batteries would exclude a large and growing market for commercial and industrial (C&I) BTM storage. Many C&I batteries are much larger, are already being deployed, and are used to manage peak demand, support operations, and provide grid benefits.	The IESO appreciates ESC’s support for the Achievable Potential Study. For clarity, battery systems included in the achievable potential study will not be limited to small installations for residential sector, but also include larger installations for the commercial and industrial sectors. Storage system sizing will vary by customer segment and will be determined based on each segment’s electricity consumption patterns and the storage duration required to meet onsite needs.

## Methodology and Stakeholder Engagement

Stakeholder Feedback	IESO Response
The OREC suggested the IESO should clearly account for real world barriers like awareness, income, supply chain and connection issues, outage risk, rising rates, and regulatory limits such as net metering restrictions. The OREC also recommended that the study test how removing these barriers and introducing new policies could	Thank you for this input. The IESO recognizes that customer adoption of solar and storage is influenced by a range of real-world factors, including awareness, affordability, connection processes, regulatory requirements, and broader market conditions. In particular, IESO will work with Cadmus to consider how the customer

<p>increase DER uptake, rather than assuming that today's rules and programs remain unchanged.</p>	<p>perception of behind-the-meter battery storage as an alternative to installing a traditional generator to improve reliability may impact achievable potential.</p> <p>The Achievable Potential modelling is intended to estimate uptake under current policies and regulations, using customer adoption frameworks that reflect these conditions. However, the IESO recognizes that changes to policy or program design could affect adoption and following production of the 2026 eDSM APS's four core scenarios may explore sensitivities or scenarios, where feasible, to better understand these impacts</p> <p>Customer and market adoption barriers are incorporated into the achievable potential analysis through the S-curve component of the adoption model. This approach reflects the cumulative impact of factors that influence the rate and extent of technology uptake over time.</p> <p>The adoption tool allows users to adjust key S-curve parameters, enabling sensitivity analysis of how different levels of market friction or acceleration affect adoption outcomes. Through these adjustments, the model can represent varying assumptions about customer readiness, market conditions, and overall adoption dynamics.</p>
<p>The OREC suggested that the study's economic potential modelling value energy generated/discharged by behind-the-meter DER at the full retail before rebates, rather than alternative energy value assumptions from a grid operator perspective.</p>	<p>To ensure the usability of the Achievable Potential Study results, cost-effectiveness modelling at the economic potential stage must be aligned with how cost-effectiveness is modelled during eDSM program design and evaluation (i.e. from the perspective of the program administrator investing ratepayer funds). The customer economics of adopting a behind-the-meter DER (or other eDSM measures) are considered in the APS as part of the customer adoption modelling in the achievable potential stage.</p>