

# Feedback Form

2026 Provincial eDSM Achievable Potential Study – February 27, 2026

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the [2026 Provincial eDSM Achievable Potential Study](#) engagement page unless otherwise requested by the sender.

Following the focused engagement session on modelling and assumptions for behind-the-meter solar and storage and demand response measures, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on draft assumptions and modelling considerations. The webinar presentation, recording, and draft measure input assumption files can be accessed from the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by **March 13, 2026**. If you wish to provide confidential feedback, please submit marked “Confidential”.** Otherwise, to promote transparency, feedback that is not marked “Confidential” will be posted on the engagement webpage.

## Draft solar/storage and demand response inputs assumptions

Please provide comments in the “Stakeholder Feedback” column of the Demand Response and Solar Storage Input Assumptions spreadsheets.

N/A

## Broader development and trends relevant to solar/storage and demand response potential modelling

Topic	Feedback
Beyond feedback shared in the Input Assumptions spreadsheets, do you have any input on broader developments and trends that may impact solar/storage and demand response potential, such as technology cost trajectories or expected impacts of recent regulatory changes concerning DER interconnection.	ESC’s additional comments are reflected in the general comments section below

### General Comments/Feedback

Energy Storage Canada (ESC) appreciates the opportunity to provide input into the IESO’s development of the eDSM Achievable Potential Study. ESC supports the IESO’s efforts to quantify the role that demand-side resources can play in meeting Ontario’s growing electricity demand while maintaining system reliability and affordability.

A key concern raised by ESC relates to the proposed scoping assumptions presented by Cadmus, particularly the approach to behind-the-meter (BTM) battery energy storage systems (BESS). Based on previous consultation materials and stakeholder discussions, Cadmus proposed limiting the scope of the study to very small BTM batteries, primarily targeting residential-scale applications.

ESC believes that this approach would significantly underestimate the achievable potential of energy storage as **an eDSM resource in Ontario**.

#### Limiting the Study to Small BTM Batteries Excludes Major Market Segments

Restricting the analysis to small residential batteries would exclude a substantial portion of the BTM storage market currently being developed by ESC members. In particular, this assumption would omit commercial and industrial (C&I) behind-the-meter battery systems, which are often larger installations designed to manage peak demand, provide operational flexibility for facilities, and deliver grid benefits.

Many of these systems can range from hundreds of kilowatts to multiple megawatts, and they are increasingly being deployed in sectors such as:

- Manufacturing and industrial facilities
- Commercial buildings and institutional campuses

- Large energy consumers seeking demand charge management
- Hybrid projects paired with distributed generation

These applications represent some of the most economically viable and scalable BTM storage opportunities available today. Excluding them from the achievable potential study would risk producing results that do not accurately reflect the real market potential for storage-enabled demand flexibility in Ontario.

#### Achievable Potential Studies Should Capture the Full Spectrum of BTM Storage

ESC recommends that the study capture BTM BESS deployments of any size, rather than applying a restrictive size threshold. The objective of an achievable potential study is to quantify the range of resources that could realistically contribute to system needs under appropriate policy and program design.

Limiting the analysis to small batteries would artificially constrain the results and fail to account for:

- The growing role of industrial and commercial energy storage in managing peak demand
- The ability of larger BTM systems to deliver meaningful load reductions at the distribution and bulk system levels
- The increasing interest from large electricity customers in deploying storage as part of electrification and energy management strategies

Including the full range of BTM storage sizes would provide the IESO with a more accurate understanding of the achievable demand-side potential available through energy storage technologies.

#### Importance of Reflecting Real Project Development Activity

ESC's members are actively developing and deploying behind-the-meter storage projects across multiple customer classes, including large industrial applications. These projects represent a significant opportunity for Ontario to unlock flexible demand-side capacity that can support system reliability, manage peak demand, and integrate new electrification loads.

If the study excludes these project types from its scope, it risks scoping out real deployment opportunities that are already emerging in the market. As a result, the achievable potential study may underestimate the role that storage can play in Ontario's electricity system.

#### Recommendation

ESC recommends that the IESO and Cadmus:

- Expand the scope of the achievable potential study to include BTM BESS of any size, including commercial and industrial applications.
- Ensure the modelling framework captures large customer-sited storage deployments that can deliver measurable demand-side benefits.

- Reflect the current pipeline of storage development and market activity underway across Ontario.

By adopting a broader approach to BTM storage, the achievable potential study will provide a more accurate and policy-relevant assessment of the demand-side potential available to Ontario's electricity system.