

Feedback Form

Enabling Resources Program (ERP) – Distributed Energy Resources (DER) Integration Project

Meeting Date: April 22, 2026

Feedback Provided by:

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Date: May 05, 2026

Following the **April 22, 2026**, engagement session, the Independent Electricity System Operator (IESO) is seeking feedback on the items discussed during the webinar. The presentation and recording can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by May 6, 2026. If you wish to provide confidential feedback, please submit it as a separate document, marked "**Confidential.**" Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

ERP's DER Integration Project

Please provide any feedback or comments on the updates provided for the DER Project, including:

Topic	Feedback
DER Project Overview	<p>We support our customers' DER assets' access to the IESO's wholesale market through ERP. However, we would emphasize that LDCs must retain sufficient visibility and access to DERs to plan for, procure, and operate local reliability and NWS objectives, as we are required to do under the Ontario Energy Board's (OEB's) Non-Wires Solutions (NWS) Guidelines. Our feedback is intended to support a mutually reinforcing wholesale and local flexibility ecosystem.</p> <p>LDCs play a broader role than simply coordinating DERs for safe participation in IESO Administered Markets (IAMs). Leveraging DER assets is critical to meeting their regulatory mandate under the Ontario Energy Board's NWS Guidelines. LDCs also require sufficient visibility into and access to DERs to plan for, procure, and operate local reliability and NWS objectives more broadly. Accordingly, Hydro One recommends the following enhancements to the IESO's ERP:</p> <ul style="list-style-type: none">• ERP frameworks must avoid unintentionally limiting LDC access to local flexibility through exclusive wholesale arrangements. The OEB's NWS Guidelines require distributors to consider, procure, and operate DERs to meet local and regional distribution system needs. Accordingly, ERP design must ensure continued LDC access to DERs so that LDCs can fulfill their planning, reliability, and NWS obligations under the OEB's regulatory framework, which in turn helps defer or reduce the need for traditional distribution and transmission infrastructure investments and mitigate the overall costs of electrification.

- Recommend that the IESO provide clarity on how ERP supports both local-and-wholesale value, consistent with its stated Transmission-Distribution (TD) coordination principles.
- Through the ERP the IESO should clearly articulate how priorities and conflict resolution will be managed when local reliability or safety needs arise. This is particularly important in situations where limited DERs connected to the distribution system are simultaneously committed to wholesale market participation Hydro One also requests transparent mapping across IESO programs that target DERs, including clarity on how, and whether, resources such as the Commercial and Industrial (C&I) HVAC Demand Response program are intended to participate in the ERP.

As presented by the IESO in its first technical session, the ERP design appears to be based on three core principles. Hydro One requests that the ERP design be expanded to include a fourth principle, as follows:

- Enable LDC access to DERs that delivers wholesale market value while supporting local distribution system needs.

DER Data Sharing Plan	For Hydro One to provide the IESO with feedback on DER data sharing, greater clarity is required on the specific data use cases and related operational details to be discussed in the upcoming technical sessions. This would help minimize unnecessary data collection, reduce implementation burden, and ensure data sharing is proportionate, purposeful, and aligned with both wholesale market objectives and local distribution system needs.
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	<p>Depending on the scale of data sharing ask, appropriate cost-recovery mechanisms to recover potentially significant costs associated with DER data sharing needs to be considered.</p>
<p>IESO's DER Technical Sessions</p>	<p>Clear definition of the problems IESO is seeking to solve and the corresponding system and model data requirements is needed before meaningful discussion on DER data sharing can occur. To that goal, it would be beneficial for the IESO to further clarify data-sharing requirements by incorporating clear, easy-to-follow, end-to-end examples within the technical sessions. These examples should illustrate how coordination would function in real-world scenarios, from data submission through to operational or market outcomes.</p> <p>We request that the IESO include NWS and local flexibility perspectives as explicit agenda items in the DER Technical Sessions. The technical sessions should build on the work done through TDWG and identify practical T&D coordination model.</p> <p>We also request that the IESO clearly articulate the relationship between the ERP and eDSM programs, both of which target DERs, including how and whether data shared for the purposes of the ERP will be used by the eDSM program.</p>

General Comments/Feedback

Hydro One's feedback is intended to support a mutually reinforcing wholesale and local flexibility ecosystem.