

# Stakeholder Feedback and IESO Response

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

Following the April 22, 2026, DER Integration Project engagement session, the IESO invited participants to provide comments and feedback on the materials presented and responses to questions included in the feedback form.

Following the session, the IESO received written feedback from:

- [Electricity Distributors Association](#)
- [Energy Storage Canada](#)
- [Hydro One Networks Inc.](#)
- [TROES Corp.](#)

The presentation materials and feedback submissions received have been posted on the [ERP DER Integration Project engagement webpage](#).

Please reference the material for specific feedback as the below information provides excerpts and/or a summary only.

If you have any questions or concerns, please contact [engagement@ieso.ca](mailto:engagement@ieso.ca).

## General Feedback

Stakeholder Feedback	IESO Response
<p><b>Alignment with Local Distribution Companies (LDCs)</b></p> <ul style="list-style-type: none"> <li>• A collaborative approach is emphasized to advance DER integration into wholesale market and safe, reliable operation of distribution systems.</li> <li>• While LDCs are required to consider Non-Wires Solutions (NWS), DERs are increasingly being contracted and dispatched by the IESO through various programs, sometimes outside traditional market signals. There is a growing need for two-way coordination to avoid unintended distribution impacts and ensure local constraints are reflected in DER participation.</li> <li>• DER coordination must consider distribution system constraints, local flexibility, and OEB requirements, not just wholesale market needs.</li> </ul>	<ul style="list-style-type: none"> <li>• Thank you for the feedback. The IESO has been proactively engaging and collaborating with stakeholders through numerous public engagements and targeted outreach sessions and will continue to do so.</li> <li>• ERP recognizes the growing need for bi-directional data sharing and coordination listed by stakeholders and intends to collaboratively address these needs in the near-term through the data sharing plan described at the April 22 public engagement.</li> <li>• IESO-to-LDC visibility is a near-term area of focus. The IESO announced it will start to publish activations of its <i>Save on Energy Peak Perks</i> and <i>Peak Performance</i> programs in the summer of 2026 to provide the sector with a clearer view of demand response activations; ERP intends build on this initiative to provide LDCs more granular information</li> <li>• Operational Coordination of dispatchable DER or DER Aggregators (DER/As) is one of three focus areas in ERP’s data sharing plan. This will ensure that unintended distribution and transmission system impacts are avoided, or appropriately managed, while DER/As participate in the wholesale market and enable pathways for DER/As to stack services and participate in local NWSs.</li> <li>• Static Data Sharing and Bi-directional Operational Visibility are two other focuses of the data sharing plan to address broader transmission and distribution reliability needs for DER planning data and situational awareness.</li> <li>• Supporting distribution system reliability is one of the IESO’s core data sharing principles (See April 22 engagement <a href="#">presentation</a>).</li> </ul>
<p><b>Alignment with the Ontario Energy Board (OEB)</b></p> <ul style="list-style-type: none"> <li>• Maintain alignment with OEB’s DSO Capabilities Consultation to avoid duplicative or conflicting requirements for LDCs and DER providers</li> </ul>	<ul style="list-style-type: none"> <li>• The IESO continues to collaborate closely with the OEB on relevant DER initiatives, including the <a href="#">OEB’s DSO Capabilities Consultation</a>.</li> </ul>
<p><b>Alignment with other IESO initiatives</b></p>	<ul style="list-style-type: none"> <li>• The IESO has a portfolio of programs that have evolved and will continue to evolve for</li> </ul>

<ul style="list-style-type: none"> <li>Clarify how ERP will interface with other IESO procurements and programs</li> </ul>	<p>DER technologies, reflecting their system value, size, and deployment. ERP is one of several DER initiatives.</p> <ul style="list-style-type: none"> <li>The objectives of ERP's DER Integration Project are 1) to improve near-term DER data sharing between DERs, LDCs, and the IESO and 2) develop a market participation model enabling DERs to access wholesale market revenue streams; note that <b>a participation model is not a procurement mechanism.</b></li> <li>The scope of the market participation model enables DERs and local area aggregations to be modeled and represented at bulk system connection points to participate in the IESO's dispatchable markets. Pathways for smaller (&lt;1 MW) DERs and existing DERs behind a customer's meter to contribute to an aggregation will be developed to complement or align with other initiatives or opportunities for DERs. Operational coordination protocols developed alongside the market participation model will build on past TDWG work and align with the outcomes of OEB's DSO Capabilities Consultation.</li> <li>The ERP initiative is coordinating internally within the IESO within the IESO given that additional DER market participation options are anticipated. As ERP's design is solidified, future procurements, auctions and/or programs could be expanded accordingly in a coordinated manner.</li> <li>Greater clarity will be available once the DER design is better defined and there is an aligned existing DER, NWS, or modified procurement or program that can incorporate the participation model.</li> </ul>
<p><b>Need for Standardization and Implementation Clarity</b></p> <ul style="list-style-type: none"> <li>Standardized, practical data-sharing approaches and clear implementation timelines should be prioritized to support investment certainty and efficient deployment.</li> </ul>	<ul style="list-style-type: none"> <li>As the design work progresses, ERP will provide clear and practical examples, use cases, and scenarios to clarify and discuss data sharing needs, including their materiality and applicability in future engagement sessions.</li> <li>The IESO will be able to share preliminary transition times that will incorporate feedback from stakeholders once the design is finalized (targeting Q2-2027).</li> </ul>

## DER Project Overview

Stakeholder Feedback	IESO Response
<p><b>DER Integration Project Scope</b></p> <ul style="list-style-type: none"> <li>• Clearer definition of the initiative’s problem statement, scope, and intended outcomes have been requested. Specifically, IESO should clarify the system/market issues being addressed, current capability gaps (e.g., visibility, dispatchability, procurement participation), and near- and long-term success metrics.</li> </ul>	<ul style="list-style-type: none"> <li>• Overall, ERP is supporting the deployment of DERs. The volume of DERs is anticipated to grow in response to local and bulks system needs. As is the case with other supply resources, the IESO’s DER project will aim to support transmission and distribution system reliability, and efficient market outcomes.</li> <li>• ERP will implement a participation model for DERAs, building on previous IESO-led initiatives (e.g., <a href="#">TDWG</a>, <a href="#">Market Vision &amp; Design Project</a>). The participation model intends to enable DERAs to support bulk-level resource adequacy and reliability, while simultaneously supporting local distribution needs.</li> <li>• As ERP work progresses, the IESO will be able to share further details, including proposed use cases and examples, in future engagement sessions.</li> <li>• The two main DER project objectives include (1) advancing DER data sharing to maintain reliability and (2) developing a participation model to enable market access for DERs.</li> <li>• These areas of scope were also shared during the <a href="#">November 19, 2025 engagement session</a>.</li> </ul>
<p><b>Inclusion of small and Behind the Meter (BTM) resources</b></p> <ul style="list-style-type: none"> <li>• One stakeholder recommends enabling Commercial and Industrial (C&amp;I) microgrids &amp; BESS assets smaller than 1 MW to participate individually or through aggregation, unlocking scalable customer-side storage.</li> <li>• Similarly, another stakeholder recommends a DER participation model that includes BTM storage of all sizes, including multi-MW C&amp;I systems.</li> </ul>	<ul style="list-style-type: none"> <li>• ERP recognizes that DER technology and options continue to evolve. With ERP’s focus on enabling DER access to the wholesale electricity market, the program is considering enablement options and potential deployments, while also factoring potential increases in operating complexities and associated impacts to market and system operations. ERP will provide a recommended approach in the near term to ensure clarity for stakeholders.</li> <li>• Not limited to any single technology, the definition of DER encompasses the full spectrum of energy injection, storage, and load-modifying capabilities. As part of the EPR design process, the program continues to assess the types of DERs that will be able to access the wholesale markets through the DER participation model and will socialize this scope at a future public engagement.</li> </ul>

<p><b>Utilization of existing tools and agnostic model</b></p> <ul style="list-style-type: none"> <li>• A flexible, non-prescriptive DER framework is supported, focusing on defining required data and coordination rather than fixed roles.</li> <li>• Near-term implementation using existing tools is encouraged, but interim decisions should not limit future participation models.</li> </ul>	<ul style="list-style-type: none"> <li>• Thank you for the feedback. ERP’s near-term focus and approach is specifically intended to maintain long term flexibility for others to adopt new tools or solutions and offer/access other opportunities for DERs.</li> <li>• ERP is going to take an incremental approach by adapting existing IESO market and operational tools, and notification mechanisms to exchange DER data to meet near-term DER data sharing and visibility needs while not losing sight of a long-term solution as the sector and policy evolves. ERP foresees that data sharing platforms which are developed or maintained by others will still be effectively integrated with the IESO’s core tools, systems, and processes.</li> </ul>
<p><b>Avoid restriction of LDC access to DERs</b></p> <ul style="list-style-type: none"> <li>• Support is expressed for enabling DER participation in wholesale markets, only if LDCs retain sufficient visibility and access to DERs to meet local reliability and non-wires solutions obligations.</li> <li>• ERP design should avoid restricting LDC access through exclusive wholesale arrangements, clearly support both local and wholesale value, and define how priorities and conflicts are managed when system needs arise.</li> <li>• Recommended adding a fourth core principle: <i>“Enable LDC access to DERs that delivers wholesale market value while supporting local distribution system needs.”</i></li> </ul>	<ul style="list-style-type: none"> <li>• ERP is developing a participation model for DERAs to provide bulk services. The model will not in itself restrict LDC access to DERs; it will provide a TD coordination mechanism that will enable DERAs to simultaneously provide both distribution-level and bulk-level services.</li> <li>• ERP’s near-term focus intends to maintain flexibility for LDCs, DER stakeholders, and the OEB to continue exploring the evolving role for distributors and their activities, such as local procurements.</li> </ul>

# DER Data Sharing Plan

## Stakeholder Feedback

## IESO Response

### DER Data Sharing Scope and Approach

- Greater clarity is needed on required data, existing gaps, and how data will be used across operational, market, and planning functions.
- Data sharing should be structured across operational, market, and economic coordination layers, while clearly defining roles, responsibilities, and governance frameworks (including privacy, cybersecurity, and commercial considerations).
- A pragmatic approach is needed, ensuring data requirements are clearly tied to defined use cases/intended outcomes.

- The April 22<sup>nd</sup> engagement was intended as a level set to enable a shared starting point understanding. As ERPs seeks to confirm the starting point and high-level objectives, the program can now understand and share additional design options that is expected to provide the required clarity.
- To support this, the April 22 engagement sought to establish that the DER data sharing plan categorizes DER data into three categories:
  1. Static planning data (e.g., asset registration, system data, NWS program information)
  2. Bi-directional operational visibility (e.g., telemetry, dispatch, real-time conditions)
  3. Operational coordination data (e.g., scheduling, dispatch coordination)
- As DER proliferation increases in the grid, incremental data and improved visibility is needed to maintain the accuracy of the IESO's system models and forecasts, and support bulk system and wholesale market operations.
- Data Usage may be categorized as:
  1. Planning: demand forecasting, system modeling, long-term studies
  2. Operations: real-time monitoring, dispatch decisions, situational awareness
  3. Market functions: scheduling, dispatch optimization, settlement processes
- Data sharing roles, responsibilities and governance frameworks, and their coordination layers will be developed with stakeholders to align with evolving sector and policy developments.
- ERP will also work with the sector on a transition plan informed by stakeholders and the IESO's ability make the necessary tool and process changes.

### DER Data Sharing Cost and Expectations from LDCs

- Data requirements should be appropriately scoped to avoid unnecessary cost and administrative

- ERP's near-term approach is intended to minimize cost impacts while advancing the ability to deploy DERs. ERP will develop solutions to maintain the IESO's bulk system models and forecasts primarily through DER data that is accessible, available, and

<p>burden, standardized to avoid custom arrangements, and clearly defined in terms of scope, granularity, update frequency, and retention.</p> <ul style="list-style-type: none"> <li>Data requirements should be proportionate to minimize burden, and appropriate cost recovery mechanisms should be considered where implementation costs are significant.</li> </ul>	<p>incremental to what is already being shared with the IESO.</p> <ul style="list-style-type: none"> <li>Data granularity, update frequency, and retention will be defined in later stages of market design in consultation with stakeholders.</li> <li>Ultimately, data requirements will be applicable only where local NWS have been deployed, where system-controlled DER activity materially impacts the bulk system, or if it is needed to enable market access for DERs (including operational coordination of these resources). Distributors which have deployed NWS and who have high percentage of flexible DERs will be expected to dynamically monitor and operate their systems in real-time to manage congestion on the distribution system, local availability, and outages.</li> <li>ERP also wants to work with LDCs, and the OEB as appropriate, to develop a transition plan to reflect stakeholder input on timing considerations balanced with system need for improved data sharing.</li> </ul>
<p><b>Impact on smaller DERs</b></p> <ul style="list-style-type: none"> <li>The DER data sharing plan should not create barriers for smaller DERs or aggregated portfolios and should evolve in alignment with OEB DSO developments to ensure consistency and avoid conflicting expectations.</li> </ul>	<ul style="list-style-type: none"> <li>ERP's objective is to avoid or otherwise mitigate potential barriers for smaller DER/As.</li> <li>As noted during the session, ERP is striving to develop flexible solutions to work with a variety of DSO solutions. To support this outcome, ERP's data sharing plan is focused on meeting near-term needs and maintaining long-term flexibility for sector and policy evolution.</li> </ul>

# IESO's DER Technical Sessions

## Stakeholder Feedback

## IESO Response

### Clarifying questions

The following questions were asked by a stakeholder to the IESO regarding DER participation models.

1. Can IESO adopt a layered model where Market Coordinator handles wholesale market interface, dispatch & settlements while DER providers manage asset control, performance and telemetry?
2. Will DER providers be allowed to share standardized asset data with Market Coordinators and LDCs via secure API/EMS to streamline requirements?
3. Can the Connection Impact Assessment (CIA) process for 100–500 kW DER be simplified and shortened?

1. The IESO is using a function model to clarify various functions required for coordination between the IESO, LDCs/DSOs and DER operators, however the IESO is not prescribing the entity that will undertake each function. Further, the IESO is not making changes to its market sequences in the scope of ERP and therefore the LDC and aggregator need to ensure that their operational model adheres to the IESO market rules and market timelines.
2. The IESO will define the baseline of asset data required to correctly model and dispatch the resources that participate in the IESO-Administered Markets (IAM). How Market Coordinators, DER providers, LDCs share data amongst themselves is not within the scope of ERP.
3. The IESO does not hold the authority to make changes to the CIA process; this lies in OEB jurisdiction.

### Recommendation for future engagement

- To improve session effectiveness of the technical sessions, it is recommended to focus on clear problem statements and use cases, clarifying where input is needed versus decisions already made, leveraging prior work (e.g., TDWG), explaining how input will be used, and providing feedback on how it shapes outcomes.
- Targeted technical sessions should prioritize:
  - Cost-effective metering and telemetry options for small DERs;
  - Clearer Real Time coordination across the Transmission-Distribution (T-D) interface, including how conflicts are resolved;
  - Value stacking and settlement for DERs participating in multiple programs; and
  - Enabling aggregators, including clear eligibility for BTM storage of all sizes.

- The first technical session was intended to introduce participants to the IAM and what is expected to participate and to establish a foundation for starting the design conversations. Market timelines and sequences are not changing in the scope of the ERP project; therefore, it was important to set a baseline understanding of what the IESO does to operate the market in the various applicable timeframes.
- Future engagements are looking at the design that is now underway. The IESO will provide use cases (where applicable) to help facilitate collaborative discussions on how to best represent the needs of the LDCs or DER providers while operating within the IESO market.
- Future engagements will focus on specific topics, such as metering, telemetry, coordination, value stacking, etc. The topics listed in the feedback are in the scope of IESO design and will be addressed at the appropriate engagement session.