Feedback Form

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

Meeting Date: July 21, 2026

Feedback Provided by:

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Following the **July 21, 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 **August 7, 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 your feedback and comments on the information presented this engagement which included the following topic areas:

DER Project Overview

Topic	Feedback
Was the DER Project Overview helpful in communicating the scope and approach of the project?	Yes. The overview was clear, and the EDA appreciates that the direction reflects prior EDA feedback, including the emphasis on serving both IESO and LDC needs. The design stream framing helps link outcomes to the work ahead. Building on the feedback the EDA provided following the April 22 session, the following would further sharpen scope and intended outcomes: • **Scope of "DER."** The term is used broadly. The EDA requests clarity on which DER types and participation models are in scope, including DERs serving customer needs and DERs outside LDC or IESO control. It would also help to confirm whether the term "Dx-connected resources" differs from "DER" (see slide 12), and which distribution resources that term captures. In addition, the EDA requests clarity on whether previously contracted DERs under other IESO programs will be eligible to participate. • **Linkage with previous and existing efforts.** To what extent will the project build on prior work, including the Transmission-Distribution Working Group (TDWG), and how does it interface with ongoing procurements and eDSM programs? • **Definitions and outcomes.** It would help members to understand how the IESO defines "near-term" and what it considers "foundational" versus "enduring". It would also help to clarify the distinction between "Market Operational Coordination (Tx-Dx)" and "IESO-LDC Operational Visibility." The EDA understands the former to relate to DERs participating in the IESO-administered wholesale market and the latter to DERs that are not and asks the IESO to confirm whether that is correct. More broadly, the EDA requests that the IESO be very clear about which DERs are "in scope" and

	"out of scope" for each design stream, outcome, and approach, ideally with a few examples. • **Status of prior design discussions.** What is the status of design changes previously explored, such as lowering the 1 MW market participation threshold? • **Future phases.** Visibility is a strong first step. The EDA asks whether future ERP phases will consider DER dispatch optimization and any concept of dispatch "priority." • **LDC role in procurements.** Many LDCs also wish to take on a greater role and potentially lead and deliver future DER procurements. The EDA encourages the IESO to keep this in mind, including how it may impact future design decisions. • **Grid modernization.** The deck states that establishing a foundation for DERA participation in the IESO-Administered Markets (IAM) is a necessary first step to prepare the grid to support future DER growth. The EDA suggests that grid modernization is at least as foundational as IAM participation, and is a key enabler of access, visibility, and coordination. The Integrated Energy Plan commits the government to work with the OEB, the IESO and LDCs to improve DER integration into system planning frameworks - targeting deployment in areas of grid constraint, informing investment decisions, and enabling smarter, more cost-effective grid modernization. While we acknowledge the OEB's role in facilitating grid modernization and that grid modernization is an important element of ERP, an update on what the Ministry, IESO and OEB are doing to advance that commitment, and how it relates to this project's sequencing, would be of significant value to LDCs.

IESO-to-LDC Operational Visibility

Topic	Feedback
What level of visibility at the Tx-Dx interface would LDCs need over Dx-consumers forming	LDCs would benefit from visibility that is as granular as practical, ideally at the station or feeder level rather than aggregated by zone

Virtual Hourly Demand Response (HDR) resources; station- or bus-level? **Why is the IESO asking:** The IESO does not model the Dx system beyond station busses connecting to the IESO-controlled grid and does not know the physical connectivity of Dx-customers forming a Virtual HDR resource (for details, please refer to slides 24-25 of the presentation materials). As a result, existing reporting only includes information about Virtual HDR resources in aggregate, such as the total demand response activated within each of the IESO-controlled grid's ten electrical zones. The IESO is considering updates which would provide LDCs with more granular visibility at the Tx-Dx interfaces where DERs, including Dx-consumers forming Virtual HDRs, are physically connected. An understanding of the level of visibility needed at the Tx-Dx interface by LDCs will inform the scope of updates needed to the IESO's existing reports and bulk system models.	or broad service territory. The EDA recommends that LDCs be provided with the information shared by DERs as part of the DER registration process to participate in the IAM. DERs should provide detailed information on where they are connected at the feeder level, to allow LDCs to model this in their systems. For Virtual HDR, the IESO should share data at the station/bus level. • Service-area-level information alone is insufficient for operational reliability, regardless of an LDC's size. Sub-service-area or station-level detail is necessary across all LDCs. While this is necessary for LDCs with diverse service areas, it is equally important for other LDCs operating local grids, active local energy markets, or with high concentrations of DERs. • Knowing what is actually activated, down to the contributor where feasible, is considerably more useful than activity reported across a broad region. Given these resources are LDC-metered, the EDA would welcome discussion on whether telemetry could be shared. • As with the IESO's own materiality approach, there is likely a practical threshold below which finer granularity is less material. The EDA intends to discuss the appropriate level further with members and would welcome one-on-one discussion.
Do LDCs currently have the capability to support the IESO map IESO-controlled DERs in their distribution systems to relevant Tx-Dx interfaces? **Why is the IESO asking:**	In general, this is achievable for most LDCs today. That said, the EDA cautions that the information shared with the IESO should be limited to the transmission station level. Associating DERs with the relevant Tx-Dx

This question builds on the previous question and supports the IESO in ensuring DERAs are accurately modelled at the Tx-Dx interface. For example, the IESO may provide an initial list of Tx-Dx interfaces to LDCs with a request to associate relevant interfaces where their local systems connect to the IESO-controlled grid to electrical or geographic boundaries within their service territories (e.g. connecting feeder, postal code, etc.). DERs within a specified boundary can then be mapped by the IESO to a transmission node and represented in bulk system models.	interface should not require LDCs to provide the IESO with granular feeder- or postal-code-level detail about their distribution systems; the IESO needs to know which interface a resource sits behind, not where it sits within the LDC's system. • Some complexity arises where a feeder can switch between stations, which any mapping approach would need to accommodate. • The EDA asks how this is intended to work for embedded distributors: would the host distributor be required to obtain information from embedded distributors, and how would that affect materiality determinations?
Do DER providers have concerns if required to provide consent for the IESO to share confidential reports with host LDCs for the purposes of local situational awareness, such as Virtual HDR standby & activation notices for Capacity Auction participants? **Why is the IESO asking:** As DER penetration continues to grow, LDCs increasingly require situational awareness of DER activity on the bulk system to safely operate their distribution systems. Where possible, the IESO will provide visibility of DER activity aggregated to the relevant Tx-Dx interfaces. However, more direct visibility of the DER(s) providing bulk services may be needed at times by LDCs managing specific local needs (e.g. at a particular station or piece of distribution equipment).	The EDA represents distributors rather than DER providers and defers to DER providers on their own concerns. The EDA is concerned about the increasing administrative burden on LDCs and requests that the IESO be mindful of any related administrative burdens that limited access may have on LDCs.

LDC-to-IESO Operational Visibility

Topic	Feedback

What are LDCs perspectives on the need for materiality thresholds to notify the IESO of local DER activity related to local NWS deployments? **Why is the IESO asking:** LDC perspectives and understanding of near-term NWS deployments will help the IESO refine the proposed materiality thresholds, notification timelines, and interim mechanisms.	LDCs understand the need for materiality thresholds and support a shared basis for notification, particularly given LDCs' obligation under applicable OEB Codes to consider non-wires solutions in distribution planning. The proposed thresholds appear reasonable on their face, and the following clarifications would help: • What is the basis for the specific values proposed (the greater of 15 MW or 10% of annual peak at an impacted station, or 10% across two or more stations)? Is there a technical or practical rationale the IESO can point to? Can the IESO point to other precedents that justify the thresholds proposed? • Is the threshold assessed against nameplate, contracted capacity, or anticipated activation?
Do LDCs with local DR programs currently have the capability to provide standby and activation notifications following timelines similar to those used for the IESO's HDR notifications? Refer to slide 28 for an overview of HDR timelines, or slide 21 for a visual reference. **Why is the IESO asking:** This question builds on the previous question.	Most LDCs have that capability today and this is consistent with prior work, such as the IESO's Grid Innovation Fund project with Toronto Hydro. That said, while many existing local DR programs have been built around IESO notification timelines to support customer participation, this may not hold for all future programs. The EDA encourages the IESO to retain flexibility as system needs evolve rather than fixing timelines too rigidly. Also, the EDA asks how outages are treated, and whether the notification obligation relates to both standby and activation.
Can LDCs with other types of NWS deployments (e.g. an LDC-controlled BESS) provide notification of anticipated activity within the IESO-Administered Markets' data submission windows? Refer to 28 slide for an overview of IESO market data submission timelines. **Why is the IESO asking:**	This is generally feasible today, though the IESO should be mindful that cases where unpredictable scenarios can prevent an LDC from notifying the IESO within the standard market windows may emerge as deployments grow. • It would help if the IESO clarified what it means by "advanced notice" and specified what data is required within the DAM and RTM windows. • The EDA flags dual-participation resources serving both IESO markets and local needs and asks how the IESO will avoid counting a resource and its information twice in IESO modelling.

This question builds on the previous question.	
In the near-term, do LDCs have a preference for either of the interim notification mechanisms under consideration? Namely, notification based on email and phone call vs. a tool-based mechanism. Refer to slide 29 for the proposed notification mechanisms. **Why is the IESO asking:** This question builds on the previous question.	The EDA supports keeping the basic baseline interim mechanism simple and low burden (e.g., email and phone calls) for LDCs with limited NWS activity. However, the EDA encourages the IESO to treat the interim period as an active testing ground for deeper operational integration rather than defaulting strictly to manual workarounds. Additionally, a tool-based mechanism can be introduced as deployments scale and regularly exceed materiality thresholds, at which point governance, roles, and responsibilities for data provision should be defined. A tool-based mechanism should only be developed after there is clarity on the roles and responsibilities as determined by the OEB.
How often do LDCs with existing, planned or contemplated NWS deployments anticipate exceeding the proposed materiality thresholds to notify the IESO within the next 5 years? How is this anticipated to change within the next 10 years? **Why is the IESO asking:** This question builds on the previous question. It provides the IESO with an understanding of the volume of information that may be exchanged with the IESO control room over a 5-10 year period, to inform conversations on notification mechanisms.	The EDA notes that Ontario LDCs have unique operating characteristics and as such LDCs may have markedly different estimates. Therefore, the EDA recommends the IESO hold one-on-one discussions with the distributors most likely to be affected in the near-term, to develop a realistic view. The EDA also observes that there are multiple references to "near-term" in the presentation and parties will be assisted by consistent use or definition.
In the near-term, are LDCs considering other NWS which do not fit within the proposed materiality thresholds, notification timelines, and interim notification mechanisms?	Possibly. The proposed framework appears oriented toward dispatchable NWS, whereas some NWS are non-dispatchable (for example, energy efficiency). LDCs have an OEB obligation to consider the full range of NWS in planning. The EDA asks the IESO to confirm whether it is only interested in

Why is the IESO asking: This question builds on the previous question. It helps the IESO understand if there are other cases that it has not considered.	dispatchable NWS, or whether the framework is intended to capture non-dispatchable measures as well.

General Comments/Feedback

The EDA remains committed to a constructive, collaborative partnership with the IESO and our member LDCs, and appreciates the IESO's responsiveness to prior feedback and the LDC-inclusive framing of this engagement. A few overarching points:

- **Use of the information**. It would help to understand what the IESO will do with the notifications it receives from LDCs. If LDC resources are planned for activation, does that affect whether the IESO schedules other resources, and will the IESO rely on these resources for bulk system needs?
- **Standby versus activation gap.** A resource may be placed on standby and reported as material but activate below the threshold and go unreported. The IESO may wish to treat activity as material once placed on standby regardless of the amount ultimately activated.
- **Alignment across initiatives**. Aligned with the EDA's earlier feedback, consistency across IESO procurements, DER programs, and OEB policy frameworks will help avoid fragmented signals to DER providers and support more efficient integration. The EDA notes that IESO design work currently appears to be outpacing OEB action, which risks misalignment for distributors that must operate under both frameworks. Several relevant OEB workstreams are effectively paused pending direction - including the OEB's reports and recommendations to the Minister of Energy and Mines on DSO capabilities and on the valuation of distributed energy resources. The EDA asks the IESO to describe how it is coordinating with the OEB on this project, how it will engage LDCs, and how it will sequence design decisions that depend on OEB policy that has not yet landed.
- **Data governance**. As data sharing advances, requirements should be tied to defined use cases, with clear roles and responsibilities and appropriate treatment of privacy, cybersecurity, and commercial considerations.
- **Timeline.** A complete implementation timeline would also be valuable, including when design streams move to implementation.
- **LDC examples.** The IESO should broaden its list of reference utilities with relevant local programs.

The EDA welcomes the opportunity to serve as a sounding board on these design considerations and looks forward to the proposed one-on-one outreach on LDC-to-IESO operational visibility.