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?	ESC found the DER Project Overview helpful in clarifying how operational visibility, Tx-Dx coordination, and future DER participation models are being developed as interconnected components of the ERP. While the project is not storage-specific, many elements indirectly affect distribution-connected storage, particularly how BESS will be represented in bulk-system models and how storage activity may trigger operational visibility requirements. ESC supports the incremental approach, which provides a clearer pathway for how storage resources may eventually participate in wholesale markets while still supporting local reliability needs.

IESO-to-LDC Operational Visibility

Topic	Feedback
What level of visibility at the Tx-Dx interface would LDCs need over Dx-consumers forming 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.	ESC supports enhanced visibility at Tx-Dx interfaces where distribution-connected storage may materially influence local or bulk-system conditions. For most storage deployments, station-level visibility is likely sufficient. Bus-level visibility may be appropriate only in areas with concentrated storage installations or where storage is used to manage specific equipment constraints.

Topic	Feedback
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:** 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.	ESC recognizes the importance of mapping storage resources to Tx-Dx interfaces to improve bulk-system modelling accuracy. Because storage is not directly represented in bulk-system models today, even high-level geographic mapping (e.g., feeder groupings or postal code boundaries) would improve model fidelity and support future storage participation frameworks.
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).	ESC does not have concerns with DER providers granting consent for confidential HDR standby and activation notices to be shared with host distributors, including where storage is used to enable demand response. Clear confidentiality protocols and consistent use of information for operational situational awareness will be important as storage-enabled DR becomes more common.

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.	ESC supports the concept of materiality thresholds and notes that storage deployments, particularly distribution-connected BESS, may exceed thresholds more frequently as adoption grows. While the thresholds are not storage-specific, they will indirectly shape how storage activity is communicated to the IESO. ESC encourages the IESO to ensure thresholds reflect realistic deployment patterns across Ontario, including smaller-scale storage installations that may still have operational relevance.
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.	ESC notes that some storage-enabled DR programs may be able to align with HDR timelines, while others may require transitional support. Clear guidance and examples will help ensure expectations are feasible for storage resources participating in emerging or pilot-scale DR programs.
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 question builds on the previous question.	ESC supports using existing market submission windows for notifications related to storage activity. ESC encourages the IESO to clarify how storage operated for local reliability needs will be treated relative to market-registered storage resources, to avoid unintended settlement or dispatch outcomes.

Topic	Feedback
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.	ESC supports a flexible interim approach, email for next-day notifications and phone calls for same-day events. As storage deployments scale, ESC recommends early design work on the future tool-based mechanism to ensure it is interoperable with storage management systems and future DERA participation tools.
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.	ESC expects threshold exceedances to increase gradually as storage deployments expand. Early exceedances may be infrequent, but growth in distribution-connected BESS and storage-enabled DR programs will likely increase reporting volumes over the next decade. Notification mechanisms should be scalable and adaptable to future storage growth.
In the near-term, are LDCs considering other NWS which do not fit within the proposed materiality thresholds, notification timelines, and interim notification mechanisms? **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.	ESC encourages continued engagement with distributors and DER providers to identify emerging storage-based NWS use cases, particularly smaller-scale or highly localized BESS installations, that may not meet current thresholds but could still have operational relevance.

General Comments/Feedback

ESC appreciates the IESO's continued focus on operational visibility as a foundational element of DER integration. As DER penetration increases, clear and scalable visibility requirements will be essential to ensuring safe and reliable operation of both distribution and bulk systems. ESC encourages the IESO to ensure visibility requirements evolve in parallel with market participation design, maintain consistency across DER and storage integration workstreams, provide clear guidance and examples to support LDC readiness, and continue engaging DER providers to ensure operational visibility requirements do not inadvertently limit future aggregation models. ESC looks forward to continued collaboration as the IESO advances DER participation, data-sharing frameworks, and Tx-Dx coordination through 2026.