

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?	Hydro Ottawa appreciates the IESO's detailed engagement with stakeholders in the Distributed Energy Resource (DER) Integration Program. Hydro Ottawa supports the IESO's efforts on this matter. It emphasises the importance of ongoing coordination between the IESO and Local Distribution Companies (LDCs) to ensure resource adequacy and grid reliability as DERs begin to scale. LDCs' operational and system expertise best positions them to provide the most value for their customers. In this regard, the IESO's acknowledgement of the LDC's role and strict responsibility for its service territory is welcomed. Further, Hydro Ottawa views IESO-LDC DER demand reduction (DR) coordination as a needed and valuable exercise because a framework helps solidify the IESO's and the LDC's/Distribution System Operator's (DSO) mandates. Specifically, the IESO can effectively focus on the bulk grid concerns and rely on the LDC to act as the sole DSO and customer contact, supporting local needs and bulk grid availability.

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.	Tx-Dx interface (or the two IESO nodes for Ottawa) level aggregate data and the proposed materiality thresholds are insufficient for effective and safe distribution system operations. While bus-level visibility at the Tx-Dx interface is the absolute requirement for bulk coordination, LDCs ultimately require customer-level visibility for IESO contracted virtual hourly demand response (HDR) resources for distribution-level activity. The LDC needs granular information from the IESO to allocate the participating resource to its asset, including the resource type and the commitment amount (capacity, energy, activation period) at the customer level, including full address. The distribution system is most often in non-designed states, i.e., switched and contingency states. Similarly, the LDCs would need the same granularity from individual or aggregator contracted DERs. Thus, the granular customer level of detail on the DER dispatchable assets would support LDC/DSO in the following ways: (1) Asset Mapping and Congestion Management: enabling precise mapping of DERs to specific distribution assets (feeders, feeder segments, distribution transformers) for proactive local congestion management; (2) Operating in Contingency States: ensuring safety when the distribution system is in non-designed state (i.e., switched, or contingency configurations);

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	(3) Maintaining Reliability: Assessing the impact of DER on localized assets when the DR is removed (esp. because of energy injecting sources) and keeping equipment operating within their limits; (4) Preserving Operational Autonomy: allowing LDCs to uphold their jurisdictional obligations as the primary contact, managing local constraints and offering alternative solutions to the IESO in support of grid integrity. Customer relations when it comes to DER dispatch permission gating, trip, or shutdown is a role the LDC needs to manage. Bulk dispatch can cause operational constraints with the Distribution network by causing sudden load/generation changes, complicating connectivity, and complicating system switching during unplanned or planned outages and potentially targeting DERs which, due to changing system configurations, are no longer within the intended impact zone. Thus, the LDC/DSO model is best positioned to support bulk and local needs with priority, as it now exists under the Transmission-Distribution Coordination Protocols, including the Under-Frequency Load Shedding agreement, to uphold the bulk grid integrity first. Without it, LDCs/DSOs can't serve their customers. The level of visibility the LDC/DSO needs from the IESO is greater than what the IESO will need from the LDC/DSO. The IESO manages a small number of transmission-distribution interface points per utility, whereas the LDC operates thousands of downstream Tx-Dx interfaces (or the IESO nodes) and feeders. Because bulk market dispatches

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	cascade directly into these localized networks, LDCs require deep operational visibility into IESO market signals. Scalable solutions (process and platform) are needed for efficiency and accuracy. The materiality component in Local DER Activity Notification Example 2 seems to mix dependable (BESS charging / discharging, DER dispatch) & non-dependable DERs (solar forecasting). Hydro Ottawa requests that the IESO clarify how non-dependable DERs are to be treated if their generation under the proposed activity notification does not materialize. Furthermore, Hydro Ottawa requests clarity as to whether the capacity is the: i) DER static nameplate, ii) DER procured capacity, or iii) DER forecasted capacity. Also, does the threshold apply to the grid normal state, operating state, or contingency state?
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	Yes, Hydro Ottawa can support mapping IESO-controlled DERs in its Distribution system to the Tx-Dx interfaces (or the IESO nodes) using a bottom-up mapping, i.e., from customer to the Tx-Dx interfaces (or the IESO nodes), currently only for the designed state, not the as-operated or real-time state. This highlights the dynamic state of the distribution network and the thousands of Tx-Dx interfaces (or the IESO nodes) the DSO would manage.

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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.	The IESO's provision of customer-level DER assets, activation, and dispatch to the LDC is critical for the LDC to ensure the assets map to the IESO's Tx-Dx point of interest.
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).	To ensure safe and reliable grid operations, DER participants - including aggregators - must provide pre-authorization for bi-directional operational data sharing across the operational chain (Aggregator, LDC/DSO, and the IESO). However, to safeguard end-use customer privacy, protect commercial confidentiality, and uphold the LDC's jurisdictional obligation to manage local distribution assets, data sharing must be strictly bounded by functional necessity. For example, the LDC requires highly granular data - including the civic address, type of DER, capacity, capacity committed, and period committed, etc. - to manage local distribution equipment effectively and safely. Whereas the IESO only needs aggregated data or notifications when localized activity meets specific bulk-system materiality thresholds (such as ≥ 15 MW). Without this structured, bi-directional data sharing, the ability to plan and maintain grid integrity at both the local and bulk levels would be severely compromised. Hydro Ottawa recommends clarifying the assessment and applicability of the threshold, and also clarity on whether the IESO's interest is in the aggregation to the two IESO nodes to a distributor's

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	Service Area or to each of the tens of Tx-Dx interfaces.

LDC-to-IESO Operational Visibility

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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.	Materiality thresholds would be administratively helpful, and the proposed limits seem reasonable. These thresholds should be established through the IESO-LDC engagement principles declared in the IESO's presentation. Also, the IESO should be cognisant that an IESO bulk activation could trigger severe localized congestion on a specific LDC/DSO feeder that falls far below the 15 MW threshold. The IESO might assume those resources are available for bulk support, unaware that the LDC/DSO may need to actively throttle or override them to maintain local grid safety. Hydro Ottawa requests that the IESO provide clarification as to whether the thresholds would also be set based on the capacity/energy need and voltage class - and even if the total in an hour, a day, all at one time, over a specified period of time - at each Tx-Dx interface (or the IESO nodes).
Do LDCs with local DR programs currently have the capability to provide standby and activation	Hydro Ottawa believes that coordination on the periods is crucial. It is also crucial that the LDC/DSO acts as the central hub managing these notifications and the dispatch of local DER-DR participants.

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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.	Owning this data flow ensures the LDC/DSO maintains the direct relationship with their customers while providing the IESO the necessary situational awareness to overcome bulk system modeling limitations - the LDCs/DSOs can simplify the IESO's data burden and analysis. It should be noted that determining bulk-Tx-Dx interface (or IESO node) notifications is possible; however, a complex aggregation process requires overlapping feeder modeling and threshold evaluations. Hence, this requires further clarification on details from the IESO, such as the time-interval threshold and other parameters raised in this feedback form.
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.	Yes, Hydro Ottawa believes that LDCs can develop notification systems that can report within the data submission windows. However, the development of this capability needs coordinated design planning with the IESO. The LDC/DSO will optimize these assets to solve local distribution constraints first - if the Tx's integrity is ok - otherwise the LDC/DSO will support the Tx system. Providing these forecasts ensures the IESO does not misinterpret LDC/DSO activity as bulk system anomalies. This effectively safeguards each entity's operational independence.
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.	Dedicated cross-stakeholder tools are important, and can likely be accomplished using existing IESO and evolving LDC/DSO platforms. Manual communications such as emails and phone calls are

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Refer to slide 29 for the proposed notification mechanisms. Why is the IESO asking: This question builds on the previous question.	inefficient, unscalable, and prone to error in real-time operations.
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.	N/A
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.	N/A

General Comments/Feedback

The complexities of DER dispatch and the dynamic distribution network necessitate careful consideration, and a deeper dive into each area is required. Establishing clear thresholds for

notifying of material changes in load and generation is of high importance, and further joint IESO-LDC collaboration is crucial to ensure the success of this integration.