Stakeholder Feedback and IESO Response

ERP Distributed Energy Resources (DER) Integration Project

Following the November 19, 2025, 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:

- Canadian Renewable Energy Association
- Edgecom Energy Inc.
- Electricity Distributors Association
- Energy Storage Canada
- Essex Energy Corporation
- Essex Power Corporation
- Hydro One Networks Inc.
- Ontario Power Generation
- Rodan Energy Solutions Inc.
- Toronto Hydro-Electric System Limited

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.

General Feedback

Stakeholder Feedback	IESO Response
Engagement Process Stakeholders were generally supportive of the structured, transparent engagement and early sharing of the foundational participation model, while expressing significant interest and need in further collaboration and engagement. Stakeholders asked for clear timelines, sequencing, and targeted engagement/working sessions (e.g., approaches and requirements for aggregated wholesale metering and operational telemetry, participation model requirements, data sharing needs, capabilities, and governance, operational coordination, value stacking and settlement considerations, etc.). **Sector Alignment** Stakeholders strongly emphasized the need for ERP's DER Integration Project to maintain alignment with regulatory distribution and DER activities, particularly as it relates to DER data sharing requirements and transmission-distribution coordination protocols. **DERA Participation Model** Stakeholder participation model priorities are largely focused on clarity related to DER/A eligibility requirements and implementation timelines, and effective design elements which: (1) effectively enable DERs and their aggregations (collectively DER/As) broader access to the IESO-Administered Markets (IAMs), (2) facilitate value-stacking opportunities for DERs, and (3) recognize and appropriately consider the range of capabilities and attributes of DER technologies and their providers. **DER Data Sharing and Coordination** In addition to alignment with regulatory activities, stakeholders emphasize close collaboration to develop consistent and practical data sharing mechanisms and	The Enabling Resources Program (ERP) appreciates the feedback from participants and interest in the DER Integration Project. **Engagement Process** ERP acknowledges the need for transparency, collaboration and clarity on timelines, milestones, and areas of focused engagement. ERP will continue to engage closely with the sector through a combination of technical sessions, targeted outreach, and public information sessions to support focused and productive discussions This approach will enable ERP to: better understand distributor and DER provider needs, concerns, and capabilities; clearly articulate the IESO's requirements and design objectives; share key design considerations and proposals for feedback, and; communicate design decisions to stakeholders in a transparent and timely manner. **Sector Alignment** ERP will continue working directly with the Ontario Energy Board (OEB) to maintain alignment with regulatory distribution and DER activities. This will inform ERP's DER participation model and the IESO's DER data sharing requirements and support the implementation of transmission-distribution coordination protocols respecting the IESO's and LDCs' jurisdictional authority. The IESO will also continue to work closely with the OEB to ensure ERP considerations are included in the DSO Capabilities Consultation, where appropriate. ERP will collaborate with LDCs that have existing or planned DER programs through the ERP's transmission-distribution coordination workstream. **DERA Participation Model** ERP's DERA participation model is not targeted towards specific technologies, resource types, or customer sectors; rather, its design aims to enable a wider range of DER types and customer

coordination protocols, which appropriately consider distributor needs, roles and responsibilities, technical capabilities, and financial and operational impacts.	segments to access the IAMs through pathways offered by DER developers. The proposed participation model intends to enable DERAs to participate in the IAMs alongside conventional dispatchable market resources in a fair and transparent manner, while maintaining system reliability requirements and preserving existing wholesale market reliability requirements to the extent possible. ERP acknowledges stakeholder priorities related to value stacking opportunities across the IAMs and other programs (including local programs for non-wires alternatives (NWA) and flexibility initiatives). To enable value stacking for DERs, ERP's participation model will permit DERs to earn revenue from the IAMs and other opportunities, such as local NWA programs. During the design phase, ERP will explore settlement and compensation considerations (including allocation of revenue and charges), while working with stakeholders to develop settlement mechanisms that are practical, transparent, and consistent with regulatory and market frameworks. **DER Data Sharing and Coordination** ERP intends to collaborate with LDCs to share and understand respective perspectives, needs, capabilities, impacts, and readiness as they relate to data sharing and coordination supporting bulk and local system reliability across planning and operational time horizons and facilitate DER/A access and participation in the IAMs.

DERA Participation Model

Stakeholder Feedback	IESO Response
Stakeholders expressed active participation interest primarily from aggregations of storage technology types across commercial, and industrial sectors, and potentially residential sector where appropriate. Anticipated DER aggregation sizes and portfolios similarly fall across a broad range. Stakeholders note DERA participation is contingent on: • DER/A size and locational eligibility, • Practical wholesale revenue metering and operational telemetry approaches and operational requirements, • Value stacking opportunities, and • Predictable registration processes **DER/A Size Threshold** Stakeholders requested clarity regarding the proposed participation model's maximum size threshold and recommended raising the maximum aggregation size above 20 MW. Stakeholders also sought additional clarity related to size thresholds for contributors, expressing aggregation interest from both small and large DER contributors. **Locational Eligibility & Connectivity Considerations** While some stakeholders expressed support for a single-nodal aggregation requirements, others noted this would be a limiting factor and are interested in additional details. **Wholesale Revenue Metering and Operational Telemetry** Stakeholders emphasize wholesale revenue metering and operational telemetry requirements are a cost barrier for small	ERP thanks stakeholders for sharing their participation interest, insights, and suggestions. ERP acknowledges that this interest is closely tied to DER/A eligibility, financial and operational bandwidth to meet participation requirements, access to other opportunities, and clarity on project timelines. To provide clarity to stakeholders, ERP's participation model design will prioritize the exploration of: • DER/A size thresholds and configurations, locational or connectivity constraints • Alternative approaches for wholesale revenue metering and operational telemetry data, and • Value stacking opportunities ERP will also continue to engage with stakeholders to explore connection and registration considerations to develop predictable registration processes. These considerations will be assessed against the IESO's operational and reliability needs, and broader potential impacts to the fairness and transparency of the IAMs (e.g., maintaining consistent market compensation approaches, market settlement timelines, etc.). **DER/A Size Threshold** For clarity, ERP's proposed aggregation size limit of 20 MW for DERAs aligns with the IESO's existing tiered operational telemetry performance requirements. This would enable participation without subjecting DER providers to more stringent operational telemetry obligations. ERP will continue to consult and work collaboratively with stakeholders including LDCs, DER providers, and the OEB to consider practical options for small (<1 MW) and large (>20 MW) DER/As to access and effectively participate in the IAMs. **Locational Eligibility & Connectivity Considerations**

DERs and broadly endorse ERP's further exploration of alternative approaches. Suggestions include leveraging inverter data and/or LDC revenue meters for measurement & verification of wholesale revenue meter data and settlement purposes, avoiding dual telemetry streams, and adoption of wholesale revenue metering and operational telemetry approaches implemented in US jurisdictions. **Transmission-Distribution Coordination** Stakeholders re-iterated the need for practical transmission-distribution coordination protocols, building upon previous sector work and jointly developed with LDCs, to ensure alignment with regulatory activities and appropriately reflect LDC needs, capabilities, and priorities. Specifically, one stakeholder expressed concerns ERP may be advancing a dual participation coordination model, one of three models discussed through the IESO's transmission-distribution working group (TDWG).	ERP will continue to consider wider DER/A locational eligibility requirements (e.g., enabling DERAs to be formed from DERs sited within the same geographic zone, or with connectivity to specified groupings of transformer stations) by exploring connectivity considerations with LDCs and DER providers, and assessing potential system reliability and wholesale market impacts. **Wholesale Revenue Metering and Operational Telemetry** ERP will prioritize the exploration of alternate approaches to both wholesale revenue metering and operational telemetry for DER/As. Specifically, ERP will consider hardware options for small and behind-the-meter (BTM) DER contributors, and wholesale revenue meter data measurement and verification approaches for both DERAs and DER contributors (e.g. demand response and/or BTM DERs) While the IESO is informed by experiences and practices from other jurisdictions, it is important to recognize unique differences in the IAMs, the IESO-controlled grid (ICG), and the broader Ontario context. For example, any alternative wholesale revenue metering approach must continue adhering to standards and requirements set by IESO Market Rules and Measurement Canada. **Transmission-Distribution Coordination** A primary objective of ERP is to establish joint coordination protocols between the IESO and LDCs. ERP wishes to re-assure stakeholders transmission-distribution coordination protocols will leverage existing sector work (TDWG) and be collaboratively developed in consultation with DER stakeholders. With the DERA participation model, ERP intends to introduce a new "DER coordinator" role. DER providers will be able to designate either themselves or an LDC into the role. This flexibility will enable LDCs capable of fulfilling the TDWG's proposed "market facilitator" role to do so, while providing broader wholesale market access to DER/As sited in distribution service territories without sufficient market facilitator capabilities.

	ERP will continue to engage with distributors and DER stakeholders as it continues to develop its DERA participation model and coordination protocols to share additional details and solicit feedback.

DER Data Sharing

Stakeholder Feedback	IESO Response
Stakeholders are aligned on the need for DER data sharing, bi-directional operational visibility and transmission-distribution coordination protocols. However, DER providers and distributors require additional clarity and rationale to fully consider the practicality of ERP's proposed data sharing mechanisms. Stakeholders expressed preference for automation and standardization of data sharing requirements and frameworks to reduce administrative burden, simplify registration processes, and support practical operational coordination. Stakeholders also cautioned that costs and readiness vary by distributor. **Distribution Equipment Registration** Stakeholders, particularly LDCs, expressed concerns with registering additional distribution system equipment with the IESO but remained open or notionally supportive provided requirements are right-sized and clearly scoped. This includes	ERP appreciates the feedback from stakeholders on DER data sharing and thanks stakeholders for sharing their perspectives and needs for practical data sharing mechanisms. ERP recognizes the importance of ensuring that data sharing requirements are needs-based and clearly scoped, with data sharing mechanisms which carefully consider potential financial and administrative impacts on LDCs and DER providers, and appropriate data governance and privacy safeguards. ERP will work with LDCs to assess data sharing requirements and understand their associated cost impacts. ERP will also continue to engage with LDCs and the OEB to align IESO data needs, data sharing mechanisms, and registration approaches with distributor capabilities and regulatory frameworks. This ongoing engagement will help inform the definition of IESO data requirements and ensure that situational awareness objectives are met practically and cost-effectively.

identifying the specific assets required, data needs (e.g. granularity, update cadence, materiality thresholds), and roles and responsibilities. **Data Sharing Privacy and Confidentiality** Stakeholders expressed general support provided appropriate considerations and safeguards for data privacy and governance, including need-to-know principles**,** privacy/retention policies**,** clear use cases**,** liability clarity**,** and scope limits. Some stakeholders expressed no concerns beyond baseline security/relevance while others expressed a desire for additional details and specific scope before endorsing. To reduce administrative burden and uncertainty, stakeholders prefer a standardized framework rather than bespoke bilateral agreements. **Data Sharing Mechanisms** Stakeholders representing DER providers, expressed support for the direction of the proposed data sharing mechanisms, particularly those automating or standardizing data sharing activities to reduce administrative burden and facilitate DER/A access to the IAMs and/or other opportunities. Stakeholders re-iterated data sharing mechanisms must be collaboratively developed to ensure they are practical and consistent, and operational responsibilities are fairly allocated. Stakeholders further emphasized the need to consider distributor and DER provider capabilities, implementation costs, administrative burden, and the prioritization of DER/As for local reliability needs. **DER/A Deliverability Assessments** Stakeholders highlighted the broader potential of ERP's efforts to advance DER data sharing and implement transmission-distribution coordination protocols to	**Distribution Equipment Registration** ERP will consider key design elements identified by stakeholders, including specific data requirements, roles and responsibilities, asset scope, and materiality thresholds. Recognizing operational capabilities and financial considerations vary among distributors, ERP will prioritize automated and standardized approaches for data across LDCs to minimize administrative overhead, where appropriate. **Data Sharing Privacy and Confidentiality** ERP will progress toward a standardized data sharing framework to provide a consistent and clearly defined scope for confidential data sharing, while maintaining flexibility to accommodate specific and unique conditions. This framework will consider data governance and confidentiality, including clearly articulated use cases, need-to-know principles, data retention and privacy expectations, liability considerations, and appropriate scope limitations. ERP will continue to engage with stakeholders to define data governance elements and provide greater specificity as requirements are developed, enabling informed stakeholder input. **Data Sharing Mechanisms** ERP recognizes the importance of minimizing administrative burden, avoiding manual or duplicative processes, and ensuring fair allocation of operational responsibilities between the IESO, LDCs, and DER providers. ERP will provide additional details as it continues to work alongside DER stakeholders to understand their capabilities and address their concerns on mechanisms for data sharing and coordination. ERP will clearly articulate the purpose, scope, and rationale of the IESO's DER data sharing needs to support reliable and safe system operations. These considerations will inform the development of standardized data-sharing mechanisms and frameworks to maintain a consistent and flexible approach across LDCs

facilitate DER/A access to bulk system revenue streams. As a specific example, one stakeholder suggested aligning ERP's proposed static data sharing mechanism requiring DER/A distributor deliverability assessments and the IESO's Long-Term 2 (LT2) procurement's deliverability test, and improved operational coordination between the IESO and LDCs.	and support predictable and coordinated operational outcomes. **DER/A Deliverability Assessments** ERP will work internally with IESO teams to better understand the specific needs and considerations driving their DER/A processes and requirements. This will enable ERP to consider alignment opportunities with stakeholders as DER data sharing mechanisms and transmission-distribution coordination protocols are developed. Regarding feedback on the IESO's LT2 RFP procurement and deliverability testing, the deliverability test helps ensure that projects awarded contracts can operate with minimal risk of curtailment and congestion on the system during system peak conditions. For transmission connected projects, the IESO performs a set of tests for potential equipment outages and system conditions to confirm deliverability. For distribution connected projects, LDCs do the same and take account of the unique characteristics of their specific systems. Through regular engagement with LDCs as part of the procurement, the IESO will clarify to LDCs that all projects awarded a contract under LT2 must still complete a Connection Impact Assessment (Dx-CIA) conducted by the LDC and those projects ≥ 10 MW must also complete the Connection Assessment and Approvals process with the IESO and the applicable Transmitter. The LDC may specify operational restrictions within the Dx-CIA that can be applied to minimize impacts under specific conditions, provided the ability to charge remains permitted and the resource is still available during qualifying hours as specified in the LT2 Contract. For clarity, as the LT2 RFP procurement is underway, the IESO will not modify the current rules, requirements, or testing methodologies. Should stakeholders wish to have their feedback considered in future procurement windows, please direct questions and comments related to LT2 procurements to LT2.RFP@ieso.ca.