

# Feedback Form

## Distributed Energy Resources (DER) Roadmap – June 22, 2021

### Feedback Provided by:

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Following the June 22, 2021, DER Roadmap engagement meeting, the IESO is seeking feedback from participants on the DER Roadmap, stakeholder views on the DERs that are most likely to emerge in Ontario, the OEB/IESO joint engagement objectives and proposed process, and finally, on the upcoming OEB/IESO joint targeted call on Enabling Resource. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the June 22, 2021 entry on the [DER Roadmap webpage](#).

**Please provide feedback by July 14 2021 to [engagement@ieso.ca](mailto:engagement@ieso.ca).** Please use subject: *Feedback: DER Roadmap*. To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the [DER Roadmap webpage](#) unless otherwise requested by the sender.

Thank you for your time.

# DER Roadmap

Topic	Feedback
Has the IESO identified the right focus areas to deliver on its goal for DER integration?	<p>ESC is supportive of the focus areas identified by IESO in general; however, we believe that more specificity is required. For example:</p> <ol style="list-style-type: none"><li data-bbox="987 428 1511 936">1. <b>NWAs</b> – please clarify how the DER roadmap will “implement” the recommendations of the Regional Planning Process Review. Will the DER Roadmap specify procurement mechanisms, funding streams and operational requirements, etc.? We suggest that these topics will require significant stakeholder input, including policy and regulatory alignment. Therefore, is the intent of the DER Roadmap to outline IESO’s preferred approach?</li><li data-bbox="987 947 1511 1493">2. <b>Wholesale Market Integration</b> – please clarify the extent that this evaluation will align with IESO’s Innovation and Sector Evolution Whitepaper Series (including the ability to provide capacity, energy and operating reserve). For example, will IESO consider options for aggregated DERs. We suggest that it would be helpful to consider the extent to which IESO’s wholesale market integration align with near-by markets (e.g., Alberta, and FERC-regulated jurisdictions).</li><li data-bbox="987 1503 1511 1850">3. <b>T-D coordination</b> – the scope of this topic may be very broad, and we suggest that the IESO should clarify specifically what is intended to be achieved as part of the DER Roadmap. For example, does this refer to planning coordination vs. operational coordination? Does the IESO intend to consider new</li></ol>

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	<p>roles/responsibilities for distributors (e.g., independent DSO model per York Region NWA)? We suggest that this topic will require significant stakeholder input, including policy and regulatory alignment. Therefore, is the intent of the DER Roadmap to outline IESO's preferred approach?</p>
<p>Will the near-term initiatives enable the IESO to make timely progress on its goal and focus areas?</p>	<p>We suggest that additional clarity and specificity is required by the IESO to distinguish between multiple process underway. For example, the DER potential study will be completed in 2022, after the proposed final DER Roadmap. Likewise, the IESO proposes to commence the DER Market Vision Project, which will be informed by the Targeted Call, but it is unclear how the Market Design Vision will feed into the DER Roadmap.</p> <p>Further, we believe more clarity is required with respect to the IESO's DER Roadmap, DER Vision and the already completed Long-Term Storage Design vision.</p>
<p>Are stakeholders supportive of the approach detailed in the draft DER Roadmap Engagement Plan?</p>	<p>Generally speaking, we are supportive of the framework, but we suggest that additional time may be required to respond to and incorporate stakeholder feedback with respect to the draft DER Roadmap.</p> <p>That said, we recommend the IESO should as part of the framework, identify activities that enable meaningful DER integration in the near term (e.g., 2022/2023) and that additional measures may be implemented post-MRP. With need for new supply resources emerging in mid-2020s, DERs could play an important role to meet supply requirements if barriers were removed.</p>

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	Further, we suggest additional details within the engagement plan are required to provide stakeholders with clarity for this initiative. For example, IESO may wish to provide a draft high-level Table of Contents to illustrate expected outcomes of this report.

## DER Roadmap – Stakeholder Views

The IESO is seeking stakeholders who wish to present their views on the DERs that are most likely to emerge in Ontario and how they should be incorporated into wholesale markets. IESO will seek to identify a number of stakeholders to present their views at the September engagement days and will work with stakeholders to coordinate content. Presentations and subsequent stakeholder discussions will provide insight for the DER Market Vision Project.

Interested stakeholders are asked to briefly identify their views below. If stakeholders prefer not to have these initial views on DERs published as part of this broader feedback submission, please email your comments separately to [engagement@ieso.ca](mailto:engagement@ieso.ca).

Topic	Feedback
Views on the DERs that are most likely to emerge in Ontario and how they should be incorporated into wholesale markets	ESC suggests the following: <ul style="list-style-type: none"> <li>• FTM energy storage (e.g., directly connected to IESO grid) per IESO’s long-term design vision</li> <li>• BTM energy storage, that may participated as demand response only (e.g., HDR or Dispatchable Load)</li> <li>• BTM energy storage, that has the ability to participate as demand response and the ability to inject electricity</li> <li>• FTM and BTM energy storage that may participate as part of an aggregated DER resource (e.g., mixture of FTM energy storage, BTM energy storage and DERs)</li> </ul>

## OEB/IESO Joint Engagement on DER Integration

Topic	Feedback
Do the proposed OEB/IESO Joint Engagement objectives meet stakeholder needs?	Yes, ESC is supportive of the Joint Engagement. We suggest that IESO and OEB should establish a reporting function on the identified cross-cutting issues, including applicable frameworks for decision-making and resolution.
Will the proposed process for OEB/IESO Joint Engagement enable us to deliver on the proposed objectives?	<p>In general, ESC is supportive. We suggest that IESO/OEB should:</p> <ol style="list-style-type: none"> <li>1) Allow for stakeholder input on agenda setting</li> <li>2) Provide pre-reading materials in advance of meetings</li> <li>3) Schedule meetings consistent with IESO engagement days</li> <li>4) Given the 6-month frequency, it will be important to provide meeting notes and track action items</li> <li>5) Provide stakeholders with opportunity to respond to IESO/OEB proposals</li> <li>6) Provide timely responses to stakeholder feedback</li> </ol>
What are the cross-cutting issues relevant to the OEB/IESO Joint Engagement that there should be focus on/awareness of and why do they matter?	<p>ESC believes there are a number of cross cutting issues, for example:</p> <ul style="list-style-type: none"> <li>• Implementation of MRP, including prices that would be applicable to non-IESO market participants (e.g., embedded retail generators, embedded retail consumers, storage)</li> <li>• C&amp;I rate design, including impacts of rates/price signals on energy storage (e.g., non-coincident peak rates)</li> <li>• Planning and procurement process for NWAs</li> <li>• Evaluation of NWAs (including assessment of revenues from wholesale market)</li> <li>• Resource Adequacy framework, including options for DER participation in Capacity Auction /</li> </ul>

Topic	Feedback
	RFPs (including connection requirements, etc.)

## OEB Innovation Sandbox and IESO Grid Innovation Fund Joint Targeted Call on Enabling Resources

Topic	Feedback
<p>Given the problem statement, recommendations, and opportunity presented today, what barriers to DER integration are best suited to be addressed through the joint call?</p>	<p>We suggest that the Joint Targeted Call could be best suited to address matters related to:</p> <ul style="list-style-type: none"> <li>• Procurement of NWAs, including partnerships with LDCs</li> <li>• Aggregation of DERs, and ability to provide Capacity, Energy, ancillary services.</li> <li>• T-D coordination and interoperability requirements</li> </ul>
<p>Which kinds of projects designed to address these barriers would be expected to benefit from regulatory support available through the OEB Innovation Sandbox?</p>	<p>OEB Innovation Sandbox can support:</p> <ul style="list-style-type: none"> <li>• New business model for LDCs</li> <li>• Procurement and partnership related to NWAs</li> <li>• Clarity with respect to roles/responsibilities of LDCs per operations of NWAs</li> </ul>

## General Comments/Feedback

ESC is very supportive of IESO's DER Roadmap development. It is our recommendation that the IESO identify actions that may be completed in the near term (e.g., 2022/2023) to ensure that DERs are able to compete with traditional supply resources as IESO moves to procure resources to meet resource requirements emerging in the mid-2020s (e.g., Capacity Auctions and RFPs). We look forward to next steps of this engagement and ongoing participation.