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ONTARIO ENERGY BOARD

C/O Regulatory Electronic Submission System (RESS)

**RE:**

**PROPOSED AMENDMENTS TO THE DISTRIBUTION SYSTEM CODE REGARDING A MARGIN ON  
PAYMENT INCENTIVE MECHANISM FOR THE USE OF THIRD PARTY DERs AS NON-WIRES SOLUTIONS**

Energy Storage Canada (ESC) is the national trade association dedicated to accelerating the deployment of energy storage projects and technologies, with a membership that includes electricity distributors and third-party distributed energy resources (DERs) project proponents<sup>1</sup>. We appreciate the opportunity to provide comments on the proposal to amend the Distribution System Code (DSC), and establish a methodology for the setting of rates to include a margin on payments (MoP) incentive related to the use of third-party DERs as non-wires solutions (NWSs) to meet a distribution system need.

ESC strongly supports the OEB's work to enhance regulatory predictability for distributors to assess and consider the use of third-party owned DERs as NWSs. Amending the DSC to codify the requirements for the Margin On Payment (MoP) incentive is an important step toward enabling demand-side and distributed energy storage to fulfill its potential supporting the province to cost-effectively meet its growing electricity needs.

Very best regards,

*Andrew Thiele*

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<sup>1</sup> For further information, please visit: [www.energystoragecanada.org](http://www.energystoragecanada.org)