



October 24, 2025

Registrar

By RESS and Email: registrar@oeb.ca

Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Re: EB-2025-0060 – Distribution System Operator (DSO) Capabilities Consultation

Elexicon Energy welcomes the opportunity to contribute to the Ontario Energy Board's (OEB) consultation on DSO capabilities. We recognize the OEB's commitment to engaging stakeholders and commend the thoughtful approach taken to coordinate multiple, overlapping workstreams. Continued transparency and alignment with related initiatives at the OEB and IESO will be essential as this work progresses.

DSO Vision

Elexicon supports an expanded vision for the DSO that goes beyond facilitating DER participation in wholesale markets. We encourage the OEB to prioritize the integration of DERs in ways that strengthen distribution services, optimize grid performance, and enhance reliability and resiliency. Elexicon submits that LDCs are the natural fit to take on the DSO role given their experience in planning, and that they are already making the enabling technology investments in grid modernization in order to leverage other benefits related to resiliency and reliability. The DSO role is the natural evolution of the LDC and enables LDCs to leverage more benefits for customers over the long term. A comprehensive approach to DSO development will deliver meaningful benefits to Ontario's communities and customers.

Workstream Considerations

- **Grid Modernization as a Core Principle:** Modernizing the grid should be a foundational element across all DSO workstreams. This is consistent with the Minister's Integrated Energy Plan and reflects the sector's commitment to building a future-ready distribution system. Elexicon believes that LDCs are well-positioned to lead and shape these modernization efforts.
- **Leveraging Sector Knowledge:** It is important that the OEB clearly outlines how foundational work such as assessments led by the Transmission Distribution Working Group—will inform and accelerate progress across the workstreams. Collaboration and

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shared platforms will be key to validating scalable solutions and building operational experience.

- **Pilots and Learning Integration:** Exelicon encourages the OEB to provide clear guidance on the intended outcomes of pilot projects and how insights from these pilots will be incorporated into subsequent workstreams and policy development. Sharing results broadly will help inform future decisions and support sector-wide learning.
- **Early Clarification of DSO Roles and Responsibilities:** Exelicon recommends that the OEB identify, as early as possible, the specific roles and responsibilities that will be assigned to DSOs through Workstream 4 to establish the DSO “Model” in Ontario. Establishing what these roles and responsibilities are upfront, and the various configurations they could take, will enable current and future pilots to be designed with these variables in mind, ensuring that pilot learnings are directly applicable to the regulatory framework under development.

Conclusion

Exelicon Energy supports the OEB’s commitment to a transparent, collaborative, and adaptive roadmap for DSO capabilities. By emphasizing grid modernization, leveraging sector expertise, integrating pilot learnings, and clarifying roles and responsibilities early, Ontario can ensure that DSO development delivers reliable, resilient, and customer-focused outcomes.

We look forward to continued collaboration with the OEB and sector partners as the DSO roadmap advances.

All of which is respectfully submitted.

Sincerely,

DocuSigned by:

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