

October 24, 2025

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

Via Email: DSOcapabilities@oeb.ca

RE: Distribution System Operator Capabilities Consultation – Written Feedback

On behalf of GridSmartCity (GSC), we appreciate the opportunity to provide written feedback following the Ontario's Energy Board's (OEB) Distribution System Operator (DSO) Capabilities Consultation.

GSC is a consortium of 18 local distribution companies (LDCs), and 22 partner organizations. Collectively, these LDCs manage over \$3.64 billion in assets and deliver electricity to approximately 1 million customers in more than 60 communities across the province. Our purpose is to continuously increase value through a collaborative framework that reflects the importance of local community. Since 2009, we have worked to lead sector innovation synergistically and will continue to deliver on this mandate as we seek to prepare Ontario's electricity grid for the future.

GSC has established a comprehensive DSO Readiness Strategy designed to guide participating LDCs with a unified approach that emphasizes customization, flexibility, standardization, and cost-effectiveness. This strategy acknowledges the varying requirements across different service territories, enabling LDCs to adapt and progress at a pace suited to their individual circumstances. Developed over two years with the help of technical experts, the plan enables a phased rollout towards a common services platform aligned with existing policy initiatives.

By promoting a consistent customer experience and fostering efficiency and ongoing improvement, the DSO Readiness Strategy reduces redundancy and encourages collaboration. Notably, early adopters such as PowerShare are already advancing operational frameworks tailored to mid-sized LDCs, paving the way for broader implementation.

Looking ahead, GSC anticipates the DSO Readiness Strategy will continue to drive operational uptake among both small and mid-sized LDCs, supporting the transition to a more integrated and intelligent electricity distribution system.

GridSmartCity is ready and eager to collaborate with the OEB as part of this consultation to unlock new efficiencies and support of the grid of the future.

Sincerely,



Art Skidmore
President, GridSmartCity & GridSmartCity Cooperative

Direct Feedback to OEB's DSO Capabilities Consultation

GSC supports the OEB's approach to the DSO Roadmap and encourages the OEB to continue specifying functions and capabilities rather than mandating specific models. The Roadmap reflects the sector's current state and would further benefit from guidance on essential capabilities, while addressing commercialization and customization abilities.

GSC urges the OEB to accelerate progress on "Workstream 2," with particular attention to pilots, demonstrations, and small-scale deployments for participants who are ready and willing. Early investment in these initiatives simultaneously prepares the sector for growing market demand and fosters the development of best practices.

In addition to accelerating progress on "Workstream 2", the following modifications are recommended to strengthen the Roadmap:

- Define funding mechanisms more clearly, particularly for pilots, demonstrations, and small-scale deployments.
- Address the funding of the overall DSO development journey, not just end-state capital deployment.
- Encourage early investment in pilots to foster lessons learned and best practices.
- Consider recognized cost-benefit frameworks to justify ongoing DSO investments.
- Maintain focus on flexible capability requirements over prescriptive models to allow adaptation.

Comments for Further Consideration

The following topics are intended to prompt discussion and provide clarity regarding funding, implementation and risks:

- Consider programmatic options for funding mechanisms, particularly around pilots, demonstrations and small-scale deployments.
- Consider recommendations in the Roadmap to fund the 'journey to DSO' (i.e. development costs), rather than just the end-state (i.e. direct capital deployment).
- Consider the risk of moving too slow on DSO implementation at the cost of full replacement of the bulk grid.