



By RESS

October 24, 2025

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
PO Box 2319
2300 Yonge St., Suite 2700
Toronto, ON, M4P 1E4

Dear Mr. Murray:

Subject: Distribution System Operator Capabilities – Stakeholder Consultation - OEB File No. EB-2025-0060

Hydro Ottawa Limited (Hydro Ottawa) appreciates the invitation to comment on the OEB's stakeholder consultation on Distribution System Operator Capabilities.

Please see Appendix A attached, which provides Hydro Ottawa's comments regarding the OEB's Discussion Questions on this matter.

Hydro Ottawa looks forward to continued dialogue with the OEB on this important initiative.

Sincerely,

Signed by:

April Barrie

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Appendix A

On October 14, 2025, the Ontario Energy Board presented its Distribution System Operator (DSO) Roadmap and solicited comments from interested stakeholders. During the meeting, the OEB outlined the DSO Roadmap approach, its objectives, and the overall vision. It also introduced four roadmap workstreams: (i) define DSO capabilities, (ii) define flexibility services, (iii) mandatory assessment, and (iv) enduring policy. The workstreams established the methods for achieving the DSO vision, including actions specific to developing the regulatory framework needed for its implementation.

Hydro Ottawa is receptive to the OEB's proposed DSO roadmap, including the workstreams, with the following comments.

- a. The workstream elements should clearly define how and which of the OEB's Distributed Energy Resources (DER) related initiatives tie into the overall DSO roadmap.
- b. The OEB should provide ongoing support by ensuring distributors' approval and funding for DSO-related functions are not negatively impacted while the roadmap is finalized.
- c. The workstreams 1 and 2 should be distributor-led, with the OEB utilizing the utility's expertise to define capabilities and flexibility services.
- d. Further clarity should be provided to establish how pilot, demonstration, and small-scale deployment projects are expected to contribute to the roadmap and the distributor's role.

The OEB has a number of open DER-related initiatives, which are collectively setting the groundwork for DSO adoption by updating key regulations for DER integration. For more clarity as to how these proceedings relate to the DSO roadmap, Hydro Ottawa recommends that the OEB integrate these ongoing DER proceedings, assigning them to appropriate workstreams within the broader DSO roadmap. This systematic approach will provide stakeholders with a better understanding of how each proceeding fits into the comprehensive DSO vision, ensuring that all DER activities are assessed and advanced with DSO implementation in mind.

Hydro Ottawa is encouraged by the work the OEB has completed thus far on DSO. Being a larger distributor with complex service territory needs, the utility continues to advance innovative solutions to grid constraints, including the adoption of DSO functionality. For example, Hydro Ottawa has made foundational grid modernization investments, such as advanced metering infrastructure and Non-Wires Solutions (NWS) integrated into its business case analysis, alongside coordinating with Independent Electricity System Operator (IESO) on demand-side management. To ensure that utilities can continue to invest in this foundational work and the progression toward DSO capabilities, Hydro Ottawa recommends that the OEB be clear that the intention is not to impede appropriate funding, and is instead to foster evidence-based investment needs and a future-focused environment without imposing unnecessary delays or restrictions while the DSO roadmap is being finalized.

As noted above, distributors have the operational experience and expertise to best advise on the development of workstreams 1 and 2. Hydro Ottawa, therefore, believes that the DSO roadmap workstreams should include wording that highlights the expectation for distributors to play a primary role in defining DSO capabilities and flexibility services.

Finally, Hydro Ottawa requests more clarity from the OEB on how the DSO roadmap contemplates the inclusion of pilot, demonstration, and small-scale deployment projects to the overarching DSO vision. This will ensure that all distributors have a fair opportunity to participate and benefit from knowledge transfer and best practices.

Ultimately, Hydro Ottawa favours a roadmap that encourages flexibility and empowers distributors to pursue DSO functionality. The OEB's DSO roadmap, when collaboratively informed by stakeholder feedback, ongoing engagement between key parties (IESO, OEB, consumer groups, and distributors), distributor expertise, and forward-looking investments, can offer customers enhanced reliability while strategically modernizing the grid for the energy transition.