

BY EMAIL and RESS

October 24, 2025

Mr. Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Mr. Murray:

EB-2025-0060 Distribution System Operator Capabilities - Building Owners and Managers Association Toronto's (BOMA Toronto) Comments

Introduction

On January 28, 2025, the Ontario Energy Board (OEB) launched a consultation to consider and define a policy framework to set expectations for electricity distributors regarding the development of Distribution System Operator (DSO) capabilities.

On May 20, 2025, the OEB released two reports to support the consultation: i) DNV Energy Insights Report - This report focuses on the core drivers behind the implementation of DSOs, use cases, DSO functionality and architecture; ii) OEB Staff Discussion Paper - Based on the research that OEB staff has undertaken, the paper sets out DSO opportunities and policy objectives, discusses the core regulatory considerations that DSO capabilities give rise to, and proposes an approach for moving forward.

In the June 23/24, 2025 stakeholder engagement session, DNV Energy Insights and OEB staff presented their reports and other stakeholders also delivered presentations on topics such as DSO capabilities, critical success factors and policy objectives.

In its July 22, 2025 submission, BOMA Toronto stated that it is generally supportive of the OEB's objectives and approach to consider and define a DSO policy framework.

BOMA Toronto attended the October 14, 2025 stakeholder meeting. We are providing additional comments in this letter.

BOMA Toronto will continue to provide a voice for commercial property owners and operators in Ontario throughout the development of this important initiative.

BOMA Toronto Comments

1. A Balanced Approach

BOMA Toronto supports DSO development as it aligns with the province's long-term energy transition and emission reduction goals. DSO development is the only pathway to successfully integrate and optimize two-way DERs such as renewable generators, electric vehicles (EV) and storage in the electricity grid.

Many electric distributors are already developing long term capital plans to support higher electricity demand from electrification. The development of DSO must move forward without significant delays as electric distributors need to know that they can rely on DSO capabilities to manage non-wires alternatives and to optimize their distribution system plans (DSP).

However, BOMA Toronto also acknowledges that DSO development will be complex and costly. It is therefore critical to balance DSO development with the following principles:

- Shorter DSO development timelines so electric distributors can move ahead to optimize their DSPs with non-wires alternatives and reinforce their infrastructure for electrification (and to help support emission reduction targets);
- A careful, diligent (i.e. avoid bleeding-edge innovation of technology) and slower DSO development pace to limit and defer customer bill impacts; and
- Customer choice/engagement, benefits, affordability should always be key considerations in every step of DSO development.

2. Clearly defined DSO Governing Policies

As discussed above (point #1), electric distributors are already developing long term capital plans to support higher electricity demand from electrification. Clearly defined DSO governing policies need to be established using a collaborative, integrated and transparent approach.

Electric distributors require well defined and clearly communicated policies to develop their DSO capabilities. Delay or confusion in policies would lead to lost time,

effectiveness and opportunities to a sustainable, green and reliable electric grid to support customer benefits and emission reduction.

A collaborative, integrated and transparent process to develop DSO policies requires collaboration among key stakeholders from all sectors, electric utilities (transmitters, distributors and the Independent Electricity System Operator or IESO) and different levels of government. The process needs to be transparent (e.g. working groups) and subject to industry review.

3. Diversity of Electric Distributors in Ontario

Electric distributors with more resource and expertise should be encouraged to move ahead with DSO development in a faster pace and with more independence (i.e. less prescriptive), coming up with innovative systems/technologies, setting industry standards, sharing knowledge and lesson learned with other distributors. Electric distributors that are currently behind in DSO capability development should be allowed to progress at a different pace, learning from the faster pace distributors and adopting a more mature system.

4. Standardization of Data

Successful DSO development, implementation and operation require effective and reliable communication among numerous participants with different data-intensive systems and applications on diverse platforms. As such, standardization of data requirements, format and communication protocol will be vital. Although DSO development is still at an early stage with many uncertainties, it is important to have DSO data standardization policies in place in advance. This will provide guidance to system development and will minimize future time and effort spent on data issues.

Respectfully submitted on behalf of BOMA Toronto,



Clement Li

Director, Policy & Regulatory Development

Enerlife Consulting Inc.

cli@enerlife.com