



October 24, 2025

VIA RESS

Ontario Energy Board
P.O. Box 2319,
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Acting Registrar

Dear Mr. Murray

**Re: DSO Capabilities Consultation
Board File No.: EB-2025-0060**

We are counsel to the Distributed Resource Coalition (“**DRC**”) in the above-noted Ontario Energy Board (the “**OEB**” or “**Board**”) stakeholder consultation on Distribution System Operator (“**DSO**”) capabilities (the “**Consultation**”). DRC provides these comments in response to the OEB’s stakeholder consultation and presentation materials provided on October 14, 2025 (the “**Presentation**”), in addition to its prior comments in the Consultation.

About DRC

DRC is a group of electricity customers and consumers, consisting of end-use residential customers, non-profit organizations, and owners' associations. DRC’s members are directly affected by and interested in: (i) optimizing existing energy assets; (ii) efficiently facilitating the integration of existing and innovative distributed energy resources (“**DERs**”), including electric vehicles (“**EVs**”) and DER aggregators (“**DER/As**”), to achieve customer and grid solutions; and (iii) providing input on direct customer needs and local distribution company (“**LDC**”) opportunities relating to EVs. DRC’s members for the Consultation include the Electric Vehicle Society (“**EVS**”) and Plug’n Drive (“**PnD**”).

DRC’s Comments

DRC broadly agrees with the OEB’s continued evolution of its approach to supporting the development of DSO capabilities as reflected in the update to the DSO Roadmap’s overall vision, objectives, and workstreams as outlined in the Presentation. DRC also wishes to reiterate its previously stated position that DERs and DER/As, including EVs, function as both storage systems and dispatchable energy sources, which deliver substantial and measurable benefits to Ontario’s energy system. When properly integrated and enabled, they enhance affordability, security, reliability, and sustainability across both the distribution and transmission systems.

The participation of DERs in Ontario's energy system, including by large aggregators, industrial users, and, most importantly, individual consumers, is central to the energy transition. The value of DERs lies precisely in their ability to democratize energy participation by empowering Ontarians to be active contributors to their own energy needs, reliability, decarbonization, and system efficiency. Every customer, from a homeowner with rooftop solar or an EV to a commercial entity managing an EV fleet, should have a fair and straightforward pathway to provide much-needed energy services back to the grid.

In this context, the OEB's role is critical. The Board must ensure that regulatory frameworks and market structures fairly enable customer choice and participation. Through consistent, transparent, and technology-neutral rules, the OEB can foster an environment where innovation is balanced with fairness, where utilities are rewarded for enabling customer choice, and where individual DER owners and aggregators alike can help deliver the electricity Ontario requires now and in the future. The OEB and LDCs must ensure that they are able to facilitate a modern, participatory electricity system in which Ontarians are not merely consumers of electricity but active partners in the province's energy future.

DRC's following comments respond to the OEB's three consultation questions and are intended to support the advancement of a regulatory framework that enables DERs to contribute meaningfully to Ontario's reliability, affordability, and decarbonization objectives:

1. Are the proposed roadmap elements appropriate?

DRC supports the roadmap elements outlined by the OEB and agrees that they are appropriate for advancing the Consultation as they provide a flexible and coherent structure for building the DSO Roadmap. DRC agrees with other participants in the Consultation that OEB should continue to consider whether certain activities and elements should advance in parallel rather than sequentially, and how this should be done where appropriate. Concurrent progress is essential for ensuring that the OEB, the Ministry, and the energy sector in Ontario are able to move beyond conceptual planning and meet the moment toward the practical, coordinated management of DER/As that are already operating on the system or ready to be dispatched to improve reliability and Ontario's energy independence.

The roadmap could also benefit from explicitly acknowledging that each of the asset classes of DERs (including distributed generation, storage, demand-side flexibility, and mobile energy assets such as EVs), presents unique interoperability, visibility, and market-participation challenges, both broadly for Ontario's transmission and distribution systems and in service territories of certain LDCs with identified infrastructure and technological constraints and/or gaps. As such, the DSO Roadmap must ensure that it is able to adequately consider the impacts of various asset classes and system constraints holistically (such as the distinctive characteristics of EVs as both significant new loads and rapidly scalable mobile distributed storage systems), as this will ensure that the DSO Roadmap, working groups, and workstreams are properly scoped and remain relevant to the rapidly advancing technologies that are already shaping the grid and will continue to do so as Ontario and Canada continue their energy transition and decarbonization pathways.

2. Do the roadmap elements adequately reflect the sector's current state and Ontario's needs and priorities? If not, how should the elements be changed?

While the DSO Roadmap elements capture the Board and Ontario's broad direction, it may understate how much actionable knowledge already exists from prior OEB and IESO work and

amongst LDCs. As noted in DRC's previous comments, the OEB has produced a significant body of analysis to support DER integration and DSO capabilities. Collectively, these initiatives have generated a deep understanding of where DER capabilities add value and what regulatory enablers are needed. DRC recommends that the priority should be to implement and scale what has already been tested and piloted, both in Ontario and in comparable jurisdictions.

Ontario's immediate need is to fairly integrate DERs, including aggregated EVs, fleets, and bidirectional charging, into the distribution and bulk systems in a way that enhances reliability, potentially defers costly infrastructure, and lowers system costs for all customers, while providing important market incentives to accelerate DER adoption. The DSO Roadmap should therefore emphasize a flexible, innovative, and streamlined approach to supporting DSO capabilities and align with the best practices from other jurisdictions, most notably the UK. Thoughtful consideration of other comparable jurisdictions will ensure that the DSO Roadmap and the OEB's broader approach to supporting DSO capabilities for LDCs is informed by existing experience and knowledge from other regulators and utilities that have embedded DER visibility and flexibility procurement into LDC operations. DRC fully supports the evolution of the Board's approach to move away from the simplified or interim DSO concepts discussed as part of the original Proposal 2, as they would divert resources and delay meaningful progress to support DSO capabilities as quickly as possible to meet the growing electricity needs of Ontario. Instead, the DSO Roadmap should direct distributors to advance directly to full DSO functionality as quickly as possible where readiness has been demonstrated through existing capability assessments or DER integration pilots.

3. How could the roadmap elements be modified or clarified to improve the strategy for developing and implementing DSO capabilities in Ontario?

DRC proposes the following three clarification to strengthen the DSO Roadmap workstreams:

- (i) Workstream 2 (Define Flexibility Services), in tandem with "Pilots, Demonstrations and Small-Scale Deployments" should commit to near-term standardization of a small number of high-impact use cases that are technologically and commercially ready, including managed EV charging, vehicle-to-grid (V2G) and vehicle-to-home (V2H) exports for local capacity support, and aggregated DER participation in other non-wires alternatives. Workstream 2 should seek to develop regulatory instruments that can be adopted for existing use case and provide certainty to DER/As and LDCs, allowing them to design and procure flexible services in the near term without waiting for any proposed full market-design phase to conclude.
- (ii) Workstream 3 (Mandatory Assessments) should consider how LDCs can evaluate their readiness to integrate and manage both stationary and mobile DERs. EVs introduce unique temporal and geographic flexibility opportunities and impacts that traditional planning tools may not fully capture. LDC's may also lack the necessary data and system visibility of mobile DERs that move between distribution systems. As such, the Board should consider what resources will be required when developing assessment methodologies that ensure system upgrades and digital investments are targeted where they can unlock the most flexibility and value for all types of DER/As.
- (iii) Workstream 4 (Enduring Policy) should ensure that DSO capability policy development proceeds in tandem with existing regulatory reforms targeted at DER integration and adoption, to prevent duplication and streamline participation for customers and aggregators. The OEB should also consider what additional public reporting and stakeholder involvement can be adopted to increase transparency and support continued

progress on how DSO capabilities are delivering measurable benefits to customers, LDCs, and DER owners, such as reduced peak-load investment, increased reliability, or decarbonization benefits.

DRC respectfully submits that the above comments and the OEB's evolution in thinking on the DSO Roadmap strongly support an evidence-based approach to supporting DSO capabilities that is responsive to Ontario's evolving energy landscape, and capable of unlocking the full potential of DERs as an integral part of a modern, reliable, and customer-centred electricity system.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Vollmer", with a stylized, flowing script.

DT Vollmer

c. Cara Clairman, PnD
Devin Arthur, EVS