



November 13, 2025

**VIA RESS**

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

Dear Mr. Murray,

**Re: Consultation on the Regulatory Treatment of Local Electricity Demand-side Management (Stream 2) Programs  
Board File No.: EB-2025-0156**

We are counsel to the Distributed Resource Coalition (“**DRC**”) in the Ontario Energy Board (the “**Board**” or “**OEB**”) consultation on the regulatory treatment of local electricity demand-side management (“**eDSM**”) programs in Stream 2 (the “**Consultation**”). DRC appreciates the opportunity to participate in the Consultation and provide the following comments on the eDSM Regulatory Working Group’s (the “**WG**”) report providing a proposed framework for implementation of local eDSM (the “**Report**”).

**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, 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 supports the WG’s proposal, which is an important step toward creating a more flexible, efficient, and decarbonized electricity system. DRC believes that the proposal is well-aligned with the Ministerial Directives issued to the IESO and the OEB, which call for local eDSM programs delivered by LDCs to address system constraints and provide broad system benefits. The proposed framework for eDSM Stream 2 will enable LDCs to deliver demand-side solutions, including managed charging, distributed storage, and local efficiency programs, that directly support Ontario’s energy transition and prepare local distribution systems for the energy transition and increased electrification.

DRC supports the WG's recommendation that the majority of local eDSM programs be approved through Delegated Authority. This practical approach will expedite the delivery and funding of local programs that respond to evolving distribution-level needs, particularly as electrification accelerates load growth and introduces new flexibility opportunities while addressing system reliability risks. A streamlined review process will also reduce regulatory burdens while maintaining important transparency and oversight mechanisms through the IESO's and OEB's oversight and the use of the MAL.

DRC also supports the WG's recognition that eDSM programs must evolve to include innovative, technology-enabled measures. A flexible, technology-neutral framework must be able to support eDSM programs that include EV charging, vehicle-to-grid and vehicle-to-home pilots, and EV battery aggregation that can provide both local and bulk system benefits when properly integrated into LDC eDSM programming and planning.

DRC further supports the proposal for an eDSM Variance Account with no materiality threshold. Removing materiality barriers will allow more LDCs and project proponents to participate fully in the transition to a more responsive local distribution system. This approach is especially important for advancing pilot projects and non-traditional demand resources such as EV-based load flexibility, distributed storage, and thermal energy management.

Finally, DRC respectfully encourages the OEB to continue to consider how to encourage LDC partnerships with EV aggregators, demand response providers, and community-based energy partners to maximize the system value of DERs to the distribution system. For example, eDSM programs that integrate EV charging flexibility or other DERs into eDSM design should be recognized for their contribution to overall system efficiency, resilience, and emissions reductions. DRC strongly supports advancing local eDSM programming and shares the goal of ensuring that the Stream 2 framework enables innovation, system reliability, and customer participation. As future consultation phases proceed, DRC looks forward to engaging further on implementation details such as program evaluation, interoperability standards, and pathways to integrate EV-based resources into the broader eDSM framework for all streams.

Sincerely,

A handwritten signature in black ink, appearing to read "Devin Arthur", with a stylized, cursive script.

DT Vollmer

c. Cara Clairman, PnD  
Devin Arthur, EVS