SLIDE	TOPIC	REC REF	FEEDBACK
13, 14, 16, 18-20	Resilience in Value Stack	9, 10, 11	DERs provide essential grid and customer resilience, which seems to be missing from the value stack. The resilience value can vary by use-case. For example, residential batteries providing resilience installed under Hydro One's reliability improvement program were at 8% the cost of a wires solution. Grid resilience can be measured through SAIDI and SAIFI scores. Homeowners may also be willing to contribute to part of the resilience value including access to back-up power, which could support the business case for an aggregated residential storage fleet. For BTM and FTM energy storage, NRStor recommends inclusion of resilience in the value stack for any recommendations on pricing, programs, and procurements.
17-22, 31	Generation capacity, Tx & Dx capacity, ancillary services (including reactive power) from BTM standalone Dx storage and aggregated FTM & BTM storage	6, 7, 9, 10, 11	**RECOMMENDATIONS 9, 10, and 11 – Value Stacking Aligning with Operability Profiles and Performance Capability of DERs** A fleet of residential energy storage assets can provide grid services such as bulk capacity, TX and DX capacity, operating reserve, voltage/frequency support including reactive power, and demand flexibility, in addition to non-energy benefits including resilience as mentioned above. When aggregated and managed as a fleet, aggregated behind-the-meter energy storage offers dependable, planning-grade grid service performance not unlike larger centralized energy storage projects and thus should also be compensated for their full operability profile. This is particularly important for residential storage where the CAP-EX can be 2x as centralized or grid-scale capacity and generation projects. NRStor supports and emphasizes the need for the IESO and LDCs to explicitly allow for a simplified process for a portfolio approach in value stacking opportunities that adequately compensate for the full range of grid services and provide sufficient market certainty for residential standalone and hybrid energy storage. This includes stacking of programs including eDSM incentives as well as the federal Investment Tax Credits (accessible to corporations or developers), in addition to time varying rates, long-term bulk, TX, and DX

capacity revenues as well as ancillary services (including reactive voltage) and resilience.

Unfortunately, the eDSM incentives for storage are limited to hybrid solar+storage installations and accessible only directly to customers (which does not enable stacking of ITCs). Standalone storage, particularly when paired with a time varying rate, can be configured such that it is not contributing to system peak; rather that it is utilized for optimal ratepayer savings.

MISSING RECOMMENDATION ON GENERATION CAPACITY GAP FROM BTM STORAGE AND STORAGE AGGREGATIONS

While the capacity value is high for DX storage as the OEB rightfully recognizes, there is a gap in procurement mechanisms to adequately compensate BTM DX storage for capacity and ancillary services.

This limitation extends from BTM storage to also aggregations of standalone FTM and BTM batteries.

- IESO's local generation program is limited to FTM and generation only DERs.
- IESO's proposed ERP foundation model recommends a minimum size threshold of > = 1 MW for DER aggregations.
- Further, the established funding caps for Stream 2 eDSM are a limiting factor and may only serve to support a handful of pilot-sized distributed storage projects. For commercially sized BTM residential storage aggregations, the upfront costs can be high but the benefits are commensurate and accrue over the operation of assets.
- While BTM residential batteries can access demand response and capacity auctions, both demand response and capacity auctions tend to provide a lower value and provide less certainty relative to longer-term procurements like IESO's LT series.

Absent of significantly higher capacity auction clearing prices, NRStor highly encourages enabling procurements, in the immediate to near- term given the constraints identified in recent IRRPs, with 15+ year terms for capacity services, as well as value stacking with ancillary and resilience services.

			RECOMMENDATIONS 6, 7 and 8 – TX and DX constraints For areas that anticipate high load growth and electrification, procurements, programs, and pricing schemes that help prioritize distributed multi-use and shared assets that enable more dynamic use of the grid, and which can serve as critical thermal and electrical reserves for the customers and the grid, such as such as thermal storage and distributed batteries, should be implemented. Importantly, contractual barriers that make exclusive use of distributed assets that could otherwise support multiple grid functions at the bulk, transmission, and distribution levels, should be removed. For constrained regions, BTM – in addition to FTM – residential standalone and hybrid aggregated energy storage should have a commercial/contracting pathway to contribute to alleviating both transmission and distribution constraints. It is important that requirements are not cost prohibitive for residential solutions (including metering and settlement requirements) in urban centres or fast-growing regions. NRStor is actively developing 10-50 MW of bulk capacity and infrastructure relief from installed batteries spread across 10,000+ homes in congested areas as identified in regional plans. We welcome a meeting with the OEB to provide confidential information that could help inform regulatory considerations for near-term commercialization of these kinds of projects.
24	Net Billing	1, 2, 3	NRStor supports a new net billing approach that could better enable energy arbitrage through time-based exports, with the following considerations: Export from stand-alone aggregated BTM residential energy storage should be made eligible (e.g., through extending the definition of eligible generators) in both Net Metering and Community Net metering regulations. The value received through net billing should have a pay-out mechanism (beyond an expirable credit) for exports and load reductions that are both locational and market reflective and account for mitigating or lowering the Ontario Electricity Rate funded through the tax base.

			Settlement implications (e.g., use of inverter data as is the case in Green Mountain Power vs typical utility metering) for BTM residential storage should be carefully examined to mitigate cost prohibitive measures, to the extent possible. NRStor welcomes a discussion with the OEB on this topic.
40	Base distribution rates, retail transmission service rates and applicable delivery charges, BTM storage	Section C	NRStor supports exempting front-of-meter electricity storage from both base distribution rates and retail transmission service rates and recommends examining the application of similar exemptions for BTM storage installed by RPP customers including residential customers including those managed by third-party developers and aggregators, as applicable.

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