

24 October, 2025

Registrar, Ontario Energy Board (Registrar@OEB.CA)

Dear Registrar,

**RE:**

**Distribution System Operator (DSO) Capabilities (EB-2025-0060)**

**ESC Written Comments in Response to October 14, 2025 Stakeholder Meeting and Questions**

Energy Storage Canada (ESC) is the national trade association dedicated to accelerating the deployment of energy storage projects and technologies<sup>1</sup>. Please accept this letter as ESC's written comments in response to the content presented, and questions posed, during the October 14, 2025 stakeholder meeting on Distribution System Operator (DSO) Capabilities.

1. ESC appreciates the opportunity to participate in this process, and commends OEB Staff for the effective engagement and consultation to date.
2. The continued development of advanced capabilities by electricity distributors to integrate, manage, and optimize Distributed Energy Resources (DERs) (such as demand-side and distributed energy storage) for distribution and wholesale electricity market services, and bulk- and non-bulk coordination, is of critical importance to the following imperatives in the Integrated Energy Plan: enabling economic growth; and "[evolution] to: use DER as reliable, low-cost providers of grid services; monetize DER fairly, ensuring customers receive compensation that reflects the value their resources contribute to the grid; and mobilize DER providers and investors, making Ontario a leading jurisdiction for innovative energy solutions" (pg. 87 of 152).
3. It is ESC's perspective that the ambition and urgency in the "DSO Roadmap Overall Vision" should be strengthened in alignment with these imperatives. For example: "**DSO Capabilities enable DERs to significantly increase their contribution** contribute to an affordable, secure, reliable and clean energy system that meets evolving consumer needs and delivers long-term value, **with pilots,**

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<sup>1</sup> For further information, please visit: [www.energystoragecanada.org](http://www.energystoragecanada.org)

demonstrations and small-scale deployments building learnings, capacity and momentum in the near-term". Long-term impact, and near-term results should be explicit targeted outcomes in the vision for this initiative.

3. Furthermore, to leverage ongoing initiatives and accelerate progress, we recommend that a formal workstream consider pilots, demonstrations and small-scale deployments (past and future), and the foundational grid modernization investments required to enable them. This workstream would enhance collaboration and knowledge transfer, avoid duplication and maximize synergies, and increase the scale and pace of near-term actions and results.

Very best regards,

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