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TO: **Ontario Energy Board**

FROM: **International Solar Solutions**

DATE: **April 21, 2026**

RE: **EB-2025-0156 – Comments on Stream 2 eDSM Framework**

International Solar Solutions ("iSolar") appreciates the opportunity to provide comments on the Ontario Energy Board's proposed updates to the Non-Wires Solutions (NWS) Guidelines, including the draft Appendix on Stream 2 local electricity demand-side management (eDSM) programs, as part of proceeding EB-2025-0156. As a provider of distributed, behind-the-meter technologies focused on reducing residential cooling demand and peak electricity use, iSolar brings a practical, implementation-focused perspective on how emerging solutions can support both local distribution system needs and broader system objectives. These comments are intended to support the OEB in refining the Stream 2 framework to ensure it is both rigorous and workable in practice, enabling distributors to identify, evaluate, and deploy a broader range of cost-effective solutions.

Unlocking the Value of Distributed Cooling Solutions in Stream 2 eDSM Programs

iSolar Perspective on EB-2025-0156

iSolar welcomes the Ontario Energy Board's proposed updates to the Non-Wires Solutions (NWS) Guidelines and the introduction of a formal framework for Stream 2 local electricity demand-side management (eDSM) programs. This represents a meaningful step toward enabling distributor-led solutions that can address both local distribution system needs and broader electricity system objectives.

As a provider of retrofit solar attic fan technology designed to reduce residential cooling demand and peak electricity use, iSolar is encouraged by the OEB's recognition of the role that distributed, behind-the-meter solutions can play in supporting system reliability and cost-effectiveness. At the same time, the proposed framework raises important considerations regarding how emerging technologies are evaluated, validated, and ultimately enabled within the Stream 2 construct.

1. Recognizing the Distribution Value of Cooling Load Reduction

The Stream 2 framework appropriately emphasizes the importance of addressing identified distribution system constraints. However, the value of technologies such as retrofit solar attic ventilation is inherently distributed and cumulative and may not always align neatly with traditional approaches to identifying and quantifying system need.

iSolar encourages the OEB to ensure that the framework allows for the aggregation of distributed impacts and recognizes the role of geographically targeted deployments in delivering measurable distribution-level benefits.

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2. Ensuring Cost-Effectiveness Frameworks Capture Full System Value

iSolar's retrofit solar attic fan technology delivers both energy and peak demand savings and has demonstrated strong cost-effectiveness under standard evaluation frameworks. Independent analysis indicates that the technology performs well under traditional tests, reflecting its ability to reduce cooling-related electricity consumption and contribute to peak demand reduction.

At the same time, the application of cost-effectiveness frameworks within Stream 2 will play a critical role in determining how technologies are deployed in practice. The value of distributed, behind-the-meter solutions is often influenced by assumptions related to load shapes, coincidence with system peaks, and localized system conditions. These factors can vary across service territories and may not always be fully captured through standardized inputs.

iSolar supports the OEB's approach to incorporating both quantitative and qualitative benefits within the evaluation framework. Providing additional clarity on how localized distribution benefits. including peak demand reduction in constrained areas, deferred infrastructure investment, and system resilience, are assessed would further strengthen the framework and support consistent application across distributors.

In addition, as Stream 2 programs evolve, there may be value in enabling pilot-oriented approaches or staged program deployment, particularly where technologies are applied in new geographic or system contexts. This would allow distributors to validate performance under real-world conditions while maintaining alignment with cost-effectiveness objectives.

3. Expanding Pathways for Non-Standard Measures – Updating the IESO's MAL

iSolar's technology is not currently represented in standardized measure lists such as the IESO's Measures and Assumptions List (MAL), which creates an unnecessary barrier to a pre-approved measure being more easily considered for inclusion within utility-led conservation programs.

iSolar has undertaken and supported independent third-party expert validation efforts to quantify the energy and demand impacts of its technology in real-world conditions. However, the absence of a clear pathway for incorporating non-standard measures into Stream 2 program applications introduces uncertainty for both technology providers and distributors.

iSolar recommends that the OEB work with the IESO to establish a defined and public process for evaluating and incorporating (updating) emerging measures, supported by third-party studies, pilot results, and jurisdictional experience. This would ensure that the framework remains adaptable to innovation while maintaining appropriate levels of rigor and currency.

In particular, iSolar urges the OEB to encourage or direct the IESO to update the MAL to include such proven measures so that utilities can consider their deployment as soon as this framework is settled and not have to wait until the next MAL re-opening, which should be routinely adjusted on bi-annual schedule.

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4. Enabling Practical Program Design and Delivery

For Stream 2 programs to succeed, distributors must be able to design and implement programs that are both effective and practical. Technologies such as retrofit solar attic fans offer several advantages in this context, including ease of installation, scalability across residential markets, and alignment with peak demand reduction objectives and ease of installation into existing roof vents.

However, overly complex application requirements or rigid cost effectiveness (EST & DST) evidentiary standards may discourage distributors from pursuing programs that involve newer technologies, even where those technologies offer meaningful system benefits.

iSolar encourages the OEB to ensure that application and approval processes are proportionate to program scale and risk, and that distributors are supported in piloting and scaling solutions that may not yet have extensive program history.

5. The Role of Residential Solutions in Addressing System Needs

Residential demand continues to play a significant role in Ontario's summer peak, driven largely by cooling loads. Technologies that directly reduce cooling demand, particularly those that operate passively or with minimal customer intervention, represent a practical and scalable opportunity to address these challenges.

iSolar's retrofit solar attic fans operate without drawing electricity from the grid, and in fact are independently proven to save on both peak demand and energy consumption, providing a unique form of demand reduction that aligns directly with system peak periods. As such, they offer a complementary solution to existing demand-side measures and can be deployed in a targeted manner to address localized constraints.

Ensuring that the Stream 2 framework accommodates such solutions will be important to achieving its intended objectives.

Conclusion

iSolar supports the OEB's efforts to advance a framework that enables distributor-led, locally targeted demand-side solutions. The introduction of Stream 2 represents a significant opportunity to unlock new approaches to managing system needs in a cost-effective and flexible manner for the benefit of ratepayers and LDCs.

To fully realize this opportunity, it will be important to ensure that the framework accommodates emerging technologies, provides flexibility in evaluation methodologies, and supports practical implementation by distributors.

iSolar looks forward to continued engagement with the OEB, the IESO, and electricity distributors to support the development and deployment of solutions that contribute to a more efficient, resilient, and sustainable electricity system.