

May 14, 2026

Mr. Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge St, 27th Floor
Toronto, ON M4P 1E4

Dear Mr. Murray:

Re: NOTICE OF PROPOSAL TO AMEND A CODE PROPOSED AMENDMENTS TO THE DISTRIBUTION SYSTEM CODE (EB-2019-0207)

The Electricity Distributors Association (EDA) appreciates the opportunity to provide comments on the Ontario Energy Board's (OEB) proposed amendments to the Distribution System Code (DSC) regarding distributed energy resource (DER) information sharing requirements and associated updates to Appendix E connection agreements.

The EDA represents Ontario's local electricity distributors (LDCs), which safely and reliably deliver electricity to homes, businesses, and institutions across the province. Collectively, LDCs own more than \$35 billion in distribution infrastructure and invest over \$3.2 billion annually to maintain reliability, support growth, and enable electrification, while remaining directly accountable to customers for affordability and service quality. Ontario's LDCs are increasingly central to the successful integration of DERs, electrification, customer connections, and broader system coordination.

Overall, we are supportive of the proposed amendments and recognize the importance of improving coordination and information sharing to support DER integration, forecasting, and planning activities across Ontario's electricity system. We note that much of the proposed information already exists within distributor systems and, in some cases, is already provided to the Independent Electricity System Operator (IESO) through existing OEB reporting requirements in a static format.

However, several implementation, operational, and governance considerations warrant further clarification before the proposed amendments come into force.

General Comments

We support efforts to improve coordination between the IESO and distributors as DER penetration and electrification continue to increase. At the same time, the proposal raises broader questions regarding how information will be requested, governed, interpreted, and shared between the IESO and LDCs.

We are concerned that the proposed framework establishes a regulatory obligation before sufficient clarity has been provided regarding the scope, governance, implementation expectations, and future application of the requested information. Additional transparency regarding how the IESO intends to operationalize and use this information would help distributors better assess the appropriateness and value of the requests.

We encourage the OEB and IESO to clearly articulate the operational, planning, forecasting, and coordination objectives the information is intended to support. Clear linkage between requests and defined use cases would help ensure reporting expectations remain proportionate, practical, and aligned with intended system outcomes.

We also note there appears to be overlap between the proposed requirements and existing OEB Reporting and Record Keeping Requirements (RRRs). Greater coordination between the OEB and IESO would help avoid unnecessary duplication of reporting requirements on distributors and support more efficient reporting frameworks.

Scope and Interpretation of Requested Information

During the stakeholder consultation, we identified concerns regarding the breadth and ambiguity of provisions allowing the IESO to request “any other static information as may be reasonably requested.”

Additional guardrails are needed regarding what constitutes a “reasonable” request. While the proposal is currently limited to static information, members expressed concern that establishing these requirements without clearer governance parameters could create precedent for future expansion into more dynamic or operational data requests.

We recommend that the OEB:

- Provide additional guidance regarding the scope and limitations of supplementary information requests
- Clarify the governance process for new or expanded requests
- Establish principles to ensure requests remain proportionate and tied to defined operational or planning objectives
- Consider stakeholder consultation before material expansion of reporting expectations

We also note that additional clarity is required regarding the definition of “future connections,” including the stage at which a proposed DER connection becomes reportable. Without clearer thresholds, distributors may interpret these obligations differently.

Reciprocity and Information Sharing

From a broader policy perspective, we question the nature of the reciprocity and whether these requirements represent a one-way flow of information to the IESO.

As DER participation and coordination between bulk and distribution systems continue to evolve, distributors will also require timely and meaningful access to relevant system-level information and insights to support safe and reliable operation of local distribution systems. As DER participation and IESO-administered DER programs continue to expand, **distributors increasingly require visibility into how DERs connected to their systems are being dispatched** or influenced through market and programmatic channels. **Two-way coordination will be important to ensure distribution system constraints and operational considerations are appropriately reflected.**

We encourage the OEB and IESO to consider reciprocal information-sharing frameworks that support two-way coordination between the IESO and LDCs as part of evolving DER integration and Distribution System Operator (DSO)-related functions.

We also note that significant sector work has already been undertaken through the Transmission-Distribution Coordination Working Group (TDWG), including the B2 Communication Assessment report, which represents a multi-year effort to evaluate how information can and should flow under various DSO models and operational scenarios. **We encourage the OEB and IESO to leverage and build upon this existing work as DER-related coordination frameworks continue to evolve, rather than developing new information-sharing structures in isolation.** Finalizing and incorporating TDWG outputs into future DER and DSO-related data-sharing initiatives may help support greater consistency, clarity, and alignment across the sector.

We also note that broader DSO and non-wires solutions policy direction and associated distributor responsibilities continue to evolve. Additional clarity may therefore be required regarding how future information-sharing expectations could align with evolving DSO-related roles, operational responsibilities, and communication standards and coordination requirements.

We note that information-sharing needs may arise across a range of planning, operational, and market coordination functions as DER integration evolves. Establishing clearer frameworks for reciprocal visibility and coordination may help support more efficient integration and alignment between bulk and distribution system operations.

We believe reciprocal visibility would support:

- Improved operational coordination
- Better local planning and forecasting
- Enhanced understanding of system conditions and DER participation
- More effective alignment between bulk and distribution system planning activities

We believe reciprocal information sharing and greater transparency from the IESO is consistent with the broader objectives of improving DER coordination and optimizing system integration across Ontario.

Data Context and System Visibility

Distributors generally have strong visibility into local distribution system conditions and DER integration impacts, while the IESO may have more limited visibility into distribution-level operational realities.

As DER participation and IESO-administered DER programs continue to expand, distributors increasingly require visibility into how DERs connected to their systems are being dispatched or influenced through market and programmatic channels. Continued two-way coordination between distributors and the IESO will therefore remain important to avoid unintended operational impacts and support effective DER integration across both bulk and distribution systems.

We believe ongoing coordination with distributors will remain critical to ensuring DER-related information is interpreted within the appropriate local system context and not relied upon in isolation.

Distribution System Code Appendix E Amendments

We generally support the proposed updates to Appendix E connection agreements intended to improve customer awareness and transparency regarding information sharing obligations.

We agree that consistent disclosure language may help clarify distributors' obligations regarding regulatory and legal information-sharing requirements.

However, we note that distributors may require additional implementation guidance regarding:

- Communication expectations for existing DER customers
- Transition considerations for existing agreements
- Consistency of customer communication approaches across the sector

Members also raised questions regarding confidentiality, customer expectations, and potential unintended downstream implications associated with sharing customer or DER-related information across organizations. While existing confidentiality frameworks may permit such sharing, additional clarity regarding privacy protections, permitted use of information, and customer communication considerations may help support confidence in the framework. Some parties also suggested that additional privacy or legal review may be appropriate as implementation progresses.

We also encourage the OEB and IESO to consider the cybersecurity and data governance implications associated with expanded cross-organizational information sharing, particularly as DER-related operational and customer information becomes increasingly interconnected across systems.

We encourage the OEB to continue engaging with distributors regarding implementation expectations associated with customer communication and transition requirements.

Administrative Burden and Implementation Considerations

While much of the underlying data generally exists within distributor systems, compiling, validating, formatting, and maintaining the information may still require material staff effort, system changes, and administrative resources.

The level of burden will depend significantly on:

- Frequency and cadence of requests
- Required response timelines
- Standardization of data formats
- Degree of manual validation or extraction required
- Whether requests are recurring, ad hoc, or expanded over time

At present, the proposal does not specify reporting cadence, which will be a key factor in determining operational burden.

We encourage the OEB and IESO to work collaboratively with LDCs to establish practical implementation expectations, including standardized formats, reasonable timelines, and clearly defined service standards.

We also recommend monitoring implementation impacts following the amendments coming into force to assess whether additional guidance or cost recovery considerations may become necessary.

Conclusion

We appreciate the OEB's continued efforts to support DER integration and coordination across Ontario's electricity sector.

We are generally supportive of the proposed amendments and recognize the value of improving information sharing between distributors and the IESO. At the same time, we believe additional clarity is required regarding scope, governance, implementation expectations, reporting cadence, and reciprocity to ensure the framework remains practical, proportionate, and operationally effective.

We encourage continued collaboration between the OEB, IESO, and distributors as this work advances.

Thank you for the opportunity to provide these comments. Should you have any questions or require further information, please do not hesitate to contact Brittany Ashby, Senior Regulatory Affairs Advisor, at bashby@eda-on.ca or 416-886-4420.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ted Wigdor', is written over a light grey rectangular background.

Ted Wigdor
Vice President, Policy, Government & Corporate Affairs