

**BY EMAIL AND RESS**

May 14, 2026

Mr. Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Mr. Murray,

**Re: EB-2019-0207 – OEB Proposed Amendments to the DSC – Hydro One’s Comments**

On April 23, 2026, the Ontario Energy Board (“OEB”) issued a Notice of Proposal to amend the Distribution System Code (DSC) and related standard form generation facility agreements. The proposed amendments are being made to support a new requirement for licensed electricity distributors to share certain information, upon request, about DERs connected to their distribution systems with the IESO to support their activities. The OEB has established that the amendments will come into force on August 1, 2026.

Hydro One Networks Inc. (“Hydro One”) is supportive in principle of sharing DER information with the IESO if this information is necessary for the IESO to fulfil its obligations. However, in Hydro One’s view, the IESO and OEB have not yet been able to explain how the specified DER information listed in section 6.6.7 will inform the IESO’s stated activities related to the deployment of DERs. Hydro One believes that the OEB should not move to specify data sharing requirements without first clarifying how this information will be used by the IESO to meet its objectives. Hydro One is concerned that distributors could be required to expend effort to respond to information requests from the IESO and that this information will not provide meaningful value in supporting the IESO’s activities. Furthermore, clause (e) of section 6.6.7 is open-ended in terms of the data that could be requested by the IESO. As a result, distributors could be required to provide data that may not be readily available or could require more significant effort than was otherwise anticipated.

Hydro One understands that the foundational data sharing requirements established under section 6.6.7 are intended to satisfy Section 16 of Minister of Energy and Mines’ Directive to the OEB related to Ontario’s Integrated Energy Plan<sup>1</sup>. Hydro One also notes that a similar directive has been issued by the Minister to the IESO to broadly facilitate and advance DER data sharing<sup>2</sup>. The IESO is currently undertaking a public consultation under its Enabling Resource Program DER Integration Project to establish DER data sharing requirements to address planning needs and support improved and effective DER deployment. In Hydro One’s view, this consultation will serve as an important first step in understanding the operational needs and requirements of both the IESO and distributors as it relates to this objective. It is expected that this understanding will also inform the type of data required by the IESO from distributors to support effective DER deployment. Hydro One does not believe that the OEB should establish new DER data sharing

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<sup>1</sup> Order in Council 802/2025, Minister’s Directive to the OEB

<sup>2</sup> Order in Council 803/2025, Minister’s Directive to the IESO, Section 14

requirements in the DSC until further work is undertaken to determine what data is required by the IESO and how this data will be used. By taking this approach and having a clear understanding of the needs driving the requirement for better DER data sharing, this would avoid the need to make subsequent DSC amendments to revise the DER data sharing requirements. Furthermore, having this understanding would also allow distributors to comment more meaningfully on their ability to provide the required data and reasonable timelines for responding to IESO requests.

Hydro One appreciates the opportunity to comment on the proposed amendments in Notice. Please do not hesitate to contact myself or Yoon Kim ([yoon.kim@hydroone.com](mailto:yoon.kim@hydroone.com)) if you would like to discuss these comments or have further questions.

An electronic copy of this response has been submitted using the Board's Regulatory Electronic Submission System.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Savulak". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jason Savulak