

January 30th, 2017

IESO Stakeholder Engagement
Submitted via Email

RE: IESO Market Renewal Benefits Case

EnerNOC Ltd (EnerNOC) is pleased to provide comments on the Preliminary Benefits Case Findings presented by The Brattle Group to the stakeholder community on December 19th, 2017. EnerNOC, as a member of the IESO Market Renewal Working Group, participated in working group sessions as The Brattle Group developed their business case approach and prepared their findings. EnerNOC, a leading provider of Energy Intelligent Software and demand response solutions, has participated in demand response in the Ontario electricity system since 2008.

EnerNOC is supportive of the broad direction that the IESO and the Brattle Group have taken in the preparation of the business case for estimating the potential benefits of reforms to the energy market, improving the operability and flexibility of the electricity system and introducing a centralized capacity auction. EnerNOC believes that moving towards these reforms will meet the objectives set out by the IESO for the Market Renewal Stakeholder Engagement including improving the efficiency of the marketplace through competition and leveling the playing field for all resources. In particular, a centralized capacity market open to competition from all resources offers a stark improvement over how supply is procured today through long-term contracts that saddle consumers with extra costs when technology evolves and prices drop. The state of the electricity system is changing from the needs of the original market design with supply becoming increasingly distributed and variable, the demand side becoming engaged and now participating in the market, and the opportunities emerging for coordination with neighbouring markets. Both the electricity system and the market have to evolve to meet these changing needs.

EnerNOC supports the findings of the benefits case for all three work streams – energy market, operability and capacity auction - and supports that the results are sufficient to move forward to the next steps of market renewal.

The design stage of the three streams will be an important step to ensuring benefits are achieved. EnerNOC looks forward to continuing to participate in and support the Market Renewal Stakeholder Engagement as it moves to the next phase, and beyond.

If you have any questions or require further information, please feel free to follow up.

Yours truly,



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