EnergyHub + Whisker Labs prioritization for IESO changes in the short and long term

2017

1. Peak DR resource for weather-sensitive loads (this would also eliminate "concern about duration of activations" #13, which would otherwise be on our list)
    a. This is highly dependent on #2 below
    b. Suggest if the control group is used that control group size is reduced from 500 to 250. See study being done at CAISO by the BAWG (we can share when published).
2. Residential data access
    a. Residential loads simply cannot participate without this data
    b. We'd ask that the IESO help DR providers to persuade the Ministry to develop a consumer friendly (commercially viable) process for data sharing
    c. Ideally this would make available scrubbed non-participant meter data for matched pair control groups so there would no need to draw from the participant pool of contributing loads (and this would also eliminate the issue of having such a large control group 1.b.)
3. Varying DR capacity obligations
    a. Weather sensitive loads will have to bid their minimum capability at the highest peak unless obligations can vary by month
4. Reduce minimum aggregation size or allow for aggregation across LDCs
    a. Especially with such a high control group requirement (500 resources that cannot contribute to the aggregation) it may be nearly impossible for first time entrants to deliver the minimum 1MW. Suggest 100kW which is standard in other markets.
5. Eliminate virtual zonal limits
    a. No reason for some resources to be limited while others are not. If there is a high minimum and a low cap it makes it pretty hard to do business.

2018

1. More efficient contributor management system
    a. While today we can submit a spreadsheet – at some point we should consider a more automated system that is less manual (less human error).
2. Automated notification for standby and activation notices
    a. We prefer that everything that can be automated, be automated – it removes any issues due to human error as does #1 above.
3. Longer commitment periods (and incremental auctions)
    a. It is easier to invest in thousands of resources if the commitment period is multiple years. With an incremental auction each year, resources can move in and out as necessary. However, allow longer commitments to still be seasonal (e.g. 3 summers).
4. PeakSaver transition
    a. There is a concern that LDCs may be bidding rate payer funded resources into a competitive market. How will third parties have access to those customers? Will customers be able to switch to other programs run by third-parties? This should be a requirement and be a streamlined, digital process.
5. Reinstate utilization payments
    a. Most markets pay a capacity payment and an energy payment during events.