

April 24th, 2017

IESO
Stakeholder Engagement

Via email

Dear IESO Stakeholder Engagement:

Re: DRWG April 6th, 2017 Meeting Feedback

EnerNOC, a leading provider of Demand Response and EIS solutions, is pleased to provide feedback based on the IESO Demand Response Working Group meeting on April 6th, 2017. EnerNOC supports the work the IESO and the DRWG are doing to make improvements to Hourly DR to ensure that the value of the competitive DR resource is being recognized in the system to meet system needs.

1. Improvements to Hourly DR Utilization

EnerNOC supports the need to continue to evolve the Hourly Demand Response (HDR) resource to compete against traditional sources of supply. EnerNOC also supports the need to ensure that the HDR resource is competitive and flexible to meet the IESO system needs. EnerNOC believes that increasing the flexibility of activation by adjusting the duration requirements is a necessary first step. The duration should reflect the needs of the system. EnerNOC recommends that the duration of events be changed to **up-to**-four hours. If resources are only needed for one hour, HDR could be activated for just one hour instead of the current four hour duration. Various other markets and DR programs have a maximum number of hours of dispatch versus a set number of hours.

2. Peaksaver

HDR, procured through the Demand Response Auction (DRA), continues to evolve to meet the needs of the system and provide value and flexibility to the system through competition. As we move towards an incremental capacity auction which is being developed through the Market Renewal initiative the DRWG should ensure that the rules for HDR build a foundation for the ICA. This includes the notion that there may be different rules for different resource types, such as dispatchable loads, residential and C&I loads, however those rules ensure equality and a level playing field among the resource types. Any transition of the peaksaver resources should take this into account.

Yours truly,



Sarah Griffiths
EnerNOC