

Wednesday June 7th, 2017

IESO Stakeholder Engagement
Submitted via email

Dear IESO Stakeholder Engagement

Re: Demand Response Working Group – May 30th Meeting Comments

EnerNOC, a global provider of energy intelligence software and demand response services, is pleased to provide comments on the Notification and Activation of the Hourly DR Resource proposal provided by IESO staff at the May 30th DRWG. EnerNOC will provide comments on the *peaksaver* resource at a later date.

IESO Staff have proposed Option 4, which includes:

- Standby notice if predispatch price prior to 7 am > \$100 (TBC) for any 1 hour of the commitment window
- Activation notice if scheduled in 3 hour ahead pre-dispatch for at least 1 hour
- Length of activation is 1 up-to 4 hours depending on how many consecutive hours are economic

EnerNOC has concern with the ratio identified in the Option 4 results – 44 standby days but only 2 days of dispatch. This ratio will become untenable from a customer perspective and could lead to the degradation of performance when required as the ‘standby’ notice will have no predictive value to the customer that an actual dispatch will occur.

The IESO has indicated that the \$100 is an administrative price that will be established through the DRWG. If a price trigger is used it must alleviate the ratio issue identified above. The price trigger should be based on an acceptable standby/activation ratio. EnerNOC continues to have concern with the creation of an administrative price being set for the triggering of a standby notice as indicated in our comments filed on May 19th. EnerNOC supports the other elements of Option 4.

EnerNOC recommends that Option 6 be re-considered for the proposed option and believes that these changes will lead the resource to be more efficient and valuable to the system.

Yours truly,



Sarah Griffiths
EnerNOC