

April 25, 2018

IESO Stakeholder Engagement  
Submitted via email  
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**Re: Demand Response Working Group Webinar – April 20<sup>th</sup>, 2018**

EnerNOC, an Enel Group Company, is a trusted partner helping enterprises develop, execute, refine customized energy management strategies to reduce costs, manage risk, and maximize the value of emerging energy technologies. EnerNOC is the global leader in demand-side flexibility services, providing large energy users access to more demand response and demand management programs worldwide than any other provider. EnerNOC is pleased to provide comments in response to the IESO Demand Response Working Group (DRWG) webinar on April 20<sup>th</sup>.


EnerNOC recognizes the need to improve the value of the Hourly Demand Resource for the IESO, and has provided support for the addition of the resource to the OESCA list and the removal of the 4 hour day ahead scheduling barrier. Since the DRA is now considered a transition auction, EnerNOC continues to participate in the Incremental Capacity Auction consultation to ensure that the development of the auction will provide the IESO with a valuable capacity product and therefore the right capacity resources in the future.

As noted in past comments, the DRA was created to procure a resource to meet a specific need. As the need for the IESO evolves, the rules for participation and procurement need to evolve as well. However in absence of a defined capacity product in the ICA consultation at this time, EnerNOC may understand what the IESO wants to transition the DRA to, but the decision has not been made. Market participants need stable program/auction rules which is even more important when a product is being procured year-over-year. Stable rules limit program risk for participants. EnerNOC would prefer that changes, to the magnitude that the IESO is proposing for the dispatch trigger, are limited until a defined product has been established for the ICA.

For the proposed priced-based trigger, EnerNOC would support a phased in approach which would use a \$200 trigger for the 2018 DR Auction and then re-evaluate the proposal before moving to a \$100 trigger for subsequent auctions.

Once again, EnerNOC appreciates the opportunity to provide comments on the discussions at the recent DRWG webinar. If there are any questions, EnerNOC would be more than happy to provide further information on this topic.

Yours truly,



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EnerNOC, an Enel Group Company