

February 20th, 2018

IESO Stakeholder Engagement
Submitted via email

RE: Market Renewal Working Group – Stakeholder Engagement and Governance

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 for the February 6th Market Renewal Working Group (MRWG) meeting on the topic of Stakeholder Engagement and Governance.

Support for the Comments from the Consortium

EnerNOC supports the comments submitted by Power Advisory on February 21st, 2018 on behalf of a consortium of renewable generators, energy storage providers, and industry associations (Consortium). This support includes the proposed next steps outlined on page 3. As we move toward changes in all the markets, through the Market Renewal Project (MRP), EnerNOC supports the call in the comments for market participants and other stakeholders to have increased accountabilities within the decision-making process of market design changes and amendments to market rules and market manuals. This is about “decision making” to more accurately reflect what is of most concern to market participants and stakeholders.

The Move to a Market Committee

As communicated at the February 6th MRWG meeting, EnerNOC recommends moving toward a market committee construct similar to those found in ISO-NE, PJM and NYISO. All interested parties would have standing, recorded weighted votes by sectors with ability to provide comments would allow IESO decision makers, the IESO Board as well as other policy makers a direct view into the opinions of market participants and interested parties. A markets committee structure would allow a holistic view into the market rules, proposed amendments and market manual changes for all members versus the current ‘one off’ stakeholder engagements. The Market Renewal Project has demonstrated how closely linked changes to the current markets and the addition of new market mechanisms are. This type of cohesive understanding by participants and IESO staff should continue well beyond the completion of the initial MRP rules, and mechanisms. This type of committee wouldn’t only provide insight into the views of participants by the decision makers, but it will also lead to a better educated and informed sector.

In the interim, for the MRP, once the high level designs are completed through the current processes in 2018, then review of the draft market rules or redlines should be brought to a ‘committee of the whole’ where they can be discussed, consulted on and potentially amended before they are sent to the Technical Panel. If substantial consensus isn’t reached, at least the Technical Panel and then the IESO Board members will have direct insight into the reasons for potential dissent and can make a decision on full information.

Conclusion:

EnerNOC appreciates the opportunity to bring forward new ideas on the MRP to ensure its success. EnerNOC looks forward to continued conversations about the topics raised at the February 6th MRWG meeting on governance/decision-making and those found in the submissions by EnerNOC, the Consortium, as well as the other ideas proposed by MRWG members.

Please let me know if you have any questions or require further information.

Yours truly,



Sarah Griffiths
EnerNOC, an Enel Group Company