

October 5th, 2017

IESO Stakeholder Engagement

Submitted via email engagement@ieso.ca

Re: DRWG – September 12th Meeting - Comments

EnerNOC, an Enel group company, is a leading provider of energy intelligence software (EIS) and demand response solutions. EnerNOC is pleased to provide comments in response to the IESO Demand Response Working Group meeting of September 12th, 2017. Overall, EnerNOC continues to support the work the IESO and DRWG members are doing to increase the value of the demand response (DR) resource to the system operator, while the resource is transitioned from a DR only auction to the competitive Incremental Capacity Auction. All changes to the current market rules for the Demand Response Auction and the Hourly DR resource need to have this transition as a top priority.

EnerNOC supports the efficient dispatch of the DR resource. Throughout global capacity markets and scarcity programs, the demand response resource is valued as a capacity resource. At this time, the market does not need the resource to displace efficient and cost effective energy, but it should procure the DR resource to ensure the system meets its resource adequacy needs during times of system stress. In the Ontario system today, DR should be treated as a capacity resource. EnerNOC recommends a reliability based trigger, such as an EEA event, for the resource procured through the Demand Response Auction.

From the transition of DR3 to a market based procurement, EnerNOC has always supported using the resource in times of need and not based on pre-defined time limits, such as the legacy 4-hour block. EnerNOC continues to advocate for the change of the 4-hour block to 'up to 4 hours' and being based on system need. If the resource is needed for 1 hour, it should be dispatched for 1 hour.

EnerNOC recommends that the standby notice remain. EnerNOC would also recommend keeping the notification time or make changes based on lead up to meeting the EEA needs. EnerNOC looks forward to further discussion of this idea at the next DRWG.

If you have any questions or require further information, please contact me.

Yours truly,



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