

June 16<sup>th</sup>, 2016

IESO Stakeholder Engagement  
*Submitted via email*

Dear IESO Stakeholder Engagement:

**Re: IESO DRWG – May 30<sup>th</sup> 2016 Meeting**

EnerNOC Ltd. (EnerNOC), a leading provider demand response who has participated in demand response programs in Ontario since 2008, is pleased to participate in the renewed IESO Demand Response Working Group (DRWG) and appreciates the opportunity to provide comments on the material presented by the IESO at the May 30<sup>th</sup> Working Group meeting.

First off, EnerNOC wants to compliment the IESO on the May 30<sup>th</sup> meeting and the ability of participants to present their views on the topics at hand. The DRWG provides a forum for stakeholders to work alongside the IESO to ensure demand response (DR) continues to grow and prosper in Ontario, while remaining a competitive resource. EnerNOC looks forward to continuing to participate in this group and to presenting our ideas for discussion on potential changes to the Auction and market design.

**Proposal to Enable Transfer of DR Capacity Obligations**

EnerNOC supports the IESO staff proposal of allowing Demand Response Auction Participants to transfer DR Capacity Obligations to other qualified Demand Response Auction Participants. The ability to transfer capacity obligations, either in part or whole of an obligation will assist to mitigate risk for unforeseen circumstances, as outlined in the IESO presentation, as well as ensuring that the entire amount of procured DR capacity will be available for delivery in the energy market. As a growing resource in the province, which will one day compete with other capacity resources in incremental capacity auctions, it is most important to ensure that the entire DR resource capacity be maintained.

EnerNOC recommends that Capacity Transfers should be available to be made throughout the commitment period. Currently, Demand Response Market Participants (DRMP) have a buy-out option during the commitment period if they are unable to meet their capacity obligation. Instead of using this option, DRMP should be allowed to transfer this capability to other qualified DRMP to ensure that the DR resource capacity is maintained. Similar timelines to the buy-out option should be in place.

Currently in ISO-NE, capacity transfers can occur during the commitment period. ISO-NE has a schedule in the Forward Capacity Market rules that allows for transfers of Capacity Supply Obligations (CSO) during the forward period as well as twelve monthly CSO bilateral periods that allow resources to trade obligations for a single month, two months in advance of the obligation month. Transfers must occur during a 1.5 day window.



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EnerNOC looks forward to continuing discussions on this topic at the next DRWG. Please let me know if you have any questions or require further information.

Yours truly,

A handwritten signature in blue ink, appearing to read "S. Griffiths".

Sarah Griffiths  
EnerNOC