

## **IESO Engagement**

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**From:** Cory Cook  
**Sent:** October 18, 2016 1:14 PM  
**To:** IESO Engagement  
**Subject:** Residential DR Baseline

Good afternoon,

Toronto Hydro CDM (THESL) would like to note the following comments:

- Current residential DR (RDR) methodology leads to negative baseline bias: weather sensitivity in residential loads means more energy on typical DR days
- Strong support for RCT Baseline methodology for RDR in other jurisdictions; also limits data collection to global DR participant group (assume peaksaver customers)
- THESL currently maintains dynamic peaksaver EM&V control groups and proposes their continued use for ease of development and evaluation; these were determined by IESO and their evaluation contractor, but will they meet new RCT sample guidelines?
- Providing data “on an event basis” would prove quite difficult for THESL, as it involves IT involvement each time
- Propose a deemed DR reduction based on historical peaksaver evidence in the first year, and then annual ex-post analysis for all event days, with potential true-up depending on settlement process
- At this time, it is difficult to support future stratification of resources as proposed
- Since RDR resources are very weather sensitive, how is under-performance or over-performance relative to registered resource quantity treated in settlement? Could the registered resource be temperature dependent?

Thank you,

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