

IESO Engagement

From: Laura Kier
Sent: December 09, 2016 1:43 PM
To: IESO Engagement
Cc: Erika Diamond
Subject: EnergyHub Comments on November 30 DRWG Planning Meeting

Hello,

Thank you for giving us the opportunity to comment on the most recent DRWG Planning Session on November 30, 2016. We'd like to remark on a few of the presentations and discuss some of the open issues. Please consider these our official comments on these issues.

1. We'd like to reiterate that a change from a 1 MW minimum aggregation size by zone to 100kW is necessary for market competitiveness and the entrance of residential aggregators into the DR auction.

2. We support many of Rodan's proposals that they discussed in their presentation. Specifically, we also believe that the following should be high priority goals for 2017 DR:

- Longer deliver periods (up to 5 years) will encourage investment in resources.
- The removal of zonal limits for virtual resources will make it easier for an aggregator to reach the 1 MW minimum threshold.
- Monthly commitment variability will provide the IESO with the most load reduction possible and will most efficiently utilize the IESO's DR resources. In the current construct, demand response providers must bid the minimum load reduction they are able to achieve for the entire six month delivery period. Meaning, a seasonal resource that may be able to provide more load drop in August must bid the amount they are able to provide in May. As a result, the IESO is not taking advantage of the entire resource available and will be spending more money than necessary to achieve its DR goals.

In addition, we strongly support the following enhancements:

- More efficient contributor entry for those with multiple sites
- More structure surrounding test dispatch - email backup, cancellation, etc
- Automatic data submission

3. We support many of EnerNOC's proposals as well, including the following:

- Dispatch time should be a maximum of 4 hours.
- Energy payments should be included in the DR Auction/Hourly DR.
- DR is a flexible resource and does not require advanced day-ahead standby notice. However, the market must provide a more automated method of notification so that the demand response provider does not need to log into the IESO DR portal every morning to see whether or not their resource may be dispatched.

4. Most importantly, we'd like to share our research and experience with the third party meter data and customer information access issue. We strongly advocate for third party access to the MDMR for all data (customer information and meter data). MDMR can serve as a central repository with one front door in comparison to

Green Button Connect, which may be implemented differently by every LDC, rendering it an unscalable solution.

Even using Green Button Download my Data presents serious hurdles for aggregators. For instance, many LDCs' T&Cs for their utility portals specifically prohibit customers from sharing their username and password with third parties. Powerstream's terms and conditions state the following: "*You agree not to share your password(s), let anyone else access your account and/or the Site using your account number(s) or password(s) or do anything else that might jeopardize the security of your account and you agree to be responsible for all acts or omissions with respect to your user account*" (<https://www.powerstream.ca/my-account-standard-terms-conditions.html>). A customer would then have to log into his/her utility portal, download their data, and send this data to a third-party. This solution is not scalable.

Thank you again for the opportunity to comment and please let us know if you have any questions.

Thank you,
Laura

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