

**Comments of OhmConnect, Inc.**  
***In Response to the Demand Response Working Group (DRWG) November 30, 2016 Meeting***

Submitted by	Company	Date Submitted
Brian Kooiman <a href="mailto:brian@ohmconnect.com">brian@ohmconnect.com</a>	OhmConnect, Inc.	December 16, 2016

## 1. INTRODUCTION

OhmConnect, Inc. (OhmConnect) appreciates the opportunity to submit comments to the Independent Electricity System Operator (IESO) on the presentations to the DRWG from the November 30, 2016 meeting. In these comments, we emphasize the consensus position of the residential Demand Response (DR) providers that attended the meeting that data access is a priority for 2017. We also provide feedback to the IESO on the success of the stakeholder presentation and open discussion portion of the meeting.

## 2. COMMENTS

OhmConnect believes that a top priority of the DRWG for 2017 and beyond is to enable a streamlined and simple process for third-party DR providers to access their customers' meter data. In addition, we believe this sentiment was shared in the meeting by a majority of DR providers. We wholeheartedly appreciate and support that "for 2017, IESO sees merit in pursuing the following priorities...[including] further integration of residential DR resources";<sup>1</sup> we note, however, that data access is conspicuously absent from the list of "stakeholders' priorities shared with the IESO so far" from the final presentation of the day by the IESO.<sup>2</sup> To enable full integration of residential DR, the IESO should provide DR providers with at least one pathway for directly accessing meter data with customer consent. Furthermore, to ensure that the market for DR remains as competitive as possible, these pathways should not necessitate that third parties enter contractual partnerships with LDCs. As OhmConnect explained in its presentation to the DRWG, relying on such partnerships can eliminate the "even playing field" due to market-wide asymmetric information and pre-existing user advantage, along with the logistical challenge of requiring each DR provider to manage over seventy LDC partnerships.<sup>3</sup> Therefore, we ask the IESO to prioritize data access for 2017 and beyond, whether solutions come through

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<sup>1</sup> See November 30th, 2016 "Demand Response Evolution in Ontario", at slide 7; available at <http://www.ieso.ca/Documents/consult/drwg/DRWG-20161130-Demand-Response-Evolution.pdf>.

<sup>2</sup> Ibid., at slide 6.

<sup>3</sup> See November 30th, 2016 OhmConnect presentation, at slide 5; available at <http://www.ieso.ca/Documents/consult/drwg/DRWG-20161130-OhmConnect.pdf>.

direct third party access to existing data repositories, full Green Button “Connect My Data” implementation across the LDCs, or some other means.

OhmConnect also wishes to comment on the overall meeting. Committing the majority of the agenda to stakeholder presentations enabled DRWG members to present their DRWG priority preferences for the upcoming year. We found the presentations, and the subsequent dialogue they generated, to be very helpful and informative. We encourage the IESO to hold similar meetings in the future on at least an annual basis.

### **3. CONCLUSION**

OhmConnect thanks the IESO for considering our comments. We hope that our comments provide additional helpful perspective as a residential DR provider, and we look forward to continuing to work with the DRWG in the upcoming year.