

April 22, 2016

IESO Stakeholder Engagement
Submitted via email

Dear IESO Stakeholder Engagement:

Re: Comments on 2016 Work Plan for the IESO Demand Response Working Group

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 input on the topics of discussion of the working group.

The IESO Demand Response Auction was the next step in moving forward the ability of load to participate and compete with other resources to provide capacity and other services in Ontario's electricity system. The expansions of demand side participation in the electricity system will not only help the IESO meet its overall market efficiency goals but will also assist the province meet its Climate Change goals.

Based on EnerNOC's experience in Ontario in the former OPA DR3 program, the IESO CBDR transition program, and the DR Auction, as well as participation in capacity auctions and markets throughout the world, EnerNOC has prepared the following recommendations for topics of discussion at the DRWG.

EnerNOC Recommendations for Topics of the DRWG:

- Discussion on proposed changes to Market Rules:
 1. Market Rule Changes to increase participation:
 - a. Hours of availability
 2. Market Rule Changes to increase competition:
 - a. Introduction of a secondary market: Reconfiguration Auctions similar to ISO-NE
 3. Market Rule Changes to improve performance:
 - a. Introduction of a proportional dispatch similar to the UK Capacity Market
- Discussion on Operational Mechanics:
 1. Ability to provide contributor management information in 'bulk uploads'
 2. Revisit information needs for contributor management – what information does the IESO really need to ensure participation in DR programs?
- Revisit DRWG Discussion Topics:
 1. The need for Virtual and Physical Caps
 2. The four hour delivery window

- Discussion on expanding the role of the demand side participation in the electricity system:
 1. Allowing aggregated load to participate in Ancillary Services similar to AESO (Operating Reserves), PJM (Synchronized Reserve) and ERCOT (ERS-30)
 2. Removal of the 500 MW cap based on the Minister's Directive

As a market participant in numerous jurisdictions, EnerNOC recommends that the IESO continue to study market and operational mechanisms from other markets to learn best practices. EnerNOC looks forward to bringing their experiences in such markets to the DRWG.

If you have any questions or require further information on EnerNOC's recommendations, please feel free to reach out.

Yours truly,



Sarah Griffiths
EnerNOC Ltd.