

August 15, 2014

Ryan King
Stakeholder Engagement
IESO
Submitted through Email

Dear Mr. King:

Re: Comments – Demand Response Working Group August 6th Meeting

EnerNOC Ltd (EnerNOC) is pleased to provide comments on the proposed Market Manual changes for Capacity Based Demand Response (DR) that was presented at the August 6th Demand Response Working Group meeting.

Market Manual Changes – Operations

EnerNOC does not have any additional comments on the Market Manual changes for Operations in Capacity Based DR at this time.

Market Manual Changes – Settlement

Q. Will moving the V1 Settlement data submission date to ‘third business day of the following week’ correct data submission issues identified by DRWG?

Partially. EnerNOC believes that the change from the first business day to the ‘third business day of the following week’ will mitigate some of the identified data submission issues. In addition EnerNOC continues to recommend that an interval of time be established wherein IESO provides confirmation that they have received the data and that the data has been received in an acceptable format. If the data is deemed to be unacceptable there would be time to resend the data files without penalty. As noted in previous submissions, the purpose is not to correct data, but to ensure that a robust confirmation process for transfer of data is established.

Settlement – Additional Comments

EnerNOC continues to recommend that the penalties attached to the submission timelines should be a fixed-\$ penalty or a cap on the scaling penalty that currently exists to ensure that the penalty is commensurate with the impact of a late submission on the IESO.

To ensure participation of various types of loads, EnerNOC continues to recommend that changes be made to the Meter Requirements for the new Capacity Based DR program. In the June 23rd submission, EnerNOC recommended that the meter accuracy be changed to +/-2% to enable pulse-based sub-metering, which would allow for quicker deployment and more flexible participation by Contributors.



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Conclusion

EnerNOC continues to be encouraged by the progress made by the IESO in the formulation of the Capacity Based DR program. If there are any questions on the comments above, EnerNOC would be pleased to provide further information.

Yours truly,

[Original signed by]

Sarah Griffiths
EnerNOC Ltd.