

September 26th, 2014
Jason Grbavac
Stakeholder Engagement
IESO
Submitted via Email

Dear Mr. Grbavac:

Re: Comments – Demand Response Working Group – September 12th Meeting

EnerNOC Ltd (EnerNOC) is pleased to provide comments and questions on the presentations for the Market Manuals that were delivered by IESO staff at the September 12th Demand Response Working Group meeting, as well as the presentation at the DR3 Transition meeting. EnerNOC is a leading energy intelligent software company that has participated in demand response in Ontario since 2008.

Registration of DR in Market Manuals:

EnerNOC recommends IESO consider the possibility of providing flexibility to aggregators to de-register their portfolios that would still be part of the Capacity Based DR program (contracts that expire in 2017) to allow those MWs to participate in the 2015 auction for delivery in 2016. There may be an impact on the portfolios of aggregators when some MWs are under the proposed DR auction, and others remain part of the Capacity Based DR program, including the aggregation of loads for settlement and compliance purposes. The contracts will technically already be terminated if they have been moved to the IESO capacity based DR program as outlined in the March 31st Directive to the CEO of the OPA.

Market Manual Changes for Operations of Capacity Based DR:

Q1. Are there any operational areas of the program rules that have not been reflected in the proposed changes?

At this time EnerNOC believes that the operational areas of the program rules have been reflected in the proposed changes.

Settlement of Capacity Based DR Changes to Market Manuals/Proposed Meter Data Submission:

EnerNOC supports the proposed changes to the current V1 meter data submission deadline which have been extended by 5 business days. However, EnerNOC recommends that the IESO remove the penalties associated with the submission of data. Aggregators are already incented to provide the data to the IESO in order to receive settlement.

If penalties continue to exist for weekly data submission, then EnerNOC would recommend that if the data is sent before the deadline and it is unacceptable, there would be time to resend the

data without penalty. A time period could be set where participants who have submitted their data early would be notified if there are meter data issues, and therefore, would have time to resubmit before the 5th Business Day deadline.

EnerNOC also recommends that if the IESO continues with a penalty structure for the weekly data submission, a change be made to the penalty of 20% measurement data set-off to their availability payment prorated for the week. EnerNOC recommends that the penalty should have a flat fee, with a cap of the set off, since the work for the IESO is not impacted based on the size of the settlement account that has the data submission issue. The actual amount of the flat fee per settlement account and the cap could be established through a subsequent discussion with the IESO and the current aggregators. For example, a penalty of \$500/settlement account could be established with the cap equaling the cost of the effort of the IESO to reload the dataset.

The program, under each the proposed recommendations, would continue to have rigorous and more stringent data submission guidelines than numerous other programs that EnerNOC participates in. For instance, participants in many other markets do not submit any data for settlement unless there is an actual event.

If further information is required on the recommendations provided above, EnerNOC would be pleased to provide further information.

Yours truly,



Sarah Griffiths
EnerNOC Ltd.