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June 15, 2016
IESO Stakeholder Engagement
Submitted via email

Dear IESO Stakeholder Engagement,

RE: Comments on Proposal to Enable Transfer of DR Capabilities

Thank you for including us in the Demand Response Working Group. We look forward to collaborating with the IESO and other stakeholders to create market rules that encourage Residential DR participation.

EnergyHub attended the May 30, 2016 Demand Response Working Group meeting in which the IESO presented its Proposal to Enable Transfer of DR Capacity Obligations.

We agree that the IESO proposal helps reduce risk for participation in the DR auction. The proposal does not have any adverse impacts on the effectiveness of the market; on the contrary, many more participants will be incentivized to participate, creating more competition and cost effective DR options.

We raise here one particular issue that we hope the IESO will consider. EnergyHub requests that there be more clarification regarding the requirement that the DR capacity transfer be of the same "type." As all DR capacity has the same end-use impact, as required by the product rules, capacity obligations should be able to be filled/transferred by any DR capacity available.

Thank you,

Erika Diamond
Vice President, Energy Markets
EnergyHub