

July 22nd, 2016

IESO Stakeholder Engagement
Submitted via email

Dear IESO Stakeholder Engagement:

Re: IESO DRWG – July 15th, 2016 Meeting

EnerNOC Ltd. (EnerNOC), a leading provider of demand response who has participated in demand response programs in Ontario since 2008, is pleased to provide comments on the material presented by the IESO at the July 15th Working Group meeting.

Proposal to Enable Transfer of DR Capacity Obligations

EnerNOC continues to support the IESO staff proposal of allowing Demand Response Auction Participants to transfer DR Capacity Obligations to other qualified Demand Response Auction Participants. EnerNOC is committed to working with the IESO to identify potential legal and market issues that will need to be resolved before allowing transfers during the Commitment Period. EnerNOC looks forward to dealing with this sub-topic during upcoming DRWG meetings.

EnerNOC does not agree that the “Qualified MW” of participants needs to be published in the Post-Auction Summary Report. Other markets that allow for transfer of capacity obligations do not publish “Qualified MW” information and still maintain healthy bi-lateral transfer markets. They have dealt with the question of how to pair market participants together who are looking to trade/buy obligations by allowing interested parties to contact each other directly or through third parties and/or setting up message boards for interested parties to seek out partners for potential transactions, something that as the resource grows and expands into an Incremental Capacity Auction will be beneficial to all participants. EnerNOC recommends that the IESO follow PJM’s lead on this topic.

EnerNOC understands the reason for requiring the same type of resource capacity being transferred (virtual for virtual, physical for physical). However this limitation may impact the ability of the right number of DR MW to be available during the commitment periods. EnerNOC recommends that the IESO review with the DRWG the reasons for the MW cap on virtual resources in zones where the cap on physical resources is set at a higher MW value and the work that would need to be accomplished to remove this barrier especially when the DR Auction moves to the Incremental Capacity Auction.

Target Capacity

EnerNOC is supportive of the proposed growth trajectory of DR and agrees that it will assist the IESO to meet the multiple objectives. EnerNOC looks forward to participating in the upcoming Ministry of Energy Long Term Energy Plan consultations and will advocate for this growth target to be included in the plan as well as the movement to an Incremental Capacity Auction so all capacity resources can compete to meet the province’s needs.

Yours truly,



Sarah Griffiths
EnerNOC