



Regulatory and Government Affairs
11-1155 North Service Road, Oakville
ON Canada L6M 3E3
T 1 617 224 9900

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IESO Technical Panel
Submitted via email
rule.amendments@ieso.ca

Re: Transitional Capacity Auction – MR-00439-R04

Enel X, (formerly EnerNOC), is a trusted partner helping Ontario enterprises develop, execute, and refine customized energy management strategies to reduce costs, and manage risk. Enel X is the global leader in demand-side flexibility services, providing large energy users and businesses access to more demand response and demand management participation in markets worldwide than any other provider. EnerNOC has worked with businesses in Ontario since 2008 and is a Market Participant in the IESO market, active in the Demand Response Auction.

For Market Rule Amendment MR-00439-R04, Enel X provides the following recommendation:

Section 4.8.3

Enel X recommends changing “any compensation” to read “any adjustment” similar to section 4.8.4. It is arbitrary and capricious for the treatment of billing errors to be asymmetrical depending on which party owes a net-payment. Enel X views this difference in language as an error and requests that the market rule be amended accordingly. Please see recommended changes in s. 4.8.3.3 highlighted in red/bold below.

4.8.3 The *IESO* shall, at the end of each *energy market billing period*, recover from *market participants*, in the manner specified in the applicable *market manual*, the following amounts:

4.8.3.3 any **compensation adjustments** for ~~demand-response~~ capacity market participants paid in that *energy market billing period* by the *IESO* pursuant to section 4.7J.

4.8.4 The *IESO* shall distribute to *market participants*, in the manner specified in the applicable *market manual*, the following amounts:

4.8.4.3 any adjustments to ~~demand~~ capacity response market participant payments pursuant to section 4.7J.