

## 2013 CAISO Stakeholder Initiatives Catalog

Submitted by	Company	Date Submitted
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EnerNOC appreciates the opportunity to provide these comments seeking clarification and providing elaboration on a few discretionary initiatives in the process outlined in the CAISO October 4, 2013 Market Notice. We look forward to providing additional comments on the ranking of all discretionary initiatives on November 22.

In addition to the clarification requested on the discretionary initiatives below, EnerNOC requests clarification on whether there needs to be an “initiative” included to specifically allow demand response resources to provide spinning reserves, per the recently approved BAL-002-WECC-2-Contingency Reserve standard. Our assumption is that this would fall under the “FERC-mandated” or “Non-discretionary” issue areas, but clarification would be helpful.

### **Section 3.2 DLAP Level Proxy Demand Response (D)**

EnerNOC supports modifying Proxy Demand Resource (PDR) to add the ability for a default load aggregation point (DLAP) level resource to be incorporated into the CAISO market. PG&E suggests this would allow utility DLAP wide dynamic rate tariffs to be explicitly incorporated into the CAISO markets. Olivine previously commented that DLAP PDR aggregations might “ease the burden of PDR management,” and suggested that there is “no commensurate value in the added administrative overhead of identifying and restricting PDRs to a sub LAP.” EnerNOC believes another significant issue is that the current PDR mechanism would require flexible resource adequacy criteria and must offer obligations (FRACMOO) bids to be submitted on a sub-LAP basis. However, a flexible capacity resource requirement is being developed to meet a system need. We believe it is critical to add DLAP level PDR to facilitate the current “non-discretionary” FRACMOO initiative currently underway.

### **Section 8.6 Use-limited Resource Adequacy Criteria and Must Offer Obligations (D)**

EnerNOC is pleased to see that the Standard Capacity Product design for Demand Response resources has made it onto the issue list. We look forward to the next draft that presumably would include the timing of this initiative.

### **Section 8.7 Voluntary Demand Response Auction (D)**

A voluntary preferred resource auction is an interesting concept, but, as a general comment, there are not enough details here to understand how CAISO envisions this type of auction would work and whether this rises to the top in terms of priority. EnerNOC has several questions:

- Would there be any overlap between a “voluntary preferred resource action” and the “reliability services auction” that provides a voluntary platform for LSEs to procure additional capacity beyond the capacity they procure bilaterally to satisfy their resource adequacy demonstrations?
- Would a voluntary DR auction be specific to meeting local resource adequacy obligations?
- Is there any concern regarding CAISO designing an auction that is specific to demand response?