

**AESO Discussion Paper – Intertie Restoration Initiative
Stakeholder Comment Matrix**

Response from: EnerNOC, Inc.

Contact: Aaron Breidenbaugh (617-224-9918/abreidenbaugh@enernoc.com)

Section	Subsection	Stakeholder Response
2.0 Intertie Restoration Policy	2.1 Obligation to Restore Capacity	<ul style="list-style-type: none"> • EnerNOC supports the comments of IPCAA. It appears clear that AESO has a clear obligation to restore the interties in a timely fashion. • We also agree that it is those who will be providing the product (e.g. loads and aggregators) should drive the design of that product subject to FEOC constraints.
	2.2 Cost Allocation <ol style="list-style-type: none"> a. Transmission Development Policy b. Import restoration cost allocation c. Export restoration cost allocation d. Variable cost flow through? 	<ul style="list-style-type: none"> • EnerNOC takes no position as to the appropriate allocation of LSSi costs at this time, beyond the general principle that beneficiaries of a product or service should generally pay for it.
3.3 Options to Increase Import ATC	3.3 Options <ol style="list-style-type: none"> a. LSSi to be pursued b. ILRAS not an option at this time c. Service available for in market use as opposed to emergency use only? d. Others? 	<ul style="list-style-type: none"> • EnerNOC supports the comments of IPCAA regarding the merits of developing and implementing an LSSi product. • We concur that demand response represents a viable, if technically challenging, solution to the problems identified. There is clear precedent in several other markets for a product like LSSi and EnerNOC would certainly be interested in helping to facilitate the procurement and operation of such a product on either a sole-source or competitive basis with the AESO.
	3.4 Next Steps <ol style="list-style-type: none"> a. Form working group 	<ul style="list-style-type: none"> • EnerNOC would like to participate in the LSSi working group. As the largest demand response aggregator in the world, actively integrating demand response resources into energy, capacity and ancillary service markets across the United States, Canada and the United Kingdom, EnerNOC

		<p>has unique expertise and perspective to offer the AESO and other stakeholders regarding what works and what doesn't.</p> <ul style="list-style-type: none"> • EnerNOC fully intends to aggregate loads to provide an LSSi product if the rules developed in the working group are amenable to our doing so. • To the extent that ancillary services such as LSSi are provided by demand response elsewhere, it is either directly by large customers or through aggregators like EnerNOC. IPCAA and others will ably represent the perspectives of the former. It is imperative that the working group include EnerNOC and other interested aggregators as well.
4.3 Options to Increase Export ATC	4.3 Options <ol style="list-style-type: none"> GRAS to increase export limit to 935 MW No GRAS to increase SOK flow limit Integrate wind forecast into export ATC limit Service available for in market use? Others? 	<ul style="list-style-type: none"> • EnerNOC takes no position on these issues at this time.
	4.4 Next Steps <ol style="list-style-type: none"> Form Working Group 	<ul style="list-style-type: none"> • EnerNOC will likely not participate in a GRAS working group, but certainly has no objection to its formation.
5.0 Conclusions and Next Steps	5.0 Conclusions and Next Steps <ol style="list-style-type: none"> Form Independent Working Group Should variable costs of services be charged to users? 	<ul style="list-style-type: none"> • EnerNOC agrees that an LSSi working group should be formed and has no objection to a GRAS group. • Costs in general should be allocated to those for whose benefit they are incurred.