

April 12, 2012

NYISO  
10 Krey Boulevard  
Rensselaer, NY 12144

Re: Energy Curtailment Specialists, Inc. comment to NYISO PRLWG

On March 13, 2012, the Installed Capacity Working Group and the Price Responsive Load Working Group of the NYISO met. Among the topics discussed was the Provisional ACL for Special Case Resources (SCR's), centering around a presentation made by Innoventive Power, which proposed revising the current rules in order to allow the ACL of an SCR to increase in proportion to a long-term increase in load. We appreciate the opportunity to present the NYISO with comments and would like to convey our support for the revisions proposed, which we hope will be implemented by the NYISO in the near future.

At the time the shutdown rules were established, Energy Curtailment Specialists, Inc. (ECS) and others sought to account for a long-term *increase* in load in the same manner as a decrease in load, which was being accounted for. We reasoned that if the NYISO wishes to eliminate free-ridership from loads that reduce from one year to the next, then the RIP's should be protected when the load *increases* from one year to the next. At that time ECS was assured by the NYISO that they would take these recommendations under consideration at a later time due to the fact time was short to implement rules prior to the season. It has not been followed up on until now.

There are no reasonable arguments against the implementation of the proposed changes. The rule modification ensures market equity, as RIP's are measured based on an aggregate performance and the shutdown rules should also likewise be based on aggregation both for increases and decreases of load. The proposed rule ensures more load reduction is available to give the system a greater capability to address capacity shortages, and ensures that SCR's are treated in a similar manner to generators going forward.

ECS has been assured by the NYISO that upon the submission of these comments, NYISO management will review all comments submitted pertaining to recent ACL issues in order to implement all necessary changes to the market rules at once. ECS is encouraged by this but would also request that the NYISO review and implement the necessary changes in an expedited manner, in order to mitigate the time lost to the current, archaic system rules.

For the above reasons, ECS urges the NYISO to...

- (1.) Immediately move ahead to adopt Innoventive Power's recommended changes to the market rules in order to allow a Change in Status and Change of Load to reflect an increase as well as a decrease.

Regards,

Marie Pieniazek  
Chief Operating Officer  
Energy Curtailment Specialists, Inc.  
4455 Genesee Street, Bldg. #6  
Buffalo, New York 14225  
(716) 565-1327  
[mariep@ecsgrid.com](mailto:mariep@ecsgrid.com)