

FERC Order 745

Comments submitted by Aaron Breidenbaugh on behalf of EnerNOC

Leigh,

I expressed EnerNOC's concerns at the meeting. I saw Donna taking notes, so I hope you all have a record.

Just to briefly recap though, we have concerns about:

- Not using all hours in the NBT test
- Having an NBT that is nearly double that of other ISOs
- Providing only two business days to digest the final NBTs prior to bidding
- Leaving too much unsaid in the tariff regarding M&V and deferring too much to the infamously vague "ISO Procedures"
- In appropriate penalty provisions regarding over- or under-deliveries in RT (the "higher of" rule)
- Excluding behind the meter generation altogether
- Lack of a real-time market opportunity

Although the latter four are not new, both could have been rectified or clarified in this filing, but were not.

- We are OK with the cost allocation changes and the M&V revisions, generally. However, the 20% cap on the in-day adjustment reduces the accuracy of the M&V and can unreasonably harm providers on very hot or very cold days. It should be removed.

Best Regards

Aaron

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