

Comments submitted by EnerNOC, CPower, Innoventive, Energy Spectrum, and NuEnergen:

“The demand response community strongly supports the NYISO undertaking this project. We urge the NYISO to consider capacity market impacts of the Clean Energy Standard equally to energy market impacts, as recent presentations given by the NYISO appear to be more focused on the energy market.

Demand response resources depend on the capacity market for nearly all of its revenue. Without a competitive capacity market that places transparent market signals on capacity and enables all resources to compete on an equal basis, demand response participation will drop significantly from current levels. This runs contrary to state policy goals and would negatively impact reliability.

The NYISO needs to consider how the capacity market can remain competitive while accommodating state public policy goals. This process is underway in ISO-NE and PJM, and we’d urge the NYISO to monitor developments in those markets while also offering and encouraging ideas in New York. The demand response community looks forward to being engaged in these discussions.”