

## FERC Order 745

Comments submitted by Brett Feldman on behalf of Constellation

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- Could you include an analysis of an uncapped weather adjustment to see how that performs?
- Please consider leaving flexibility for customers who might take pre-actions such as pre-cooling prior to an event, because a symmetrical adjustment may penalize them. When Day-Ahead notice is involved, it is reasonable for customers to do some operational planning before their start time. ISO-NE and PJM are both considering these types of cases in their FERC 745 filings.
- NYISO had requested input on how many days DR resources would need if price changes are posted after the 15th of the month. ISO-NE already has a similar process for its Day-Ahead Load Response program. The price is posted 2-3 business days before the 1st of the month. I would say that 3 days is preferred, because if there were to be any major changes from the price posted on the 15th, we would need to reach out to multiple customers, and sometimes it can take a day or 2 to connect. 2 days is not impossible, but just leaves a little risk that not all customers will get in for the first of the month.