



January 8, 2009

Ms. Rae McQuade, President
North American Energy Standards Board
1301 Fannin, Suite 2350
Houston, TX 77002

Dear Ms. McQuade,

Pursuant to your December 4, 2008 request, EnerNOC, Inc. hereby submits its formal comments regarding on proposed measurement and verification business practice standards for Wholesale Electric Market Demand Response (DR) Programs.

EnerNOC is a leading demand response resources and energy management services provider throughout the United States. EnerNOC currently manages almost 2,000 MW of demand response resources capability across over 3,000 sites nationwide. We actively participate in a range of reliability-based demand response programs, economic price response programs, and ancillary services markets.

EnerNOC is been an active direct participant in the demand response programs three Independent System Operators ("ISOs") or Regional Transmission Organizations ("RTOs"), including New York ISO, ISO New England, and the PJM Interconnection. We are also direct participants in ERCOT, and via utility contracts, indirect participants in the California ISO programs. We have signed contracts with a variety of utilities to provide demand response services, including Connecticut Light & Power, Southern California Edison, Pacific Gas & Electric, San Diego Gas & Electric, National Grid, NSTAR, the Tennessee Valley Authority, Tampa Electric Company, Public Service of New Mexico and Salt River Project.

We wish to express our appreciation of the work done to date by the DSM-EE task force, especially in developing a common framework and vocabulary that can be used to discuss DR programs. Unfortunately, our principal observation is that this is the only task accomplished by the group to date.



In the informal comments we filed in October, EnerNOC took exception to the paucity of actual technical standards that had been developed to that date. Since that time, two things have happened which lead us to support the document now being presented to the WEQ Executive Committee. First, and most important, is the recasting of the recommendation as a “framework.” As we noted in our informal comments in October, the recommendations ARE very valuable as a framework. However they cannot credibly be considered to be technical standards. Second, it has become clear that the NAESB membership is not yet in a position to opine on the types of actual standards that need to be developed.

Simply put, we recognize that this is a significant new effort and NAESB needs to walk before it runs. We have been assured that the present recommendation is simply the first step on a much longer road and that efforts to turn this framework into actionable standards will continue uninterrupted. With that assurance, that this is a beginning and not an end, we support the proposed framework and look forward to working with the other NAESB constituents over the coming months to develop technical standards that will allow those venturing onto the uncertain seas of DR program design to avoid many of the reefs and shoals that others have had to navigate.

Respectfully Submitted,



Aaron Breidenbaugh
Senior Manager, Regulatory Affairs and Public Policy
EnerNOC, Inc.
75 Federal Street, Suite 300
Boston, MA 02110
(617) 913-9054
abreidenbaugh@enernoc.com

