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The IMO  
Station A Box 4474  
Toronto ON Canada M5W 4E5

Attention: Cynthia Harrison

Dear Cynthia:

I would like to thank the IMO for requesting input into the redesigned TDRP. I believe that demand response is key component to Ontario's generating capacity shortage.

In summary it is definitely an improvement over the last EDRP program. However, there are still limiting factors in this proposal for a fully effective demand response. Demand response should be encouraged to its full capability.

Here are my points:

- TDRP is considered to be transitional for 2 to 3 years. The retail sector will take about 2 years to gear up, and most participants it will take them at least a year. I would suggest a 5-year minimum duration. I would also suggest the IMO consider a permanent program following this transitional period. The IMO and the MP's should work as partners to design the plan implement it and determine its duration.

- It is a good suggestion that the IMO is investigating for non-dispatchable loads to participate in the reserve market. This would be similar to the old Ontario Hydro program by having an interruptible rate. Loads are familiar how to operate in this environment.

- Dispatchable loads should be able to participate in this program using their non-dispatchable volume.

- There should not be a cap of 100MW. The bigger the demand response, the better it is for the market and consumers.

- There should not be a limit of 15% and 5MW. Each participant should establish a limit based on his or her operation.

- Price threshold (currently \$120/MW) should be determined by the MPs based on their economic needs, and should be able to change daily.

- I am not sure if the base line calculation is fair. The operation may have been shut down during the specified period, and hence will not be able to benefit when they start up. A longer period may be appropriate, similar to TRO base line calculation.

- Program termination and participation limit should not be decided by the IMO but by MPs and consumers. Consumers always end up paying; hence the decision should be in their hands.

-Finding capacity as quickly as possible is the priority of the government. Therefore the focus of the IMO should be on stimulating the maximum DR possible from a DR program. Estimates indicate that there may be potential to take 500 MW off the system. This can only be achieved through affective partnering with MP's. The IMO must initiate this partnering activity.

I believe that demand response is critical to Ontario's electricity market and their consumers. IMO should maximize the opportunities from available loads.

Regards

**George Blechta, P.Eng.**  
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