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Kirsten Walli  
Board Secretary  
Ontario Energy Board  
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File Number **EB-2010-0215**

The following comments are being submitted by Energy Curtailment Specialists, Inc. (“ECS”) in response to the invitation to provide comments to the Board regarding “Establishment of LDC Conservation Targets under the Green Energy Act-Target setting and allocation methodology advice from the OPA”, dated April 1, 2010.

ECS is North America’s largest privately held full service demand response and energy management service companies, and a leading demand response provider for commercial, industrial, and institutional customers. ECS has more than 2,000 Megawatts of demand response reduction under contract in its capacity-based programs and several hundred additional Megawatts participating in economic and ancillary based demand response programs. ECS provides demand response services in New York, New England (Maine, Vermont, New Hampshire, Massachusetts, Connecticut, Rhode Island), PJM Interconnection (“PJM”) (Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia), California, Missouri, Kansas, as well as a robust program in Ontario, Canada.

ECS actively participates in a range of reliability-based, economic price response, and ancillary services demand response market opportunities pursuant to contracts with its end user customers, and ECS is an active Curtailment Service Provider (“CSP”) in the demand response programs of PJM, ISO New England, and the New York ISO. Additionally, ECS is one of the single largest aggregators currently participating in Ontario’s DR3 program. ECS has also entered into agreements with a variety of utilities both inside RTO/ISOs and in bilateral markets to provide demand response services to utilities and their customers.

On March 31, 2010, the Minister issued a directive to the OEB, instructing it to establish mandatory CDM Targets for LDCs to achieve reductions in electricity consumption and reductions in peak provincial electricity demand over a four year period beginning January 1, 2011 (the “CDM Targets”). That directive specified that the total of the CDM Targets established for all LDCs be equal to 1,330 megawatts (MW) of provincial peak electricity demand and 6,000 gigawatt hours (GWh) of electricity consumption over that four-year period (“LDC Provincial Aggregate Targets”).

ECS would like to state that they generally support the proposed LDC target setting as outlined by the OPA. As an active Curtailment Service Provider having a direct demand response contract with the OPA, ECS would like to provide what we believe are additional comments and thoughts that seek to assist OEB, and LDCs in reaching the conservation targets under the Green Energy Act.

Clearly much time has gone into the establishment of CDM targets for LDC's over the next four years. ECS believes that by allowing third party Demand Response & Energy Efficiency providers the ability to provide services for both demand reduction and energy efficiency that such third party providers will assist the LDCs in reaching their established goals much more rapidly and efficiently.

ECS and other third party providers are engaged in providing demand response and energy efficiency services to both wholesale markets and directly to Electric Distribution Companies. We contract with Commercial and Industrial end-users who are willing and able to curtail their electric consumption in accordance with an established demand response program, as set out in their requirements. Third party providers install metering and control equipment to enable curtailment, and aggregate customers to meet our obligations to either an LDC or wholesale market. ECS also provides various other energy efficiency and energy management services to our customer's, and have resources currently in place to market, enroll, and deploy electricity end-users in wholesale demand response programs and LDC programs.

As a third party provider, ECS establishes a relationship with their customers which includes assisting the customer in defining their obligation to reduce load, shielding the customer from non-compliance penalties (through hedging and aggregation of accounts), eliminating administrative costs associated with demand reduction participation, and educating customers on how to take proactive steps to reduce electric consumption. These are just a few of the benefits that can and are associated with third party providers. Other important benefits can be found in marketing and enrollment of end use customers into demand reduction and energy efficiency programs. When marketing and enrollment is coupled with education, action plans, reducing risk, and reducing overhead costs, end use customers find that third party providers are an exceptional solution. The third party provider solution leads to superior program participation by end use customers, which will support the LDCs in reaching their established goals under the Green Energy Act.

In conclusion, ECS respectfully thanks the Ontario Energy Board for the opportunity to submit comments on the "Establishment of LDC Conservation Targets under the Green Energy Act-Target setting and allocation methodology advice from the OPA". Implementing and establishing conservation targets will ultimately benefit all consumers and ratepayers.

Respectfully submitted,

/s/ B. Marie Pieniazek

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