

## North American Energy Standards Board

Comments on Measurement ) WEQ 2008 AP Item 5(a)  
and Verification Business Practices )  
for Wholesale Electric Market )  
Demand Response Programs )

### COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY ON WEQ 2008 AP Item 5(a) - DRAFT RECOMMENDATION FOR PROPOSED MEASUREMENT AND VERIFICATION BUSINESS PRACTICES FOR WHOLESALE ELECTRIC MARKET DEMAND RESPONSE PROGRAMS

Pursuant to North American Energy Standards Board's (NAESB) request for informal comments with respect to its draft recommendations for proposed measurement and verification (M&V) business practice standards for demand response programs administered in the wholesale markets that "may be the subject of individual tariffs filed with and approved by the Federal Energy Regulatory Commission." The informal comment process began on October 6 and ends on October 22. Portland General Electric Company ("PGE") hereby submits these comments.

PGE is a regulated, vertically integrated electric utility located in the Western Electricity Coordinating Council ("WECC") that provides electric service to over 700,000 residential and commercial customers in Oregon. PGE's service territory includes most of the greater Portland, Oregon, metropolitan area and some surrounding areas. PGE owns generation, transmission, and distribution facilities for service to wholesale and retail customers and it buys and sells power in the Western energy market. It is subject to the regulatory authority of the Oregon Public Utility Commission for its Oregon utility operations and to the Federal Regulatory Commission for the sale of electricity and transmission services in interstate commerce.

PGE will be subject to any final business practices that may result from this proceeding.

I. NOTICE

The following persons are authorized to receive notices and communications in the above captioned proceeding:

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II. COMMENTS

Thank you for the opportunity to comment on the draft recommendation for proposed measurement and verification business practice standards for Wholesale Electric Market Demand Response programs.

The common platform for evaluating and monitoring savings from demand response for individual tariffs filed with the Federal Energy Regulatory Commission (FERC) is the objective of the draft recommendation and to that end Portland General Electric offers the following comments:

1. Telemetry for Wholesale Electric Demand Response Energy, Capacity, Reserve, and Regulation Products.

Sections 015-1.1, 015-1.5, 015-1.9 and 015-1.13 address Telemetry for Wholesale Electric Demand Response Energy, Capacity, Reserve, and Regulation products.

Regarding On-Site Generation Telemetry, Portland General Electric suggests the following clarifying language (new language in *italics*):

“If on-site generation *of greater than 1 MW* is present behind the primary Telemetry point, real-time Telemetry data shall be required to measure performance of the generator unless otherwise specified by the System Operator. *For Demand Response applications After-the-Fact Metering will be required at the generation output if Telemetry is not used.*”

Justification for the requested change is that smaller systems such as solar or PHEV will find it onerously expensive to provide real-time telemetry. Additionally the System Operator will not require real-time telemetry from each residential node participating in a demand response event. Generally, telemetry is added as required to ensure stable operation of the network to which the generator. Demand response of small generation resources can be adequately validated with After-the-Fact metering.

### III. CONCLUSION

Based on the above comments, PGE requests that NAESB adopt the language proposed herein.

Respectfully submitted,

/s/Laura Rooke

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