

The IRC members are submitting the following comments in response to the NAESB “Request for Informal Comments on Draft Recommendations for Priority Action Plans 3, 4 and 9 – Release 0.1” issued on November 17, 2009.

The IRC members are supportive of the efforts undertaken by NIST. Work for Priority Action Plans 3, 4 and 9 has been assigned to NAESB and members of our organizations have been collaborating in the NAESB subcommittee working groups over the past several months. The IRC members are very interested in working closely with other industry participants to deliver standards that both facilitate the adoption of new Smart Grid technologies and provide a smooth upgrade path from existing technologies.

Overall Recommendations

1. The goals for all work products should be focused on business process design, common terminology, and business scenarios (or “use cases”).
2. Technical information, including information models, data schemas, and attribute definitions, should be developed within OASIS where technical standards will be developed based on the business requirements published through NAESB. If data elements are to be listed as business requirements, those requirements should not include technical details, e.g. precision and format
3. A glossary of relevant terms should be harmonized across all three PAPs and removed from individual documents to ensure a common set of definitions that will benefit each of the groups and drive consistency. The “Actors” List (organization or roles for organizations taking action within use cases) should also be centrally aggregated where appropriate. Additionally, actors should not include inanimate objects or information technology systems, e.g. meter, display.

PAP 9: Standard DR Signals: Framework

1. This PAP is focused on Demand Response and we recommend removing the phrase “Distributed Energy Resources” from the title. In some regions distributed energy resources may offset demand and count as demand response and should be treated as a special case.
2. We recommend removing acknowledgements from the document.
3. Key finding #2 is related to pricing, and is more appropriate to PAP4.
4. Key finding #3, #5, and #6 represent one possible future; the standards should not rule out these scenarios, but should not be constrained to only these scenarios.
5. The history can be removed from the “Introduction”. If necessary, this information could be paired with the acknowledgements as a separate document not included in the standards.

6. The “Demand Response Reference Model” is applicable only to retail use cases, and should be moved into the Retail Use Case document.
7. Table 4 must include a reference; otherwise, it may be viewed as subjective.
8. The “Market Types” section might be changed from:
 - a. Regions with no open wholesale and no retail competition
 - b. Regions with open wholesale market only
 - c. Regions with open retail competition only
 - d. Regions with open wholesale and open retail competitionTo:
 - a. Demand Resources participating in Wholesale Markets
 - b. Demand Resources participating in Retail Markets
9. Section 4.1.3 describes “Business Entities”. It is unclear how these are different from “Actors”.
10. It is unclear what Figures #5, #7, #9, #11, #13, and #14 describe.
11. The following sections are not directly related to the standards and might be compiled into a companion reference guide document which is not ratified through NAESB voting:
 - a. Section 3.1 “Overview of North America Electricity Wholesale and Retail Markets”
 - b. Section 3.2.1 “What is Demand Response?”
 - c. Section 3.2.3 “What is a Distributed Energy Resource?”
 - d. Section 4.1.4 “Business Functions”
 - e. Appendix 6.1 “Demand Response Program Examples”

PAP 9: Standard DR Signals: Wholesale Use Cases

We realize more work is required to both complete the use cases documented in Appendix A as well as harmonize the results with the other working papers.

Additionally, we hope the industry reviews these and comment whether they are appropriate, since these suggestions influence ISO/RTO systems and processes as well as those for wholesale demand response market participants.

PAP 9: Standard DR Signals: Retail Use Cases

1. Section 2.3, “Technical Environment” is not required for Business Practice Standards
2. It is unclear what Figures #1, #3, and #8 describe.
3. Descriptions should be included with all sequence diagrams. Without narrative information, it is difficult for the reader to understand the process thoroughly.
4. Section 3.1.2.1 “Administrate DR Program” and Section 3.1.2.2 “Administrate Customer for DR” should not be included in scope; scope should be constrained to the processes beginning with the enrollment of resources to the evaluation of performance from a demand response event.
5. It is unclear how “DR Execution – Dynamic Price-Based” is meant to function; by definition a dynamic, priced-based market implies a “self-deployed” resource, not one with a Demand Response “execution”.
6. Section 4.9 “Operational Coordination between Transmission, Distribution and DR Resources” seems to be incomplete and would be very helpful to see described.
7. The purpose of the data elements following each sequence diagram should be clarified. It is our understanding that the working group intends to deliver comprehensive lists of data elements, and this goal should be made clear – otherwise the lists may be taken as illustrative.

PAP 3: Common Pricing Model

To date, IRC members have not had the time to contribute to the work on Common Pricing Models; however, the IRC intends to lend more support in the future.

To cover a variety of market design permutations for demand response within PAP9, IRC members are defining candidate protocols to support use cases. In particular, the wholesale E-S use cases (use cases related to Product = Economic Energy and Deployment = Self) represent resources responding to wholesale pricing. We expect our design information to dovetail with the existing work in PAP3.

PAP 4: Common Scheduling Mechanism

To date, IRC members have not had the time to contribute to the work on Common Pricing Models; however, our group intends to lend more support in the future.