**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Recommendations:** 2014 WEQ Annual Plan Item 7b – Develop a specification for demand response products and services to support a certification program

**Submitted By:** CAISO,ERCOT, IESO, ISONE, MISO, NYISO, PJM, SPP

**Date:** November 7, 2014

We agree and fully support the No Action Recommendation. The mentioned recommendation indicates that a certification specification for the WEQ is neither practical, warranted, nor prudent at this time, based on: the applicability of the existing set of WEQ standards for M&V of Demand Response, the parties likely to benefit from the certification, and the pending litigation regarding Demand Response in the wholesale markets and therefore, there is no additional work required by NAESB on WEQ 2014 AP Item 7(b).