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Advocates for the West  
AirWorks, Inc.  
Alaska Housing Finance Corporation  
Alliance to Save Energy  
Alternative Energy Resources Organization  
American Rivers  
A World Institute for a Sustainable Humanity  
BlueGreen Alliance  
Bonneville Environmental Foundation  
Centerstone  
Citizens' Utility Board of Oregon  
City of Ashland  
City of Seattle Office of Sustainability & Environment  
Clackamas County Weatherization  
Clean Energy Works Oregon  
Climate Solutions  
Community Action Partnership Assoc. of Idaho  
Community Action Partnership of Oregon  
Conservation Services Group  
David Suzuki Foundation  
Earth and Spirit Council  
Earth Ministry  
Ecova  
eFormative Options  
Emerald People's Utility District  
Energy Trust of Oregon  
Environment Oregon  
Environment Washington  
Friends of the Earth  
HEAT Oregon  
Home Performance Guild of Oregon  
Home Performance Washington  
Housing and Comm. Services Agency of Lane Co.  
Human Resources Council, District XI  
Iberdrola Renewables  
Idaho Clean Energy Association  
Idaho Conservation League  
Idaho Rivers United  
Idaho Rural Council  
Interfaith Network for Earth Concerns  
Laborers International Union of North America, NW Region  
League of Women Voters – ID, OR & WA  
Metrocenter YMCA  
Montana Audubon  
Montana Environmental Information Center  
Montana Renewable Energy Association  
Montana River Action  
Montana Trout Unlimited  
National Center for Appropriate Technology  
Natural Resources Defense Council  
New Buildings Institute  
Northern Plains Resource Council  
Northwest Energy Efficiency Council  
Northwest Renewable Energy Institute  
NW Natural  
NW SEED  
Olympic Community Action Programs  
One PacificCoast Bank  
Opower  
Opportunities Industrialization Center of WA  
Opportunity Council  
Oregon Energy Coordinators Association  
Oregon Environmental Council  
Oregonians for Renewable Energy Policy  
Pacific Energy Innovation Association  
Pacific NW Regional Council of Carpenters  
Pacific Rivers Council  
Portland Energy Conservation Inc.  
Portland General Electric  
Puget Sound Advocates for Retired Action  
Puget Sound Cooperative Credit Union  
Puget Sound Energy  
Renewable Northwest  
River Network  
Salmon for All  
Save Our wild Salmon  
Sea Breeze Power Corp.  
Seattle Audubon Society  
Seattle City Light  
Seinergy, LLC  
Shoreline Community College  
Sierra Club  
Sierra Club, Idaho Chapter  
Sierra Club, Montana Chapter  
Sierra Club, Washington Chapter  
Silicon Energy  
Smart Grid Northwest  
Snake River Alliance  
Solar Installers of Washington  
Solar Oregon  
Solar Washington  
South Central Community Action Partnership  
Southeast Idaho Community Action Partners  
Southern Alliance for Clean Energy  
Spokane Neighborhood Action Partners  
Student Advocates for Valuing the Environment  
Sustainable Bainbridge  
Sustainable Connections  
SustainableWorks  
The Climate Trust  
The Energy Project  
The Policy Institute  
Trout Unlimited  
US Green Building Council, Idaho Chapter  
Union of Concerned Scientists  
United Steelworkers of America, District 12  
Washington Environmental Council  
Washington Local Energy Alliance  
Washington State Department of Commerce  
Washington State University Energy Program  
World Steward



June 17, 2016

Steve Crow, Executive Director  
Northwest Power and Conservation Council  
851 SW 6th Avenue, Suite 1100  
Portland, OR 97204

Dear Mr. Crow:

The NW Energy Coalition appreciates the opportunity to comment on the Northwest Power and Conservation Council's issue paper, *Demand Response Advisory Committee Scope*.

NWEC supports the formation of the Demand Response Advisory Committee and wishes to be considered for membership. We also support the general thrust of establishing a System Integration Forum but have thoughts about a somewhat modified scope. We provide below our responses to the Questions for Reviewers concerning demand response (DR) and related subjects.

***1. Is the scope of the proposed demand response advisory committee sufficient?***

***a. Do you agree with the focus of the advisory committee in both the near- and long-term?***

In general, we agree with the scope. We strongly believe that the Council should establish the DRAC and supporting efforts as a high priority. DR emerged as an important potential capacity resource in the 7<sup>th</sup> Plan. Most recently, the Council's draft 2016 Resource Adequacy Assessment now confirms the need for immediate and coordinated scale-up of DR within the Northwest, as potentially the cheapest and most readily available and flexible resource beyond already planned new conservation in meeting the region's resource adequacy and peak capacity needs.

In addition, we suggest three points to emphasize as the process moves forward:

- The scope of DR should be discussed and a working definition adopted early in the process. The definition should be broad while applying reasonable bounds. Historically, DR has often focused primarily on the annual peak coincident hour or period. However, changing conditions in the power sector strongly indicate that DR has a role and can provide value in many other periods of system stress. For example, BPA is currently procuring DR and other "inc/dec" resources

to address congestion in the South of Allston area (Portland-Vancouver metro) during summer super-peaks.

- The rapid diffusion of knowledge about DR is essential to securing benefits from early and effective availability of DR resources in the next five years. To do so, the DRAC should engage in an accelerated process to assess historic, current and planned DR activities in the Northwest, draw on the deep experience base in other regions, and provide assessments useful to utilities and other stakeholders in formulating DR program development in the crucial years ahead.
- The work of the DRAC should be framed in terms of opportunities and priorities as well as removing barriers. The region has relatively little full-scale programmatic activity, but has a long history of testing and pilot programs. As a result, we believe the DRAC should be called upon to help identify and advise on priority program development through IRP and procurement processes alongside the development of DR supply curves for the 8<sup>th</sup> Plan.

Finally, we would like to suggest that care be taken to coordinate the DRAC with the RTF and other Council efforts relating to energy efficiency, because of the complementary aspects of the resources and the potential for marketing and implementation to reach the same target audiences in many cases.

We suggest including specific language to address the benefits of coordinating DR and energy efficiency in the DRAC charter, and perhaps some overlap in membership of the advisory groups.

In addition, it is important to include representation from organizations involved with low income and hard-to-reach segments, as they bear the costs and can supply significant DR response.

## ***2. Is it appropriate to convene a separate forum to discuss smart grid, storage, and other enabling technologies?***

### ***a. Do you agree that a forum is the appropriate venue for these topics (versus an advisory committee)?***

We agree that discussion of a broader range of issues should be addressed once the DRAC is up and running, and this effort should be launched early in 2017. We suggest that the scope should be broadened from “system integration” to “grid edge” or a similar phrase that captures the broader context which includes many elements including distributed generation, storage, power electronics, microgrids, the system integration services that can be incorporated into transportation electrification, etc. As we explained in the NWECC comments on the draft 7<sup>th</sup> Plan dated December 18, 2015:

Grid edge refers to a location on the grid where the distribution system and the customer interconnect, where technology, policy and markets come together to create a two-way, digitally enabled local power network. The grid edge includes a set of interrelated and overlapping technologies and applications that allow utilities, and their customers, to better manage existing resources and more efficiently use and conserve electricity.

The question of whether a Grid Edge Forum (or whatever label) should continue independently or be merged with the DRAC can be assessed later. More importantly, we believe an early start of this effort is important. The 8<sup>th</sup> Plan should start incorporating elements in the Council's assessment processes, modeling and recommendations that address the important changes beginning to happen at the grid edge. These changes, gradual at first and then dramatic, will affect the Council's traditional focus on generation, energy efficiency resources, system adequacy and so forth, and the Council's assessment and modeling is needed to "fill in the gap" where dynamic new technologies, policies and markets are emerging.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Fred Heutte". The signature is written in a cursive, slightly slanted style.

Fred Heutte  
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