

May 29, 2018

RE: Comments on Puget Sound Energy's Draft Demand Response RFP UE-180272

Puget Sound Energy should consider mentioning in their RFP what they envision their relationship with CAISO's Western Energy Imbalance Market will be. For example, will they serve as a Scheduling Coordinator for demand response providers that aggregate substantial load in their service territory and allow them to function as Proxy Demand Resources? If so, the company should give a rough idea of whether this greatly increased complexity provides substantial more value beyond just fast demand response. If not, the company may be missing out on the potential value they gained by joining the EIM.

I understand PSE's projected needs don't indicate they will actually buy any DR for a few years. However one of the functions of issuing the RFP is to get a detailed read of market capabilities and prices for shaping ranges of prices in future IRP's. It's hard for a DR provider to provide substantial feedback or commit to work if the RFP process leaves out any hint as to whether DR providers should add substantial complexity to their offering.

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