

From: [Scanlan, Kathi \(UTC\)](#)
To: [UTC DL Records Center](#)
Cc: [Reynolds, Deborah \(UTC\)](#); [McGuire, Chris \(UTC\)](#)
Subject: FW: PSE 2020 DR RFP - Comments from Enbala
Date: Tuesday, July 7, 2020 10:55:26 AM
Attachments: [image001.png](#)

Records Center:

Please file the email comment received from Graham Horn, below, in Docket UE-200413.

Kathi

From: Anderson, Linda (UTC) <linda.anderson@utc.wa.gov>
Sent: Tuesday, July 7, 2020 8:16 AM
To: UTC DL Conservation & Energy Planning Group
<ConservationEnergyPlanningGroup@utc.wa.gov>
Subject: FW: PSE 2020 DR RFP - Comments from Enbala

From: Graham Horn <ghorn@enbala.com>
Sent: Monday, July 6, 2020 5:12 PM
To: UTC DL Energy Regulation <EnergyRegulation@utc.wa.gov>
Subject: FW: PSE 2020 DR RFP - Comments from Enbala

Resending this to the Energy Regulation email. It bounced back from the Conservation email.

Graham Horn, Vice President, Enterprise Accounts
Mobile:(604) 641 2877, Email: ghorn@enbala.com

From: Graham Horn <ghorn@enbala.com>
Date: Monday, July 6, 2020 at 4:59 PM
To: "ConservationEnergyPlanningGroup@utc.wa.gov"
<ConservationEnergyPlanningGroup@utc.wa.gov>
Subject: PSE 2020 DR RFP - Comments from Enbala

Hello - I see the comment window for the PSE DR RFP closes today. Is this comment window for vendors? Or is it really intended for Ratepayers or Stakeholders impacted by a filing.

I am a vendor. For your reference, the comments/questions I would like to raise are:

- 1) **Term of the Contract** - Is the Contract Term for the DR RFP limited to 5 years. This is all that is provided in the Pricing Appendix. If this is the maximum Contract Term, would

PSE consider extending the Contract Term to 10 years? This will allow vendors to amortize equipment over a longer period of time and should lead to lower prices and better value for ratepayers.

2) **Likelihood of Award** - PSE did not award anything as part of the 2016 DR RFP. And to my knowledge they did not award anything from the 2018 All-Source RFP. Does PSE expect to award anything based on this 2020 RFP?

3) **Avoided Cost** - Could PSE provide a worked example of how they will use the figures in the DR RFP, Page 37 Exhibit A , Table 2 (2017 IRP Forecast of Avoided Costs) to evaluate the cost effectiveness of the DR bids?

4) **Program Support** — Does PSE have the necessary team, programs and price incentives (like Peak Time Rebates) in place to allow PSE to onboard and scale a cost effective and robust portfolio of DR resources?

5) **CETA Applicability and Timing** – Will the **CETA** provisions be considered in the evaluation of the cost effectiveness of the DR bids. I understand there are DR minimums, Emission targets, Equity targets and other non-price benefits that could be coming into play here.

Please advise if you consider these comments submitted or if I should submit by some other channel.

Kind regards,

Graham

Graham Horn

Vice President, Enterprise Accounts

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