

**Exhibit No. \_\_\_ (JMW-8)**  
**Docket UE-130617**  
**Witness: Juliana Williams**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY, INC.,**

**Respondent.**

**DOCKET UE-130617**

**EXHIBIT TO  
TESTIMONY OF**

**JULIANA WILLIAMS**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*Staff conversations with Portland General Electric staff  
regarding the Dispatchable Standby Generation program*

**August 14, 2013**

**Portland General Electric Company  
Dispatchable Standby Generation (DSG) Contact Log**

Prepared by David Nightingale, UTC Staff, July 2013.

<b>Date</b>	<b>Contact</b>	<b>Discussion</b>
7/10/2013	Ed Rainey, PGE	DSG program began in 1999 with the first customer connected and operational in 2000.
7/12/2013	Kelly Cox, PGE Manager, Customer Specialized Programs	<p><b><i>Size of program:</i></b> Had 88 MW of nameplate capacity at the end of 2012 and anticipate having 104 MW in the program by the end of 2013. Currently at 89 MW. In 2012 they added 20 MW and in 2013 they will add 16 MW.</p> <p><b><i>Operation and Maintenance:</i></b> When they start the standby generators they run them at 90% of their rated capacity. They run them all for an hour a month to assure their operation and reliability. They perform quarterly on-site inspections and annual maintenance. The Company has paid for all maintenance and fuel costs for the generators.</p> <p><b><i>Cost-effectiveness:</i></b> They have found this peaking resource to be more cost effective than purchasing capacity on single cycle combustion turbines.</p> <p><b><i>Reduced non-spinning reserves:</i></b> The DSG resources provide all of the non-spinning reserves for the PGE system which provides a significant savings to the Company.</p> <p><b><i>Grid reliability increases:</i></b> The DSG also increases reliability when a feeder is heating up due to heavy loading and a DSG is available it can temporarily reduce the overloading on that circuit.</p> <p><b><i>New EPA Air Quality Standards:</i></b> In January 2013 US EPA implemented revised rules for Reciprocating Internal Combustion Engines (RICE Rules). The Company has chosen to classify the DSG program as emergency generators to allow continued use as intended. This will limit the maximum number of hours of operation per year for energy to 50 hours. Kelly Cox believes that this will not decrease the value of the DSG resource very much, as 50 hours should provide enough operating time for critical peak reduction that the company would normally want to run these units.</p>