



**December 5, 2005**

**I. Background**

DRAM is an industry association that includes the leading providers of advanced metering and demand response services and technologies. Its members<sup>1</sup> represent the a broad spectrum of technologies, applications and product types focused on the very questions that the Commission is looking to assess in implementing its responsibilities under EPACT. For policy purposes, DRAM represents a consensus-based organization where the members have agreed to definitions and positions related to demand response and provided input to policy makers at the State and Federal level on numerous occasions.

**II. Request to Participate in the Technical Conference**

For the reasons stated in (I) above, DRAM is ideally suited be able to represent the demand response and advanced metering industry at the Technical Conference and would be happy to provide a panel of experts to present to the Commission at the conference and respond to its questions. We respectfully request that DRAM members be included as participants.

**III. Comments on Proposed Metering Survey**

In its discussion of the metering survey on page 2, the Commission notes in paragraph 6 that the survey is targeted towards end-use customers. DRAM notes that in restructured states, two parties may share an end-user (the commodity provider and the delivery/wires company). The Commission may wish to consider this in the instructions accompanying the survey to ensure that all customer metering points are included.

In its discussion of the metering survey on page 2 of the Notice, the Commission states in paragraph 6:

*“Because there are no standard industry definitions, Commission staff is uncertain about the best set of questions for obtaining information on the saturation and penetration of advanced metering.”*

DRAM does indeed have definitions for advanced meters and advanced metering and, given its representation of the advanced metering and demand response industry, we believe this qualifies as at least one standard industry definition. Those definitions are as follows:

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<sup>1</sup> Members of the DRAM Coalition participating in this filing include: Landis & Gyr, eMeter, Echelon, E-MON/MeterSmart, DCSI/TWACS, Elster Electricity, SmartSynch, Electric City Corporation, Invensys, Comverge and EnerNOC

### ***Advanced Meter***

An electric meter, new or appropriately retrofitted, which is 1) capable of measuring and recording usage data in time differentiated registers, including hourly or such interval as is specified by regulatory authorities, 2) allows electric consumers, suppliers and service providers to participate in all types of price-based demand response programs, and 3) which provides other data and functionality that address power quality and other electricity service issues.

### ***Advanced Metering or Advanced Metering System***

A system that collects time-differentiated energy usage from advanced meters via a fixed network system, preferably two-way, on either an on-request or defined schedule basis. The system is capable of providing usage information to electricity customers, utilities and other parties on at least a daily basis and enables them to participate in and/or provide demand response products, services and programs. The system also supports additional features and functionality related to system operation and customer service, e.g. outage management, connect/disconnect, etc.

That said, DRAM believes that the Commission has taken a reasonable approach to the design of its survey. By focusing on the functionality of the metering and differentiating between such metering being capable and it being used, the survey has the potential to paint an accurate picture of the advanced metering population. By varying the questions as it has, FERC also provides respondents, which will primarily be utilities, with greater flexibility as to how they may categorize the metering which they currently have in place.

DRAM has one specific suggestion on a survey question. Question 19 asks for “total number of meters of all types (advanced and conventional)” With “conventional being an undefined term, it might be better to eliminate the parenthetical so that the question is simply asking for the total number of meters.

## **IV. Comments on Proposed Demand Response Programs Survey**

### **A. Demand Response Programs**

The Commission lists as program types “DLC, IL and EC” and then introduces a category of “other”. DRAM believes that one program type does deserve its own status – Negawatt Resource. This involves a demand response provider making a contractual commitment to a load serving entity to deliver a block of demand response during a peak period. This is becoming a more prevalent type of demand response program and should have its own specific category in the survey.

Related but separate from this, DRAM believes that a field should be introduced to note whether the program is under the utilities control or the control of the third party.

Another recommended new field is the actual peak reduction in the program's most recent implementation. This would complement the current field on potential.

Along the same lines, a field is recommended to capture the net kWh reduction due to the demand response program. This is an important issue in the general debate over demand response today and the Commission could assist in learning more about it. The issue is whether demand response programs, which have as their objective the reduction of MWs of peak load, result in an increase or decrease in kWh produced/used over the course of a daily, weekly or monthly period. DRAM is aware of a number of data points that indicate that there is a net conservation effect with demand response. DRAM is also aware of some demand response efforts that may not be even measuring for kWh impact, since it is not a design criterion. New information on this question via the Commission's survey would be beneficial.

A field should be also added for a respondent to indicate how long the program has been in place.

DRAM believes that there are also other opportunities that can be included in the survey without adversely impacting either the Commission or respondents. These fields could be voluntary but yet provide the respondent with the ability to convey some very valuable information about its demand response programs.

A field could be added for a respondent to indicate if there are public domain case-study type documents available for the program in question.

A field could be added for a respondent to describe (in free form text) what the major barrier(s) have been to program success and how they have been overcome.

## **B. Time-based Rate Programs**

Similar to its comments in Subsection (A) above, DRAM believes that several fields should be added for each program.

A field to indicate how long the program has been in operation should be added.

A field for potential peak reduction should be added.

A field for actual peak reduction should be added.

A field for net energy reduction should be added.

Voluntary fields to indicate availability of case-study type documents and to describe barriers and how they were overcome should be added.

## V. Conclusion

DRAM commends the Commission for its work on the Draft Survey. DRAM believes that the Commission has structured an instrument that will assist it in the implementation of its responsibilities under EPACT and which will also provide valuable new insight into demand response and advanced metering.

Any questions regarding these comments should be directed to:

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