



August 28, 2009

Ms. Rae McQuade
President, North American Energy Standards Board
1301 Fannin Street
Suite 2350
Houston, Texas 77002

Dear Ms. McQuade:

The ISO/RTO Council respectfully submits the following comments in support of the proposed Measurement and Verification Business Practice Standards for Retail Electric Market Demand Response Programs.

You may be aware that several ISO/RTOs staff have participated in the development of these Retail Standards and have made significant contributions to the effort that we are supporting today. Furthermore, we appreciate the enormous dedication of time and resources provided by other members of the retail work group, including NAESB members in the Retail and Wholesale Electric Quadrants and other stakeholders. Having spent the better part of two years working on the Wholesale DR M&V Standards, and part of that time participating on the Retail Standards, we are fully aware of the effort and determination it takes to move standards from a request to ratification. We support this process and fully intend to continue to support the NAESB standards development process.

As noted in the Introduction of the Retail Standards, the Wholesale M&V Standards formed the basis for development of the Retail Standards. We supported this approach from its beginning and believe it creates consistency in standards across Retail and Wholesale products. We believe that adopting this format and approach has assisted the Retail work group in defining key criteria required to measure and verify demand reductions from Retail Demand Response products and services. We note that the Retail Standards address differences in regional application of product types, while providing a level of specificity which is appropriate for this level of product diversity.

The Retail Standards have gone beyond the Wholesale Standards in several respects, to which we credit the process and support. In particular, several common definitions have been enhanced, providing greater clarity and detail that was not captured in the Wholesale Standards definitions. Furthermore, the Retail Standards have added terms that are applicable to Retail products and may be applicable to Wholesale Demand Response products. These new terms may be considered for inclusion in future revisions to the Wholesale Standards. The Retail Standards also include greater detail related to sampling, which is an important feature of Retail Demand Response products and can be applicable to Wholesale Demand Response products and services. While retaining much of the same criteria and specificity, the Retail Standards have incorporated improvements that we support and will consider in future enhancements to the Wholesale Standards.

Comments and a redlined version of the standards were submitted by the group represented in this letter during an informal comment period. These comments are available on the NAESB website under the DSM/EE section of the WEQ in the supporting documents for the July 29th DSM/EE subcommittee meeting. We noted several terms, defined in the glossary, are not used in the body of the standards and that these inclusions may be inconsistent with the practice of defining only terms that are used in the body. The Retail workgroup concurred that these terms as used in the Wholesale Standards serve as useful points of reference and do not in principle detract from the quality of the Retail Standards. No changes were requested. We also noted under the section entitled Measurement of Load, that REQ 13.3.2.3 and 13.3.2.4 may be repetitive absent specific quantitative details. The Retail workgroup addressed our comment and no change was requested. Based on the responses from the Retail workgroup we believe our concerns have been addressed. We have no further concerns or requests for additional changes.

In conclusion, the ISO/RTO Council supports the Retail Standards as approved by the DSM/EE subcommittee on July 29, 2009 and presented in the request for formal comments. We appreciate the opportunity to have participated in the development of these Retail Standards and to provide these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Rana Mukerji", with a stylized flourish at the end.

Rana Mukerji
Vice President, NYISO
IRC Markets Committee Chair