PUBLIC UTILITY COMMISSION OF OREGON

UE 189

STAFF DIRECT TESTIMONY

OF

LISA SCHWARTZ

In the Matter of PORTLAND GENERAL ELECTRIC CO.

Request to Add Schedule 111, Advanced Metering Infrastructure (AMI)

November 21, 2007

CASE: UE 189

WITNESS: LISA SCHWARTZ

PUBLIC UTILITY COMMISSION OF OREGON

STAFF EXHIBIT 100

November 21, 2007

- Q. PLEASE STATE YOUR NAME.
- A. My name is Lisa Schwartz.
- Q. ARE YOU THE SAME LISA SCHWARTZ THAT FILED JOINT TESTIMONY SUPPORTING A STIPULATION IN THIS PROCEEDING?
- A. Yes.
- Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?
- A. First, I explain the rights Staff and other parties have in future proceedings where PGE's recovery of Advanced Metering Infrastructure (AMI)-associated costs will be addressed. Second, I advise the Commission that Staff may comment in other proceedings about PGE's proposed timing of direct load control programs for residential and small non-residential customers.
- Q. FIRST, PLEASE EXPLAIN WHAT KIND OF AMI COST REVIEW MAY BE DONE IN FUTURE DOCKETS.
- A. Parties will review whether actual AMI costs and savings are materially different than PGE's estimates. As noted in Exhibit 100, Staff and Parties have entered into this Stipulation based on their current understanding of estimated future costs and savings. If those estimates prove to be unreasonably different than actual costs and savings, and Staff or Parties find AMI's actual net benefits to be unreasonably below PGE's estimates for this proceeding, Staff or Parties may recommend that the Commission disallow unreasonable costs.
- Q. REGARDING YOUR SECOND ISSUE, PLEASE EXPLAIN PGE'S
 PROPOSED TIMING FOR A DIRECT LOAD CONTROL PROGRAM.

In PGE's Conditions document (Joint Exhibit 101), the Company commits to issuing a Request for Proposals (RFP) for direct load control providers eight months prior to the scheduled completion of AMI deployment, approximately the first quarter of 2010. Further, the Company commits to filing a direct load control program for residential and small non-residential customers by the end of the AMI deployment period.

PGE proposes this timing in order to issue an RFP for direct load control providers that will be attractive to the market – in other words, timed for full use of the AMI system. See Joint Exhibit 101 at 3-4.

Q. DOES PGE NEED TO USE AN AMI SYSTEM TO DEPLOY A DIRECT LOAD CONTROL PROGRAM?

A. No. Many utilities have implemented programs to control customer loads such as air-conditioning and water heating without AMI. For example, utilities or third-party providers can use a paging system and control switches on energy-consuming devices.

Q. CAN PGE USE ITS AMI SYSTEM TO DEPLOY A DIRECT LOAD CONTROL PROGRAM?

A. Yes. The two-way AMI communications system PGE is proposing can be used to send signals to customers' premises for direct control of loads. The system can verify resulting reductions in loads at customer's premises, as well.

Alternatively, aggregated load reductions can be monitored at the substation level.

Q. WHAT IS STAFF'S POSITION ON TIMING OF A DIRECT LOAD CONTROL PROGRAM FOR PGE?

A. PGE should review the appropriate timing for a direct load control program as the Company develops its proposed Critical Peak Pricing (CPP) tariff in 2008.

Also at that time, PGE should review future technology needs for the full range of demand response programs for residential and small non-residential customers. That includes direct load control and appliance controls, as well as pricing programs.

The Conditions document states that PGE will file an experimental CPP tariff approximately first quarter of 2009. That's one year *before* the Company plans to issue an RFP to direct load control providers. The Conditions document further commits PGE to evaluate the suitability of programmable communicating thermostats and other technologies that can be used for two purposes: 1) automated customer response to CPP signals – e.g., a device that sets a higher temperature for air conditioning during summer CPP events and 2) utility direct load control.

In addition, Staff and other parties are reviewing the proposed timing of direct load control programs in PGE's 2007 Integrated Resource Plan (Docket LC 43).

Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?

A. Yes.

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