RE: Comments to the Draft Vision for Demand Resources Working Group

Thank-you for this opportunity to offer comments to the draft. My comments are related to the role that advanced energy storage can play in demand response.

On page three, under the heading, "Reduce the Environmental Impact Caused by Electricity Usage", I recommend the following insertion to the second paragraph, indicated in italics:

- Demand response via permanent load shifting or *energy storage* can help integrate intermittent, non-peak time, renewable resources into the electric grid and benefit the system load factor.

I would emphasize energy storage here because it is better able to respond to the intermittent nature of renewable energy versus permanent load shifting. Once a load shift is "permanent", it loses its ability to respond to variations in energy generation. However, an energy storage device can vary demand response as required to adjust for intermittent generation.

I also recommend the following clarification to the next paragraph:

- The definition of demand response does not include or encourage switching to use of fossil-fueled auxiliary or emergency backup generation.
- *However, energy storage technologies, as a non-supply side resource, should be included and encouraged in the definition of demand response.*

Back-up generation is a supply side resource and should be excluded from demand response. Although it may appear obvious, it may be useful to affirm the inclusion of energy storage, which can store energy from the grid and deliver it when needed, as a valuable demand side resource.

Thank-you for your consideration of my comments.

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