

Docket No. 09-0263

Response to AG
First Set of Data Requests to CUB
CUB witness Thomas

AG 1.9 Is it Mr. Thomas' opinion that AMI installation and dynamic pricing are necessary to achieve cost effective efficiency and demand response results from residential customers? If so, please provide all documents, studies, reports and workpapers that support that opinion.

RESPONSE:

Cost effective efficiency and demand response are being achieved today to some limited extent. However, based on his experience, Mr. Thomas believes that the full range of achievable cost effective EE and DR cannot be obtained without better metering infrastructure and technology in the hands of customers. Mr. Thomas' opinion is based on general knowledge of industry trends and general discussions with curtailment service providers, utilities, and researchers from across the U.S. and internationally. Mr. Thomas also relied upon "A National Assessment of Demand Response Potential" from FERC located at <http://www.ferc.gov/legal/staff-reports/06-09-demand-response.pdf> in support of his opinion.

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I.C.C. DOCKET NO. 09-0263
Thomas Exhibit No. 2
Witness _____
Date 8/20/09 Reporter JA