RA Procurement

1. Are the IOUs to procure a minimum of 22 MW in *each* delivery month? So, in the specific case of SCE, is SCE required to procure a minimum of 10 MW system RA capacity from supply-side DR resources during each delivery month (June 2016 - December 2016)?
   - The IOUs interpret the 22 MW target as being for the peak month (August). For example, if we procure 22 MW for August 2016 and 20 MW for other months, we have met our target.

2. What is the anticipated target for residential MW?
   - The 20% residential set-aside is first based on DRAM minimums, for a total of 4.4 MWs across all three IOUs, based on each IOU's pro rata share of DRAM capacity. This translates as a minimum residential set-aside procurement target of 2 MWs each for SCE and PG&E and 400 kW for SDG&E. Residential MWs will be at least 20% of all MWs taken, so the total may exceed the minimums depending on budgets and registrations available.

3. Can you please clarify how the residential set-aside will work in DRAM delivery months *besides* August 2016? Is SCE required to procure a certain MW quantity (e.g. 20% x 10 MW = 2 MW) from residential resources during each of these months? Or is SCE only required to procure from residential resources 20% of the *total* MW procured during each of these months (which could be less than 10 MW)?
   - The requirement is to purchase 2 MW of residential DR in August 2016, regardless of how many MW of overall bids are received. However, a bid might contain MW in multiple months so in accepting the bid, the IOU could be purchasing the MW in all months.
   - SDG&E is allowing zero kW bids for August so it is theoretically possible for SDG&E to procure 0 MW of August non-residential capacity if the funding or Rule 32 limit is reached first. In that highly unlikely case, the required residential target for August would be 0 MW X 20% = 0 MW. In practice, SDG&E plans to take the lowest weighted cost per MW residential bid first without regard to months offered before considering non-residential capacity to comply with the spirit of the Commission's mandated residential set-aside.

Proxy Demand Response (PDR)

4. My understanding is Joint PDRs can be formed by combining two (or more) DRAM contracts belonging to two (or more) *different* Sellers. However, could a Joint PDR also be formed by combining two or more DRAM contracts belonging to the same Seller? As a simple example, suppose that for a given delivery month, a Seller has two contracts with SCE: one for q1 MW at price p1/MW-month, and the other for q2 MW at price p2/MW-month. I presume this Seller can construct a Joint PDR with total load curtailment potential of q1 + q2 MW?
   - No, the purpose of joint PDRs is for the situation where an individual seller cannot meet the 100 kW CAISO minimum load reduction in a sub-lap. Please see the definition of a joint PDR under Exhibit A of the Purchase Agreement.

5. Is there a tool to check SubLAPs for the three utilities?

- Final determination of a service account's SubLAP is handled through the CISR form process. A general guide for each IOU:
  - SCE has a tool available at the following website: http://on.sce.com/mapview. You can enter an address under "block view" or else select all the blocks for a general breakdown of the six SubLAPs in SCE territory. SCE blocks are synonymous with SLAPs.
  - PG&E has a map available in the "Other Information" section of their DRAM website (www.pge.com/dram), which provides a general breakdown of the 16 SubLAPs in the PG&E territory. An Excel file with a zip code to SubLAP mapping is also available on the website. For customer-specific SubLAP information, you would need to fill out a CISR-DRP form, as the release of information related to the SubLAP of individual service accounts is private and requires customer consent for release to a third party under Rule 24.1.d.(1).
  - SDG&E has only one SubLAP in its territory.

6. What do you mean by "at least 100 kW per month per PDR bid?"
   - Each PDR must have a minimum of 100 kW of load reduction, per CAISO. http://www.caiso.com/Documents/DemandResponseUserGuide.pdf

7. Is there any information available regarding PDR registration and testing for awarded participants beyond the 2/8/2016 "Energy Division gives notice of other actions" listed on the DRAM website? Primarily in regard to any applicable deadlines leading up to the first Delivery month.
   - Offerors should work with their Scheduling Coordinator and team to meet all requirements of the CAISO, CPUC, and individual utility for items not listed in the RFO documents. The DRAM Contract requires Seller to provide a Supply Plan to the Buyer 10 business days prior to the RA Showing Month deadline, which is 45 calendar days prior to the Showing Month. The Supply Plan requires registered PDR(s).

8. Are there any special considerations that should be taken into account for demand response offerings grounded in a behavioral program (much like SCE's Save Power Day Program)?
   - The IOUs encourage different technologies and approaches in the RFO as long as they meet the contract requirements in providing the contracted capacity.

Request for Offer (RFO)

9. In the simplest case, a Seller's bid specifies a capacity quantity and capacity price for just a single delivery month. However, a bid can also specify quantities and prices for multiple delivery months (and these quantities and prices can differ across months). Will a multi-month bid be either accepted or rejected in its entirety? Suppose a Seller submits the following multi-month bid to SCE: {(q_June, p_June), (q_July, p_July)}. Is it possible that SCE would accept the June

component (q_June, p_June) but reject the July component (q_July, p_July)? Or will SCE either accept or reject *both* the June and July components?

- Each final bid will be accepted or rejected in its entirety. To submit a monthly offer, or a subset of the full term, submit a unique offer for each month as a single delivery or subsets of the full term.

10. I understand that Sellers are to separate their capacity costs from their SC costs in their DRAM bids. However, it's not clear to me how the bid-in SC costs will factor into the IOUs' determinations of which Sellers are awarded DRAM contracts.
    - For bid evaluation purposes, all costs are added together. Please read each IOU's RFO document for the prescriptive details on how bids will be evaluated.

11. Can a PDR Seller submit both residential and not residential PDRs for the same showing month?
    - Each bid must either be a residential bid or a non-residential bid. Offeror must submit two separate Offers for the same showing month for the different types of PDRs. A bidder can win one or more contracts if it has multiple bids using different customer groups. It cannot win more than one bid if the two bids are variations of each a larger bid and the same customers are being used in for both bids.

12. Will selected offers always be taken in full? I.e., a single offer cannot be split up and only have some months selected. If multiple offers are entered in a bid should they be cumulative or independent? In the same concept will only one offer per bid be accepted or could multiples be accepted?
    - Offers will always be taken in full, and are independent (i.e., not cumulative).
    - SDG&E: Each of the 20 potential Offers from an Offeror shall be mutually exclusive of all other Offers and will be shortlisted as a single independent Offer in its entirety. The bids will not be split up by month. If the Offeror wishes to Offer single months as an option, those should be submitted as additional Offers for each month and will count towards the 20 Offer limit.
    - SDG&E's Offer Form requires each Offer to have a minimum and expected number of registrations. SDG&E reserves the right to shortlist a bid if necessary by using any number of registrations between the minimum number and expected number.
    - SCE's Offer Form allows Offeror to identify whether an Offer is mutually exclusive or inclusive. As with SDG&E, the bids will not be split up by month. If the Offeror wishes to Offer single months as an option, those should be submitted as additional Offers for each month and will count towards the 20 Offer limit.
    - PG&E will evaluate each offer variation independently of the others submitted from the same Bidder, and may shortlist multiple offer variations. If a Bidder submits 20 offer variations, PG&E may shortlist up to 20 of these offer variations. Note that if multiple offers are shortlisted from one Bidder, then multiple unique customer sets may be required for bid fulfillment.

13. The SCE RFO states that "costs include offered capacity price per kW, SC fees and debt equivalence." Can you expand on what debt equivalence refers to?
    - Debt equivalence is the cost, if any, that SCE incurs due to the accounting (debt rating) impacts of its contractual obligations.

14. The PG&E RFO states that "a maximum of 20 variations will be accepted per offer." Does this apply to SCE as well? How do the IOUs envision this working? Will the lowest price offer for exclusive resources always been chosen?
    - Yes, the 20 variation maximum applies to all three IOUs. Each of the 20 Offers from an Offeror will be ranked according to each IOU's methodology. Please see the respective IOU RFO documents for more information.
    - PG&E and SDG&E will evaluate each offer variation independently of the others submitted from the same Bidder, and may shortlist multiple offer variations. If a Bidder submits 20 offer variations, PG&E could shortlist up to 20 of these offer variations. Note that if multiple offers are shortlisted from one Bidder, then multiple unique customer sets will be required for bid fulfillment. If necessary, further clarification around the exclusivity of certain Offers may be requested during the cure period.

15. The PG&E RFO on page 9 has a paragraph relating to confidentiality - while SCE provides an NDA for participants. Would PG&E consider doing so? Can the CPUC, PRG, CEC provide assurances that offers will remain confidential?
    - As noted, there is confidentiality language on p. 9 of PG&E's DRAM RFO Protocol. PG&E believes that this language, in addition to the fact that the Purchase Agreements are non-negotiable, deem Confidentiality Agreements unwarranted for this RFO.
    - SDGE will also not entertain additional confidentiality language in addition to what is already in the RFO documents.
    - For information on the CPUC's confidentiality provisions please see Public Utilities Code § 454.5(g), Public Utilities Code § 583, General Order 66-C, Public Records Act, Govt. Code § 6254(k), Evidence code § 1060, Civil Code § 3426.1, CPUC D.06-06-066, CPUC D.07-05-032, and CPUC D.08-04-023.

16. The PG&E RFO provides a table of RA weights used to evaluate the bids, while the SCE RFO only refers to using "relative value weights for each month." Can we assume the weights are the same or, if not, can SCE provide their relative value weights by month?
    - As stated in the RFO description documents, SCE and SDG&E are using proprietary weights that will not be made public at this time.

17. Is an S&P, Moody's and Fitch rating mandatory for the application? If a bidder does not have these ratings can they submit a DUNS or alternative credit rating in lieu of the three designated ratings?

- Bidders are not required to have a credit rating in order to submit a bid. However, if your bid is selected and contract executed, your credit status will affect Performance Assurance posting requirements under the contract. Please see Article 5. Credit and Collateral in the DRAM Resource Purchase Agreement for details.
- SDG&E, PG&E – We only accept Moody's and S&P in lieu of the deposit.

18. Page 4 of the PG&E DRAM RFO Instructions states: "Each Offer must contain a minimum of 1 month of delivery for August 2016". Does this mean that *each* of the (up to 20) "variations" within an Offer must include a non-zero offer quantity (kW) for delivery month August 2016? Or does this mean that *at least one* of the (up to 20) variations within an Offer must include a non-zero offer quantity for August 2016?
    - Every variation must have a non-zero offer quantity for delivery month August 2016.

19. Section 3.04 (page 7) of the SCE DRAM RFO Instructions states: "Each bid must contain a minimum of 1 [...] month delivery and contain delivery during the month of August 2016". Does this mean that any bid that specifies non-zero kW quantities for delivery months other than August 2016, but a zero kW quantity for delivery month August 2016, will not be accepted?
    - Yes, each bid must have a non-zero quantity for delivery month August 2016. Bids that have a zero quantity for delivery month August 2016 will be deemed non-conforming.

20. Page 7 of the SDG&E DRAM RFO Instructions states: "The Delivery Period(s) shall be no earlier than June 2016 and no later than December 2016, with a minimum Delivery Period of one month and a minimum increment of one month up to the maximum of seven months." In the case of SDG&E, is there any requirement that a bid include a non-zero kW quantity offer for delivery month August 2016?
    [SDG&E only] Offerors **are allowed** to bid zero kW for August. This solicitation is seeking a minimum of 2 MW in August 2016 (20% of which must be from residential Offers) BUT up to the funding or registration limit if those are reached first.

CISR-DRP

21. Will there be an electronic version of the CISR-DRP that a customer can populate online (as opposed to filling out a PDF)?
    - SDGE and PG&E - No, only a PDF version is available at this time.
    - SCE - Yes, the CISR-DRP will be available as a web form that captures the data electronically. The traditional PDF approach is still available, although, it is not the preferred method.

22. Just to clarify - PG&E, SDG&E say they will not have a digital CISR form option for this DRAM. Is this a final decision? Will the delivery assume that mass market customers (likely >5k customers) will print a form, sign it and send it back to the DRP/Aggregator?
    - Yes, it is final for this RFO.
    - Please see the respective IOU websites for more information on the CISR process:
        - SDG&E – A link to the CISR-DRP form and email address for CISR-DRP submissions is on the RFO website.

- SCE – An electronic CISR-DRP form will be launched in early 2016. Instructions on how to submit an electronic CISR-DRP will be posted to the DRAM RFO website once available.
- PG&E – While we do not have an electronic version of the CISR-DRP form at this time, we are exploring alternatives for future RFOs. PG&E expects that a "docu-sign" signature process will be available in early 2016 to help facilitate the CISR-DRP process

Customer Eligibility

23. Are Automated Demand Response (ADR) customers eligible for DRAM?
    - Yes, an ADR customer can participate in DRAM; however, event participation during the DRAM period will be factored, along with any previous utility event-based DR performance, into the 40% incentive payment calculation, if the customer has not completed their first year on the ADR program. DRAM event participation information in this case needs to be provided to the IOUs by the Seller. As DRAM customers cannot be dual enrolled on a utility event-based DR program, de-enrolling in said programs must occur before an ADR customer may participate in DRAM.
    - The DRAM period will also count towards the ADR's 36 month compliance period if that has not been met. The ADR Customer remains responsible for fulfilling its obligations under the Buyer's ADR program while it is in the Seller's DRAM program. The ADR Customer is required to participate in a qualified DR program upon the conclusion of Seller's 2016 DRAM program if the 36 months requirement has not been met.

24. Are Self-Generation Incentive Program (SGIP) customers eligible for DRAM?
    - Yes, an SGIP customer participating in DRAM can continue on the SGIP program provided the customer continues to satisfy the requirements of the SGIP program, including continuing to provide the data and information required. Participating in DR events may affect their Performance Based Incentives (PBI). However, if changes are made in the SGIP proceeding to prohibit participation in utility DR programs, it would also apply to DRAM.

25. For customer migration for SCE - the migration sheet states that for PTR customers they would have to un-enroll via your website or call. Can you share the direct link to the page on which the customer would un-enroll? Or must they login to their account first and navigate to the page? Can you share the pathway?
    - PTR opt-in customers can de-enroll from the program via sce.com is by logging into their MyAccount. Once in MyAccount, they must navigate to the "Services" section and select to edit their Service Account Information. This will pull up the selection options where customers can change their PTR event notification settings or de-enroll.
    - Customers on PTR-ET-DLC (PTR with Direct Load Control enabling technology) opt-out via the 3rd Party vendors under contract with SCE.

26. What is the IOU stance on Auto-DR (ADR) TI incentives as it relates to the DRAM?

- Per the Staff Disposition of SCE AL 3208-E-A, SDG&E AL2729-E-A and PG&E AL 4618-E-A sent out on 09/24/15, the Utilities shall consider DRAM an IOU DR program; however, all rules and requirements under ADR must be met.
- PG&E - In accordance with the above-referenced Staff Disposition, PG&E has issued an updated "DRAM Set Aside" document on the PG&E DRAM RFO website , which has an updated description of how PG&E would treat ADR customers that would like to participate in DRAM.
- SCE – SCE has posted an updated "DRAM Customer Migration Matrix" on the SCE DRAM RFO website as well.

Scheduling Coordinators/CAISO

27. Can a Scheduling Coordinator (SC) that did not respond to the RFI for SCs still provide SC services for the DRAM?
    - Yes.

28. All agreements indemnify the buyer from any costs, penalties or fines assessed against the buyer by the CPUC or CAISO, resulting from a failure to deliver. What are these potential fees? Where are they defined?
    - The CAISO fees and penalties are defined in the CAISO Tariff. The CPUC potential penalties for the Buyers have been waived per the DRAM Resolution.

29. How often can bidders expect to be dispatched on the CAISO market? If this information is not available, where can bidders find historic dispatch information? Is there a minimum number of times we need to dispatch the capacity? Where can we find historic data on typical rate of super-peak capacity?
    - The CAISO dispatches will depend on CAISO market conditions and the Sellers bidding strategy (e.g. price). The CAISO website provides information on their historical system conditions and performance. The CAISO Tariff and BPMs specify the Must Offer Obligation and participation requirements.

30. Can bidders with low overhead price capacity cost at $0 and cover expenses through dispatch returns?
    - The capacity payment from the IOUs is strictly for the RA. Offerors must bid directly into the CAISO day-ahead energy market and any resulting revenues or liabilities shall be allocated solely to the Offeror. The Offeror must make their own determination of economics and all Offer pricing is final.

31. In PG&E's DRAM RFO Protocol Appendix A: Offer Sheet, "DRAM RFO Offer Form" tab, column L, should we provide the total or monthly Scheduling Coordinator costs?

- Participants in PG&E's RFO should provide the total Scheduling Coordinator costs in column L, not the monthly costs. Note that this is different from what SCE and SDG&E are asking for in their DRAM offer forms.

Capacity Demonstrations

32. How will Net Qualifying Capacity (NQC) for joint PDRs be demonstrated (e.g., event verification)?
    - See Section 1.6 of the DRAM Purchase Agreement.

33. Are there any restrictions regarding participation of assets that will come online after the beginning of the DRAM? I understand that the number of unique meters must be listed as a part of the initial RFO response, and that a Qualified Capacity Test will be run before the DRAM begins. If the "late" meters are included in the original bid, and the Qualified Capacity can be achieved without the late meters participating, could these assets then be used in the later months of the DRAM? (For example, this could be reflected by an increasing kW nomination over the course of each subsequent DRAM month).
    - Offerors are not expected to have customers/service accounts/registrations under contract when the Offer is submitted. Offerors are expected to submit binding bids for Qualified Capacity each month that they expect to be able to achieve. RA payments will be made on a month by month basis and are capped at the contracted capacity or the demonstrated capacity, whichever is less. Offerors are not allowed to make up a shortfall in one month by having extra in another month.

34. Can a resource re-test its Qualified Capacity to increase the maximum possible bid after the pilot begins?
    - No, Capacity size per month is binding and not subject to increase after the Offer is accepted. Bids in the CAISO market can exceed the contract capacity, but the RA payment is based on the lesser of (a) the Demonstrated Capacity for the applicable Showing Month, and (b) The Monthly Quantity for the applicable Showing Month as set forth in the table in Section 1.5 of the Purchase Agreement.

35. How do you calculate the bid size?
    - The bid size is whatever is listed is the Offer Form. A bid of 1 MW for all months from June to December 2016 is a 1 MW bid. The maximum bid size (10 MW for SCE and PG&E, 2 MW for SDG&E) is the maximum in any month.

36. The SCE RFO says that "each PDR specified by an Offeror must have a corresponding monthly NQC value assigned to it by the CAISO for the RA compliance period." However, we were under the impression that the NQC would be equal to the contract amount since there is no historical data for these resources and that demonstrated capacity (p4) would then determine capabilities in delivering on commitments. Can you please clarify?

- Per CPUC Decision 15-06-063, the Net Qualifying Capacity (NQC) will be considered equal to the lessor of the Contract Capacity or the Demonstrated Capacity, however the Seller must meet additional requirements (e.g., registration) to have eligible NQC, per CAISO Tariff and BPMs. For DR, QC and NQC are equivalent.

37. Can we provide additional analysis to support the capacity offers shown in the submitted offer form?
    - Yes.

38. What is the penalty for non-performance of a resource when an event is called? How are liquidated damages calculated?
    - If a resource doesn't perform when it is called this could have impacts to the Demonstrated Capacity. Please refer to 1.6.(a) of the DRAM Purchase Agreement, which states that any of the three (Seller test, average amount of capacity bid, results of a Dispatch) can satisfy the demonstrated capacity requirement for each PDR.
    - Non-performance would also impact the energy payment from CAISO in the form of uninstructed imbalance energy (Charge Code 6475). Seller should discuss potential charges with its Scheduling Coordinator.
    - There are no liquidated damages in the 2016 DRAM Purchase Agreement.

39. If in the contract we are obligated to nominate 3 MW for the month of August but only nominate 2 MW, is there a penalty, and if so how is that calculated?
    - The Buyer interprets the term "nominate" in two ways:
        1. If "nominate" means the Seller's SC only submits 2 MW on month ahead RA Supply plan, then the RA capacity payment will be limited to 2 MW even though the contract stated 3 MW. The RA capacity payment may be further lowered if the demonstrated capacity is also lower than 2 MW. Please refer to 1.6.(a) of the DRAM Purchase Agreement for more details.
        2. If "nominate" refers to only energy bids in the CAISO markets because the month ahead RA Supply plan includes 3 MW, then CAISO will assess non-availability charges to the Seller for the non-performance of 1 MW. Non-availability charges are part of CAISO's RA Availability Incentive Mechanism recently approved by FERC (ER15-1825). The energy bid may also impact the demonstrated capacity for RA capacity payment in 1.6.(a) of the DRAM Purchase Agreement.

40. Is there some type of cost analysis that we should be aware of, like there was in the AMP contracts?
    - No.

41. Section 1.6.i. lists a two hour load curtailment test. Does this two hour requirement apply to all bids submitted? Or does a 1 hour bid, award, and curtailment count towards the 24 dispatchable hours per month listed in the MOO requirements?
    - The two hour testing requirement applies to future qualifying capacity (QC) methodology requirements as adopted in CPUC Decision 14-06-050. CPUC Decision 15-06-063 exempted 2016 PDRs from the established QC methodology.

- The two hour dispatch data can also be used to meet the demonstrated capacity requirement per section 1.6.(a).
- Any test event dispatch would count towards the 24-hour monthly minimum dispatch.

Must Offer Obligation (MOO)

42. Are the MOO hours inclusive of most day-time hours? If not, what limitations on the MOO hours are permissible?
    - Seller, through its designated SC, is required to bid into the CAISO Day-Ahead Market the contracted MW during the Availability Assessment Hours, as required by the CAISO Tariff and Business Practice Manual for DR resources to meet their RA obligation. Outside of those hours, there would be no CAISO bidding requirements unless required by the CAISO tariff or CPUC rules.
    - Per CAISO's Fifth Replacement Tariff, published December 1, 2014, section 40.8.1.13, PDRs must be available at least four (4) hours per month in which they are eligible to provide RA Capacity and must be dispatchable for a minimum of thirty (30) minutes per event within each of those months. Per section 40.9.3, the CAISO also establishes Availability Assessment Hours applicable for each month of each RA Compliance Year, to assess the extent to which each RA Resource has met the Availability Standards. The CAISO annually determines the five hour range for the Availability Assessment Hours for each month and shall specify them in its Business Practice Manual.
    - The CAISO Board of Governors recently approved the Reliability Services Initiative (RSI), under which PDRs shall have the following minimum availability requirements starting 2016:
        - Able to be dispatched for at least 24 hours per month,
        - Able to be dispatched for at least three consecutive days, and
        - At least four hours per dispatch
    - PDRs must offer into the CAISO energy markets in the following hours:
        - 1:00 p.m. – 6:00 p.m., April-October
        - 4:00 p.m. – 9:00 p.m., November-March

43. If most day-time hours are included, does the applicable Net Benefits Test (NBT) require the bidding of an economic value with a significant chance of clearing in each of the subject hours? If the NBT does not require a bid with a realistic chance of clearing in each hour, what controls the number of hours when such a realistic bid is required?
    - Most day-time hours are not included in the Must Offer Obligation. The NBT value is a minimum bid value, the Seller is free to choose the price to offer load reductions to the CAISO above that value (up to the maximum) so as to maximize the economic benefits derived from participation in the CAISO energy market.

44. If there is a significant risk of dispatch during many hours in each day, is it realistic to expect the participating PDRs in this DRAM to be aggregations of customers without any alternative energy source to use during the potentially dispatchable hours?

- Back-up generation cannot be used for Demand Response load reduction under the DRAM Purchase Agreement. Please see section 7.2.b.v and the definition of "Back-up Generation" in the Purchase Agreement.

45. Can you tell me if there is a cap on the number of events that can be called in a month and the number of hours?
    - The CAISO dispatches will depend on CAISO market conditions and the Sellers bidding strategy (e.g., price). The CAISO website provides information on their historical system conditions and performance. The CAISO Tariff and BPMs specify the Must Offer Obligation and participation requirements.
    - There is no cap, unless the resource owner specifies one in the CAISO Master File. In this case, the cap cannot be less than one dispatch per non-holiday weekday.
    - The Must Offer Obligation is met if there have been dispatches totaling 24 hours in a month; the Seller would not be required to bid into the market once these conditions have been met.

46. According to the Apr. 20, 2015 DRAM Advice Letter (page 5), the must-offer hours for DRAM resources are as follows:

    - Apr-Oct: 1:00-6:00 PM (or, in CAISO-speak: HE 14 through HE 18 -- 5 hours total)
    - Nov-Mar: 4:00-9:00 PM (or, in CAISO-speak: HE 17 through HE 21 -- 5 hours total)

    Can you please clarify whether the DRAM MOO applies to *all* days of the week (i.e. weekends and CAISO holidays included)? Or does the MOO only apply to non-holiday weekdays?

    - The DRAM MOO is consistent with Section 40.9.3 of the CAISO Tariff and applies to any non-federal holiday weekdays (not weekends).

47. Can you please confirm whether the must-offer obligation for DRAM resources in the CAISO's Day-Ahead Market applies to all days, or only to non-holiday weekdays?
    - The DRAM MOO is consistent with Section 40.9.3 of the CAISO Tariff and applies to any non-federal holiday weekdays (not weekends).

<u>Other</u>

48. Can you please describe in detail the data it will make public at the conclusion of the DRAM RFO? In particular, will each of the IOUs make the following auction results data publicly available:

    a. Total residential and total non-residential capacity bid into the auction, during each delivery month?
    b. (Weighted) average cleared capacity price during each delivery month, for all offers, residential offers only, and non-residential offers only?
    c. Maximum cleared capacity price during each delivery month, for all offers, residential offers only, and non-residential offers only?
    d. (Anonymous) individual bids submitted to the RFO?

- Information will not be released unless specifically ordered to do so by D-06-06-066 Appendix 1.
- At the conclusion of this DRAM pilot program, the IOUs will prepare two reports, one with auction metrics including the information described above in a. to d. and a second report describing the "lessons learned" from the auction process. The first report will be submitted confidentially to the CPUC while the second report will have any confidential information included in this report identified and submitted to the Commission under PUC code section 583 to protect the confidential information. Whether information listed in subsections a. to d. above would be confidential once aggregated across the three utilities by the CPUC will depend on the CPUC. Per the DRAM Resolution, the CPUC has no obligation to make any report on the DRAM evaluation metrics.

49. Is this program run like BIP where there is a Firm Service Level (FSL) or is the program run like CBP where it is a Guaranteed Load Drop (GLD)?
    - The IOUs are not involved in the seller-customer DR transaction. It is up to the Seller to manage its customers to provide the load drop associated with its RA commitment and CAISO bidding process, whether it is a firm service level or a guaranteed load drop or a combination.