

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6173E
As of August 16, 2021

Subject: Joint Submittal - Emergency Load Reduction Program Pilot Terms and Conditions of Southern California Edison Company, Pacific Gas & Electric, and San Diego Gas & Electric Company in Compliance with Decision 21-03-056

Division Assigned: Energy

Date Filed: 04-26-2021

Date to Calendar: 04-30-2021

Authorizing Documents: D2103056

Disposition:	Withdrawn
Effective Date:	None

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Erik Jacobson

415-973-3582

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

April 26, 2021

ADVICE 4478-E
(Southern California Edison Company - U 338-E)

ADVICE 6173-E
(Pacific Gas and Electric Company - U 39-E)

ADVICE 3744-E
(San Diego Gas and Electric Company - U902 M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Emergency Load Reduction Program Pilot Terms and Conditions of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company in Compliance With Decision 21-03-056

PURPOSE

In compliance with Ordering Paragraph (OP) 8 of Decision (D.)21-03-056, Southern California Edison Company (SCE) hereby submits this advice letter in coordination with Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) (together, the "Investor Owned Utilities" (IOUs)) to provide each IOU's Emergency Load Reduction Program (ELRP) pilot Terms and Conditions.

BACKGROUND

On November 19, 2020, the California Public Utilities Commission (Commission) initiated Rulemaking (R.)20-11-003 to establish policies, processes, and rules to ensure reliable electric service in California in the event of an extreme weather event in 2021.

On March 26, 2021, after receiving testimonies, legal briefs, and oral arguments from the parties, the Commission issued D.21-03-056 (the Decision), directing the Joint IOUs to take specific actions to prepare for potential extreme weather in the summers of 2021 and 2022. Among other things, the Commission directed the IOUs to establish an

ELRP pilot to decrease peak and net peak demand in the summers of 2021 and 2022.¹ OP 8 of the Decision directs the IOUs to file a Tier 1 advice letter incorporating the ELRP pilot terms and conditions.² The Decision directs that the advice letter should include details necessary to implement the ELRP pilot per the guidelines provided in the Decision, and address various aspects of the ELRP pilot design and processes, including enrollment, the process to update enrollment related program parameters, ELRP event notifications, customer acknowledgment, incremental load reduction measurement, and settlement.³

As experience with ELRP is gained, the IOUs may seek to modify various aspects of ELRP design by jointly filing a Tier 2 advice letter by December 31 of each program year to manage program enrollment, improve program efficiency, increase potential load reduction available to ELRP, and improve program value and reduce program cost.⁴ The change request shall be limited to technical aspects of the program design related to program participation criteria (including various minimum threshold parameters), program trigger(s), Group A baselines and settlement, and Group B baselines, settlement, and invoicing guidelines. Changes to sub-group A.1 Minimum Size Threshold parameter could be sought via an IOU-specific Tier 2 advice letter.⁵

DISCUSSION

In the documents attached, each IOU provides its ELRP pilot terms and conditions. The IOUs have aligned their terms and conditions when able to do so but due to system, process, and customer differences, were unable to align on all programmatic aspects.

The attachments to this filing are as follows:

1. Attachment A: SCE's ELRP Pilot Terms and Conditions
2. Attachment B: PG&E's ELRP Pilot Terms and Conditions
3. Attachment C: SDG&E's ELRP Pilot Terms and Conditions

Each IOU is separately responsible for filing a Tier 1 advice letter requesting deferral of any provisions allowed for by D. 21-03-056.

TIER DESIGNATION

Pursuant to OP 8 of D.21-03-056, this advice letter is submitted with a Tier 1 designation.

¹ D.21-03-056, Ordering Paragraph (OP) 7, p. 85.

² *Id.*, OP 8, pp. 85-86.

³ *Id.*

⁴ *Id.*, Attachment 1, p. 15.

⁵ *Id.*

EFFECTIVE DATE

This advice letter will become effective on May 1, 2021.

NOTICE

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com and SDGETariffs@sdge.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B, R.20-11-003, A.17-01-012, et al., R.13-09-011 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Lisa Mau at (626) 302-3684 or by electronic mail at lisa.mau@sce.com

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:Im:jm
Enclosures



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Darrah Morgan
 Phone #: (626) 302-2086
 E-mail: AdviceTariffManager@sce.com
 E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE
 ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4478-E

Tier Designation: 1

Subject of AL: Emergency Load Reduction Program Pilot Terms and Conditions of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company in Compliance With Decision 21-03-056

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 21-03-056

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 5/1/2021

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Gary A. Stern, Ph.D.
Title: Managing Director, State Regulatory Operations
Utility Name: Southern California Edison Company
Address: 8631 Rush Street
City: Rosemead
State: California Zip: 91770
Telephone (xxx) xxx-xxxx: (626) 302-9645
Facsimile (xxx) xxx-xxxx: (626) 302-6396
Email: advicetariffmanager@sce.com

Name: Tara S. Kaushik c/o Karyn Gansecki
Title: Managing Director, Regulatory Relations
Utility Name: Southern California Edison Company
Address: 601 Van Ness Avenue, Suite 2030
City: San Francisco
State: California Zip: 94102
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx: (415) 929-5544
Email: karyn.gansecki@sce.com

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Attachment A

Southern California Edison Company
Emergency Load Reduction Program
(ELRP) Pilot Terms and Conditions
Pursuant to California Public Utilities
Commission Decision 21-03-056

May 1, 2021

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Program Overview

On March 26, 2021, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 21-03-056 which approved the Emergency Load Reduction Program (ELRP) pilot, an out-of-market demand response (DR) resource.

These Terms and Conditions of the ELRP pilot conform with the ELRP program parameters for “Group A” ELRP participants set forth in Commission D.21-03-056 and Attachment 1 thereto, and can change in whole or in part subject to CPUC approval. The ELRP will be administered by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company for their respective service territories.

The ELRP pilot provides financial incentives to eligible participants that provide demand load reductions, or demand response, during times of potential or actual stress on the California Independent System Operator (CAISO) transmission system. The ELRP pilot will be available starting May 1, 2021 and will end October 31, 2025. As discussed herein, some elements of the pilot will not begin until May 1, 2022.

The ELRP does not provide capacity or enrollment incentives; rather, incentives are in the form of a non-penalty pay-for-performance energy payment for a customer’s verified incremental load reduction. The ELRP load reduction capacity is not eligible for Resource Adequacy (RA), nor to be included in the California Energy Commission (CEC) peak forecast framework. ELRP does not have any California Independent System Operator (CAISO) market obligations.

These terms and conditions are meant to enhance the understanding of the ELRP pilot. They do not replace pricing information or program requirements contained in SCE’s CPUC-approved tariffs. Please refer to the tariffs, which are available on <https://www.sce.com/regulatory/tariff-books>.

1 Program Eligibility and Enrollment

1.1 Program Participant Criteria

ELRP eligible participants are divided into several sub-groups. All customers must be located in SCE's service territory and must have an SCE-approved interval meter or SmartConnect™ meter that can measure energy consumption, at least hourly, and if applicable, can measure exported energy.

Group A: Select non-residential customers and aggregators not participating in DR programs

- Sub-Group A.1. – Non-Residential Customers
- Sub-Group A.2. – Base Interruptible Program (BIP) Aggregators
- Sub-Group A.3. – Rule 21 Exporting Distributed Energy Resources (DERs)
- Sub-Group A.4. – Virtual Power Plants (VPP)¹

Additional descriptions for each sub-group in Group A are provided below.

1.1.1 Sub-Group A.1. – Non-Residential Customers

Bundled and unbundled non-residential customers may directly participate in ELRP, if the customer's service account meets all of the following:

- Has a monthly peak demand of greater than or equal to 200 kW (≥ 200 kW);
- Is not currently taking service on a Critical Peak Pricing (CPP) or Real-Time Pricing (RTP) rate; and
- Is not simultaneously enrolled in another DR program offered by SCE, a demand response provider (DRP), or a Community Choice Aggregator (CCA), with the exception that dual enrollment in SCE's Base Interruptible Program (BIP) or Agricultural and Pumping Interruptible (AP-I) program is permitted.

BIP Customers: If an eligible BIP customer is participating with a BIP aggregator, then the BIP customer must participate under Sub-Group A.2. unless their BIP aggregator chooses not to participate in ELRP, in which case a BIP customer may enroll

¹ SCE will elect to defer ELRP eligibility and participation for Sub-Group A.4 to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056. SCE will include the T&Cs Application Process for Sub-Group A.4. upon eligibility of this sub-group.

and participate in ELRP under Sub-Group A.1. BIP-ELRP dual participants should also review the Special Conditions on compensation in [Section 3.2.1.1](#).

1.1.1.1 Enrollment Process

Qualifying customers can directly apply and enroll with SCE by going to www.sce.com/drp/enroll. At the time of enrollment, customers must submit their Energy Bid, defined as the estimated target load reduction quantity to be achieved during an ELRP event, and, if applicable, must provide information about their back-up generation (BUG), including location, type of fuel used, the capacity of the generator, and the notice or ramp time for the generator that may be used during ELRP events.

BIP customers who are currently enrolled through a third-party aggregator should contact their aggregator for enrollment options.

1.1.2 Sub-Group A.2. – Base Interruptible Program Aggregators

Third-party aggregators participating on SCE’s Base Interruptible Program (BIP) are eligible to participate in ELRP. Eligible BIP aggregators can only add and nominate bundled and unbundled non-residential Service Accounts that are participating under the aggregator’s BIP portfolio and meet the criteria in [Section 1.1.1](#).

1.1.2.1 Enrollment Process

Customer Service Accounts in a BIP aggregator portfolio that meet the eligibility criteria will be automatically enrolled after their BIP Aggregator elects to participate in ELRP. At the time of enrollment, the BIP Aggregator must provide information about their customer’s back-up generation (BUG), including location, type of fuel used, the capacity of the generator, and the notice or ramp time for the generator that may be used during ELRP events. Also, see Special Conditions on compensation for BIP-ELRP dual participants in [Section 3.2.1.1](#).

1.1.3 Sub-Group A.3. – Rule 21 Exporting Distributed Energy Resources (DERs)

Bundled and unbundled non-residential customers may directly participate in ELRP, if the customer’s service account meets all of the following:

- Is not simultaneously enrolled in any market-integrated DR program offered by SCE, a third-party DRP, or CCA;
- Possesses a behind-the-meter (BTM) Rule 21-interconnected device (including Prohibited Resources/BUG) with an existing Rule 21 export permit; and
- Customer's BTM Rule 21 physical interconnected device has a minimum capacity of 25 kW and is able to export a minimum of 25 kW for at least one hour in compliance with Rule 21 and other applicable regulations and permits during an ELRP event.

Government agencies who own electric vehicles and their associated charging equipment that are located on a service that is electrically contiguous to a facility also owned by that agency, with the electrically contiguous facility possessing continuous export permission to operate may be granted a limited deviation by SCE to facilitate the agency's participation in ELRP under Sub-Group A.3. The government agency may request for a deviation to SCE's electric Rule 21, with its scope limited to the duration of an ELRP event, and seek to export energy from its electric vehicles and utilize that portion of the previously approved continuous export permission to operate that is unutilized during the ELRP event. This potential interconnection pathway for government fleets to use an existing Rule 21 Permission to Operate, where available, does not limit a government fleet from using any other approved Rule 21 interconnection pathway.

1.1.3.1 Enrollment Process

Qualifying customers can directly apply and enroll with SCE by going to www.sce.com/drp/enroll. At the time of enrollment, customers must submit their Energy Bid and, if applicable, must provide information about their back-up generation (BUG), including location, type of fuel used, the capacity of the generator, and the notice or ramp time for the generator that may be used during ELRP events.

1.1.4 Sub-Group A.4. – Virtual Power Plants

A third-party aggregator managing a BTM hybrid Virtual Power Plant (VPP) consisting of storage paired with net energy metering (NEM) solar deployed with residential

(bundled or unbundled) or non-residential (bundled or unbundled) customers, whose VPP meet all of the following criteria, are eligible participate in ELRP:

- The VPP or any customer site within the aggregation is not simultaneously enrolled in a market-integrated DR program offered by SCE, a third-party DRP, or CCA;
- A customer site within the aggregation is not currently taking service on a CPP or RTP rate schedule;
- All sites within the VPP aggregation are located within SCE's service territory;
- The aggregated BTM storage capacity of the VPP is a minimum of 500 kW, where the VPP size is determined by summing the Rule 21 interconnected capacity of the individual storage devices comprising the aggregation; and
- Each site within the VPP aggregation has a Rule 21 export permit.

SCE will elect to defer ELRP eligibility and participation for Sub-Group A.4 to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056. SCE will include the T&Cs for the Enrollment Process for Sub-Group A.4. upon eligibility of this sub-group.

2 Program Parameters

2.1 Program Availability

An ELRP event can be dispatched from May 1 through October 31 each year for the five-year pilot period (2021-2025).

An ELRP event can occur any day of the week (Sunday – Saturday) during the hours of 4:00 p.m. to 9:00 p.m.

ELRP events shall be a minimum of one (1) hour up to a maximum of five (5) hours each day.

ELRP will have an annual dispatch limit of sixty (60) hours.

2.2 Program Trigger

ELRP may be activated after the CAISO issues or declares a day-ahead (DA) Alert. A CAISO Alert is defined by the “Alert, Warning, Emergency (AWE)” process in CAISO Operating Procedure 4420.

There is no day-of (DO) trigger for ELRP.

The ELRP will not be used for SCE’s localized needs (i.e., local transmission and distribution).

In the future, when the CAISO completes the transition from the current AWE process to the North American Electric Reliability Corporation (NERC) Energy Emergency Alert (EEA) standards, then the AWE declarations shall be replaced with the equivalent NERC EEA level notice.

2.2.1 Group A

SCE shall notify Group A participants of the start time and duration of the ELRP event. Notification can occur through email, phone, or SMS.

2.2.1.1 Group A Test Events

SCE will conduct one test event, with two-hour duration, per year for Group A participants. Each Group A participant, except for those relying exclusively on prohibited resources, is required to participate in test events. **Use of prohibited resources during a test event is not permitted and should not be compensated.** Otherwise, all other incremental load reduction delivered during the ELRP test event is eligible for ELRP compensation set forth in Section 3 below.

3 Compensation

Participation during an ELRP event is entirely voluntary, and no financial penalties will result from not meeting or exceeding the Energy Bid amount during the event.

Incremental load reduction (ILR) is defined as the load reduction achieved during an ELRP event incremental or relative to the non-event applicable baseline and/or any other existing commitment. Only ILR is eligible for compensation under ELRP.

Any load reduction technology may be used during an ELRP event to achieve ILR. BUGs or Prohibited Resources may be used in compliance with Rule 21 and other applicable regulations and permits during an ELRP event to achieve ILR, including during the overlapping period with an independently triggered event in a dual-enrolled DR program, but only for achieving load reduction incremental to any other existing commitment (e.g., under a dual-enrolled DR program).

There are no penalties for non- or under-performance.

If applicable, SCE may withhold a Participant's ELRP incentives until data or information about the customers' back-up or onsite generation resources (e.g. Prohibited Resources) is provided. Data will be collected in 2021 and 2022. Participants are required to provide information about the location, type of fuel used, the capacity of the generator, and the notice or ramp time for the generator that may be used during ELRP events.

3.1 Incentive Rate

The ELRP Compensation Rate (ECR) is \$1 per kilowatt-hour (\$1/kWh).

3.2 Incentive Calculation

Compensation for load reduction delivered during an ELRP event is determined by calculating the product of ILR and ECR. The ELRP incentive calculation for Group A varies. Details are provided below.

3.2.1 Group A

To be eligible for compensation for an ELRP event, a participant's ILR must be at least 50 percent of their Energy Bid load shed or exported energy quantity. A participant's ELRP compensation shall not exceed 200 percent of their Energy Bid load shed or exported energy quantity. SCE will perform ELRP incentive calculations by or before

December 31 or 60 days after all service account have been billed, whichever is later. *SCE will elect to defer to count export energy in ILR to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056. SCE will include the T&Cs for counting exported energy upon eligibility of this provision.*

3.2.1.1 Group A Special Conditions

- 1) A BIP-ELRP dual participant will only be eligible for an ERLP incentive when:
 - a) BIP and ERLP event hours overlap; and
 - b) The customer's hourly energy usage is below their BIP Firm Service Level (FSL).

The effective date for this Special Condition is May 1, 2022; therefore, no ERLP compensation will be provided to BIP-ELRP dual participants until May 1, 2022.

- 2) If the customer has a Rule 21 interconnected device with export capability and permit, the customer may choose to count exported energy in ILR.

SCE will elect to defer to count export energy in ILR to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056. SCE will include the T&Cs for counting exported energy upon eligibility of this provision.

3.2.1.2 Baseline and Settlement Calculations for Sub-Group A.1.

Steps for calculating a participant's ERLP baseline, except for BIP-ELRP dual participants. For BIP-ELRP dual participants, see [Section 3.2.1.1](#):

- 1) Calculate the Customer Specific Energy Baseline (CSEB) – A Customer service account must have at least 10 days of interval meter data available in SCE's billing system to have a valid CSEB. Only the hourly average usage for the hours included in the event will be included in the CSEB determination. The CSEB and Adjusted Customer Specific Energy Baseline (ACSEB) will all be calculated at the service account

level. The CSEB and ACSEB will be calculated on an hourly basis using a 10-day rolling average energy usage profile of the immediate past 10 calendar days, including holidays, prior to the ELRP Event. The past 10 calendar days will exclude days when the customer: (1) was subject to an ELRP event, or (2) an event for a dual-enrolled DR program or rate, if applicable, or (3) was subject to a grid outage. *SCE will implement a 10-in-10 calendar day baseline with a 40 percent day-of adjustment by filing an Advice Letter as permitted by D.21-03-056. In addition, SCE will elect to defer to exclude grid outages from an ELRP baseline to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056. SCE will include the T&Cs for excluding grid outages upon eligibility of this provision.*

- 2) Calculate the Day-Of Adjustment (DOA) – A DOA shall not be less than 1.00 or greater than 1.40. The DOA is a ratio of (a) the average load of the first three hours of the four hours prior to the ELRP Event to (b) the average load of the same hours from the last 10 calendar days, excluding days in accordance with Step 1 above. *SCE will implement a 10-in-10 calendar day baseline with a 40 percent day-of adjustment by filing an Advice Letter as permitted by D.21-03-056.*
- 3) Calculate the Adjusted Customer Specific Energy Baseline (ACSEB) – A service account’s ACSEB for an ELRP event is calculated by multiplying the CSEB by the DOA.

3.2.1.3 Baseline and Settlement Calculations for Sub-Group A.2.

For BIP-ELRP dual participants, see Special Conditions in [Section 3.2.1.1.](#)

3.2.1.4 Baseline and Settlement Calculations for Sub-Group A.3.

Same baseline calculation as Sub-Group A.1. (see [Section 3.2.1.2.](#)) with exceptions as follows:

- A Rule 21 Exporting DER customer on a CPP or RTP equivalent tariff, the ELRP baseline is deemed to be zero and only exported energy is counted in ILR.

- A Rule 21 Exporting DER customer not on a CPP or RTP equivalent tariff, the ELRP baseline for Sub-Group A.1. (see [Section 3.2.1.2.](#)) is applied and modified to account for exported energy during non-event days and exported energy is counted in ILR.

SCE will elect to defer to count export energy in ILR to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056. SCE will include the T&Cs for counting exported energy upon eligibility of this provision.

3.2.1.5 Baseline and Settlement Calculations for Sub-Group A.4.

SCE will elect to defer ELRP eligibility and participation for Sub-Group A.4 to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056. SCE will include the T&Cs Baseline and Settlement Calculations for Sub-Group A.4. upon eligibility of this sub-group.

Attachment B

Pacific Gas & Electric Company
Emergency Load Reduction Program
(ELRP) Pilot

Terms and Conditions Pursuant to
California Public Utilities Commission
Decision 21-03-056

May 1, 2021

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Program Overview

On March 26, 2021, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 21-03-056 which approved the Emergency Load Reduction Program (ELRP) pilot, a demand response (DR) resource that is not bid or integrated into the CAISO market.

These are the Terms and Conditions of the ELRP pilot for potential participants and other interested parties and can change in whole or in part subject to CPUC approval. The ELRP will be administered by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) for their respective service territories. Any changes made to the ELRP Terms and Conditions will be published in revisions to this document and/or posted to PG&E's website and/or its ELRP Program Administrator's website. Other documents supporting the ELRP will be made available and updated from time to time at PG&E's website and/or its ELRP Program Administrator's website. PG&E has engaged Olivine, Inc., to be the Program Administer for the ELRP at this time.

The ELRP pilot provides financial incentives to eligible participants that provide demand load reductions, or demand response, during times of potential or actual stress on the California Independent System Operator (CAISO) transmission system. The ELRP will be available starting May 1, 2021 and will end by October 31, 2025.

The ELRP does not provide capacity or enrollment incentives; rather, incentives are a pay-for-performance energy payment for a customer's verified incremental load reduction. The ELRP load reduction capacity is not eligible for Resource Adequacy (RA), nor in the California Energy Commission (CEC) peak forecast framework. ELRP does not have any California Independent System Operator (CAISO) market obligations.

Aggregators involved with Group A will need to affirm intent to participate in ELRP, including acceptance of terms and conditions and any agreements that may be developed to support third-party participation in ELRP no later than May 31, 2021.

1 Program Eligibility and Enrollment

1.1 Program Participant Criteria

ELRP eligible participants are divided into several sub-groups (A.1, A.2, A.3 and A.4). All customers must be located in PG&E's service territory and must have a PG&E approved interval meter or SmartMeter™ meter that can measure energy consumption at least hourly, and if applicable, can measure exported energy.¹

Group A: Select non-residential customers and aggregators not participating in DR programs

- Sub-Group A.1. – Non-Residential, Non-DR Customers
- Sub-Group A.2. – Base Interruptible Program (BIP) Aggregators
- Sub-Group A.3. – Rule 21 Exporting Distributed Energy Resources (DERs)²
- Sub-Group A.4. – Virtual Power Plants (VPP)³

Additional descriptions for each of these 4 sub-groups are provided below.

1.1.1 Sub-Group A.1 – Non-Residential Customers

Bundled and unbundled non-residential customers that meet all of the following criteria may directly participate in ELRP:

- Customer's service account is classified as non-residential⁴; and
- Customer's service account is not currently taking service on a Critical Peak Pricing (CPP) or real-time pricing (RTP) rate;⁵ and
- Customer's service account is not simultaneously enrolled in another DR program offered by an IOU, demand response provider (DRP), or Community Choice Aggregator (CCA), with the exception that dual enrollment is allowed in PG&E's Base Interruptible Program (BIP).

¹ PG&E is not required to install an interval meter and communication equipment or SmartMeter™ to provide remote read capability if the installation is impractical or not economically feasible.

² ELRP eligibility and participation for Sub-Group A.3 may be deferred to a date no later than May 1, 2022, should Energy Division approve and PG&E chooses to submit an Advice Letter (AL) seeking to defer the effective date.

³ ELRP eligibility and participation for Sub-Group A.4 may be deferred to a date no later than May 1, 2022, should Energy Division approve and PG&E chooses to submit an AL seeking to defer the effective date.

⁴ Non-residential consists of Commercial, Industrial and Agricultural as well as Small Medium Business.

⁵ PG&E's existing non-residential CPP program is known as Peak-Day Pricing (PDP). PG&E does not currently offer an RTP.

If an eligible BIP customer is participating with a BIP aggregator, then the BIP customer must participate under Sub-Group A.2. If the customer's BIP aggregator chooses not to participate in ELRP, then a BIP customer may enroll and participate in ELRP under Sub-Group A.1.

1.1.1.1 Enrollment Process for Sub-Group A.1

Qualifying individual customers can directly apply and enroll with PG&E at elrp.olivineinc.com. At the time of enrollment, or at designated times during the ELRP pilot, customers must nominate, unless exempt, an estimated target load reduction quantity to be achieved during an ELRP event and, if applicable, must provide information about their back-up generation (BUG), including: (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity of the generator, that may be used during ELRP events, and (4) the notice or ramp time for the generator that may be used during ELRP events.

BIP customers who are currently enrolled with a third-party aggregator should contact their aggregator for enrollment options.

1.1.2 Sub-Group A.2 – Base Interruptible Program Aggregators

Third-party aggregators participating in PG&E's Base Interruptible Program (BIP) are eligible to participate in ELRP. Eligible BIP aggregators can only add bundled and unbundled non-residential service accounts for ELRP that are participating under the aggregator's BIP portfolio and meet the following criteria:

- Customer's service account is classified as non-residential; and
- Customer service account is not currently taking service on a Critical Peak Pricing (CPP) or real-time pricing (RTP) rate schedule.

1.1.2.1 Application Process

Sub-Group A.2 applicants can enroll into the ELRP by contacting the Program Administrator under Section 1.1.1.1 titled Enrollment Process.

At the time of enrollment, or at designated times during the ELRP pilot, the BIP aggregator, if applicable, must provide information about their customer's back-up generation (BUG), including: (1) location (address), (2) type of fuel used

(e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity of the generator, and (4) the notice or ramp time for the generator that may be used during ELRP events.

1.1.3 Sub-Group A.3 – Rule 21 Exporting Distributed Energy Resources

Bundled and unbundled non-residential customers that meet all of the following criteria may directly participate in ELRP:

- Customer's service account is not simultaneously enrolled in any market-integrated DR program offered by PG&E, a third-party DRP, or CCA; and
- Customer's service account possesses a behind-the-meter (BTM) Rule 21-interconnected device (including Prohibited Resources/BUG) with an existing Rule 21 export permit; and
- Customer's BTM Rule 21 physical interconnected device has a minimum capacity of 25 kW and is able to export a minimum of 25 kW for at least one hour in compliance with Rule 21 and other applicable regulations and permits during an ELRP event.

Government agencies who own electric vehicles and their associated charging equipment that are located on a service that is electrically contiguous to a facility also owned by that agency, with the electrically contiguous facility possessing continuous export permission to operate may be granted a limited deviation by PG&E to facilitate the agency's participation in ELRP under Sub-Group A.3. The government agency requesting a deviation to PG&E's electric Rule 21, with its scope limited to the duration of an ELRP event, for an agency that wishes to export energy from its electric vehicles and can utilize that portion of the previously approved continuous export permission to operate that is unutilized during the ELRP event. This potential interconnection pathway for government fleets to use an existing Rule 21 Permission to Operate, where available, does not limit a government fleet from using any other approved Rule 21 interconnection pathway.

PG&E will elect to defer ELRP eligibility and participation for Sub-Group A.3 to a date no later than May 1, 2022, by filing an Advice Letter as permitted by D.21-03-056.

1.1.3.1 Application Process

Sub-Group A.3 applicants can enroll into the ELRP by contacting the Program Administrator identified under Section 1.1.1.1 titled Enrollment Process.

At the time of enrollment, or at designated times during the ELRP pilot, the BIP aggregator must nominate, unless exempt, an estimated target load reduction quantity for each eligible account to be achieved during an ELRP event and, if applicable, must provide information about their customer's back-up generation (BUG), including: (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity of the generator, and (4) the notice or ramp time for the generator that may be used during ELRP events.

1.1.4 Sub-Group A.4 – Virtual Power Plants

A third-party aggregator managing a BTM hybrid Virtual Power Plant (VPP) consisting of storage paired with net energy metering (NEM) solar deployed with residential (bundled or unbundled) or non-residential (bundled or unbundled) customers, whose VPP meet all of the following criteria, is eligible participate in ELRP:

- The VPP or any customer site within the aggregation is not simultaneously enrolled in a market-integrated DR program offered by PG&E, a third-party DRP, or CCA; and
- A customer site within the aggregation is not currently taking service on a CPP or RTP rate schedule; and
- All sites within the VPP aggregation are located within PG&E's service territory; and
- The aggregated BTM storage capacity of the VPP is a minimum of 500 kW, where the VPP size is determined by summing the Rule 21 interconnected capacity of the individual storage devices comprising the aggregation, and
- Each site within the VPP aggregation has a Rule 21 export permit.

PG&E will elect to defer ELRP eligibility and participation for Sub-Group A.3 to a date no later than May 1, 2022, by filing an Advice Letter as permitted by D.21-03-056.

1.1.4.1 Application Process

Sub-Group A.4 applicants can enroll into the ELRP by contacting the Program Administrator identified under Section 1.1.1.1 titled Enrollment Process.

At the time of enrollment, or at designated times during the ELRP pilot, the VPP aggregator must nominate an estimated target load reduction quantity for each eligible accounts to be achieved during an ELRP event and, if applicable, must provide information about their customer's back-up generation (BUG), including: (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity of the generator, and (4) the notice or ramp time for the generator that may be used during ELRP events.

2 Program Parameters

2.1 Program Availability

The ELRP has the following program parameters for all participants:

- Program Availability:
 - May – October
 - Seven (7) days per week
 - 4 p.m. to 9 p.m. (Pacific Time Zone)
- Event Duration:
 - 1-hour minimum; 5-hour maximum
- Annual Dispatch Limit:
 - Up to 60 hours
- Consecutive Day Dispatches
 - No constraints (limits)

2.2 Program Trigger

ELRP may be activated after the CAISO issues or declares a day-ahead (DA) Alert. A CAISO Alert is defined by the “Alert, Warning, Emergency (AWE)” process in CAISO Operating Procedure 4420. At this time there is a Day-Ahead (DA) trigger for ELRP, but PG&E reserves the right to expand to a Day-Of (DO) trigger based on CPUC guidance. The ELRP will not be used for PG&E’s localized needs (i.e., local transmission and distribution).

In the future, when the CAISO completes the transition from the current AWE process to the North American Electric Reliability Corporation (NERC) Energy Emergency Alert (EEA) standards, then the AWE declarations shall be replaced with the equivalent NERC EEA level notice.

2.2.1 Group A

PG&E shall notify Group A participants the start time and end time of the ELRP event. Notification can occur through email, call, or text. Customers or participants with connected Automated Demand Response (AutoDR or ADR) technology may also receive a notification.

2.3 Test Events

PG&E will conduct one test event, with a two-hour duration, per year for Group A participants. Each Group A participant, except for those relying exclusively on prohibited resources, is required to participate in test events. **Use of prohibited resources during a test event is not permitted and should not be compensated.** Otherwise, all other incremental load reduction delivered during the ELRP test event is eligible for ELRP compensation set forth in Section 3 below.

3 Compensation

Participation during an ELRP event is entirely voluntary, and no financial penalties will result from not meeting or exceeding the nominated target load reduction during the event.

Incremental load reduction (ILR) is defined as the load reduction achieved during an ELRP event incremental or relative to the non-event applicable baseline and/or any other existing commitment. Only ILR is eligible for compensation under ELRP.

Any load reduction technology may be used during an ELRP event to achieve ILR. BUGs or Prohibited Resources may be used in compliance with Rule 21 and other applicable regulations and permits during an ELRP event to achieve ILR, including during the overlapping period with an independently triggered event in a dual-enrolled DR program, but only for achieving load reduction incremental to any other existing commitment (e.g., under a dual-enrolled DR program). There are no penalties for non- or under-performance.

If applicable, PG&E may withhold a Participant's ELRP incentives until data or information about the customers' back-up or onsite generation resources (e.g. Prohibited Resources) is provided. Data will be collected for at least 2021 and 2022. Participants are required to provide information about the location, type of fuel used, the capacity of the generator, and the notice or ramp time for the generator that may be used during ELRP events.

3.1 Incentive Rate

The ELRP Compensation Rate (ECR) is \$1 per kilowatt-hour (\$1/kWh)

3.2 Incentive Calculation

Compensation for load reduction delivered during an ELRP event is determined by calculating the product of ILR and ECR. Details are provided below.

3.2.1 Sub-Group A

To be eligible for compensation for an ELRP event, the following requirements apply based on the following customer class:

- Commercial/Industrial/Agricultural participant's ILR must be at least 50 percent of their pre-nominated load shed or exported energy quantity. A participant's ELRP compensation shall not exceed 200 percent of their pre-nominated load shed or exported energy quantity. However, a participant who is dually enrolled in BIP and ELRP will not have a pre-nomination requirement and therefore the 50 to 200 percent collar will not apply.⁶
- Small-Medium Business will not have a pre-nomination requirement and therefore the 50 to 200 percent collar will not apply.⁷

3.2.1.1 Baseline for Sub-Groups A.1, A.3, and A.4.

Steps for calculating a participant's ELRP baseline:⁸

- 1) Calculate the Energy Baseline (EB) – A service account must have at least 10 days of interval meter data available in PG&E's billing system to have a valid baseline. Only the hourly average usage for the hours included in the event will be included in the EB determination.
- 2) The EB and Adjusted Energy Baseline (AEB) will all be calculated at the service account level. The EB and AEB will be calculated on an hourly

⁶ D.21-03-056, Attachment 1, pg. 10 stipulates that "...only the incremental reduction below the customer's pre-committed firm service level (FSL) is counted in ILR." Therefore, the FSLs serves as an implied ceiling from where a load reduction begins.

⁷ The removal of a pre-nomination requirement and the associated collar was deemed to both encourage and facilitate participation by the SMB customer class.

⁸ As it pertains to steps 2 and 3 under Section 3.2.1.1, PG&E seeks to limit the ELRP baseline to only one option for the ten-day selection or one option for the Day-Of adjustment by filing a Tier 1 Advice Letter consistent with D.21-03-056.

basis using the average of the preceding *similar* days⁹, excluding those days when the customer: (1) was subject to an ELRP event, or (2) an event for a dually-enrolled DR program or rate, if applicable, or (3) was subject to a grid outage. *PG&E will elect to defer to exclude grid outages from an ELRP baseline to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056.*

- 3) Calculate the Day-Of Adjustment Value (DOAV) – A DOAV shall not be less than 1.00 or greater than 1.40. The DOAV is a ratio of (a) the average load of the first three hours of the four hours prior to the event to (b) the average load of the same hours from the days selected in accordance with Step 2 above.
- 4) Calculate the Adjusted Energy Baseline (AEB) – A service account's AEB for an ELRP event is calculated by multiplying the EB by the DOAV.

3.2.1.2 Sub-Group A Special Conditions

- 1) In the case of customers dual enrolled in BIP and ELRP, for overlapping BIP and ELRP events, only the incremental reduction below the customer's pre-committed firm service level (FSL) for BIP is counted in ILR.
 - a) Load reduction by dual-enrolled BIP customers during an ELRP event outside of a BIP event is excluded from ILR (and not eligible for ELRP compensation).
 - b) Load reduction by dual-enrolled BIP customers during an ELRP event on a day with no BIP event is excluded from ILR (and not eligible for ELRP compensation).
- 2) If the customer has a Rule 21 interconnected device with export capability and permit, the customer may choose to count exported energy in ILR. In that case, the applicable ELRP baseline is modified to

⁹ For weekday events, the 10 non-excluded weekdays will be selected; for weekend and holiday events, the 4 non-excluded weekend and holiday days will be selected.

account for exported energy during non-event days and count exported energy in ILR.

3.2.1.3 Settlement Calculations for Sub-Group A.3.

For a customer on a CPP or RTP equivalent tariff, the ELRP baseline is deemed to be zero and only exported energy is counted in ILR.

For a customer not on a CPP or RTP equivalent tariff, the ELRP baseline defined under A.1 is utilized and modified to account for exported energy during non-event days and exported energy is counted in ILR.

PG&E will elect to defer ELRP eligibility and participation for Sub-Group A.3 to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056.

3.2.1.4 Settlement Calculations for Sub-Group A.4.

The aggregator selected CPUC approved baseline for IOU's CBP is utilized and modified to account for exported energy during non-event days and count exported energy in ILR.

PG&E will elect to defer ELRP eligibility and participation for Sub-Group A.4 to a date no later than May 1, 2022 by filing an Advice Letter as permitted by D.21-03-056.

Attachment C

San Diego Gas and Electric Company
Emergency Load Reduction Program
(ELRP) Pilot Terms and Conditions
Pursuant to California Public Utilities
Commission Decision 21-03-056

May 1, 2021

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EMERGENCY LOAD SHED PILOT (ELRP)

Program Overview

On March 26, 2021, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 21-03-056 which approved the Emergency Load Reduction Pilot (ELRP), an out-of-market demand response (DR) resource.

These are the Terms and Conditions of the ELRP for potential participants and other interested parties and can change in whole or in part subject to CPUC approval. Any changes made to the ELRP Terms and Conditions will be published in revisions to this document and/or posted at SDGE's ELRP website. The ELRP will be administered by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company for their respective service territories.

The ELRP provides financial incentives to eligible participants that provide demand load reductions, or demand response, during times of potential or actual stress on the California Independent System Operator (CAISO) transmission system. The ELRP will be available starting May 1, 2021 and will end after October 31, 2025.

The ELRP does not provide capacity or enrollment incentives; rather, incentives are a non-penalty pay-for-performance energy payment for a customer's verified incremental load reduction. The ELRP load reduction capacity is not eligible for Resource Adequacy (RA), nor the California Energy Commission (CEC) peak forecast framework. ELRP does not have any California Independent System Operator (CAISO) market obligations.

1. Budget

1.1 Administrator Program Budgets

The Commission adopted 2021 and 2022 administrative and incentive budget caps for ELRP in Decision (D.) 21-03-056. Budget caps for 2023 through 2025 shall be requested in each Program Administrator’s next demand response (DR) application. SDG&E’s authorized administrative and incentive budgets are as follows:

Year	SDG&E’s Annual Budget Cap	
	Admin	Incentive
2021	\$1,600,000	\$14,800,000
2022	\$1,600,000	\$14,800,000
2023	\$1,600,000	\$14,800,000
2024	\$1,600,000	\$14,800,000
2025	\$1,600,000	\$14,800,000

SDG&E, as Program Administrator, is responsible for processing enrollments and the issue of incentives to authorized participants up to the annual budget cap. SDG&E can work with the CPUC to adjust the budgets if needed.

2. Program Eligibility and Enrollment

2.1 Program Participant Criteria

ELRP-eligible participants are divided into two groups with several sub-groups. All customers must be located in SDG&E's service territory and must have an SDG&E installed and approved interval meter that can measure energy consumption at least hourly.

Group A: Select non-residential customers and aggregators not participating in DR programs

- Sub-Group A.1. – Non-Residential, Non-DR Customers
- Sub-Group A.2. – Base Interruptible Program (BIP) Aggregators
- Sub-Group A.3. – Rule 21 Exporting Distributed Energy Resources (DERs)¹
- Sub-Group A.4. – Virtual Power Plants (VPP)²

Additional descriptions for each of these four sub-groups are provided below.

2.1.1 Sub-Group A.1 – Non-Residential Customers

Bundled and unbundled non-residential customers that meet all of the following criteria may directly participate in ELRP:

- Customer's service account must be able to shed a minimum of 100KW.
- Customer's service account is not currently taking service on a Critical Peak Pricing (CPP) or real-time pricing (RTP) rate; and

Customer's service account is not simultaneously enrolled in another DR program offered by an SDG&E, demand response provider (DRP), or Community Choice Aggregator (CCA), with the exception that dual enrollment in SDG&E's Base Interruptible Program (BIP) is permitted.

2.1.1.1 Application Process

- Forms will be posted to SDG&E's ELRP website.

Nominations are processed by SDG&E for direct enrolled participants. Once a participant has nominated a load reduction amount (kW), the frequency of nomination updates will be based on the following customer class distinction:

- Commercial, Industrial and Agricultural: No less than weekly (over 20 kW/Mo)
- Small, Commercial Business: No less than monthly (under 20kW/Mo)

Updates to nominations can be made at the DRP@SDG&E email address for direct SDG&E enrolled participants; updates for Aggregator participants should be coordinated with their Aggregator.

Customers may terminate their participation by providing SDG&E a minimum of 30 days written notice. Termination will become effective the first regular billing cycle after the 30-day notice period.

Customers that are currently enrolled in BIP through a third-party Aggregator should first contact their aggregator for enrolment information. If the customer's Aggregator does not participate in the ELRP, the customer can directly enroll with SDG&E in this subgroup.

2.1.2 Sub-Group A.2 – Base Interruptible Program Aggregators

Third-party aggregators participating on SDG&E's Base Interruptible Program (BIP) are eligible to participate in ELRP. Eligible BIP must meet the following criteria:

- Customer service account is not currently taking service on a Critical Peak Pricing (CPP)

2.1.2.1 Application Process

- Aggregators must utilize SDG&E's enrollment form which will be posted to the SDG&E ELRP website.
- At the time of enrollment, or at designated times during the ELRP pilot, the BIP aggregator must nominate an estimated target load reduction quantity for each of their eligible accounts to be achieved during an ELRP event and, if applicable, must provide information about their customer's back-up generation (BUG),

including location, type of fuel used, and the capacity of the generator that may be used during ELRP events.

2.1.3 Sub-Group A.3 – Rule 21 Exporting Distributed Energy Resources Bundled and unbundled non-residential customers that meet all of the following criteria may directly participate in ELRP:

- Customer’s service account is not simultaneously enrolled in any market-integrated DR program offered by SDG&E, a third-party DRP, or CCA; and
- Customer’s service account possesses a behind-the-meter (BTM) Rule 21-interconnected device (including Prohibited Resources/BUG) with an existing Rule 21 export permit: and
- Customer’s BTM Rule 21 physical interconnected device has a minimum capacity of 25 kW and is able to export a minimum of 25 kW for at least one hour in compliance with Rule 21 and other applicable regulations and permits during an ELRP event.

Government agencies who own electric vehicles and their associated charging equipment that are located on a service that is electrically contiguous to a facility also owned by that agency, with the electrically contiguous facility possessing continuous export permission to operate may be granted a limited deviation by SDG&E to facilitate the agency’s participation in ELRP under Sub-Group A.3. A government agency may request a deviation to SDG&E’s electric Rule 21, with its scope limited to the duration of an ELRP event, if it wishes to export energy from its electric vehicles and can utilize that portion of a previously SDG&E approved continuous export permission to operate, if otherwise unutilized during the ELRP event. This potential interconnection pathway for government fleets to use an existing Rule 21 Permission to Operate, where available, does not limit a government fleet from using any other approved Rule 21 interconnection pathway.

2.1.3.1 Application Process

Contact information will be posted to SDG&E's ELRP website.

2.1.4 Sub-Group A.4 – Virtual Power Plants

A third-party aggregator managing a BTM hybrid Virtual Power Plant (VPP) consisting of storage paired with net energy metering (NEM) solar deployed with residential (bundled or unbundled) or non-residential (bundled or unbundled) customers, whose VPP meet all of the following criteria, is eligible participate in the ELRP:

- Aggregator must be able to shed a minimum of 500kW.
- The VPP or any customer site within the aggregation is not simultaneously enrolled in a market-integrated DR program offered by SDG&E, a third-party DRP, or CCA; and
- A customer site within the aggregation is not currently taking service on a CPP or RTP rate schedule; and
- All sites within the VPP aggregation are located within SDG&E's service territory; and
- The aggregated BTM storage capacity of the VPP is a minimum of 500 kW, where the VPP size is determined by summing the Rule 21 interconnected capacity of the individual storage devices comprising the aggregation, and
- Each site within the VPP aggregation has a Rule 21 export permit.

2.1.4.1 Application Process

Will be posted to SDG&E's ELRP website.

At the time of enrollment, or at designated times during the ELRP pilot, the VPP aggregator must nominate an estimated target load reduction quantity for each eligible account to be achieved during an ELRP event and, if applicable, must provide information about their customer's back-up generation (BUG), including

location, type of fuel used, and the capacity of the generator that may be used during ELRP events.

3.0 Program Parameters

3.1 Program Availability

An ELRP event can be dispatched from May 1 through October 31 each year for the five-year pilot period (2021-2025).

An ELRP event can occur any day of the week (Sunday – Saturday) during the hours of 4:00 p.m. to 9:00 p.m.

ELRP events shall be a minimum of one (1) hour and a maximum of five (5) hours.

ELRP will have an annual dispatch limit of sixty (60) hours.

3.2 Program Trigger

ELRP may be activated after the CAISO issues or declares a day-ahead (DA) Alert. A CAISO Alert is defined by the “Alert, Warning, Emergency (AWE)” process in CAISO Operating Procedure 4420.

There is no day-of (DO) trigger for ELRP.

An ELRP event cannot be triggered by SDG&E for a localized transmission or distribution emergency.

3.2.1 Group A

SDG&E shall notify Group A participants the start time and duration of the ELRP event. Notification can occur through email, call, or text. Customers or participants with connected Automated Demand Response (AutoDR or ADR) technology may also receive a courtesy notification from SDG&E’s Demand Response Automation Server (DRAS). [Signaling platform]

3.3 Test Events

SDG&E will conduct one test event, with two-hour duration, per year for Group A participants. Each Group A participant, except for those relying exclusively on prohibited resources, is required to participate in test events. **Use of prohibited resources during a test event is not permitted and will not be compensated.** Otherwise, all other incremental load reduction delivered during the ELRP test event is eligible for ELRP compensation set forth in Section 4 below.

3. Compensation

Participation during an ELRP event is entirely voluntary, and no financial penalties will result from not meeting or exceeding the nominated target load reduction during the event.

The incremental load reduction (ILR) is defined as the load reduction achieved during an ELRP event incremental or relative to the non-event applicable baseline and/or any other existing commitment. Only ILR is eligible for compensation under ELRP.

Any load reduction technology may be used during an ELRP event to achieve ILR. BUGs or Prohibited Resources may be used in compliance with Rule 21 and other applicable regulations and permits during an ELRP event to achieve ILR, including during the overlapping period with an independently triggered event in a dual-enrolled DR program, but only for achieving load reduction incremental to any other existing commitment (e.g., under a dual-enrolled DR program).

There are no penalties for non- or under-performance.

4.0 Incentive Rate

The ELRP Compensation Rate (ECR) is \$1 per kilowatt-hour (\$1/kWh) for verified load shed.

4.2 Incentive Calculation

Compensation for load reduction delivered during an ELRP event is determined by calculating the product of ILR and ECR. The ELRP incentive calculation for Group A and Group B varies. Details are provided below.

4.2.1 Sub-Group A

To be eligible for compensation for an ELRP event, a participant's ILR must be at least 50 percent of their pre-nominated load shed or exported energy quantity. A participant's ELRP compensation shall not exceed 200 percent of their pre-nominated load shed or exported energy quantity

4.2.1.1 Baseline for Sub-Groups A.1. and A.3.

Steps for calculating a participant's ELRP baseline:

- 1) Calculate the Energy Baseline (EB) – A service account must have at least 10 days of interval meter data available in SDG&E's billing system to have a valid EB is defined as all service accounts having at least 10 days of interval meter data available to SDG&E's billing system. Only the hourly average usage for the hours included in the event will be included in the EB determination. The EB and Adjusted Energy Baseline (AEB) will all be calculated at the service account level. The EB and AEB will be calculated on an hourly basis using the average of the immediate past 10 calendar days, including holidays, of all applicable service accounts.

The past 10 calendar days will exclude days when the customer:

(1) was subject to an ELRP event, or (2) an event for a dual-enrolled DR program or rate, if applicable, or (3) was subject to a grid outage.

- 2) To Calculate the Day-Of Adjustment Value (DOAV) – A DOAV shall not be less than 1.00 or greater than 1.40. The DOAV is a ratio of (a) the average load of the first three hours of the four hours prior to

the event to (b) the average load of the same hours from the last 10 calendar days selected in accordance with Step 1 above.

- 3) Calculate the Adjusted Energy Baseline (AEB) – A service account's AEB for an ELRP event is calculated by multiplying the EB by the DOAV.

4.2.1.2 Sub-Group A Special Conditions

- 1) In the case of overlapping BIP and ELRP events, only the incremental reduction below the customer's pre-committed firm service level (FSL) is counted in ILR.
 - a) Load reduction by dual-enrolled BIP customers during an ELRP event outside of a BIP event is excluded from ILR (and not eligible for ELRP compensation).
 - b) Load reduction by dual-enrolled BIP customers during an ELRP event on a day with no BIP event is excluded from ILR (and not eligible for ELRP compensation)
- 2) If the customer has a Rule 21 interconnected device with export capability and permit, the customer may choose to count exported energy in ILR. In that case, the applicable ELRP baseline is modified to account for exported energy during non-event days and count exported energy in ILR.

4.2.1.3 Settlement Calculations for Sub-Group A.3.

For a customer on a CPP or RTP equivalent tariff, the ELRP baseline is deemed to be zero and only exported energy is counted in ILR.

4.2.1.4 Settlement Calculations for Sub-Group A.4.

The aggregator selected CPUC approved baseline for SDG&E's CBP is utilized and modified to account for exported energy during non-event days and count exported energy in ILR.

For a customer not on a CPP or RTP equivalent tariff, the ELRP baseline defined under A.1 is utilized and modified to account for exported energy during non-event days and exported energy is counted in ILR.

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF

IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy