

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6250E
As of August 24, 2021

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 AND DECISION 21-06-027

Division Assigned: Energy

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Disposition:	Accepted
Effective Date:	07-09-2021

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



Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Erik Jacobson

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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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



Clay Faber – Director
Regulatory Affairs
8330 Century Park Ct.
San Diego, CA 92123
cfaber@sdge.com

July 9, 2021

ADVICE LETTER 3802-E
(San Diego Gas & Electric - U 902-E)

ADVICE LETTER 4538-E
(Southern California Edison Company – U338 E)

ADVICE LETTER 6250-E
(Pacific Gas and Electric Company – U39 M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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 AND DECISION 21-06-027

PURPOSE

In compliance with Ordering Paragraph (OP) 4 of Decision (D.) 21-06-027 (dated June 24, 2021), which modified D.21-03-056 (the Decision) to add a day-of trigger to the Emergency Load Reduction Program (ELRP), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE) and Pacific Gas and Electric (PG&E) (collectively, the Joint Investor Owned Utilities (IOUs)), hereby submit for approval by the California Public Utilities Commission (Commission) this joint Advice Letter (AL) to update the ELRP terms and conditions to incorporate the day-of trigger.

Separately, PG&E is also updating Terms and Conditions submitted in Advice 6173-E¹ pursuant to guidance provided by the Energy Division (ED) on June 24, 2021, to remove exemptions for Small-Medium Business (SMB) participants. ED staff requested that PG&E submit this change, which adds the Day-Of trigger to ELRP in compliance with the decision and remove the inconsistent language. Therefore, included in this filing is the requested removal of the exemption for SMB participants within PG&E's ELRP terms and conditions.

¹ Joint IOU ELRP Group A Advice Letters 4478-E (SCE), 6173-E (PG&E) and 3744-E (SDG&E) submitted on April 26, 2021, Attachment B, p 11.

BACKGROUND

The ELRP is intended to be an emergency program activated based on alerts issued by the California Independent System Operator (CAISO). Initially, the Decision indicated that ‘there is no ELRP Day-Of trigger for Group A or Group B defined at this time.’² D.21-06-027 modifies the Decision to clarify that the ELRP shall have both day-of and day-ahead triggers for Group A participants.

Ordering Paragraph (OP) 8 of D. 21-03-056 and page 15 of the related Attachment 1 directed the IOUs to jointly file a Tier 1 advice letter incorporating the ELRP pilot terms and conditions for Group A participants. Subsequently, on April 26, 2021, SCE submitted a Tier 1 AL on behalf of the three IOUs³. D.21-06-027 also directs the IOUs to jointly file a Tier 1 AL, updating the terms and conditions for Group A participants. PG&E’s exemption language for SMB participants, which had been proposed in the initial Tier 1 AL has been removed to remain consistent with the decision.

DISCUSSION

In the documents attached, each IOU provides its updated ELRP pilot terms and conditions for Group A. The IOUs have aligned their terms and conditions where possible, but due to system, process, and customer differences, some areas were unable to align on all programmatic aspects. Inclusion of the Day-Of trigger can be found in each IOU’s “Program Trigger” section of their respective attachment.

The attachments to this filing are as follows:

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

In regards to PG&E’s removal of the SMB language from its terms and conditions, The ED informed PG&E that the Terms and Conditions filed for Group A as it relates to the exemption for the nomination requirement by SMB participants is inconsistent with the language of D.21-03-056. Specifically, the following language in AL 6173-E was identified as inconsistent:

“Small-Medium Business will not have a pre-nomination requirement and therefore the 50 to 200 percent collar will not apply.”

PG&E has removed this language from its terms and conditions.

TIER DESIGNATION

Pursuant to OP 4 of D.21-06-027, this advice letter is submitted with a Tier 1 designation.

² Decision 21-03-056, Attachment 1, p 8.

³ Joint IOU ELRP Group A Advice Letters 4478-E (SCE), 6173-E (PG&E) and 3744-E (SDG&E) submitted April 26, 2021.

EFFECTIVE DATE

SDG&E believes this filing is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to GO 96-B. Since this filing is being made in compliance with D.21-06-027, SDG&E therefore respectfully requests that it become effective on July 9, 2021, which is the date filed.

PROTEST

Anyone may protest this advice letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based and should be submitted expeditiously. The protest must be made in writing and received by July 29, 2021, which is 20 days after the date this advice letter was submitted with the Commission. There is no restriction on who may submit a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Greg Anderson
Regulatory Tariff Manager
E-Mail: GAnderson@sdge.com & SDGETariffs@sdge.com

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:

Shinjini C. Menon
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-3377
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E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
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77 Beale Street, Mail Code B13U
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Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached GO 96-B list and Service Lists R.20-11-003, A.17-01-012, et al., and R.13-09-011 by providing them a copy electronically.

Address changes should be directed to SDG&E Tariffs by e-mail at SDGETariffs@sdge.com.

/s/ Clay Faber

CLAY FABER
Director – Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: San Diego Gas & Electric (U902-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Norma Toothman

Phone #: 619-605-9877

E-mail: NLToothman@sdge.com

E-mail Disposition Notice to: SDGETariffs@sdge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3802-E, 6250-E, 4538-E Joint IOU

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 And Decision 21-06-027

Keywords (choose from CPUC listing): Compliance; ELRP,

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.21-03-056, D.21-06-027

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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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: 7/9/21

No. of tariff sheets: N/A

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: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

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: Greg Anderson
Title:
Utility Name: San Diego Gas & Electric
Address: 8330 Century Park Court, CP32C
City: San Diego
State: California Zip: 92123
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: GAnderson@sdge.com

Name: SDG&E Tariff Department
Title:
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D
City: San Diego
State: California Zip: 92123
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: SDGETariffs@Sdge.com

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

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B. Barkovich

Biofuels Energy, LLC

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Service List(s)

A.17-01-012
R.20-11-003
R.13-09-011

ATTACHMENT A

Southern California Edison Company Emergency Load Reduction
Program (ELRP) Pilot Group A
Terms and Conditions Pursuant to California Public Utilities
Commission Decisions 21-03-056 and 21-06-027

SCE Advice Letter 4538-E

Southern California Edison Company
Emergency Load Reduction Program
(ELRP) Pilot Group A
Terms and Conditions Pursuant to
California Public Utilities Commission
Decisions 21-03-056 and 21-06-027

July 9, 2021

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Program Overview

On March 26, 2021 and June 25, 2021, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 21-03-056 and D.21-06-027, respectively, 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 D.21-06-027 and their respective Attachments, and may change in whole or in part subject to CPUC approval. The ELRP will be administered by Pacific Gas and Electric Company, 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 have a delayed start.

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)
- 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 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.

ELRP participation for Sub-Groups A.3 and A.4 within SCE's service territory has been delayed due to operational challenges around eligibility, enrollment, and compensation.

D.21-03-056 permits deferral of the effective date for these Sub-Groups until up to May 1, 2022 through the filing of an Advice Letter. SCE filed such an Advice Letter (see AL 4482-E) but is currently working with the Commission to activate participation for these Sub-Groups to an earlier date.

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 will utilize both day-ahead (DA) and day-of (DO) event triggers. ELRP may be activated after the CAISO issues or declares an Alert, Warning, or Emergency Notice, as defined by the “Alert, Warning, Emergency (AWE)” process in CAISO Operating Procedure 4420.

Following any AWE declaration by the CAISO, SCE will exercise discretion to activate the DA or DO trigger for Group A participants, either selectively staggered over time or for all participants simultaneously.

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, the AWE declarations will be replaced with the equivalent NERC EEA level notices.

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. The start time and duration specified by SCE will define the ELRP event window for the Group A participants.

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 ELRP 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 ELRP 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 ELRP 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.

As noted above, ELRP participation for Sub-Groups A.3 and A.4 within SCE's service territory has been delayed due to operational challenges, and SCE had elected to defer the effective date for these Sub-Groups until up to May 1, 2022 as permitted by D.21-03-056, but is currently working with the Commission to activate participation for these Sub-Groups to an earlier date.

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

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

PG&E Advice Letter 6250-E

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

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

July 9, 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)
- Sub-Group A.4. – Virtual Power Plants (VPP)

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-residential²; and
- Customer's service account is not currently taking service on a Critical Peak Pricing (CPP) or real-time pricing (RTP) rate;³ 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).

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

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

³ PG&E's existing non-residential CPP program is known as Peak-Day Pricing (PDP). PG&E does not currently offer an RTP.

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 nominate⁴, 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-

⁴ Note that originally PG&E intended to waive the nomination requirement for SMB customers; however, the CPUC determined this would be inconsistent with D.21-03-056

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.

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.

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. The ELRP utilizes Day-Ahead (DA) and Day-Of (DO) triggers 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, 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.⁵

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

Steps for calculating a participant's ELRP baseline:⁶

- 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 basis using the average of the preceding *similar* days⁷, 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*

⁵ 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.

⁶ 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.

⁷ 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.

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 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.

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.

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

SDG&E Advice Letter 3802-E

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. 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 either a Day-Ahead (DA) or a Day Of (DO) Alert. A CAISO Alert is defined by the “Alert, Warning, Emergency (AWE)” process in CAISO Operating Procedure 4420.

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.

4. 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.

4.1 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