

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6445E
As of July 26, 2022

Subject: Joint Submittal of Proposed Modifications to the Emergency Load Reduction Program Pilot Pursuant to Decision 21-03-056 and Decision 21-12-015

Division Assigned: Energy

Date Filed: 12-29-2021

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Authorizing Documents: D2112015

Disposition:	Accepted
Effective Date:	07-25-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Sidney Bob Dietz

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

December 29, 2021

ADVICE 4677-E
(Southern California Edison Company - U 338-E)

ADVICE 6445-E
(Pacific Gas and Electric Company - U 39-E)

ADVICE 3917-E
(San Diego Gas and Electric Company - U 902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Joint Submittal of Proposed Modifications to the Emergency Load Reduction Program Pilot Pursuant to Decision 21-03-056 and Decision 21-12-015

PURPOSE

In compliance with Ordering Paragraph (OP) 1 of Decision (D.)21-03-056 and OP 22 and Attachment 2 of D.21-12-015 (the Decision), Southern California Edison Company (SCE) hereby submits this joint advice letter on behalf of itself, Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) (together, the "Investor Owned Utilities" (IOUs)) to modify certain program parameters of the Emergency Load Reduction Program (ELRP) pilot.

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, directing the Joint IOUs to take 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

On July 30, 2021, Governor Newsom signed an emergency proclamation to “free up energy supply to meet demand during extreme heat events and wildfires that are becoming more intense and to expedite deployment of clean energy resources this year and next year.”² In the Governor’s July 30, 2021 Emergency Proclamation, all energy agencies, including the Commission, were directed to act immediately to achieve energy stability during this emergency. In response to the Governor’s Emergency Proclamation, on August 2, 2021, the assigned Administrative Law Judge (ALJ) sent a ruling to parties in R.20-11-003 initiating Phase 2 of this rulemaking. After receiving testimony, briefing, and comments on the Phase 2 proposed decision from the parties, on December 6, 2021, the Commission issued the Decision, which orders the IOUs to take actions to prepare for potential extreme weather in the summers of 2022 and 2023.

Attachment 2 of the Decision provides that as experience in ELRP is gained, the IOUs may seek to modify various aspects of ELRP design via an IOU-specific or joint IOU Tier 2 AL as appropriate before or by January 15 of each program year to manage program enrollment, improve program efficiency, increase potential load reduction available to ELRP, improve program value, and reduce program cost. The change request must be limited to technical aspects of the program design related to program eligibility criteria or requirements (including various minimum size threshold parameters), dual participation between ELRP and another DR program, program trigger(s), minimum dispatch hours, Group A baselines and settlement, and Group B baselines, settlement, and invoicing guidelines. A request to allow a particular dual participation option should be accompanied with an explanation and methodology to demonstrate how the Incremental Load Reduction (ILR) during overlapping event could be attributed uniquely to ELRP participation and avoid double compensation.³

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

² See Governor Newsom’s Press Release at <https://www.gov.ca.gov/2021/07/30/governor-newsom-signs-emergency-proclamation-to-expedite-clean-energy-projects-and-relieve-demand-on-the-electrical-grid-during-extreme-weather-events-this-summer-as-climate-crisis-threatens-western-s/> and the Proclamation of a State of Emergency at <https://www.gov.ca.gov/wp-content/uploads/2021/07/Energy-Emergency-Proc-7-30-21.pdf>.

³ D.21-12-015, Attachment 2, p. 20.

DISCUSSION

Per Attachment 2 of the Decision, the IOUs submit the following modifications to the ELRP pilot to improve program efficiency, increase potential load reduction and reduce program cost. Some modifications are requested by one, two or all of the IOUs as indicated below.

Modifications Applicable to All IOUs

Clarifying ELRP Testing Requirements

The IOUs seek clarification on the ELRP testing requirements. Specifically, the testing requirements for Group A should be applicable only if there are no actual ELRP events or dispatches. In D.21-03-056 and D.21-12-015, the Commission established Test Event requirements for ELRP Group A participants and required that these participants participate.⁴ Typically test events are performed when actual events do not occur so that a measurement and evaluation of the resource can be performed. If ELRP Group A is dispatched for actual grid emergencies and/or dispatched to meet their minimum hours,⁵ a test event is not necessary for measurement and evaluation purposes.

The IOUs propose the following modification to the IOU's respective ELRP Terms and Conditions:

Test Events

~~Half an ELRP event or dispatch does not occur during the season,~~ IOUs shall conduct one test event, with two-hour duration, per year for Group A participants.

Modifications to Group B Settlement Methodology

Clarifying use of Qualified Capacity in Group B Settlement Methodology

In D.21-03-056 and D.21-12-015, the Commission authorized demand response resources bid into the California Independent System Operator (CAISO) wholesale energy market as Proxy Demand Resources (PDRs) to be eligible to participate in ELRP under Group B. Attachment 2 of the Decision outlines the settlement methodology for calculating ILR for PDR aggregations. As part of ensuring incrementality of ELRP compensation, the methodology determines the interval-specific ELRP Compensation, "by subtracting 1) any CAISO market payments for any

⁴ D.21-03-056 Attachment 1 (pp. 14-15) and D.21-12-015 Attachment 2 (p. 19).

⁵ In D.21-12-015, the Commission established minimum dispatch hours for ELRP Sub-Group A.2., Sub-Group A.4., and Sub-Group A.5 of 10 hours, 20 hours, and 30 hours, respectively.

portion of the load reduction counted in the interval-specific ILR and 2) the interval-specific CAISO Opportunistic Revenue (COR).” Regarding the calculation of the COR, the IOUs seek clarification on the use of Qualified Capacity (QC) in determining the Market Eligible Capacity (MEC), which ultimately informs the calculation of the COR.

The use of the QC in the calculation of the MEC appears to serve as a proxy for a market bid quantity that a Scheduling Coordinator would submit for a PDR. However, there are reasonable circumstances where the QC may not be reflective of a PDR’s market bid. The QC value of a PDR does not constrain the amount of capacity that it can offer to the market, thus PDRs can bid below or above their QC value.

The IOUs propose to replace the use of QC with the Supply Plan quantity in the calculation of MEC as that is more reflective of a resource’s market bids given the must-offer obligation within the Availability Assessment Hours (AAH). For hours or days outside of the AAH, the QC will be set to zero for 2022.

Establishing a Floor Value of Zero for the Market Eligible Capacity

Attachment 2 of the Decision specifies the logic for calculation of the MEC for intervals where the CAISO scheduled award quantity is non-zero and the interval-specific MEP is greater than the QC.

“And if the interval-specific MEP is greater than the Qualifying Capacity (QC) of the PDR in that interval, then the interval-specific MEC is equal to the interval-specific QC of the PDR minus the interval-specific total CAISO scheduled award quantity.”

Attachment 2 of the Decision also provides guidance on instances where a PDR has no assigned QC, thus replaced by the PMin value.

“If the PDR has no assigned QC in the above cases, then the QC is replaced by the PDR’s “PMin” parameter on record in the CAISO Master File applicable to the interval.”

It is a reasonable use case for a PDR which does not have an assigned QC value to have PMin = 0. This ends up setting the QC to zero and subtraction of the interval-specific total CAISO scheduled award quantity would result in a negative MEC value. The IOUs propose to set a floor of zero for the MEC, as a negative MEC value makes the COR additive to the ELRP Compensation as opposed to subtractive.

Modifications Applicable to SCE and PG&E

SCE’s ELRP Terms and Conditions state in relevant part: “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.⁶

PG&E calculates and issues ELRP incentives twice per season. Incentives earned in the months of May, June and July are issued within 60 days of the end of July. Incentives earned in the months of August, September and October are issued within 60 days of the end of October.

Considering the modifications and expansion of Group A adopted in D.21-12-015, SCE and PG&E are concerned these changes will have consequences for their respective billing systems and settlement calculations that may not make it feasible to issue ELRP incentives by December 31. Therefore, SCE and PG&E propose to modify the payment provisions for Group A to a period that is feasible for the utility's systems as well as verification of data completeness and quality.

Modifications Applicable to PG&E Only

Exclusion of Outage Days from ELRP Baseline

On August 17, 2021, Energy Division approved PG&E Advice Letter (AL) 6174-E requesting for prescribed accommodation and allowed deferrals associated with the ELRP. Among the requests was the deferral of the effective date of excluding grid outage days from the ELRP baseline to a date no later than May 1, 2022.⁷ In this advice letter, PG&E seeks to modify the baseline methodology for Group A to exclude Public Safety Power Shutoff (PSPS) related grid outage days from the baseline.

Update Dispatch Trigger Language to Reduce Ambiguity

In PG&E's ELRP Group A Terms and Conditions, Energy Division Staff identified a potential ambiguity in the language pertaining to the activation of the ELRP based on CAISO "Alerts, Warnings, Emergency" (AWE). While PG&E Advice Letter (AL) 6250-E was approved, Energy Division Staff requested that the language be modified to reduce ambiguity in a Tier 2 AL. PG&E proposes the following modifications to its Group A Terms and Conditions:

2.2 Program Trigger

ELRP may be activated after the CAISO issues or declares ~~an "Alert, Warning, Emergency (AWE)" a day-ahead (DA) Alert. A CAISO Alert is defined by the.~~ 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.~~

⁶ SCE ELRP Terms and Conditions, Sub-Section 3.2.1, Incentive Calculation for Group A.

⁷ PG&E Advice Letter 6174-E approved by Energy Division on August 17, 2021 with an effective date of April 26, 2021.

Modifications Applicable to SCE Only

Per D.21-03-056 and D.21-12-015, Base Interruptible Program (BIP) Aggregators and their customers are eligible to participate in ELRP Sub-Group A.2. The Decision allows a BIP Aggregated customer to participate in ELRP Sub-Group A.1., if their BIP Aggregator decides to not participate in ELRP. SCE proposes two modifications to these provisions: (1) if a BIP Aggregator decides to participate in ELRP, then all of the service accounts of the BIP aggregated resource must participate; and (2) if a BIP Aggregator decides not to participate in ELRP, then the BIP Aggregator's customers cannot participate directly in ELRP. These modifications are needed due to how SCE operates and administers its BIP aggregation program. SCE's BIP aggregation program requires BIP Aggregators to provide a single Firm Service Level (FSL) for each BIP aggregated resource. Because an FSL is not provided at the service account, SCE cannot determine the aggregated groups' ILR unless all accounts are included. To ensure SCE is able to accurately determine or calculate the ILR for BIP Aggregation, SCE proposes the following modifications to SCE's ELRP Terms and Conditions:

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

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.

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

Third-party aggregators participating in SCE's Base Interruptible Program (BIP) are eligible to participate in ELRP. Eligible BIP aggregators ~~can only~~ must 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 ~~and are exempt from the ELRP Sub-Group A.1. Minimum Size Threshold eligibility criteria.~~ 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.

TIER DESIGNATION

Pursuant to OP 1, Attachment 1, of D.21-03-056, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

This advice letter will become effective on January 28, 2022, the 30th calendar day after the date submitted.

NOTICE

Anyone wishing to protest this advice letter 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 letter. 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:

For SCE:

Shinjini C. Menon
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone (626) 302-3377
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

For PG&E:

Sidney Bob Dietz II
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

For SDG&E:

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

There are no restrictions on who may submit 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 letter to the interested parties shown on the attached GO 96-B, R.20-11-003, A.17-01-012 et al., and 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) 302-3719. 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 submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted 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 Kellvin Anaya at (909) 274-3438 or by electronic mail at kellvin.anaya@sce.com.

Southern California Edison Company

/s/ Shinjini C. Menon
Shinjini C. Menon



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) #: 4677-E et al.

Tier Designation: 2

Subject of AL: Joint Submittal of Proposed Modifications to the Emergency Load Reduction Program Pilot Pursuant to Decision 21-03-056 and Decision 21-12-015

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 #: Decisions 21-03-056 and 21-12-015

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: 1/28/22

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: Shinjini C. Menon
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) 302-3377
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	

**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
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
International Power Technology

Intertie

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

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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