

January 17, 2023

ADVICE 4950-E
(Southern California Edison Company - U 338-E)

ADVICE 6826-E
(Pacific Gas and Electric Company - U 39-E)

ADVICE 4142-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, Decision 21-12-015, and Decision 21-12-069

PURPOSE

In accordance with Ordering Paragraph (OP) 1 of Decision (D.)21-03-056, OP 22 and Attachment 2 of D.21-12-015, and OP 1 of D.21-12-069 (the Decisions), Southern California Edison Company (SCE) submits this 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 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, 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 the ELRP pilot to decrease peak and net peak demand in the summers of 2021 and 2022.¹

On July 30, 2021, in response to a heat event, Governor Newsom issued an Emergency Proclamation ordering temporary measures to relieve stress on the grid and directing all energy agencies, including the Commission, to take actions to achieve energy stability. In response, the assigned Administrative Law Judge (ALJ) initiated Phase 2 of R.20-11-003. After receiving testimony, briefing, and comments, on December 6, 2021, the Commission issued D.21-12-015, ordering the IOUs to take additional actions to prepare for potential extreme weather in the summers of 2022 and 2023. D.21-12-015 ordered certain modifications to the ELRP, including by adding a residential subgroup (A.6).

As in the summer of 2021, a heat event occurred during the summer of 2022, as a result of which Governor Newsom issued an Emergency Proclamation on August 31, 2022 and two subsequent Executive Orders ordering emergency measures through September 9, 2022. Among other measures, the Governor authorized “emergency use” of stationary and portable generators, and suspended any permit, regulation, or law that would otherwise prohibit or limit such emergency use.²

In compliance with the Decisions, the IOUs have implemented the ELRP during program events called in the summers of 2021 and 2022. The Decisions provide that as experience in managing the ELRP is gained, the IOUs may seek to modify aspects of ELRP design through a Tier 2 Advice Letter (AL) by January 15³ of each pilot year to manage pilot enrollment, improve pilot efficiency, increase potential load reduction available to ELRP, improve program value, and reduce program cost. The request may address technical aspects of the pilot design related to eligibility criteria or requirements (including various minimum size threshold parameters); dual participation between ELRP and another DR program; program trigger(s); minimum dispatch hours; and 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 events could be attributed uniquely to ELRP participation in order to avoid double compensation.⁴

¹ D.21-03-056, OP 7, p. 85.

² See <https://www.gov.ca.gov/wp-content/uploads/2022/08/8.31.22-Heat-Proclamation.pdf?emrc=78e3fc>, ¶¶ 5, 6, 10.

³ The “December 31” date in D.21-12-015, OP 22 was corrected to “January 15” by D.21-12-069, OP 1.

⁴ D.21-12-015, Attachment 2, p. 20.

DISCUSSION

In accordance with the Decisions, the IOUs submit the following modifications to the ELRP pilot to improve pilot efficiency, increase potential load reduction, and reduce pilot cost. Some modifications are requested by one or all IOUs as indicated below. These modifications may be instituted by way of this Advice Letter based on the above-referenced authorizing language in D.21-12-015 and Attachment 2 thereto.⁵

Modifications Applicable to All IOUs

1. Modification of Minimum Dispatch Hours for Specified ELRP Sub-Groups

The IOUs propose to align the minimum dispatch hours of ELRP sub-groups A.4. (Virtual Power Plant (VPP) Aggregators), and A.5 (Vehicle Grid Integration (VGI) Aggregators) with those of sub-group A.2. (Non-Base Interruptible Program (BIP) Aggregators), so that the minimum dispatch hour requirement for each of these sub-groups is ten (10) hours for each ELRP summer season.

Currently, A.2 (non-BIP), A.4, and A.5 Aggregators have required minimum dispatch hours—otherwise understood as guaranteed dispatch hours—of 10, 20 and 30 hours, respectively.⁶ These hours count toward the overall annual dispatch limit of 60 hours per season.

The IOUs' experience with ELRP thus far has shown that the 20- and 30-hour minimums for sub-groups A.4 and A.5 are problematic and potentially can exhaust available dispatches for future grid emergencies. For example, because the IOUs could not foresee the September 2022 heat wave, in late July 2022, consistent with D.21-12-015, the IOUs "exercise[d] discretion" and decided to use CAISO Flex Alerts as a trigger for the ELRP sub-groups with minimum dispatch hours. Accordingly, on August 16, 2022, the IOUs sent event notifications to these sub-groups for dispatch on August 17 from 4-9pm. In anticipation of the multi-day September heat wave, there was concern that continuing to use Flex Alert as the trigger for these sub-groups could cause these sub-group to reach the 60-hour cap in September, potentially leaving zero hours for any events in October. Therefore, at the start of the heat wave events, the IOUs decided to revert to the EEA dispatch triggers for these sub-groups. To address and mitigate the scenario of reaching the 60-hour cap prematurely, thus being unable to respond to grid emergencies, and to improve program efficiency, the IOUs propose to make the minimum dispatch hours ten (10) hours for sub-groups A.2., A.4., and A.5.

⁵ See Commission General Order 96-B, General Rule 5.1.

⁶ D.21-12-015, Attachment 2, pp. 4-7.

2. Clarification of Provision Relating to Use of Prohibited Resources During ELRP Event When Permitted By Governor's Executive Order

D.21-12-015, Attachment 2 provides in relevant part:

Any load reduction technology may be used during an ELRP event to achieve ILR. Prohibited resources, except those operated by non-residential customers located in Disadvantaged Communities, may be used when permitted by a Governor's Executive Order and in compliance with Rule 21 and other applicable regulations and permits, during an ELRP event to achieve ILR The existing Prohibited Resources policy still applies to IOU and third-party managed DR programs, excluding ELRP.

There has been some confusion around this provision, because it appears to permit the use of Prohibited Resources (PR) for ILR during ELRP events when permitted by a Governor's Executive Order, with the exception of PR in disadvantaged communities. However, the Governor's Executive Orders, by their terms, have (i) allowed for emergency use of PR without any such exception for disadvantaged communities, and (ii) suspended any conflicting law or regulation, which would include any Commission decision. This has raised confusion as to whether the exception stated in D.21-12-015 could override an Executive Order permitting temporary use of PR without exception as to disadvantaged communities.

Customer confusion around the allowable use of PRs during ELRP events also has arisen due to the split jurisdictional authority between the California Air Resources Board (CARB) and Air Quality Management Districts (AQMD) on the permitted use of generators and the CPUC on the compensation of PR ILR within the ELRP. This uncertainty creates undue risks for prospective participants willing and able to participate using their PR but wary of permit compliance issues. Experience from the Governor's Emergency Proclamation issued in 2022⁷ and a subsequent legal waiver⁸ from the Governor's Office also seemingly nullified this restriction, at the same time creating conflicting messages to participants within DACs. The IOUs believe removing restricting language for PR use within DACs will increase potential ILR by giving prospective participants located within DACs clearer assurances that they will be able to participate if a Governor's Emergency Proclamation is issued.

⁷ <https://www.gov.ca.gov/wp-content/uploads/2022/08/8.31.22-Heat-Proclamation.pdf?emrc=78e3fc>

⁸ <https://www.gov.ca.gov/wp-content/uploads/2022/09/Extreme-Heat-Event-Legal-Waivers.pdf>

The IOUs therefore seek to reduce customer confusion regarding the use of PR by removing language which restricts the use of PRs within Disadvantaged Communities (DACs) regardless of a Governor's Emergency Proclamation, which, in the past, have allowed prohibited resources to be used without respect to location.

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

"Prohibited resources, ~~except those operated by non-residential customers located in Disadvantaged Communities,~~ may be used when permitted by a Governor's Executive Order and in compliance with Rule 21 and other applicable regulations and permits, during an ELRP event to achieve Incremental Load Reduction..."

3. Allowance of dual participation between IOU Direct Enrolled DR program and ELRP Sub-Group A.4. or A.5. if device level metering is used.

The IOUs seek to increase potential ILR by allowing customers currently enrolled in specified IOU Direct Enrolled DR programs⁹ to dual participate with the ELRP sub-groups A.4 or A.5 only when the A.4 or A.5 aggregator is utilizing device-level submetering for ELRP settlement purposes.

In 2022, PG&E and SCE denied enrollments of prospective sub-group A.4. participants with energy storage due to their enrollment in an IOU Direct Enrolled DR program, which resulted in lost potential participation for the ELRP. When compared to IOU Direct Enrolled DR programs, the potential ILR that could be provided by battery energy storage is greater given its capabilities. Storage can offset more of a customer's typical usage and, in certain cases, export energy to the grid. The Commission has adopted rules prohibiting dual participation, summarized in these three principles:¹⁰ 1) duplicative payments and counting for a single instance of load reduction or load drop is prohibited (i.e., no double-compensation or "double dipping"), 2) dual participation is permitted in two demand response activities, if one provides an energy payment and the other provides capacity; and 3) dual participation in two day-ahead or two day-of programs is prohibited. The IOUs' proposal takes these principles into account.

A) **This proposal will not cause double compensation or counting.** As proposed, the IOUs will require the A.4 or A.5 aggregator to utilize device-level submetering

⁹ PG&E's Smart AC Switches or BYOT, SCE's Summer Discount Plan, SCE's Smart Energy Program, and SDG&E's AC Saver are air-conditioning (A/C) or thermostat-based IOU Direct Enrolled DR programs that are not allowed dual participate with ELRP Sub-Groups A.4. and A.5.

¹⁰ Demand response dual participations rules were originally established in D.09-08-027 and affirmed in D.12-04-045 and D 17-12-003.

and settle on the submeter interval data as a condition for dual participation. The use of submetering allows the contribution of the specific DER to be quantified absent effects of any other load management measures occurring at the home. As such, the ELRP energy incentive is based on the sub-metered device load and only reflective of the device's ILR. The IOU AC cycling and thermostat programs provide a fixed payment or payments proportional to the expected average load reduction of air-conditioner use. Therefore, there is no conflict with double payment to a customer for the same load response from the same end use. The IOUs will also use the opportunity to take into consideration whether appropriate adjustments are needed to mitigate double counting of resource capacity or energy. If warranted, specific measures an IOU takes is ultimately dependent on existing operational processes and may be outlined in future ALs.

- B) This proposal does not cause more than one capacity or one energy payment.** As previously mentioned, the IOU AC cycling and thermostat programs incentive is fully incremental to the ELRP A.4 or A.5 payment because it compensates the customer only for a reduction in AC use. Whole home meter data is not used to determine the AC cycling program incentives so there is no opportunity for the load reduction from other end uses to impact the AC cycling incentive. Therefore, the proposal preserves the rule that participants do not receive more than one capacity or energy incentive.
- C) This proposal addresses two day-ahead or day-of notification prohibition.** The IOU AC cycling programs and ELRP A.4 or A.5 both utilize direct load control of a specific end use, thus, minimizing customer confusion that may come from receiving multiple dispatch notifications. This proposal is also consistent with the current ELRP dual participation rules that permit dual participation between ELRP and several other day-ahead and day-of programs including the Base Interruptible Program (BIP), Capacity Bidding Program (CBP), third-party demand response provider (third-party DRP) proxy demand resource (PDR) programs, and the Critical Peak Pricing (CPP) rate in spite of the fact that ELRP has both day-ahead and day-of triggers. Because only incremental load from additional battery energy storage or electric vehicle service equipment (EVSE) will be compensated, there is still an incremental benefit to allowing dual participation despite some similarities in the program notification types.

4. Modifications to Sub-Group A.4 and Clarification for Sub-Group A.5 Compensation

The IOUs seek to improve program efficiency and reduce administrative burden by aligning the baseline calculation for Sub-Group A.4 with those of Sub-Group A.1, A.2, A.3 and A.5. The IOUs also seek to explicitly enumerate the baseline calculation for residential aggregations within A.5. The A.4 baseline methodology currently adopts the respective IOU's CBP baseline methodology, which are different across the IOUs. To

reduce the number of different baseline methodologies, the IOUs propose to adopt the same baseline methodology for A.4 as currently used for A.1, A.2, A.3 and A.5. Therefore, baselines for non-residential customers and aggregations and mixed aggregations (e.g. aggregations consisting of both residential and non-residential customers) would use the 10-in-10 similar day baseline (e.g. 10-in-10 weekday and the 4-in-4 weekend/holiday baseline) with a +40% Day-Of Adjustment Value (DOAV) (e.g. DOAV is $1.00 \leq 1.40$). Note, A.5 non-residential or mixed aggregations already use these methods. For A.4 and A.5 residential aggregations, the baseline would use a 5-in-10 similar day baseline (e.g. 5-in-10 weekday and 3-in-5 weekend/holiday baseline) with a +40% DOAV (e.g. DOAV is $1.00 \leq 1.40$). A.4. and A.5. aggregations using sub-metered data for settlement purposes would not use a DOAV (e.g. DOAV is 1.00).

5. Additional Granularity to Group B Baseline and Settlement Methodology and Description

Currently the sections on the baseline and settlement methodologies for third-party DRPs with PDRs (Sub-Group B.1.) and CBP Aggregators (Sub-Group B.2.) are combined into a single section whose main focus is performance and settlement calculations applicable to B.1. There are details applicable to B.2 settlements that are not addressed. Therefore, we suggest modifying the Baseline and Settlement sections in the Group B Terms and Conditions to contain separate sections for each sub-group, B.1 and B.2, and to add detail that further describes the calculations applicable to B.2 participants. The proposed changes are reflected in each IOU's updated version of Group B Terms and Conditions.

Modifications Applicable to SCE Only

1. Allowing customers participating in BIP-Agg to participate in Sub-Group A.1. as long as their incremental load reduction can be determined.

Pursuant to D.21-03-056 and D.21-12-015, the Commission allows non-residential customers that participate with an aggregator on the Base Interruptible Program (BIP) may independently participate in ELRP under sub-group A.1. if their BIP aggregator decided to not participate in ELRP subject to the applicable criteria and requirements.¹¹ The structure of SCE's BIP makes it difficult to allow BIP-Agg customers to participate under sub-group A.1. because aggregators submit one aggregated firm service level (FSL) for each of their aggregated groups. So, if one customer under an aggregated group wants to participate, SCE does not have an FSL amount for that specific customer which makes it difficult to calculate their ELRP incremental load reduction (ILR). In some cases, a BIP aggregator has aggregated groups with only one customer or a BIP-Agg group with an FSL of zero. Therefore, in these certain cases, a customer's ILR can be

¹¹ D.21-03-056, Attachment 1, p. 5 and D.21-12-015, Attachment 2, p. 4.

determined. SCE proposes to allow BIP-Agg customers to participate in ELRP sub-group A.1. if their FSL can be determined.

2. Allow BIP-ELRP dual participants to get compensated for non-overlapping hours

D.21-12-015 allows BIP participants to be eligible to receive compensation for ELRP events when the BIP participant's load reduction is below their BIP FSL and only when a BIP event overlaps with an ELRP event.¹² SCE proposes to also allow BIP-ELRP dual participants to receive compensation for ELRP events for non-overlapping ELRP periods. This proposal is expected to increase enrollments in ELRP and increase the potential load reduction available. This change would allow customers to receive compensation for reducing or shifting their load, particularly when requested to do so. During the 2022 heat wave, there was a dialing for megawatts whereby large commercial and industrial customers, including BIP customers, were asked to shutdown or shift their operations during the on-peak period (e.g. 4-9 p.m.). These actions helped the grid and avoided the need for rotating outages without receiving compensation for their actions. If customers are going to be asked to shut down or shift their load and/or incur additional costs as a result, these customers should be able to receive compensation for their actions during overlapping and non-overlapping events and will achieve the Commission's ELRP goal which is "to provide additional tools for the avoidance of rotating outages."¹³ It is unclear if these customers will continue to provide voluntary load reductions in the future without compensation.

3. Charge Ready DR Pilot customers will participate in ELRP or another eligible DR program

In D.16-01-023, the Commission authorized SCE to implement the Charge Ready Pilot and directed SCE to establish a DR program in which all Charge Ready customers with installed Level 2 electric vehicle supply equipment (EVSE) are required to participate. In compliance with D.16-01-023, SCE proposed a Charge Ready DR Pilot in its 2018-2022 DR Application (A.17-01-018) which the Commission approved in D.17-12-003. Pursuant to D.17-12-003, SCE submitted AL 3773-E and 3773-E-A outlining SCE's 2-year Pilot Plan which Energy Division approved on December 14, 2018. On August 15, 2019 and July 2, 2020, SCE submitted AL 4055-E and 4244-E, respectively, requesting to extend the Charge Ready DR Pilot through 2022. On April 20, 2021, Energy Division issued a non-standard disposition approving AL 4055-E contingent upon additional analysis. In December 2021, SCE met with Energy Division Staff to provide an update and discuss DR program options for Charge Ready customers once the Charge Ready DR Pilot ends in 2022. Because SCE had created the new Emergency Load Reduction Program (ELRP) pilot pursuant to D.21-03-056, SCE proposed to allow Charge Ready DR Pilot

¹² D.21-12-015, Attachment 2, Special Consideration #1, p. 13.

¹³ D.21-12-015, p. 30.

customers to satisfy their DR enrollment requirement by enrolling in ELRP. SCE will work with these Charge Ready customers to enroll in ELRP or another eligible DR program before the 2023 summer season and will continue to offer ELRP as a DR program option for new Charge Ready customers.

4. Clarify eligibility of customers on certain rates to participate in ELRP

SCE proposes to not allow customers on rate schedules TOU-EV-1, DM, DMS-1, DMS-2, and DMS-3 to participate in ELRP. Schedule TOU-EV-1 is a rate schedule exclusive to the charging of electric vehicles on a separate meter in single family dwellings concurrently served under a Domestic schedule. Schedule TOU-EV-1 is closed to all new customers and any remaining customers are being moved to a different rate. Because this rate will be withdrawn, SCE proposes to prohibit customers on this rate from participating in ELRP. Customers on a DM (master-metered multifamily dwellings without submeters) or DMS (multifamily dwellings with submeters) rate schedule should also be prohibited from participating in ELRP since SCE does not have a way to determine which of the sub-metered units performed and which did not. Moreover, SCE would not be able to compensate the sub-metered customers since the master meter customer is the customer of record and would be the one receiving the bill credit. For these reasons, customers on Schedule TOU-EV-1, DM, DMS-1, DMS-2, and DMS-3 should not be eligible to participate in ELRP.

5. Various Clean-Up of SCE's ELRP and Power Saver Rewards Terms and Conditions

During the 2022 ELRP season, based upon feedback and experience, SCE observed that several changes need to be made to its ELRP terms and conditions for Group A, Group B, and Power Saver Rewards (PSR) Program:

Group A (excluding A.6.) Terms and Conditions

- Add provision “If there is insufficient data that impacts SCE’s ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations.”
- Replace CAISO “Alert, Warning and Emergency (AWE)” references with “Energy Emergency Alert (EEA)”.
- Replace “issued no later than” to “processed by” in section 3.2 to allow for flexibility to address complexities with verifying and resolving gaps in data.

Power Saver Rewards Program Terms and Conditions

- Correct errors and clarify the definition of ILR.
- Add provision “If there is insufficient data that impacts SCE's ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations.”

Group B Terms and Conditions

- Add the following decision language to T&Cs: "If the total CAISO scheduled award quantity in an interval is zero, then the interval-specific MEP [Market Event Performance] in the above cases is set to the interval-specific ILR." (D.21-12-015, Attachment 2, p. 18)
- Update T&Cs to allow B.1. invoices to be submitted directly to SCE program administrator, Olivine.
- Add provision "If there is insufficient data that impacts SCE's ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations."
- Replace CAISO "Alert, Warning and Emergency (AWE)" references with "Energy Emergency Alert (EEA)"
- Correct typos (e.g. replace inaccurate references to "PG&E" with "SCE").

Modifications Applicable to PG&E Only

Group A & B Terms & Conditions

1. *Replace “Alert, Warning and Emergency (AWE)” references with “Energy Emergency Alert (EEA)”*

The CAISO has completed their transition from the AWE process to the North American Electric Reliability Corporation EEA standards. As such, any references to the AWE process have been replaced by the appropriate reference to EEA.

2. *Back-Up Generator Data Collection*

D. 21-03-056 required the IOUs to, “[...] collect data on backup generator participation in ELRP, including location, type of fuel used, and the capacity of the generator, for years 2021 and 2022”.¹⁴ For 2023 and beyond, PG&E proposes to continue collecting backup generator data but, on an optional basis for participants.

Group A (excluding A.6.) Terms and Conditions

3. *Clarify Baseline Calculation at the Service Account Level for Direct Enroll Customers versus at the Aggregated Level for Aggregators*

For Aggregators, they participate by enrolling a resource of aggregated customers. As such, the baselines will be calculated at the aggregated resource level as opposed to the individual customers that comprise the aggregated resource.

Section 3.2.1.1

2) The EB and Adjusted Energy Baseline (AEB) will all be calculated at the service account level **for customers directly enrolled in ELRP. The EB and AEB for customers enrolled through an aggregator will be calculated at the aggregated level.**

Power Saver Rewards (PSR) Program Terms and Conditions

4. *Update A.6 Title and First Paragraph*

PG&E requests to add the name “Power Saver Rewards” to the title and in the first paragraph.

5. *Include ELRP Sub-Group A.4 & A.5 as Conflicting Programs*

PG&E requests to enumerate that Sub-Group A.4 and A.5, which is also open to residential customers, is conflicting program participation with PSR.

¹⁴ D. 21-03-056 p.19

Section 2.iv.

2.iv Participant is not simultaneously enrolled in another supply-side demand response program offered by PG&E, third-party DR provider (DRP), ~~or~~ Community Choice Aggregator (CCA), ~~or in ELRP sub-groups A.4 or A.5~~

6. Update End Date of PSR

PG&E requests to update the end date currently specified for the PSR to reflect the years for which the ELRP has been authorized.

Section 3

3. The Pilot ~~shall continue until at least December 31, 2023 unless extended,~~ ~~is authorized to operate in the years 2021-2025,~~ or Participant's enrollment is terminated sooner..."

7. Include A.6 Performance Methodology Description, Active Account Clarification and Insufficient Meter Data

PG&E request to add details to the performance methodology to the PSR Terms and Conditions in Section 5, clarify

5.i. Incremental load reduction is calculated as the difference between Participant's expected energy usage (recent, similar, non-event days) and actual hourly usage during an Event. For hours where usage increased, the incremental load reduction to zero.

5.ii PG&E retains sole discretion for the calculation of the incremental load reduction

5.iii. The incentive will ~~likely~~ be paid as a bill credit likely in the first months of the following calendar year for Participants whose ~~participating have an active~~ service agreement ~~is active~~.

5.iv. If there is insufficient data that impacts PG&E's ability to calculate incremental load reduction, the account may not receive an incentive or may be excluded from incremental load reduction calculations.

PG&E may submit supplemental sheets for this advice letter, if necessary, regarding the treatment of increases in usage relative to the baseline for 2023.

Group B Terms and Conditions

8. Update B.1 Invoice Submission Contact

PG&E proposes to update the Group B Terms and Conditions to instruct third-party DRPs to contact Olivine, PG&E's ELRP implementer, for invoicing materials and instructions. Existing firewalls are not affected by this proposal.

Section 3.2.3.1

~~Invoices and related information can be submitted to the following email inbox:~~
ELRPB1@pge.com

To request the Third-Party DRP Invoice Template and invoice submission instructions email: elrp-general@olivineinc.com

Modifications Applicable to SDG&E Only

1. Reduce minimum load reduction requirement for ELRP A1

In order to maximize the load reduction from ELRP A.1 and to offer as many customers as possible the opportunity to participate in ELRP, SDG&E proposes to reduce the minimum required load reduction for ELRP A1 from 50 kW to 1 kW. SDG&E has run the ELRP program for two years now and we have successfully grown the program to over 500 participating meters SDG&E is now positioned to build upon this success by opening the program to additional customers.

2. Modify the baseline for ELRP A1 to distinguish between business and non-business days

SDG&E's current baseline for ELRP A1 does not distinguish between business days (non-holiday weekdays) and non-business days (weekend and holidays) when selecting days to use in the baseline calculation. In addition, it does not distinguish between business and non-business days in terms of the number of days to include in the baseline even though one has to go much farther back in time to find ten non-business days than to find ten business days. SDG&E believes the CAISO baseline method which uses a 10 of 10 similar day baseline for business days and a shorter 4 of 4 similar day baseline for non-business days is an appropriate method to better account for the differences between business and non-business days. SDG&E therefore proposes that ELRP A1 baseline calculation include 10 similar days when an event occurs on business day and include four similar days when events occur on non-business days. The current same day adjustment will remain in place for both business and non-business days. SDG&E anticipates that these changes will increase the accuracy of the baseline because the methodology will better reflect the fact that some customers use energy differently on business versus non-business days.

3. Modify the baseline for ELRP A1 to be calculated at the meter level

Currently, customers enroll in SDG&E's ELRP A1 program at the meter level, but baselines are calculated at the service account level. SDG&E enrolls customers in ELRP A1 at the meter level rather than the service account level because in some cases not all meters with the same account number are eligible for the program and because we want customers to have the option to exclude any meters on buildings or areas that are not participating in the program that might cause a problem with the baseline calculations. In order to make it simpler to automate the baseline calculations SDG&E proposes to align the ELRP A1 baseline calculation with the enrollment process and calculate the ELRP baselines at the meter level rather than at the account level.

4. Specify that CPP days should be included in the ELRP A.1 baseline

To improve the clarity of our ELRP terms and conditions SDG&E proposes to add language to its ELRP A1 section that states that event dates for demand response rates with events such as CPP will not be excluded from the ELRP baseline in order to preserve incrementally. This proposed change will make SDG&E's ELRP terms and conditions more similar to those of PG&E and SCE which both include specific language stating that CPP events should be included in the ELRP baseline. Currently, SDG&E's terms and conditions state the demand response program events should be excluded from the ELRP baselines, but the terms and conditions do not specify how events for demand response rates such as CPP should be treated and adding this sentence will eliminate any confusion or debate about the how the events of demand response rates should be handled.

5. Allow automatic unenrollment from ELRP A6 when customers enroll in A4 or A5

Given that almost 600,000 customers are currently enrolled in SDG&E's ELRP A.6. program SDG&E expects that many customers who request to participate in either ELRP Subgroup's A4 or A5 will already be enrolled in ELRP A6. SDG&E proposes that customers who are enrolled in ELRP A6 be automatically unenrolled when they enroll in either ELRP A4 or ELRP A5. This will make it easier for customers to enroll in ELRP options that will likely produce a more reliable load reduction by utilizing technology. This proposed rule is also consistent with current ELRP rules which require that a customer be automatically unenrolled from ELRP A6 when they enroll in a supply side program.

6. Remove the ELRP B.2. invoice requirement

SDG&E proposes to modify the current invoice section for its ELRP B2 to eliminate the requirement for the CBP aggregators to submit invoices. DRAM and rule 32 participants must perform baseline calculations and submit the results to the CAISO regardless of whether they also participate in ELRP B1 so the requirement to perform

the baseline calculations and submit invoices for ELRP B1 does not impose a significant additional burden and is consistent with DRAM roles and responsibilities. However, CBP aggregators are not required to calculate baselines in order to participate in the CBP program because SDG&E bids the CBP program into the CAISO market. Therefore, SDG&E proposes that CBP aggregators no longer be required to submit invoices. This is consistent with the current CBP roles and responsibilities and may result in increased participation from CBP aggregators.

TERMS AND CONDITIONS

SCE, PG&E, and SDG&E's respective Terms and Conditions have been updated to reflect the proposed changes above, see attachments as follows:

- Attachment A – SCE Terms and Conditions for Group A
- Attachment B – SCE Power Saver Rewards Participation Terms and Conditions
- Attachment C – SCE Terms and Conditions for Group B
- Attachment D – PG&E Terms and Conditions for Group A
- Attachment E – PG&E Power Saver Rewards Participation Terms and Conditions
- Attachment F – PG&E Terms and Conditions for Group B
- Attachment G – SDG&E Terms and Conditions for Group A
- Attachment H – SDG&E Power Saver Rewards Participation Terms and Conditions
- Attachment I – SDG&E Terms and Conditions for Group B

TIER DESIGNATION

Pursuant to OP 1 of D.21-12-069, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

This advice letter will become effective on February 16, 2023, the 30th calendar day after the date submitted.

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:

For SCE:

Connor Flanigan
Managing Director, State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

and

Tara S. Kaushik
Managing Director, Regulatory Relations
Southern California Edison Company
c/o Karyn Gansecki
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
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 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) 302-4747. 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 Danny Waggoner at (818) 838-5513 or by electronic mail at Danny.Waggoner@sce.com

Southern California Edison Company

/s/ Connor Flanigan
Connor Flanigan
Managing Director – State Regulatory Operations

Pacific Gas and Electric Company

/s/ Sidney Bob Dietz II
Sidney Bob Dietz II
Director – Regulatory Relations

San Diego Gas & Electric Company

/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.: 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) #: 4950-E

Tier Designation: 2

Subject of AL: Joint Submittal of Proposed Modifications to the Emergency Load Reduction Program Pilot Pursuant to Decision 21-03-056, Decision 21-12-015, and Decision 21-12-069

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, Decision 21-12-015, and Decision 21-12-069

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: 2/16/23

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Connor Flanigan
Title: Managing Director, State Regulatory Operations
Utility/Entity Name: Southern California Edison Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: AdviceTariffManager@sce.com

Contact Name: Tara S. Kaushik c/o Karyn Gansecki
Title: Managing Director, Regulatory Relations
Utility/Entity Name: Southern California Edison Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: karyn.gansecki@sce.com

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

Clear Form

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 For Group A
(Sub-Groups A.1., A.2., A.3., A.4., and A.5.)
Pursuant to California Public Utilities
Commission Decisions 21-03-056,
21-06-027, 21-12-015, and 21-12-069

February 16, 2023

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Program Overview

As part of Rulemaking (R.) 20-11-003 (the Summer Reliability Rulemaking), on March 26, 2021, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 21-03-056, which (among other measures) approved the Emergency Load Reduction Program (ELRP) pilot, an out-of-market demand response (DR) resource. On June 25, 2021, as part of the same rulemaking, the Commission issued D.21-06-027, which added a day-of trigger for participants in “Group A” of the ELRP, as defined by D.21-03-056.

On August 2, 2021, the assigned Administrative Law Judge (ALJ) initiated Phase 2 of the Summer Reliability Rulemaking. On December 6, 2021, the Commission issued its final decision in Phase 2 of the rulemaking, D.21-12-015, which directs the investor-owned utilities (Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric (SDG&E) (collectively, the IOUs)) to take additional actions to prepare for potential extreme weather in the summers of 2022 and 2023, including modifications to the ELRP pilot. The Commission subsequently issued D.21-12-069, making minor corrections to D.21-12-015.

These Terms and Conditions of the ELRP pilot conform with the ELRP program parameters for Group A participants set forth in D.21-03-056, D.21-06-027, D.21-12-015, D.21-12-069 and their respective Attachments, and may change in whole or in part subject to CPUC approval. These Terms and Conditions are not applicable to Sub-Group A.6. (Residential ELRP, also known as the Power Saver Rewards Program), which are a separate Terms and Conditions document.¹ The ELRP will be administered by each IOU in its respective service territory. Any changes made to the ELRP Terms and Conditions will be published in revisions to this document and/or posted to SCE’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 SCE’s website and/or its ELRP Program Administrator’s website. SCE has engaged Olivine, Inc., using the ClimateResponse™ Technology Suite to be the Program Administer for the ELRP at this time. Information on ELRP is available at elrp.sce.com.

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

¹ SCE submitted Terms and Conditions for ELRP Sub-Group A.6. in Advice 4774-E on April 28, 2022.

Independent System Operator (CAISO) transmission system. The ELRP pilot became available on May 1, 2021 and is currently scheduled to end on October 31, 2025.

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 CAISO market obligations.

Participants (customers and aggregators) are required to affirm their intent to participate in ELRP and to accept these Terms and Conditions.

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, A.4, and A.5).²

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.³

Group A: Select Customers and Aggregators⁴

- Sub-Group A.1. – Non-Residential Customers
- Sub-Group A.2. – Aggregators of Non-Residential Customers
- Sub-Group A.3. – Rule 21 Exporting Distributed Energy Resources (DERs)
- Sub-Group A.4. – Virtual Power Plant (VPP) Aggregators
- Sub-Group A.5. – Vehicle Grid Integration (VGI) Aggregators

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:

- Customer's service account is classified as non-residential;⁵ and
- Customer's service account must be able to reduce load by a minimum of one kilowatt during an ELRP event; and
- Is not simultaneously enrolled in another DR program offered by SCE, a demand response provider (DRP), or a Community Choice Aggregator (CCA),

² SCE has submitted separate ELRP Terms and Conditions for Sub-Group A.6 in SCE Advice 4774-E.

³ Participation under these Terms and Conditions is subject to meter or meter programming availability. SCE is not required to install an interval meter and communication equipment or a SmartConnect™ meter to provide remote read capability if the installation is impractical or not economically feasible. Interval Metering equipment must be in operation for at least 10 calendar days prior to participation in ELRP. Direct Access (DA) and Community Choice Aggregation (CCA) customers shall be responsible for all costs incurred by SCE when the DA or CCA customer uses a third-party (i.e., external) Meter Data Management Agent (MDMA) and/or a third-party Meter Service Provider (MSP).

⁴ Unless specified, customers participating under these Terms and Conditions are not eligible to participate in another CAISO market integrated Demand Response (DR) program offered by SCE, a third-party demand response provider (DRP) or Community Choice Aggregator (CCA), such as the Demand Response Auction Mechanism (DRAM) Pilot or SCE's Aggregator Managed Portfolio (AMP) contracts which includes, but is not limited to, SCE's Local Capacity Resource (LCR), Preferred Resources Pilot (PRP), or Aliso Canyon Energy Storage (ACES) contracts.

⁵ Non-residential consists of commercial, industrial, agricultural, and small-to-medium business (SMB).

with the exception that dual enrollment in SCE's Base Interruptible Program (BIP), Agricultural and Pumping Interruptible (AP-I) program, or Summer Discount Plan Program-Commercial (SDP-C)⁶ 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. BIP-ELRP dual participants should also review the Special Conditions on compensation in [Section 3.2.1.3](#).

1.1.1.1 Enrollment Process for Sub-Group A.1.

Qualifying customers can directly apply and enroll online with SCE at elrp.sce.com. At the time of enrollment, or at designated times during the ELRP pilot, customers must nominate,⁷ unless exempt, an estimated target load reduction quantity to be achieved during an ELRP event, and, if applicable, will be asked to 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, and (4) the minimum notification time required to dispatch their 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.

1.1.1.2 Disenrollment Process for Sub-Group A.1.

A Customer may elect, or SCE may remove a Customer from these Terms and Conditions at any time. Sub-Group A.1. participants can disenroll from the ELRP by contacting the Program Administrator at support@elrp.sce.com with a written notice. The disenrollment will become effective within 30 days after the written notice is received.

⁶ The minimum size requirement is not applicable to SDP-C customers.

⁷ The amount of kW per hour (kWh) that a customer commits to reduce during an ELRP Event. The Customer's nominated load reduction amount will be for each hour of the ELRP Event. The nominated amount must be at least 1 kWh.

1.1.2 Sub-Group A.2. – Aggregators of Non-Residential Customers

Third-party, non-residential aggregators—including those participating in SCE’s Base Interruptible Program (BIP)—are eligible to participate in ELRP. Aggregators can only add bundled and unbundled non-residential service accounts for ELRP that meet the following criteria:

- Customer’s service account is classified as non-residential; and
- Customer’s service account is not simultaneously enrolled in another DR program offered by an IOU (with the exception of BIP), demand response provider (DRP), or Community Choice Aggregator (CCA).

BIP aggregators must enroll their entire BIP portfolio. If a BIP Aggregator chooses not to participate, its non-residential customers cannot independently participate in ELRP under Sub-Group A.1., unless their service account specific BIP firm service level can be determined.

For non-BIP aggregators, the aggregated resource capacity meets or exceeds 500 kW.

1.1.2.1 Application Process for Sub-Group A.2.

Sub-Group A.2 applicants can enroll online into the ELRP by contacting the Program Administrator at elrp.sce.com or contact support@elrp.sce.com.

At the time of enrollment, or at designated times during the ELRP pilot, nonresidential aggregators must nominate an estimated, portfolio load reduction quantity to be achieved during an ELRP event and will be asked to 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 minimum notification time required to dispatch their generator that may be used during ELRP events.

1.1.2.2 Disenrollment Process for Sub-Group A.2.

Sub-Group A.2 participants can disenroll from the ELRP by contacting the Program Administrator at support@elrp.sce.com. Disenrollment requests will be processed on an annual basis and requests must be received by April 15 of the program year otherwise, the disenrollment will not be effective until the following program year.

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

Bundled and unbundled non-residential customers⁸ 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; and
- 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.

1.1.3.1 Application Process for Sub-Group A.3.

Sub-Group A.3 applicants can enroll online into the ELRP by contacting the Program Administrator at elrp.sce.com.

At the time of enrollment, or at designated times during the ELRP pilot, the applicant must nominate, unless exempt, an estimated target load reduction quantity for each eligible account to be achieved during an ELRP event and, if applicable, will be asked to 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, and (4) the minimum notification time required to dispatch their generator that may be used during ELRP events.

1.1.3.2 Sub-Group A.3. Use of Virtual Aggregation

The use of a virtual aggregation may be elected by a customer at the time of enrollment. A virtual aggregation permits a customer with control over multiple electrically contiguous⁹ sites to aggregate the load and generation to fully utilize the sum of the net export allowed by any Rule 21 permit(s) associated with the

⁸ Net Energy Metering (NEM) customers that meet the requirements are eligible to participate.

⁹ Per D. 21-12-015, "Two sites are considered electrically contiguous when they have electric service derived from the same utility distribution transformer secondary and there are no devices on the utility distribution system that can interrupt power flow to only one site."

sites. Virtual Aggregation application will be reviewed and approved by SCE on a case-by-case basis.

1.1.3.3 Disenrollment Process for Sub-Group A.3.

A Customer may elect, or SCE may remove a Customer from these Terms and Conditions at any time. Sub-Group A.3. participants can disenroll from the ELRP by contacting the Program Administrator at support@elrp.sce.com with written notice. The disenrollment will become effective within 30 days after the written notice is received.

1.1.4 Sub-Group A.4. – Virtual Power Plant (VPP) Aggregators

A third-party aggregator managing a BTM hybrid Virtual Power Plant (VPP) consisting of storage paired with NEM solar or stand-alone storage deployed with residential (bundled or unbundled) or non-residential (bundled or unbundled) customers, whose VPP meet all of the following criteria, are eligible to 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, except for Summer Discount Plan Program or the Smart Energy Program (only when the VPP aggregator is using sub-metered data for settlements), a third-party DRP, or CCA; and
- All sites within the VPP aggregation are located within SCE's service territory; and
- The VPP aggregated capacity 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 permit and operates in a manner compliant with existing rules and tariffs applicable to the site.

1.1.4.1 Application Process for Sub-Group A.4.

Sub-Group A.4 applicants can enroll online into the ELRP by contacting the Program Administrator identified at elrp.sce.com or contact support@elrp.sce.com.

At the time of enrollment, or at designated times during the ELRP pilot, the VPP aggregator must nominate an estimated target load reduction for their VPP aggregation to be achieved during an ELRP event and, if applicable, will be asked to 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 minimum notification time required to dispatch their generator that may be used during ELRP events.

1.1.4.2 Disenrollment Process for Sub-Group A.4.

Sub-Group A.4 participants can disenroll from the ELRP by contacting the Program Administrator at support@elrp.sce.com. Disenrollment requests are processed on an annual basis and requests must be received by April 15 of the program year otherwise, the disenrollment will not be effective until the following program year.

1.1.5 Sub-Group A.5. – Vehicle Grid Integration (VGI) Aggregators

A VGI Aggregator managing an aggregation consisting of any combination of electric vehicles and charging stations, also known as Electric Vehicle Supply Equipment (EVSE) – including those that are capable of managed one-way charging (V1G) and bi-directional charging and discharging (V2G) deployed with residential (bundled or unbundled) or non-residential (bundled or unbundled) customers that meets all of the following criteria, is eligible to participate in ELRP:

- The VGI aggregation or any customer site within the aggregation is not simultaneously enrolled in a market-integrated, supply-side DR program offered by SCE, except for Summer Discount Plan Program or the Smart Energy Program (only when the VGI aggregator is using sub-metered data for settlements), a third-party DRP, or CCA; and
- All sites within the VGI aggregation are located within SCE's service territory; and
- All sites within the VGI aggregation have operational EVSE; and

- Sites within the VGI aggregation that intend to implement V2G must have UL 1741 SA¹⁰ certification, any subsequent UL 1741 supplement certification as required in Rule 21 or Smart Inverter Working-Group recommended smart inverter functions and satisfies all other Rule 21 interconnection requirements; and
- Sites within the VGI aggregation that intend to implement V2G must have a Rule 21 export permit and operate in a manner compliant with existing rules and tariffs applicable to the site; and
- The VGI aggregation can contribute Incremental Load Reduction (ILR) of at least 25 kW for at least one hour during an ELRP event.

NEM customers with electric vehicles meeting the above requirements are eligible to participate in the VGI aggregation.

1.1.5.1 Application Process for Sub-Group A.5.

Sub-Group A.5 applicants can enroll online into the ELRP by contacting the Program Administrator at elrp.sce.com or contact support@elrp.sce.com.

At the time of enrollment, or at designated times during the ELRP pilot, the VGI aggregator must nominate an estimated target load reduction quantity for their VGI aggregation to be achieved during an ELRP event and, if applicable, will be asked to 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 minimum notification time required to dispatch their generator that may be used during ELRP events.

1.1.5.2 Sub-Group A.5. Use of Virtual Aggregation

The use of a virtual aggregation may be elected by an aggregator at the time of enrollment. A virtual aggregation permits separately metered EVSE that have a Rule 21 Interconnection Agreement to be aggregated with other load and

¹⁰ Direct Current (DC) V2G EVSE that have UL 1741 certification, but not UL 1741 SA, may interconnect initially for the purposes of participating in the ELRP, subject to remaining Rule 21 interconnection requirements. SCE reserves the right to terminate this exception after the 2024 ELRP season via a Tier 2 Advice Letter filing. Termination of this pathway would not affect previously interconnected EVSE.

generation at an electrically contiguous¹¹ host site. This aggregation will allow export from the EVSE to reduce the host site's load. Such aggregation will permit an amount up to the sum of the net exports allowed by all available Rule 21 Interconnection Agreements pertaining to the EVSE site and the host site.

1.1.5.3 Disenrollment Process for Sub-Group A.5.

Sub-Group A.5 participants can disenroll from the ELRP by contacting the Program Administrator at support@elrp.sce.com. Disenrollment requests are processed on an annual basis and requests must be received by April 15 of the program year otherwise, the disenrollment will not be effective until the following program year.

¹¹ Per D. 21-12-015, "Two sites are considered electrically contiguous when they have electric service derived from the same utility distribution transformer secondary and there are no devices on the utility distribution system that can interrupt power flow to only one site."

2 Program Parameters

2.1 Program Availability

The ELRP has the following program parameters for all participants subject to these Terms and Conditions.

- 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 an “Energy Emergency Alert (EEA)”. The EEA process is defined by the CAISO Operating Procedure 4420.¹² The ELRP utilizes Day-Ahead (DA) and Day-Of (DO) triggers for participants subject to these Terms and Conditions.

Sub-groups with a minimum dispatch requirement—as specified in Section 3.3—may have additional program triggers in response to forecasted or anticipated grid stress conditions which may be utilized in order to achieve the minimum dispatch requirement.

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

2.2.1 Group A

SCE shall notify participants of the start time and duration of the ELRP event.

Notification can occur through email or text.¹³ Customers or participants with

¹² The EEA declarations under the North American Electric Reliability Corporation (NERC) EEA standards, are EEA Watch (day-ahead and day-of), EEA-1, EEA-2, and EEA-3.

¹³ ELRP Program Administrators, including SCE and Olivine, are not responsible for providing any costs associated with equipment or Communications that might aid participation in ELRP, including but not limited to devices, internet service, or text messages

connected Automated Demand Response (AutoDR or ADR) technology may also receive an AutoDR notification.

2.3 Sub-Group Minimum Dispatch

A minimum number of dispatch hours will be implemented within the program availability for sub-groups A.2 (Non-BIP), A.4 and A.5. The minimum dispatch hours for each sub-group are specified in the following table.

ELRP Sub-Group	Minimum Dispatch Hours
A.2. Non-Residential Aggregators (Non-BIP)	10
A.4. Virtual Power Plant Aggregators	10
A.5. Vehicle-Grid Integration Aggregators	10

2.4 Test Events

If an ELRP event or dispatch does not occur during the season, SCE will conduct one test event, with a two-hour duration, per year for Sub-Groups A.1. and A.3. Sub-Groups A.1. and A.3. participants, except for those relying exclusively on prohibited resources, are 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.

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.¹⁴ Only ILR is eligible for compensation under ELRP. If there is insufficient data that impacts SCE's ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations.

Any load reduction technology may be used during an ELRP event to achieve ILR.

Prohibited Resources¹⁵ may be used when permitted by a Governor's Executive Order and 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).

If applicable, SCE may withhold a Participant's ELRP incentives until data or information about the customers' back-up or onsite generation resources (i.e., Prohibited Resources) is provided. Data will be collected in 2021 and 2022. Participants are required to provide information about their back-up or onsite generation resources 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 minimum notification time required to dispatch their generator that may be used during ELRP events.

¹⁴ If dual participating, participants are not eligible to receive more than one incentive payment for the same interrupted/curtailed load.

¹⁵ Effective January 1, 2019, the following list of resources are prohibited in providing load reduction during demand response events: distributed generation technologies using diesel, natural gas, gasoline, propane, or liquefied petroleum gas, in topping cycle Combined Heat and Power (CHP) or non-CHP configuration (Prohibited Resources). The following resources are exempt from the prohibition: pressure reduction turbines and waste-heat-to-power bottoming cycle CHP, resources powered by fuel (e.g., renewable gas, renewable diesel, or biodiesel) that has received renewable certification from the California Air Resources Board, as well as energy storage resources not coupled with fossil fueled resources. Per D.21-03-056 Attachment 1 (p. 9, Footnote 3), as directed in Resolution E-4906 (see Ordering Paragraphs 45 and 47 at 104), customers previously using a prohibited resource fuel may switch the resource to a renewable fuel that has met CARB certification. Allowable fuels are those that have met the agency's [Low Carbon Fuel Standard \(LCFS\) Tier 2 Pathway](#).

3.1 Incentive Rate

The ELRP Compensation Rate (ECR) is \$2 per kilowatt-hour (\$2/kWh).

3.2 Incentive Calculation

Compensation for load reduction delivered during an ELRP event is determined by calculating the product of ILR and ECR. ELRP incentive calculations will be calculated within a reasonable timeframe and will be processed by March 31st of the next calendar year.¹⁶

Details are provided below.

3.2.1 Group A

All delivered ILR as a result of an ELRP event is eligible to receive compensation.

3.2.1.1 Baseline for Non-Residential Participants and Aggregations or Mixed Non-Residential and Residential Aggregations (Applicable to Sub-Groups A.1., A.2., A.3., A.4., and A.5).

Steps for calculating a participant's ELRP baseline, except for BIP-ELRP dual participants. For BIP-ELRP dual participants, see [Section 3.2.1.3.](#):

- 1) Calculate the Energy Baseline (EB) – A service account must have at least 10 similar days of interval meter data¹⁷ available in SCE's billing system or provided to SCE or its Program Administrator, if using sub-metered data, to have a valid EB. 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 be calculated at the service account level for customers directly enrolled in ELRP. The EB and AEB for customers enrolled through an aggregator will be calculated at the aggregated level.

The EB and AEB will be calculated on an hourly basis using the average of the preceding *similar* days,¹⁸ excluding those days when the customer: (1) was subject to an ELRP event, or (2) an event for a dual-enrolled DR program (e.g. BIP, AP-I, SDP-C), if applicable, or (3) was

¹⁶ ELRP incentives to directly enrolled customers will be in the form of a bill credit. Aggregators will receive a check.

¹⁷ Interval meter data should be complete and validated.

¹⁸ 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.

subject to a grid outage. CPP and RTP event days will not be excluded from the *similar* days in order to capture incrementality for ILR.¹⁹

- 3) Calculate the Day-Of Adjustment Value (DOAV)²⁰ – A DOAV 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 days selected in accordance with Step 2 above. If either (a) or (b) are negative, the DOA is 1.0.
- 4) Calculate the Adjusted Energy Baseline (AEB) – When the EB is greater than zero, the AEB will be calculated by multiplying the EB by the DOAV. There is no AEB when the EB is less than zero.

3.2.1.2 Baseline for Residential Aggregations (Applicable to Sub-Groups A.4. and A.5).

Steps for calculating a residential aggregation's ELRP baseline:

- 1) Calculate the Energy Baseline (EB) – To be included in the aggregation, the service account must have at least 10 similar days of interval meter data²¹ available in SCE's billing system or provided to SCE or its Program Administrator, if using sub-metered data, to have a valid EB. 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 be calculated at the service account level for customers directly enrolled in ELRP. The EB and AEB for customers enrolled through an aggregator will be calculated at the aggregated level.

The EB and AEB will be calculated on an hourly basis using the average²² of the preceding *similar* days,²³ excluding those days when

¹⁹ For CPP and RTP dual participants, see [Section 3.2.1.2.\(2\)](#).

²⁰ sub-metered data is used for baseline calculations.

²¹ Interval meter data should be complete and validated.

²² A simple average shall be used for 5-in-10 baseline and a weighted average shall be used for 3-in-5 baseline calculations

²³ For weekday events, the 5 highest of the 10 non-excluded weekdays will be selected; for weekend and holiday events, the 3 highest of the 5 non-excluded weekend and holiday days will be selected.

the customer: (1) was subject to an ELRP event, or (2) an event for a dual-enrolled DR program, if applicable, or (3) was subject to a grid outage. CPP and RTP event days will not be excluded from the *similar* days to capture incrementality for ILR.

- 3) Calculate the Day-Of Adjustment Value (DOAV)²⁴ – A DOAV 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 two hours of the four hours prior to the ELRP Event and the average of the last two of the four hours after the ELRP Event²⁵ to (b) the average load of the same hours from the days selected in accordance with Step 2 above. If either (a) or (b) are negative, the DOA is 1.0.
- 4) Calculate the Adjusted Energy Baseline (AEB) – when the EB is greater than zero, the AEB will be calculated by multiplying the EB by the DOA. There is no AEB when the EB is less than zero.

3.2.1.3 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. The EB for BIP and ELRP dual participants is their FSL; no adjustments are applied.
 - a. Load reduction by dual-enrolled BIP customers during an ELRP event outside of a BIP event is included in ILR. Baselines and settlements shall be the same as [Section 3.2.1.1](#) for performance intervals prior to and/or after the BIP event.²⁶

²⁴ The adjustment factor will be 1.0 if sub-metered data is used for baseline calculations.

²⁵ The post-event DOAV shall be restricted to the hours falling within the same calendar day (i.e. for an event ending at 9pm the post-event DOAV will only consider the hour 23-24.)

²⁶ If an ELRP event (e.g. 4-9pm) and a BIP event (6:47pm-8:13pm) occurs on the same day, the ELRP performance intervals for the non-overlapping hours would be 4pm-6:45pm and 8:15pm-9pm. The 6:45-8:15pm period would be subject to the ELRP Group A Special Conditions for BIP-ELRP overlapping events.

- b. Load reduction by dual-enrolled BIP customers during an ELRP event on a day with no BIP event is included in ILR. Baselines and settlements shall be the same as [Section 3.2.1.1.](#)
- 2) For Sub-Group A.3. participants on a CPP or RTP equivalent tariff, the ELRP baseline is deemed to be zero and only exported energy is counted in ILR. For Sub-Groups A.1., A.2., A.4., and A.5. customers on a CPP or RTP equivalent tariff, any ILR during overlapping event hours are attributed to ELRP.
- 3) If the customer has a Rule 21 interconnected device with export capability and permit, the customer may choose and elect to count exported energy in ILR. If elected, the applicable ELRP baseline is modified to account for exported energy during non-event days and count exported energy in ILR.²⁷

3.2.1.4 ILR Settlements Calculation for Sub-Group A.1.

The service account's AEB, defined in [Section 3.2.1.1.](#), is utilized and modified to account for Special Conditions in [Section 3.2.1.3.](#), if applicable. ILR is calculated as the difference between the service account's AEB and the recorded kWh for each hour during an ELRP Event.

ELRP participants that are also enrolled in BIP can only receive an ELRP incentive in accordance with the Special Conditions in [Section 3.2.1.3.](#)

ELRP participants that are also enrolled in AP-I or SDP-C can only receive an ELRP incentive for hours when an ELRP Event does not coincide or overlap with an AP-I or SDP-C Event and meet the requirements in in [Section 3.2.1.3.](#) Any ILR during overlapping ELRP and AP-I/SDP-C event hours are attributed to AP-I/SDP-C.

²⁷ Energy usage and exported energy data are collected in "Channel 1" and "Channel 2," respectively, in SCE's billing system, unless an Aggregator elects to use sub-metered data, then this calculation is subject to the provisions in the ELRP Aggregator Agreement. If a customer elects to count exported energy in ILR, Channel 1 and Channel 2 data will be netted to determine net usage or exports for a given ELRP event hour.

3.2.1.5 ILR Settlements Calculation for Sub-Group A.2.

The aggregator's AEB, defined in [Sections 3.2.1.1.](#), is utilized and modified to account for Special Conditions in [Section 3.2.1.3.](#), if applicable. ILR is calculated as the difference between the aggregated AEB and the aggregated recorded kWh for each hour during an ELRP Event.

3.2.1.6 ILR Settlements Calculation for Sub-Group A.3.

The service account's AEB, defined in [Section 3.2.1.1.](#), is utilized and modified to account for Special Conditions in [Section 3.2.1.3.](#), if applicable. ILR is calculated as the difference between the service account's AEB and the recorded kWh for each hour during an ELRP Event, unless the customer is a Rule 21 Exporting DER and is on a CPP or RTP equivalent tariff, in which case the ELRP baseline and the AEB are zero and all exported energy is counted as the service account's ILR.

3.2.1.7 ILR Settlements Calculation for Sub-Group A.4.

The aggregator's AEB, defined in [Section 3.2.1.1.](#) and [Section 3.2.1.2.](#), is utilized and modified to account for Special Conditions in [Section 3.2.1.3.](#), if applicable. ILR is calculated as the difference between the aggregated AEB and the aggregated recorded kWh for each hour during an ELRP Event.

The baseline method may be used in conjunction with a meter or a sub-meter embedded within a storage system (such as, an internal sub-meter within the battery inverter) that directly measures the energy flows into/out of the storage device to determine the ILR for the ELRP settlement.²⁸ The election to utilize submetering will apply to all locations within a single aggregation.

3.2.1.8 ILR Settlements Calculation for Sub-Group A.5.

The aggregator's AEB, defined in [Section 3.2.1.1.](#) and [Section 3.2.1.2.](#), is utilized and modified to account for Special Conditions in [Section 3.2.1.3.](#), if applicable. ILR is calculated as the difference between the aggregated AEB and the aggregated recorded kWh for each hour during an ELRP Event.

²⁸ Aggregators that elect to use sub-meter data for settlement purposes shall comply with submetering requirements and provisions in the ELRP Aggregator Agreement.

An EVSE meter or EVSE sub-meter if the EVSE is taking service through the host site meter, may be used to determine the ILR for ELRP settlement.²⁹ Upon adoption by the CPUC, EVSE sub-meter must meet applicable standards established by the CPUC. The election to utilize submetering will apply to all locations within a single aggregation.

²⁹ Aggregators that elect to use EVSE meter or sub-meter data for settlement purposes shall comply with submetering requirements and provisions in the ELRP Aggregator Agreement.

ATTACHMENT B

Southern California Edison Company
Power Saver Rewards - Residential Customers

Participation Terms and Conditions

Thank you for your participation in the Southern California Edison Company (“SCE”) Power Saver Rewards (“PSR”) Program, implemented by Olivine, Inc. (“Olivine”) via ClimateResponse™ on behalf of SCE. Participation is subject to these Participation Terms and Conditions (“Terms”). Customers participating in the PSR Program are referred to herein as “Participants.”

The PSR Program was approved by the California Public Utilities Commission (“CPUC”) in Decision 21-12-015, issued on December 6, 2021. The PSR Program is SCE’s program for the residential sub-group (Sub-Group A.6.) of the Emergency Load Reduction Program (ELRP) Pilot. The CPUC’s Energy Division approved SCE’s PSR Program parameters (as described in SCE Advice Letter 4709-E-A) on April 18, 2022.

1. **The PSR Program.** The PSR Program includes Participants who have been automatically enrolled or who elect to enroll in the Pilot as defined below. SCE will use each PSR Program Participant’s interval meter data to measure Incremental Load Reduction during PSR Program Events. Participants will perform during designated events by lowering their energy usage. The goal of the PSR Program is to provide relief to the electricity grid in times of high demand.
2. **Participant Eligibility.** Minimum eligibility requirements (subject to SCE’s discretion as to allowed Participants) include:
 - i. Participants must receive their electric service on a residential rate. Schedules TOU-EV-1, DM, DMS-1, DMS-2, and DMS-3 are not eligible rate schedules for the PSR Program.
 - ii. Participants must have an active service agreement with SCE.
 - iii. Participants must have an SCE interval or SmartConnect™ meter.
 - iv. Participants must not be simultaneously enrolled in another ELRP subgroup or in any market-integrated demand response (“DR”) program offered by SCE, a third-party DR provider (“DRP”), or a Community Choice Aggregator (“CCA”).
 - v. Participants may not be customers of a CCA that has opted out of being included in the ELRP.
3. **PSR Program Enrollment.** The PSR Program (as part of the ELRP) is currently authorized to operate from May through October in the years 2021-2025. Enrollment will remain available subject to these Terms. SCE may terminate a Participant’s enrollment at any time and enrollment may also be affected by eligibility changes.

4. **PSR Program Events.** As needed, PSR Program Events (“Events”) will be triggered one day ahead based on Emergency Energy Alerts and/or Flex Alerts issued by the California Independent System Operator (CAISO). Events may occur any day of the week, including weekends and holidays, from May 1 through October 31 and will be between the hours of 4:00 PM and 9:00 PM for each Event.
5. **PSR Program Incentives.** Participants who participate in Events will receive a yearly incentive based on their demonstrated performance. The incentive value has been set by the CPUC at \$2 per kilowatt hour, measured based on Participants’ Incremental Load Reduction during Events. SCE will calculate Incremental Load Reduction based upon the Participants’ Adjusted Energy Baseline, as described in subsections 5.i-ii in these Terms. It is likely that SCE or Olivine will calculate PSR Program Incentives at the end of each calendar year and pay incentives as a bill credit in the following calendar year. If there is insufficient data that impacts SCE ability to calculate ILR, the participant may not receive an incentive or may be excluded from ILR calculations.
 - i. **Incremental Load Reduction.** Incremental Load Reduction is calculated as the difference between Participant’s hourly usage across the hours and the Participant’s average hourly Adjusted Energy Baseline for each PSR Program Event.
 - ii. **Adjusted Energy Baseline.** Participant’s Adjusted Energy Baseline will be calculated using the 5-in-10 baseline approach with a 40% Same Day Adjustment for weekday events and a 3-in-5 baseline approach with a 40% Same Day Adjustment for events that occur on a weekend or holiday.
 - a) 5-in-10 Similar Day Baseline are the five (5) days with the Highest Total Usage from the most recent ten (10) non-holiday weekdays in which Participant was not subject to an Event or a grid outage.
 - b) 3-in-5 Similar Day Baseline are the three (3) days with the Highest Total Usage days from the most recent five (5) weekend and holiday days in which Participant was not subject to an Event or a grid outage.
 - c) Highest Total Usage is measured in kilowatt hours (kWh) and is the sum of kilowatts (kW) for each hour during the period of 4:00 PM through 9:00 PM.
 - d) The Participant’s Energy Baseline (EB) will be calculated for each Event Hour.
 - i. The Energy Baseline for weekday Events is the hourly average of Participant’s energy usage on baseline days identified in subsection 5.ii.a.

- ii. The Energy Baseline for weekend or holiday Events is an hourly weighted average of the load on baseline days, identified in subsection 5.ii.b., described as follows:

Weekend/Holiday Event Energy Baseline = (Load during Event hour on most recent baseline day x 0.5) + (Load during Event hour on second most recent baseline day x 0.3) + (Load during Event hour on third most recent baseline day x 0.2)

- e) Same Day Adjustment (SDA) is a ratio of (1) the average load of the first two hours of the four hours prior to the Event (Start Time – 4 hours to Start Time – 2 hours) and the average load of the two hours succeeding the two hours after the event (End Time + 2 to End Time + 4) to (2) the average load of the same hours from the baseline days identified in subsection 5.ii.a. (for weekday Events) or 5.ii.b. (for weekend/holiday Events). The SDA shall not be less than 0.6 or greater than 1.4. Given Events end at 9 PM, the post event adjustment only includes 11 PM to 12 AM (End Time + 2 hours to End Time + 3 hours).
- f) The Adjusted Energy Baseline (AEB) is calculated as a factor of the Participant's Energy Baseline multiplied by the Same Day Adjustment (e.g. $AEB = EB \times SDA$).

6. Communications. Participants may receive Event notifications and other communications regarding the PSR Program by authorizing SCE or its Implementer, Olivine, to send such communications to an email address and/or a cell phone number, or by downloading a mobile application for the PSR Program through the App Store or Google Play. Participants have the option to provide an email address or cell phone number for communications regarding the PSR Program. Participants may unsubscribe from communications by following instructions in event notifications or as directed on SCE's website. A change in communication preferences may take up to 10 days for SCE to implement.

7. Consent by Participant to Share Information. Under these Terms, Participant authorizes SCE and/or Olivine to:

- i. collect and exchange data related to your identity, your participation status, your energy usage and/or energy production, your SCE account, and your electric bill, solely for the purposes of determining your eligibility for the PSR Program;

- ii. send you emails, text messages, pre-recorded messages and other notifications related to the PSR Program and other relevant programs, including about your enrollment status;
 - iii. send you emails, text messages, pre-recorded messages and other notifications related to surveys about the PSR Program and to share your responses to such surveys;
 - iv. summarize the results of the PSR Program in publicly-available studies, provided that any program data included in such studies will be anonymous such that you are not individually identifiable; and
 - v. Utility has the discretion to change vendors at any time without advance notice or consent from Participants, upon which Participants would be automatically transferred to new elected vendor and subject to the then-current Terms for the PSR Program.
8. **Residential Customers Only.** The PSR Program is offered ONLY to residential customers located in SCE's service territory. Commercial customers interested in participating in the Energy Load Reduction Program (ELRP) should explore other sub-groups for options by going to the ELRP Olivine website (elrp.sce.com).
9. **Costs.** SCE and Olivine are not responsible for providing any costs associated with equipment or Communications that might aid participation in the PSR Program, including but not limited to devices, internet service, or text messages.
10. **No Warranty; Disclaimer.** SCE and Olivine expressly disclaim all warranties of any kind relating to the PSR Program, whether express, implied or statutory (including, without limitation, any implied warranties for conditions or merchantability, fitness for a particular purpose, title, non-infringement or misappropriation of intellectual property rights).
11. **Limitation of Liability.** To the fullest extent permitted by applicable law, under no circumstances shall SCE or Olivine be liable for any indirect, incidental, special, or consequential damages, arising in connection with the PSR Program. If any of the Participants are dissatisfied with the Pilot, object to any of these Terms, or believe Olivine or SCE has breached these Terms in any way, that Participant's sole and exclusive remedy is to discontinue participation in the PSR Program.
12. **PSR Program Participation Termination.**
- i. **Termination By SCE.** SCE has the sole discretion to terminate the PSR Program, or any customer's participation in the PSR Program, at any time without cause by providing written notice.

- ii. A customer participating in the PSR Program is permitted, at any time, to enroll in any market-integrated DR program offered by SCE, a DRP, or a CCA. Should SCE become aware that any participating customer's service account has been enrolled in a market-integrated DR program, SCE will unenroll the service account from the PSR Program.
- iii. Termination by Participant. Participant may terminate their enrollment in the PSR Program at any time for any reason by going to the PSR Olivine website (powersaver.sce.com).

13. General.

- i. *Entire Agreement.* These Terms are the entire agreement between SCE, Olivine and Participants concerning eligibility and participation requirements with respect to the PSR Program.
- ii. *No Assignment.* These Terms may not be assigned by Participant without SCE's prior written consent.
- iii. *Severability and Waiver.* If any provision herein is invalid or unenforceable, the remaining provisions will remain in full force and effect.
- iv. *CPUC Jurisdiction.* These Terms shall be subject to all legal and regulatory requirements applicable to the PSR Program (including, without limitation, any decisions, orders or rules of the CPUC).
- v. *Amendments.* These Terms may be changed by SCE from time to time and any changes will be published in revisions to this document and/or posted to SCE's or Olivine's website.

14. Privacy Notice. By participating in the Program, Participant agrees that SCE and its vendors can collect Participant's personal information or data and that if they cannot collect the required information or data, Participant may not be eligible to participate in the PSR Program. SCE and its vendors will protect Participant's personal information and usage data consistent with these Terms and each company's then-current privacy policy.

ATTACHMENT C

Southern California Edison Company
Emergency Load Reduction Program
(ELRP) Pilot Terms and Conditions for
Group B Pursuant to California Public
Utilities Commission Decisions 21-03-056
and 21-12-015

February 16, 2023

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Program Overview

As part of Rulemaking (R.) 20-11-003 (the Summer Reliability Rulemaking), on March 26, 2021, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 21-03-056, which (among other measures) approved the Emergency Load Reduction Program (ELRP) pilot, an out-of-market demand response (DR) resource.

On August 2, 2021, the assigned Administrative Law Judge (ALJ) initiated Phase 2 of the Summer Reliability Rulemaking. On December 6, 2021, the Commission issued its final decision in Phase 2 of the rulemaking, D.21-12-015, which directs the investor-owned utilities (Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric (SDG&E) (collectively, the IOUs)) to take additional actions to prepare for potential extreme weather in the summers of 2022 and 2023, including modifications to the ELRP pilot. The Commission subsequently issued D.21-12-069, making minor corrections to D.21-12-015.

These Terms and Conditions of the ELRP pilot conform with the ELRP program parameters for “Group B” ELRP participants set forth in D.21-03-056, D.21-12-015, and their respective Attachments, and may change in whole or in part subject to CPUC approval. The ELRP will be administered by each IOU in its respective service territory. Any changes made to the ELRP Terms and Conditions will be published in revisions to this document and/or posted to SCE’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 SCE’s website and/or its ELRP Program Administrator’s website. SCE has engaged Olivine, Inc., using the ClimateResponse™ Technology Suite to be the Program Administer for the ELRP at this time. Information on ELRP is available at elrp.sce.com.

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 became available on May 1, 2021 and is currently scheduled to end on October 31, 2025.

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 CAISO market obligations.

Acceptance of Terms and Conditions

All third-party entities are requested to affirm intent to participate in ELRP and to accept these Terms and Conditions for ELRP participation.

Group B

ELRP eligible participants are divided into two sub-groups under Group B with both subgroups comprised of market integrated Proxy Demand Response resources as shown.

- Sub-Group B.1 – Third-Party DR Provider (DRP)
- Sub-Group B.2 – Capacity Bidding Program (CBP)

Sub-Group B.1

Third-party DRPs involved with Sub-Group B.1 are requested to affirm intent to participate in ELRP,¹ including acceptance of Terms and Conditions and any agreements that may be developed to support third-party DRP participation in ELRP and may be able to receive courtesy ELRP event notifications.² Otherwise, Third-party DR Providers must accept Terms and Conditions and any agreements that are developed by the time they submit their invoices for processing by SCE.

Sub-Group B.2

Capacity Bidding Program (CBP) Aggregators or Participants involved with Sub-Group B.2 are requested to accept the Terms and Conditions and any Agreements³ that may be developed to support CBP enrollment in ELRP.

¹ Affirmation of intent to participate in ELRP requires executing the *Provisional Agreement for BIP Aggregators and "Group B" Participants in the Emergency Load Reduction Program*.

² Event notifications do not replace event triggers in these Terms and Conditions. It is the third-party DRP's responsibility for ensuring that ELRP events for its ELRP invoices meet the requirements in these Terms and Conditions. ELRP Program Administrators, including SCE and Olivine, are not responsible for providing any costs associated with equipment or Communications that might aid participation in ELRP, including but not limited to devices, internet service, or text messages.

³ Agreements include the *Provisional Agreement for BIP Aggregators and "Group B" Participants in the Emergency Load Reduction Program*.

1 Program Eligibility and Enrollment

1.1 Program Participant Criteria

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.⁴

1.1.1 Sub-Group B.1. – Third-Party DRPs

A third-party DRP with a market-integrated PDR resource is eligible to participate in ELRP.

1.1.1.1 Application Process for Sub-Group B.1.

Sub-Group B.1 applicants can enroll into the ELRP by contacting the Program Administrator, at support@elrp.sce.com.

At the time of enrollment, or at designated times during the ELRP pilot, Group B participants will list the Proxy Demand Resources (PDRs) that will participate in ELRP and nominate an estimated target load reduction quantity (August) to be achieved during an ELRP event by each participating PDR resource.

The third-party DRP will be asked to provide information about their customers' 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 minimum notification time required to dispatch the generator that may be used during ELRP events at the time of invoicing.

1.1.2 Sub-Group B.2. – CBP Aggregators

Third-party aggregators (Aggregators) or self-aggregated customers (Participants) participating in SCE's Capacity Bidding Program (CBP) are eligible to participate in ELRP. A service account is only eligible to participate in ELRP if the account has been nominated and bid during the ELRP operating month.

⁴ Participation under these Terms and Conditions is subject to meter or meter programming availability. SCE is not required to install an interval meter and communication equipment or a SmartConnect™ meter to provide remote read capability if the installation is impractical or not economically feasible. Interval Metering equipment must be in operation for at least 10 calendar days prior to participation in ELRP. Direct Access (DA) and Community Choice Aggregation (CCA) customers shall be responsible for all costs incurred by SCE when the DA or CCA customer uses a third-party (i.e., external) Meter Data Management Agent (MDMA) and/or a third-party Meter Service Provider (MSP).

1.1.2.1 Application Process for Sub-Group B.2.

Sub-Group B.2 applicants can enroll into the ELRP by contacting the Program Administrator, support@elrp.sce.com.

At the time of enrollment, or at designated times during the ELRP pilot, CBP participants will list CBP nominated accounts that will participate in ELRP and provide an estimated target load reduction quantity (August) to be achieved during an ELRP event for those CBP nominated accounts.

At the time of enrollment, or at designated times during the ELRP pilot, the CBP Aggregator or Participant may be asked to provide information about their customer's 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 minimum notification time required to dispatch 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 subject to these Terms and Conditions.

- 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

The ELRP shall be activated after the CAISO issues or declares an “Energy Emergency Alert (EEA)”. The EEA process is defined by CAISO Operating Procedure 4420.⁵ Group B participants utilize Day-Ahead (DA) Alert and Day-Of (DO) triggers for ELRP.

2.3 Group B Notification

An ELRP event for Group B participants is activated after the CAISO issues or declares a DA Alert or DO trigger. The start time and duration are specified in the CAISO Alert notice and is limited to the parameters set forth in [Section 2.1](#) “Program Availability” above. Parties that have affirmed their intent to participate, including acceptance of these Terms and Conditions and any agreements would be eligible to receive courtesy ELRP notifications⁶ from the Program Administrator (Olivine).

2.4 Test Events

Group B is not subject to ELRP Test Events.

⁵ The EEA declarations under the North American Electric Reliability Corporation (NERC) EEA standards are EEA Watch (day-ahead and day-of), EEA-1, EEA-2, and EEA-3.

⁶ ELRP Program Administrators, including SCE and Olivine, are not responsible for providing any costs associated with equipment or Communications that might aid participation in ELRP, including but not limited to devices, internet service, or text messages.

3 Compensation

Participation during an ELRP event is entirely voluntary, and no financial penalties will result from not achieving 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. If there is insufficient data that impacts the ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations.

Any load reduction technology may be used during an ELRP event to achieve ILR.

Prohibited Resources⁷ may be used when permitted by a Governor's Executive Order and 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).

If applicable, SCE may withhold a Participant's ELRP incentives until data or information about the customers' back-up or onsite generation resources (i.e., Prohibited Resources) is provided. Participants will be asked to provide information about the location, type of fuel used, the capacity of the generator, and the minimum notification time required to dispatch the generator that may be used during ELRP events.

3.1 Incentive Rate

The ELRP Compensation Rate (ECR) is \$2 per kilowatt-hour (\$2/kWh).

⁷ Effective January 1, 2019, the following list of resources are prohibited in providing load reduction during demand response events: distributed generation technologies using diesel, natural gas, gasoline, propane, or liquefied petroleum gas, in topping cycle Combined Heat and Power (CHP) or non-CHP configuration (Prohibited Resources). The following resources are exempt from the prohibition: pressure reduction turbines and waste-heat-to-power bottoming cycle CHP, resources powered by fuel (e.g., renewable gas, renewable diesel, or biodiesel) that has received renewable certification from the California Air Resources Board, as well as energy storage resources not coupled with fossil fueled resources. Per D.21-03-056 Attachment 1 (p. 9, Footnote 3), as directed in Resolution E-4906 (see Ordering Paragraphs 45 and 47 at 104), customers previously using a prohibited resource fuel may switch the resource to a renewable fuel that has met CARB certification. Allowable fuels are those that have met the agency's [Low Carbon Fuel Standard \(LCFS\) Tier 2 Pathway](#).

3.2 Incentive Calculation

Compensation for load reduction delivered during an ELRP event is determined by calculating the product of ILR and ECR. The ILR is determined using the prescribed baseline per [Section 3.2.1](#), and the ILR settlement methodology per [Section 3.2.2](#), for Sub-Group B.1, and [Section 3.2.3](#), for Sub-Group B.2. Payments associated with Group B varies between B.1, and B.2, as described in [Section 3.2.4](#).

3.2.1 Baseline Methodology for Group B (B.1. and B.2.)

3.2.1.1 *Baseline Methodology for Sub-Group B.1 (Third Party DRPs)*

To construct the ELRP baseline for measuring a sub-group B.1 PDR's ILR contribution during an ELRP event, the applicable CAISO baseline can be modified to account for the following:

- 1) Count net exports to the distribution grid by customer locations within the PDR aggregation that comply with Rule 21 and other applicable permits;
- 2) Exclude prior days with other ELRP events when selecting the set of “nonevent, but similar” days used to calculate the baseline;
- 3) Exclude applicable preceding hours with either CAISO market awards or another ELRP event on the day of the ELRP event when calculating the same-day adjustment (SDA) to the calculated baseline in Step 2 above; and
- 4) Allow the SDA in Step 3 to be no greater than 100%.

3.2.1.2 *Baseline Methodology for Sub-Group B.2 (CBP Aggregators)*

To construct the ELRP baseline for measuring a Sub-group B.2 Aggregation's ILR contribution during an ELRP event, the applicable CBP baseline will be modified to account for the following:

- 1) Count net exports to the distribution grid by customer locations within the CBP aggregation that comply with Rule 21 and other applicable permits;
- 2) Exclude prior days with other ELRP events when selecting the set of “non-event, but similar” days when calculating the baseline;

- 3) Exclude hours with either CBP events or another ELRP event on the day of the ELRP event from the same-day adjustment (SDA) hours, and
- 4) Since the Energy Baseline (EB) and Adjusted Energy Baseline (AEB) in SCE's Schedule CBP do not account for weekend and holiday events, a 4-in-4 similar day baseline and 3-in-5 similar day baseline will apply for CBP non-residential and residential accounts, respectively.

3.2.2 ILR Settlements Calculation for Group B (B.1 and B.2)

Settlements for eligible Group B participants will be calculated in the manner described below.

3.2.2.1 Settlement Calculation for Sub-Group B.1 (Third Party DRPs)

For participation in ELRP under Sub-Group B.1., a DRP must construct a PDR Portfolio consisting of only 1) PDRs with RA assignment or PDRs without RA assignment (but not both), and 2) PDRs limited to SCE's service territory.

The CAISO settled aggregated load during an ELRP event may be modified to count net energy exported to the distribution grid by any customer location within the PDR aggregation, subject to each customer's *net* exporting limit under its Rule 21 interconnection agreement and adherence to each customer's Net Energy Metering tariff, as applicable.

Following an ELRP event, the DRP's scheduling coordinator (SC) is responsible for determining the following:

- 1) ELRP Event Performance (total load reduction during the ELRP Event) of each PDR in the DRP's PDR Portfolio by applying the applicable ELRP modified baseline to the PDR's modified aggregated load settled during the ELRP event.
- 2) ILR of each PDR by subtracting the CAISO scheduled award quantities, inclusive of day-ahead market (DAM) and real-time market (RTM), from the PDR's ELRP Event Performance. If the total market award for the PDR during the ELRP event is zero, then ILR of the PDR equals the ELRP Event Performance.

3) The ELRP Event Compensation due for each PDR by adding all interval-specific ELRP Compensations across all applicable intervals of the ELRP event, subject to the following:

a) The interval-specific ELRP Compensation in each applicable interval of the ELRP event is obtained by subtracting 1) any CAISO market payments for any portion of the load reduction counted in the interval-specific ILR and 2) the interval-specific CAISO Opportunistic Revenue (COR), defined below, from 3) the interval-specific Product of the ECR and the interval-specific ILR (see illustration below).

If the interval-specific ILR is negative, then the interval-specific ELRP Compensation is set to zero in that interval.

If the interval-specific COR is greater than the interval-specific Product, then the interval-specific ELRP Compensation is set to zero in that interval.

b) The interval-specific COR is the product of the interval-specific Market Eligible Capacity (MEC) (defined below based on the interval-specific CAISO Market Event Performance (MEP) determined under applicable CAISO market baseline) and the interval-specific CAISO Clearing Price Delta (CCPD) (also defined below).

i. Market Eligible Capacity (MEC):

1. If the total CAISO scheduled award quantity in an interval is non-zero and the interval-specific MEP is less than or equal to the total CAISO scheduled award quantity in the interval, then the interval-specific MEC is set to zero.
2. If the total CAISO scheduled award quantity in an interval is non-zero and if the interval-specific MEP is greater than the total CAISO scheduled award quantity in the interval and less than or equal to the Qualifying

Capacity (QC)⁸ of the PDR in that interval, then the interval-specific MEC is equal to the interval-specific MEP minus the interval-specific total CAISO scheduled award quantity.

3. If the total CAISO scheduled award quantity in an interval is non-zero 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.

If the total CAISO scheduled award quantity in an interval is zero, then the interval-specific MEP in the above cases is set to the interval-specific ILR.

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. Additionally, if the PMin value is less than the total CAISO scheduled award quantity in an interval, then the interval-specific MEC is set to zero.

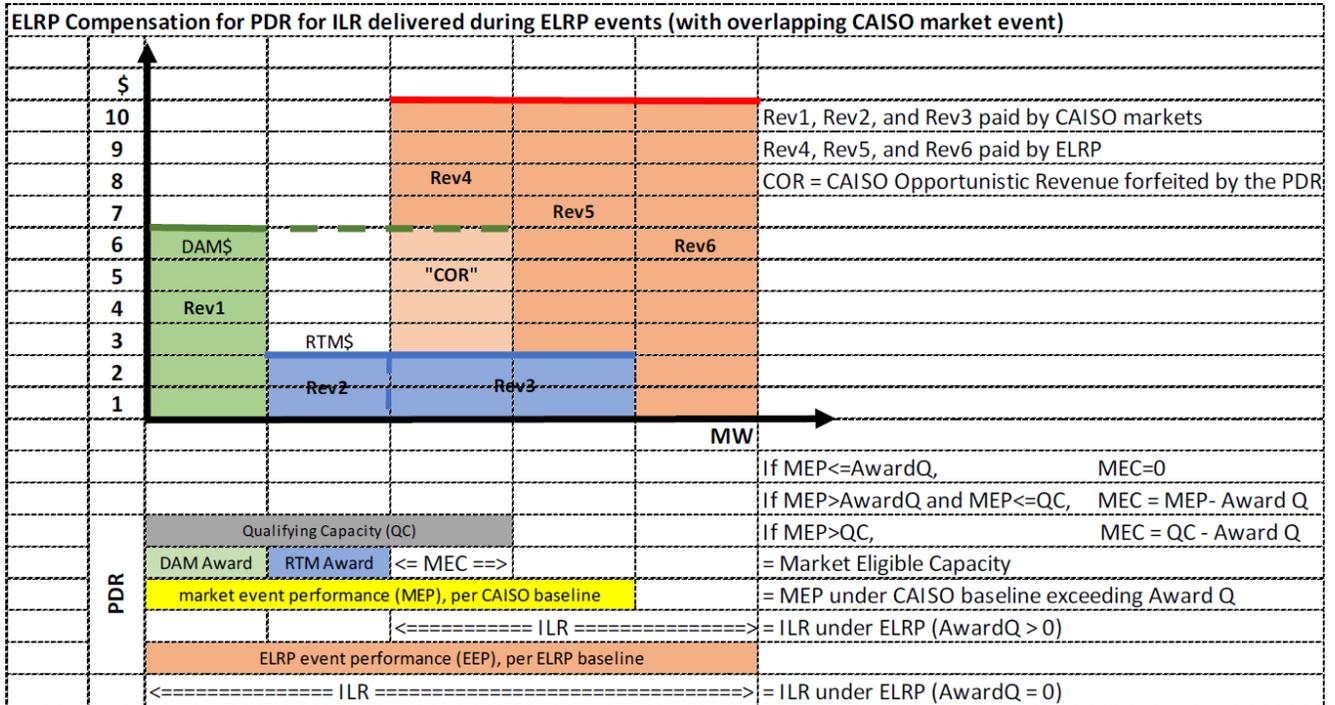
ii. CAISO Clearing Price Delta (CCPD):

For a PDR participating in the DAM only (that is, "longstart" PDR), the interval-specific CCPD is the DAM clearing price in that interval.

For a PDR participating in the RTM, the interval-specific CCPD is equal to the higher of the DAM or RTM clearing price in that interval minus the lower of the DAM or RTM clearing price in that interval.

1. PDR Portfolio Level Net Event Compensation across all PDRs in the DRP's Portfolio.

⁸ The QC value is defined as the Supply Plan quantity.



3.2.2.2 Settlements Calculation for Sub-Group B.2. (CBP Aggregators and Participants)

The following steps are used for calculating the settlement amount for a CBP aggregation:

- 1) Determine the ELRP Event Performance (total incremental load reduction during the ELRP event) for each Resource by applying the applicable ELRP modified baseline to the aggregation's load.
- 2) Determine the ELRP ILR for each Resource by subtracting the CBP nomination from the Resource's ELRP Event Performance. If a CBP Resource was not dispatched during the ELRP event, then the ILR of the aggregation equals the ELRP Event Performance.
- 3) The ELRP Event Compensation due for each Resource is calculated by adding all interval-specific ELRP Compensations across all applicable intervals of the ELRP event, subject to the following:

The interval-specific ELRP Compensation in each applicable interval of the ELRP event is obtained by subtracting any CBP energy payments for any portion of the load reduction counted in the ELRP interval-specific ILR from the interval-specific Product of the ECR and the interval-specific

ELRP ILR. If the interval-specific ILR is negative, then the interval-specific ELRP Compensation is set to zero in that interval.

3.2.3 Payment for Group B (B.1. and B.2.)

Eligible Group B participants will be compensated in the manner described below.

3.2.3.1 Payment for Group B (B.1. and B.2.)

The third-party DRP for each PDR Resource is responsible for submitting an aggregate invoice for the Cumulative Portfolio Level Net Event Compensation of each PDR Portfolio for May-June-July (First Quarter) period by September 30 and for August-September-October (Second Quarter) by December 31 of the program year to SCE's organization responsible for administering Demand Response Auction Mechanism (DRAM) invoices. Invoices and related information can be submitted directly to Olivine using the [secure upload link](#) that will be provided to them and send an email notifying the Olivine (elrp-general@olivineinc.com) and SCE (sce3rdpartyDRP@sce.com).

The Cumulative Portfolio Level Net Event Compensation of a PDR Portfolio over one Quarter is determined by summing the Portfolio Level Net Event Compensation across all ELRP events in that Quarter. Any impact on DRAM performance, if applicable, is the responsibility of the seller. The invoice shall be accompanied with the supporting data for each event, including but not limited to PDR-specific ELRP Event Performance, ILR, applicable market awards during the event, applicable CAISO market payments for load reductions counted in the ILR, and ELRP Event Compensation.⁹ SCE may audit and verify the invoice as needed. SCE will settle the invoice within 60 days of the invoice date absent the need for additional information, which would set the 60 days from the time all additional information is received in order to process the invoice. In case of an audit, the 60 day period is frozen until there is resolution to SCE's satisfaction.

⁹ An invoice template will be provided to third-party DRPs for invoice processing and audit.

3.2.3.2 Invoicing for Sub-Group B.2.

SCE will be responsible for calculating ELRP baselines and settlements and issuing payments to CBP Aggregators and/or Participants pursuant to these Terms and Conditions.

ATTACHMENT D

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

Group A Terms and Conditions Pursuant
to California Public Utilities Commission
Decision 21-03-056, 21-06-027 and 21-12-
015

February 16, 2023

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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. The Commission subsequently issued D. 21-06-027 and D. 21-11-015 making modifications to the ELRP.

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., using the ClimateResponse™ Technology Suite 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.

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, A.4, and A.5). 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 customers and aggregators not participating in DR programs

- Sub-Group A.1. – Non-Residential Customers
- Sub-Group A.2. – Non-Residential Aggregators
- Sub-Group A.3. – Rule 21 Exporting Distributed Energy Resources (DERs)
- Sub-Group A.4. – Virtual Power Plants (VPP) Aggregators
- Sub-Group A.5. – Electric Vehicle (EV) and Vehicle-Grid Integration (VGI) Aggregators

Additional descriptions for each of these 5 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 must be able to reduce load by a minimum of one kilowatt during an ELRP event; 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) subject to compliance with the BIP tariff.

If an eligible BIP customer is participating with a BIP aggregator and their BIP aggregator chooses to participate in the ELRP, then the BIP customer must participate

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.

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, may 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, (4) the notice time for the generator, and (5) the 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.

1.1.1.2 Disenrollment Process for Sub-Group A.1

Sub-group A.1 participants can disenroll from the ELRP by contacting the Program Administrator under Section 1.1.1.1 titled Enrollment Process with a 30-day written notice. The disenrollment will become effective within 30 days after the written notice is received.

1.1.2 Sub-Group A.2 – Non-Residential Aggregators

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

- Customer's service account is classified as non-residential; and
- Customer's service account is not simultaneously enrolled in another DR program offered by an IOU (with the exception of BIP), demand response provider (DRP), or Community Choice Aggregator (CCA).

BIP aggregators must enroll their entire BIP portfolio. The aggregated resource capacity meets or exceeds 500 kW for non-BIP aggregators.

1.1.2.1 Application Process for Sub-Group A.2

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, non-residential aggregators must nominate an estimated, portfolio load reduction quantity to be achieved during an ELRP event and may 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, (4) the notice time for the generator, and (5) the ramp time that may be used during ELRP events.

New BIP aggregators will need to affirm intent to participate in ELRP sub-group A.2 no later than April 15 of the program year and as part of enrollment, nominate an estimated, portfolio load reduction quantity no later than April 30 of the program year.

1.1.2.2 Disenrollment Process for Sub-Group A.2

Sub-Group A.2 participants can disenroll from the ELRP by contacting the Program Administrator under Section 1.1.1.1 titled Enrollment Process.

Disenrollment requests are processed on an annual basis and requests must be received by April 15 of the program year otherwise, the disenrollment will not be effective until the following program year.

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.

1.1.3.1 Application Process for Sub-Group A.3

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 applicant must nominate, unless exempt, an estimated target load reduction quantity for each eligible account to be achieved during an ELRP event and, if applicable, may 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, (4) the notice time for the generator, and (5) the ramp time for the generator that may be used during ELRP events.

1.1.3.2 Sub-Group A.3 Use of Virtual Aggregation

The use of a virtual aggregation may be elected by a customer at the time of enrollment. A virtual aggregation permits a customer with control over multiple electrically contiguous³ sites to aggregate the load and generation to fully utilize the sum of the net export allowed by any Rule 21 permit(s) associated with the sites. Virtual Aggregation application will be reviewed and approved by PG&E on a case-by-case basis.

1.1.3.3 Disenrollment Process for Sub-Group A.3

Sub-group A.3 participants can disenroll from the ELRP by contacting the Program Administrator under Section 1.1.1.1 titled Enrollment Process with a 30-day written notice. The disenrollment will become effective within 30 days after the written notice is received.

³ Per D. 21-12-015, "Two sites are considered electrically contiguous when they have electric service derived from the same utility distribution transformer secondary and there are no devices on the utility distribution system that can interrupt power flow to only one site."

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

A third-party aggregator managing a BTM hybrid Virtual Power Plant (VPP) consisting of storage paired with net energy metering (NEM) solar and/or stand-alone storage deployed with residential (bundled or unbundled) and/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&E⁴, a third-party DRP, or CCA; 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 permit and operates in a manner compliant with existing rules and tariffs applicable to the site.

1.1.4.1 Application Process for Sub-Group A.4

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 for their VPP aggregation to be achieved during an ELRP event and, if applicable, may 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, (4) the notice time for the generator, and (5) the ramp time for the generator that may be used during ELRP events.

⁴ Aggregators utilizing device-level metering for ELRP settlement may be eligible to dual participate in additional IOU DR programs.

1.1.4.2 Disenrollment Process for Sub-Group A.4

Sub-Group A.4 participants can disenroll from the ELRP by contacting the Program Administrator under Section 1.1.1.1 titled Enrollment Process.

Disenrollment requests are processed on an annual basis and requests must be received by April 15 of the program year otherwise, the disenrollment will not be effective until the following program year.

Sub-Group A.4 participants must nominate a non-zero estimated, portfolio load reduction quantity and failure to do so may result in disenrollment from the ELRP.

1.1.5 Sub-Group A.5 – Electric Vehicle (EV) and Vehicle-Grid Integration (VGI) Aggregators

A third-party aggregator managing a Vehicle-Grid-Integration (VGI) aggregation consisting of any combination of electric vehicles and charging stations – including those that are capable of managed one-way charging (V1G) and bi-directional charging and discharging (V2G) deployed with residential (bundled or unbundled) or non-residential (bundled or unbundled) customers that meets the following criteria, is eligible to participate in ELRP:

- The VGI aggregation or any customer site within the aggregation is not simultaneously enrolled in a market-integrated, supply-side DR program offered by PG&E⁵, third-party DRP, or CCA, and
- All sites within the VGI aggregation are located within PG&E's service territory, and
- All sites within the VGI aggregation have operational electric vehicle supply equipment (EVSE), and
- Sites within the VGI aggregation that intend to implement V2G must have UL 1741 SA⁶ certification, any subsequent UL 1741 supplement certification as

⁵ Aggregators utilizing device-level metering for ELRP settlement may be eligible to dual participate in additional IOU DR programs.

⁶ Direct Current (DC) V2G EVSE that have UL 1741 certification, but not UL 1741 SA, may interconnect initially for the purposes of participating in the ELRP, subject to remaining Rule 21 interconnection requirements. PG&E reserves the right to terminate this exception after the 2024 ELRP season via a Tier 2 Advice Letter filing. Termination of this pathway would not affect previously interconnected EVSE.

required in Rule 21 or Smart Inverter Working-Group recommended smart inverter functions and satisfies all other Rule 21 interconnection requirements, and

- The VGI aggregation can contribute Incremental Load Reduction (ILR) equal to or greater than 25 kW for a minimum of one hour during an ELRP event.

1.1.5.1 Application Process for Sub-Group A.5

Sub-Group A.5 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 VGI aggregator must nominate an estimated target load reduction quantity for their VGI aggregation to be achieved during an ELRP event and, if applicable, may 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, (4) the notice time for the generator, and (5) the ramp time for the generator that may be used during ELRP event.

1.1.5.2 Sub-Group A.5 Use of Virtual Aggregation

The use of a virtual aggregation may be elected by an aggregator at the time of enrollment. A virtual aggregation permits separately metered EVSE that have a Rule 21 Interconnection Agreement to be aggregated with other load and generation at an electrically contiguous⁷ host site. This aggregation will allow export from the EVSE to reduce the host site's load. Such aggregation will permit an amount up to the sum of the net exports allowed by all available Rule 21 Interconnection Agreements pertaining to the EVSE site and the host site. Virtual Aggregation applications will be reviewed and approved by PG&E on a case-by-case basis.

⁷ Per D. 21-12-015, "Two sites are considered electrically contiguous when they have electric service derived from the same utility distribution transformer secondary and there are no devices on the utility distribution system that can interrupt power flow to only one site."

1.1.5.3 Disenrollment Process for Sub-Group A.5

Sub-Group A.5 participants can disenroll from the ELRP by contacting the Program Administrator under Section 1.1.1.1 titled Enrollment Process.

Disenrollment requests are processed on an annual basis and requests must be received by April 15 of the program year otherwise, the disenrollment will not be effective until the following program year.

Sub-Group A.5 participants must nominate a non-zero estimated, portfolio load reduction quantity and failure to do so may result in disenrollment from the ELRP.

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 an “Energy Emergency Alert (EEA). The EEA process is defined by the CAISO Operating Procedure 4420. The ELRP utilizes Day-Ahead (DA) and Day-Of (DO) triggers for Group A participants.

Sub-groups with a minimum dispatch requirement—as specified in Section 2.3—may have additional program triggers in response to forecasted or anticipated grid stress conditions which may be utilized in order to achieve the minimum dispatch requirement.

2.2.1 Group A

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

2.3 Sub-Group Minimum Dispatch

A minimum number of dispatch hours will be implemented within the program availability for sub-groups A.2 (Non-BIP), A.4 and A.5. The minimum dispatch hours for each sub-group are specified in the following table.

ELRP Sub-Group	Minimum Dispatch Hours
A.2 Non-Residential Aggregators (Non-BIP)	10
A.4 Virtual Power Plant Aggregators	10
A.5 Vehicle-Grid Integration Aggregators	10

2.4 Test Events

If an ELRP event or dispatch does not occur during the season, PG&E will conduct one test event, with a two-hour duration, per year for Group A.1 and A.3 participants. Group A.1 and A.3 participants, except for those relying exclusively on prohibited resources, are 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 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 when permitted by a Governor's Executive Order and 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).

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. Participants may provide information about the location, type of fuel used, the capacity of the generator, the notice time for the generator and, the ramp time for the generator that may be used during ELRP events.

3.1 Incentive Rate

The ELRP Compensation Rate (ECR) is \$2 per kilowatt-hour (\$2/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

All delivered ILR as a result of an ELRP event is eligible to receive compensation.

3.2.1.1 Baseline for Sub-Groups A.1, A.2, A.3, A.4 and A.5.

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 for customers directly enrolled in ELRP. The EB and AEB for customers enrolled through an aggregator will be calculated at the aggregated level. The EB and AEB will be calculated on an hourly

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, if applicable, or (3) was subject to a grid outage. Critical Peak Pricing event days will not be excluded from the *similar* days in order to capture incrementality for ILR.

- 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) 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 sub-group A.3. Any ILR during overlapping event hours are attributed to the ELRP for sub-group A.1.

⁹ For non-residential or mixed (e.g. residential and non-residential) aggregations, the 10 non-excluded weekdays will be selected for weekday events; for weekend and holiday events, the 4 non-excluded weekend and holiday days will be selected. For residential aggregations, the 5-in-10 weekday and 3-in-5 weekend and holiday methodology is used.

- 3) If the customer has a Rule 21 interconnected device with export capability and permit, the customer may choose to count exported energy, up to their export rating, 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.

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 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.

The baseline method, as specified in Section 3.2.1.1, may be used with submetering. Aggregators that elect to use sub-meter data for settlement purposes shall also comply with approved submetering services as outlined in the Aggregator Participation Agreement. The election to utilize submetering will apply to all locations within a single aggregation.

3.2.1.5 Settlement Calculations for Sub-Group A.5.

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.

The baseline method, as specified in Section 3.2.1.1, may be used with submetering. Upon adoption by the CPUC, the submeter must meet applicable standards established by the CPUC. Aggregators that elect to use sub-meter data for settlement purposes shall also comply with approved submetering services as outlined in the Aggregator Participation Agreement. The election to utilize submetering will apply to all locations within a single aggregation.

ATTACHMENT E

Pacific Gas and Electric Company

ELRP A.6. Power Saver Rewards Residential Customers

Participation Terms and Conditions

Thank you for your participation in the Pacific Gas and Electric Company (“PG&E”) Emergency Load Reduction Program Pilot A.6 (“Pilot”), known as Power Saver Rewards, implemented by Olivine, Inc. (“Olivine”) via ClimateResponse™ on behalf of PG&E. On March 26, 2021, the California Public Utilities Commission (CPUC) issued Decision D. 21-03-056 which approved the Emergency Load Reduction Program (ELRP) pilot. The CPUC subsequently issued D. 21-12-015 making modifications to the ELRP which included a large-scale program for residential customers. Participation is legally bound by the Pilot’s participation terms and conditions (“Terms”).

1. The Pilot. The Pilot includes Participants who have been automatically enrolled or elect to participate for the Demand Response (DR) season for Pilot event hours (“Event”) as defined below. PG&E will use each Pilot Participant’s SmartMeter data to measure performance across the Pilot Events.

2. Participant Eligibility. PG&E shall determine in its sole discretion Participant’s eligibility which must include:

- i* Participant receives electric service on a residential rate
- ii* Participant has an active service agreement with PG&E
- iii* Participant has a PG&E SmartMeter
- iv* Participant is not simultaneously enrolled in another supply-side demand response program offered by PG&E, third-party DR provider (DRP), Community Choice Aggregator (CCA), or in ELRP sub-groups A.4 or A.5
- v* Participant is not an electric customer of a Community Choice Aggregator who has opted out of being included in the Pilot

3. Pilot Enrollment Period. The Pilot is authorized to operate in the years 2021-2025, or Participant’s enrollment is terminated sooner (“Pilot Enrollment Period”) or eligibility changes resulting in Participant unenrollment.

4. ELRP A.6. Residential Customers Events. ELRP A.6. Residential Customers Events will be triggered the day-ahead by CAISO Grid Alerts and Flex Alert days between May 1st and October 31st (DR Season) and the Event hours will be between 4:00 PM and 9:00 PM.

5. Pilot Incentives.

Participants who have participated in Events will receive an incentive at a minimum of yearly for Event participation. The incentive value has been set by the CPUC at \$2 per kilowatt hour as based on the incremental load reduction during Event hours.

- i.* Incremental load reduction is calculated as the difference between Participant’s expected energy usage (recent, similar, non-event days) and actual hourly usage during an Event. For hours where usage increased, the incremental load reduction will be set to zero.
- ii.* PG&E retains sole discretion for the calculation of the incremental load reduction.
- iii.* The incentive will be paid as a bill credit likely in the first months of the following calendar year for Participants whose participating service agreement is active.
- iv.* If there is insufficient data that impacts PG&E’s ability to calculate incremental load reduction, the account may not receive an incentive or may be excluded from incremental load reduction calculations.

6. Communications. Participant has the option to provide and maintain a valid email address or cellular phone number for Pilot communications, accepts responsibility for the receipt of these communications and any consequences of not receiving them. Participant may unsubscribe from communications by following instructions in event notifications or as directed on the website. It may take up to 10 days to take effect. Participant may authorize the use of email and/or cellular phone or download the Pilot app required to receive Pilot communications.

7. Participant Information. Participant authorizes PG&E and Olivine to access and/or provide Participant’s personal identifiable information, energy usage data, utility account number, or information generated and arising from Participant’s participation during the Pilot Enrollment Period to carry out the Pilot’s purpose and as required to be disclosed pursuant to the CPUC’s request.

8. Personal Non-Commercial Use. The Pilot is offered ONLY for personal, non-commercial premises.

9. Costs. PG&E and Olivine are not responsible for providing any costs associated with equipment that might aid Participant in the Pilot, i.e. devices, internet access, or, if any, impact to Participant's electric bills.

10. No Warranty; Disclaimer. PG&E and Olivine expressly disclaim all warranties of any kind relating to the Pilot, whether express, implied or statutory (including, without limitation, any implied warranties for conditions or merchantability, fitness for a particular purpose, title, non-infringement or misappropriation of intellectual property rights).

11. Limitation of Liability. To the fullest extent permitted by applicable law, under no circumstances shall Olivine or PG&E be liable for any indirect, incidental, special or consequential damages, arising in connection with the Pilot. If Participant is dissatisfied with the Pilot, any of these Terms, or believes Olivine or PG&E has breached these Terms in any way, Participant's sole and exclusive remedy is to discontinue participation in the Pilot.

12. Pilot Participation Termination.

- i Termination By PG&E.* PG&E has the sole discretion to terminate the Pilot, or Participant's participation in the Pilot, at any time without cause by providing Participant written notice.
- ii* A customer participating in ELRP A.6 is permitted, at any time, to enroll in a market-integrated DR program offered by the IOU, third-party DRP, or CCA, and ELRP sub-groups A.4 and A.5. After PG&E becomes aware that the Participant's service account has been enrolled in a market-integrated DR program, PG&E will de-enroll the service account from ELRP A.6.
- iii Termination by Participant.* Participant may terminate their enrollment in the Pilot at any time for any reason by going to the ELRP A6 website.

13. General.

- i Entire Agreement.* These Terms are the entire agreement between PG&E, Olivine and Participant concerning the Pilot's eligibility and participation requirements.
- ii No Assignment.* These Terms may not be assigned by Participant without PG&E's prior written consent.
- iii Severability and Waiver.* If any provision herein is invalid or unenforceable, the remaining provisions will remain in full force and effect.
- iv. Survival.* Termination of the Participant's enrollment in the Pilot will not affect the parties' obligations and rights under these Terms which by their sense and context are intended to survive such termination.
- v. CPUC Jurisdiction.* These Terms shall be subject to all legal and regulatory requirements applicable to ELRP (including, without limitation, any decisions, orders or rules of the CPUC).
- vi. Amendments.* These Terms may be changed by PG&E from time to time and any changes will be published in revisions to this document and/or posted to PG&E's or Olivine's website.

ATTACHMENT F

Pacific Gas & Electric Company
Emergency Load Reduction Program
(ELRP) Pilot
Group B Terms and Conditions Pursuant
to California Public Utilities Commission
Decision 21-03-056 & Decision 21-12-015

February 16, 2023

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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. The Commission subsequently issued D. 21-11-015 making modifications to the ELRP.

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., using the ClimateResponse™ Technology Suite to be the Program Administer for the ELRP at this time. Information on ELRP is available at: <https://elrp.olivineinc.com/>

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.

Acceptance of Terms and Conditions

All third-party entities are requested to affirm intent to participate in ELRP and to accept the Terms and Conditions for ELRP participation.

Group B

ELRP eligible participants are divided into two sub-groups under Group B with both sub-groups comprised of market integrated Proxy Demand Response resources as shown.

- Sub-Group B.1 – Third-party DR Provider (DRP)
- Sub-Group B.2 – Capacity Bidding Program (CBP)

1.1 Sub-Group B.1

Third-party DR Providers involved with Sub-Group B.1 are requested to affirm intent to participate in ELRP, including acceptance of Terms and Conditions and any agreements that may be developed to support third-party DRP participation in ELRP by April 15 of the program year, if they are interested in receiving courtesy ELRP notifications. Otherwise, Third-party DR Providers must accept Terms and Conditions and any agreements that are developed by the time they submit their invoices for processing by PG&E.

1.2 Sub-Group B.2

Capacity Bidding Program (CBP) Aggregators involved with Sub-Group B.2 are requested to accept the Terms and Conditions and any Agreements that may be developed to support CBP enrollment in ELRP.

1 Program Eligibility and Enrollment

1.1 Program Participant Criteria

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

1.1.1 Sub-Group B.1 – Third-party DR Providers (DRPs)

A third-party DRP with a market-integrated PDRs resource is eligible to participate in ELRP.

1.1.1.1 Application Process for Sub-Group B.1

Sub-Group B.1 applicants can enroll into the ELRP by contacting the Program Administrator, Olivine at <https://elrp.olivineinc.com/contact-us/>.

The third-party DRP may 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, (4) the notice time for the generator, and (5) the ramp time for the generator that may be used during an ELRP event at time of invoicing.

1.1.2 Sub-Group B.2 – Capacity Bidding Program (CBP)

A third-party CBP Aggregator with a market-integrated PDR resource is eligible to participate in ELRP. An account is only eligible to participate in ELRP if the service account has been nominated and bid during the ELRP operating month.

1.1.2.1 Application Process

Sub-Group B.2 applicants can enroll into the ELRP by contacting the Program Administrator, Olivine at <https://elrp.olivineinc.com/contact-us/>.

At the time of enrollment, or at designated times during the ELRP pilot, the third-party DRP may 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, (4) the notice time for the generator, and (5) the ramp time for the generator that may be used during an ELRP event.

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 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

The ELRP shall be activated after the CAISO issues or declares an Energy Emergency Alert (EEA). The EEA process is defined by CAISO Operating Procedure 4420. Group B participants utilize Day-Ahead (DA) Alert and Day-Of (DO) triggers for ELRP.

2.3 Group B Notification

An ELRP event for Group B participants is activated after the CAISO issues or declares a day-ahead (DA) Alert or day-of (DO) trigger. The start time and duration are specified in the CAISO Alert notice and is limited to the parameters set forth in Section 2.1 “Program Availability” above. Parties that have affirmed their intent to participate, including acceptance of Terms and Conditions and any agreements would be eligible to receive courtesy ELRP notifications from the Program Administrator (Olivine).

2.4 Test Events

Group B is not subject to ELRP Test Events.

3 Compensation

Participation during an ELRP event is entirely voluntary, and no financial penalties will result from not achieving 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 when permitted by a Governor's Executive Order and 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).

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. Participants may provide information about the location, type of fuel used, the nameplate capacity of the generator, the notice time for the generator, and the ramp time for the generator that may be used during ELRP events.

3.1 Incentive Rate

The ELRP Compensation Rate (ECR) is \$2 per kilowatt-hour (\$2/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 ILR is determined using the prescribed baseline per section 3.2.1 and the settlement methodology per section 3.2.2 for Group B (B.1 and B.2). Payments associated with Group B varies between B.1 and B.2 as described in section 3.2.3.

3.2.1 Baseline Methodology for Group B.1

To construct the ELRP baseline for measuring a B.1 PDR's ILR contribution during an ELRP event, the applicable CAISO baseline will be modified to account for the following steps:

- 1) Count net exports to the distribution grid by customer locations within the PDR aggregation that comply with Rule 21 and other applicable permits;

- 2) Exclude prior days with other ELRP events when selecting the set of “non-event, but similar” days when calculating the baseline;
- 3) Exclude applicable preceding hours with either CAISO market awards or another ELRP event on the day of the ELRP event when calculating the same-day adjustment (SDA) to the calculated baseline in step 2, and
- 4) Allow the SDA in step 3 to be no greater than 100%.

3.2.2 Baseline Methodology for Group B.2

To construct the ELRP baseline for measuring a B.2 PDR’s ILR contribution during an ELRP event, the applicable CBP baseline will be modified to account for the following steps:

- 1) Count net exports to the distribution grid by customer locations within the PDR aggregation that comply with Rule 21 and other applicable permits;
- 2) Exclude prior days with other ELRP events when selecting the set of “non-event, but similar” days when calculating the baseline;
- 3) Exclude hours with either CBP events or another ELRP event on the day of the ELRP event from the same-day adjustment (SDA) to the calculated baseline in step 2.

3.2.3 Settlement Calculation for Group B.1

For participation in ELRP under Group B, a DRP must construct a PDR Portfolio consisting of only 1) PDRs with RA assignment or PDRs without RA assignment (but not both) and 2) PDRs limited to PG&E’s service territory.

The CAISO settled aggregated load during an ELRP event is modified to count net energy exported to the distribution grid by any customer location within the PDR aggregation, subject to each customer’s *net* exporting limit under its Rule 21 interconnection agreement and adherence to each customer’s Net Energy Metering tariff, as applicable.

Following an ELRP event, the DRP’s scheduling coordinator (SC) is responsible for determining the following:

- 1) ELRP Event Performance (total load reduction during the ELRP event) of each PDR in the DRP's PDR Portfolio by applying the applicable ELRP modified baseline to the PDR's modified aggregated load settled during the ELRP event.
- 2) ILR of each PDR by subtracting the CAISO scheduled award quantities, inclusive of day-ahead market (DAM) and real-time market (RTM), from the PDR's ELRP Event Performance. If the total market award for the PDR during the ELRP event is zero, then ILR of the PDR equals the ELRP Event Performance.
- 3) The ELRP Event Compensation due for each PDR by adding all interval-specific ELRP Compensations across all applicable intervals of the ELRP event, subject to the following:
 - a) The interval-specific ELRP Compensation in each applicable interval of the ELRP event is obtained by subtracting 1) any CAISO market payments for any portion of the load reduction counted in the interval-specific ILR and 2) the interval-specific CAISO Opportunistic Revenue (COR), defined below, from 3) the interval-specific Product of the ECR and the interval-specific ILR (see illustration below).

If the interval-specific ILR is negative, then the interval-specific ELRP Compensation is set to zero in that interval.

If the interval-specific COR is greater than the interval-specific Product, then the interval-specific ELRP Compensation is set to zero in that interval.

- b) The interval-specific COR is the product of the interval-specific Market Eligible Capacity (MEC), defined below based on the interval-specific CAISO Market Event Performance (MEP) determined under applicable CAISO market baseline, and the interval-specific CAISO Clearing Price Delta (CCPD), defined below.

- i. MEC:

1. If the total CAISO scheduled award quantity in an interval is non-zero and the interval-specific MEP is less than or equal

to the total CAISO scheduled award quantity in the interval, then the interval-specific MEC is set to zero.

2. If the total CAISO scheduled award quantity in an interval is non-zero and if the interval-specific MEP is greater than the total CAISO scheduled award quantity in the interval and less than or equal to the Qualifying Capacity (QC)² of the PDR in that interval, then the interval-specific MEC is equal to the interval-specific MEP minus the interval-specific total CAISO scheduled award quantity.
3. If the total CAISO scheduled award quantity in an interval is non-zero and if the interval-specific MEP is greater than the Qualifying Capacity (QC)³ 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.

If the total CAISO scheduled award quantity in an interval is zero, then the interval-specific MEP in the above cases is set to the interval-specific ILR.

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. The MEC shall have a floor value of zero. Additionally, if the PMin value is less than the total CAISO scheduled award quantity in an interval, then the interval-specific MEC is set to zero.

ii. CCPD:

For a PDR participating in the DAM only (that is, "long-start" PDR), the interval-specific CCPD is the DAM clearing price in that interval.

² The QC value is defined as the Supply Plan quantity.

³ Ibid.

For a PDR participating in the RTM, the interval-specific CCPD is equal to the higher of the DAM or RTM clearing price in that interval minus the lower of the DAM or RTM clearing price in that interval.

- 4) PDR Portfolio Level Net Event Compensation across all PDRs in the DRP's Portfolio.

3.2.4 Settlement Calculation for Group B.2

The following steps are used for calculating the settlement amount:

- 1) Determine the ELRP Event Performance (total load reduction during the ELRP event) for each Resource by applying the applicable ELRP modified baseline to the aggregation's load
- 2) Determine the ELRP ILR for each Resource by subtracting the CBP nomination from the Resource's ELRP Event Performance. If a CBP Resource was not dispatched during the ELRP event, then the ILR of the aggregation equals the ELRP Event Performance
- 3) The ELRP Event Compensation due for each Resource is calculated by adding all interval-specific ELRP Compensations across all applicable intervals of the ELRP event, subject to the following:
 - i. The interval-specific ELRP Compensation in each applicable interval of the ELRP event is obtained by subtracting any CBP Energy payments for any portion of the load reduction counted in the ELRP interval-specific ILR from the interval-specific Product of the ECR and the interval-specific ELRP ILR. If the interval-specific ILR is negative, then the interval-specific ELRP Compensation is set to zero in that interval.

3.2.5 Payment for Group B (B.1 and B.2)

Eligible Group B participants will be compensated in the manner described below.

3.2.5.1 Payment for Group B-1 Participants (Third-Party DRPs)

The third-party DRP for each PDR Resource is responsible for submitting an aggregate invoice for the Cumulative Portfolio Level Net Event Compensation of each PDR Portfolio for May-June-July (First Quarter) period by September 30 and for August-September-October (Second Quarter) by December 31 of the program year to PG&E's organization responsible for administering Demand Response Auction

Mechanism (DRAM) invoices. To request Third-Party DRP Invoice Template and invoice submission instructions email: elrp-general@olivineinc.com

The Cumulative Portfolio Level Net Event Compensation of a PDR Portfolio over one Quarter is determined by summing the Portfolio Level Net Event Compensation across all ELRP events in that Quarter. Any impact on DRAM performance, if applicable, is the responsibility of the seller. The invoice shall be accompanied with the supporting data for each event, including but not limited to PDR-specific ELRP Event Performance, ILR, applicable market awards during the event, applicable CAISO market payments for load reductions counted in the ILR, and ELRP Event Compensation.⁴ PG&E may audit and verify the invoice as needed. PG&E will settle the invoice within 60 days of the invoice date absent the need for additional information, which would set the 60 days from the time all additional information is received in order to process the invoice. In case of an audit, the 60 day period is frozen until there is resolution to PG&E's satisfaction.

3.2.5.2 Payment for Group B-2 Participants (CBP Aggregators)

PG&E will be responsible for calculating baselines and settlements for each CBP Aggregator/Participant.

⁴ An invoice template will be provided to participants for invoice processing and audit.

Attachment G

Emergency Load Reduction Program (ELRP) Terms and Conditions Group A

February 16th

2023

UPDATED

Emergency Load Reduction Program (ELRP) Terms and Conditions Group A

These Terms and Conditions incorporate requirements from Decision D.21-03-056, D.21-06-027, and D.21-12-015 and reflect all changes from the original ELRP Terms and Conditions Dated April 26, 2021. The terms and conditions are detailed in the following sections.

1. Pilot Program Duration
2. Out of Market Framework
3. Program Parameters
4. Customer Eligibility and Enrollment
5. Program Event Triggers
6. Compensation

1. Pilot Program Duration

ELRP duration will be five years (2021-2025), with years 2023-2025 subject to review and revision in the Demand Response (DR) Applications proceeding expected to be initiated May 2022.

ELRP design aspects that are subject to review and revision include minimizing the use of diesel backup generators where there are safe, cost-effective, and feasible alternatives; consideration of local air pollution impacts on disadvantaged communities; and other modifications to make the program more effective and consistent with the state's decarbonization goals. To this end, PG&E, SCE, and SDG&E should collect data on backup generator participation in ELRP, including as location, type of fuel used, minimum notification time required to dispatch the generator, and the capacity of the generator, for years 2021 and 2022.

2. Out of Market Framework

ELRP load reduction capacity will be excluded from the Resource Adequacy (RA) / California Energy Commission (CEC) peak forecast framework with no CAISO market obligations.

3. Program Parameters

Program availability: May 1st – October 31st; seven days a week; 4 pm – 9 pm

Event duration: 1-hour minimum; 5-hour maximum

Annual dispatch limit: Up to 60 hours

Consecutive day dispatches: No constraints

As discussed below, the program parameters for Residential ELRP may differ.

4. Customer Eligibility and enrollment

Eligible participants for ELRP are divided into two groups with several subgroups:

Group A: Customers and aggregators not participating in Demand Response (DR) programs.

- A.1. Non-Residential Customers
- A.2. Non-Residential Aggregators
- A.3. Rule 21 Exporting Distributed Energy Resources (DERs)
- A.4. Virtual Power Plants-(VPP) Aggregators
- A.5. Vehicle-Grid-Integration (VGI) Aggregators

Group B: DR providers participating in market-integrated supply-side Demand Response (DR) programs.

- B.1. Third-party DR Providers (DRPs)
- B.2. IOU Capacity Bidding Programs (CBPs)

At any time, a customer can participate in ELRP via either Group A or Group B, but not both groups at the same time. At any time, a Group A customer can participate in ELRP via only one sub-group under Group A. Eligibility criteria for each group are defined below.

GROUP A ELIGIBILITY: Customers and aggregators not participating in Demand Response (DR) programs.

At the time of enrollment, or at designated times during the ELRP pilot, Group A participants, will nominate an estimated target load reduction quantity to be achieved during an ELRP event. 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.

A.1. Non-Residential Customers Eligibility and Enrollment

Bundled and unbundled non-residential customers of an IOU who meet the following criteria are eligible to enroll and participate in ELRP:

- Customer's service account must be able to reduce load by a minimum of 1 kW during an ELRP event
- Customer is not simultaneously enrolled in another supply-side DR program offered by an IOU, third-party demand response provider (DRP), or community choice aggregator (CCA),

with the exception that dual enrollment in SDG&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.

Qualifying individual customers can directly apply and enroll with SDG&E or our program administrator. At the time of enrollment, or at designated times during the ELRP pilot, customers must nominate 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, (4) the notice time for the generator, and (5) the ramp time for the generator that may be used during ELRP events.

A.2. Non-Residential Aggregators Eligibility and Enrollment

Third-party non-residential aggregators including BIP aggregators are eligible to participate in ELRP.

Non-BIP aggregators with aggregated bundled or unbundled non-residential customer resources meeting the following criteria are eligible to participate in ELRP:

- Customer's service account is classified as non-residential; and
- The aggregated resource is not simultaneously enrolled in a supply-side DR program offered by an IOU, third-party DRP, or CCA, and
- The aggregated resource capacity meets or exceeds Minimum the Aggregation Size Threshold at 500 kW

If a non-BIP aggregator chooses not to participate, its non-residential customers may independently participate in ELRP under sub-group A.1 . Non-Residential customers are subject to the applicable criteria and requirements.

Qualifying individual customers can directly apply and enroll with SDG&E or our program administrator. At the time of enrollment, or at designated times during the ELRP pilot, customers must nominate 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, (4) the notice time for the generator, and (5) the ramp time for the generator that may be used during ELRP events.

A.3. Rule 21 Exporting DER Eligibility and Enrollment

Bundled and unbundled non-residential customers of an IOU who meet the following criteria are eligible to enroll and participate in ELRP:

- Customer is not simultaneously enrolled in any market-integrated DR program offered by an IOU, third-party DRP, or CCA, and
- Customer possesses a behind-the-meter (BTM) Rule 21-interconnected device (including Prohibited Resources) with an existing Rule 21 export permit, and
- Customer's BTM Rule 21 interconnected device meets the Minimum Export Threshold of 25kW specified further below for at least one hour in compliance with Rule 21 and other applicable regulations and permits during an ELRP event.

NEM customers meeting the above requirements are eligible to participate in ELRP. Qualifying individual customers can directly apply and enroll with SDG&E at www.sdge.com/emergency-load-reduction. At the time of enrollment, or at designated times during the ELRP pilot, customers must nominate 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, (4) the notice time for the generator, and (5) the ramp time for the generator that may be used during ELRP events.

A.4. Virtual Power Plant Aggregators Eligibility and enrollment

An aggregator managing a BTM virtual power plant (VPP) aggregation consisting of storage paired with net energy metering (NEM) solar or stand-alone storage deployed with residential (bundled or unbundled) or non-residential (bundled or unbundled) customers, whose VPP meet 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 an IOU, third-party DRP, or CCA,
- All sites within the VPP aggregation are located within the distribution service area of a single IOU, and
- The aggregated BTM storage capacity of the VPP meets the Minimum VPP Size Threshold 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 permit.

NEM customers meeting the above requirements are eligible to participate in ELRP.

VPP aggregators interested in participating in ELRP should contact SDG&E at drp@sdge.com or [our program administrator](#). SDG&E may negotiate agreements with the VPP Aggregator to clarify other requirements as needed, including potential administration fees, to implement the Minimum Dispatch Hours and related ELRP compensation. If applicable, VPP Aggregators 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.

A.5. Vehicle-Grid-Integration Aggregators Eligibility

An aggregator managing a Vehicle-Grid-Integration (VGI) aggregation consisting of any combination of electric vehicles and charging stations – including those that are capable of managed one-way charging (V1G) and bi-directional charging and discharging (V2G) deployed with residential (bundled or unbundled) or non-residential (bundled or unbundled) customers that meets the following criteria, is eligible to participate in ELRP:

- The VGI aggregation or any customer site within the aggregation is not simultaneously enrolled in a market-integrated, supply-side DR program offered by an IOU, third-party DRP, or CCA, unless the ELRP A4 payments to the aggregator are based on end use data and the customer site is enrolled in AC Saver
- All sites within the VGI aggregation are located within the distribution service area of a single IOU, and
- The VGI aggregation can contribute Incremental Load Reduction (ILR) of at least 25 kW for a minimum of one hour during an ELRP event.
- Subject to Rule 21 interconnection requirements, any direct current (DC) V2G electric vehicle supply equipment (EVSE) that has UL 1741¹ certification but not UL 1741 SA certification, any subsequent UL 1741 supplement certification required in Rule 21, or Smart Inverter Working Group-recommended smart inverter functions may interconnect initially, but only for the purpose of participating in the ELRP.

NEM customers with electric vehicles meeting the above requirements are eligible to participate in the VGI aggregation.

The use of a virtual aggregation may be elected by an aggregator at the time of enrollment. A virtual aggregation permits separately metered EVSEs that have a Rule 21 Interconnection Agreement with other load and generation at an electrically contiguous host site. This aggregation will allow export from the EVSE to reduce the host site's load. Such aggregation will permit an amount up to the sum of the net exports allowed by all available Rule 21 Interconnection Agreements pertaining to the EVSE site and the host site. Virtual Aggregation applications will be reviewed and approved by SDG&E on a case-by-case basis.

VGI aggregators interested in participating in ELRP should contact SDG&E at drp@sdge.com or [our program administrator](#). SDG&E may negotiate agreements with the VGI Aggregator to clarify other requirements as needed, including potential administration fees, to implement the Minimum Dispatch Hours and related ELRP compensation.

VGI Aggregators must provide information about their customer's back-up generation (BUG),

¹ Direct Current (DC) V2G EVSE that have UL 1741 certification, but not UL 1741 SA, may interconnect initially for the purposes of participating in the ELRP, subject to remaining Rule 21 interconnection requirements. SDG&E reserves the right to terminate this exception after the 2024 ELRP season.

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.

5. Program Event Triggers

Minimum Aggregation Dispatch Hours

Certain aggregated resources participating in ELRP have Minimum Aggregation Dispatch Hours, as follows:

- Sub-Group A.2. (Non-BIP Aggregators) = 10 hours
- Sub-Group A.4. (VPP Aggregators) = 10 hours
- Sub-Group A.5. (VGI Aggregators) = 10 hours

To meet the Minimum Aggregation Dispatch Hours, SDG&E will exercise discretion to dispatch aggregators in response to other forecasted or anticipated grid stress conditions, such as, high locational marginal prices in the CAISO markets, extreme heat waves, etc., and will notify aggregators of the start time and duration of the ELRP event to achieve the Minimum Aggregation Dispatch Hours.

ELRP will utilize both day-ahead (DA) and day-of (DO) triggers.

ELRP may be activated after the CAISO issues or declares an Energy Emergency Alert (EEA) watch EEA 1, EEA 2, or EEA 3. The EEA process is defined by the CAISO Operating Procedure 4420². The ELRP utilizes Day- Ahead (DA) and Day-Of (DO) triggers for Group A participants.

Sub-groups with a minimum dispatch requirement may have additional program triggers in response to forecasted or anticipated grid stress conditions which may be utilized in order to achieve the minimum dispatch requirement.

Group A Test Events: SDG&E will conduct one test event, with two-hour duration, per year for Sub-Group A.1. and Sub-Group A.3. participants. Each 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 Section below.

6. 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.

² 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 (e.g., EEA Watch, EEA-1, EEA-2, and EEA-3).

Incremental Load Reduction (ILR) is defined as the load reduction achieved during an ELRP event incremental to the non-event applicable baseline and 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. Prohibited resources may be used when permitted by a Governor's Executive Order and 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).

If applicable, SDG&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. Participants are required to provide information about the location, type of fuel used, the capacity of the generator, the notice time for the generator and, the ramp time for the generator that may be used during ELRP events.

General ELRP compensation parameters for all customers include the following:

- After-the-fact pay-for-performance will be made at a prefixed energy-only ELRP Compensation Rate applied to ILR.
- There are no "capacity-like" payments.
- There are no penalties for non- or under-performance.

The ELRP Compensation Rate for Group A is set at \$2 / kilowatt-hour (kWh) (or \$2000 / megawatt-hour (MWh)).

GROUP A COMPENSATION

For Group A eligible participants, the compensation for load reduction delivered during an ELRP event is determined by calculating the product of ILR and ELRP Compensation Rate.

A.1. Non-Residential Customer Compensation

The ELRP baseline will be constructed according to the method described below.

- i. Calculate the Customer Specific Energy Baseline (CSEB) – A Customer service account must have at least 10 similar days of interval meter data available in SDG&E'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 CSEB (ACSEB) will all be calculated at the meter level. If the ELRP event occurs on a non-holiday weekday the CSEB and ACSEB will be calculated on an hourly basis using the average of the ten (10) preceding similar non-holiday weekdays. If the ELRP event occurs on a weekend or holiday the EB and AEB will be calculated on an hourly basis using the average of the four (4) preceding similar weekend or holiday days.

In both cases the similar days shall exclude those days when the meter: (1) was subject to an ELRP event, or (2) an event for a dually enrolled DR program, if applicable, or (3) was subject to a grid outage. Critical Peak Pricing and time of use plus event days will not be excluded from the similar days in order to capture incrementality for ILR.

- ii. 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 similar days, excluding days in accordance with Step 2 above.
- iii. Calculate the Adjusted Customer Specific Energy Baseline (ACSEB) – A meters ACSEB for an ELRP event is calculated by multiplying the CSEB by the DOA.

Special Considerations

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.
3. If the customer is currently taking a CPP or real-time pricing (RTP) equivalent tariff, any ILR during overlapping hours between the dynamic rate and the ELRP event is attributed to ELRP.

A.2. BIP Non-Residential Aggregators Compensation

Same guidelines as A.1 apply.

A.3. Rule 21 Exporting DER Compensation

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.

Only during ELRP dispatch hours, a customer with control over multiple electrically contiguous sites is permitted to virtually aggregate the load and generation to fully utilize the sum of the net export allowed by any Rule 21 permit(s) associated with the sites. Two sites are considered electrically contiguous when they have electric service derived from the same utility distribution transformer secondary and there are no devices on the utility distribution system that can interrupt power flow to only one site.

A.4 Virtual Power Plant Aggregators Compensation

The baseline for ELRP A1 will be used for aggregations of non-residential customers participating in A.4 with the exception that if submeter data is used the day-of adjustment (DOA) will not be applied.

The baseline for residential A4 aggregations is described below. If submeter data is used the day-of-adjustment will not be applied.

Calculate the Customer Specific Energy Baseline (CSEB) – A customer service account must have at least 10 similar days of interval meter data available in SDG&E’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 CSEB (ACSEB) will count net exports to the distribution grid. If the ELRP event occurs on a non-holiday weekday the CSEB and CSAEB will be calculated on an hourly basis using the average of the highest five (5) of the ten (10) preceding similar non-holiday weekdays. If the ELRP event occurs on a weekend or holiday the CSEB and CSAEB will be calculated on an hourly basis using the weighted average of the three (3) highest of the five (5) preceding similar weekend or holiday days.¹

In both cases the similar days shall exclude those days when the customer: (1) was subject to an ELRP event, or (2) an event for a dually enrolled DR program, if applicable, or (3) was subject to a grid outage. Time of Use plus event days will not be excluded from the similar days in order to capture incrementality for ILR.

Calculate the Day-Of Adjustment Value (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 two hours of the four hours prior to the ELRP Event and the average of the last two of the four hours after the ELRP Event[6] to (b) the average load of the same hours from the days selected in accordance with Step 2 above. If either (a) or (b) are negative, the DOA is 1.0.

¹ Weight are 0.5 for the day before the event, 0.3 and 0.2.

Calculate the Adjusted Energy Baseline (AEB) – when the CSEB is greater than zero, the AEB will be calculated by multiplying the IAB by the DOA. There is no CSAEB when the IAB is less than zero

The baseline method stated above may be used in conjunction with submetering once the CPUC has approved submetering protocols. Aggregators that elect to use sub-meter data for settlement purposes shall also comply with approved submetering services as outlined in the Aggregator Participation Agreement. The election to utilize submetering will apply to all locations within a single aggregation.

A.5 Vehicle-to-Grid Aggregators Compensation

The A.5. baseline calculations will be the same as the A.4 baseline calculations described above. Once the CPUC has approved submetering protocols and is accepted by SDG&E, an EVSE meter or EVSE sub-meter if the EVSE is taking service through the host site meter, may be used to determine the ILR for ELRP settlement.

Only during IOU dispatched hours, the VGI aggregator is permitted to virtually aggregate separately metered EVSE that have a Rule 21 Interconnection Agreement with other load and generation (if any) at an electrically contiguous host site to allow export from the EVSE to reduce the host site's load and export from such aggregation up to the sum of the net export allowed by any available Rule 21 Interconnection Agreements of the EVSE site and the host site.

Two sites are considered electrically contiguous when they have electric service derived from the same utility distribution transformer secondary and there are no devices on the utility distribution system that can interrupt power flow to only one site.

(End of Terms and Conditions for Group A, excluding A.6 Residential, found in Attachment H)

Attachment H

San Diego Gas and Electric Company

ELRP A.6. Residential Customers

Participation Terms and Conditions

Thank you for your participation in the San Diego Gas and Electric ELRP Residential (“Pilot”). On March 26, 2021, the California Public Utilities Commission (“CPUC”) issued Decision D.21-03-056 which approved the Emergency Load Reduction Program (“ELRP”) pilot. The CPUC subsequently issued D.21-12-015 making modifications to the ELRP which included a large-scale program for residential customers. Participation is legally bound by the Pilot’s participation terms and conditions (“Terms”).

1. The Pilot. The Pilot includes Participants who have been automatically enrolled or elect to participate for the Demand Response (DR) season for Pilot event hours (“Event”) as defined below. SDG&E will use each Pilot Participant’s interval meter data to measure performance across the Pilot Events.

2. Participant Eligibility. SDG&E shall determine in its sole discretion Participant’s eligibility which must include:

- i* Participant receives electric service on a residential rate.
- ii* Participant has an active service agreement with SDG&E.
- iii* Participant has an interval data meter.
- iv* Participant is not enrolled in any other SDG&E, Demand Response Provider (“DRP”), Community Choice Aggregator (“CCA”), or third-party supply-side DR program.
- v* Participant is not an electric customer of a CCA who has opted out of being included in the Pilot.

3. Pilot Enrollment Period. The Pilot shall continue until at least December 31, 2023, unless extended, or Participant’s enrollment is terminated sooner (“Pilot Enrollment Period”) or eligibility changes resulting Participant unenrollment.

4. ELRP A.6. Residential Customers Events. ELRP A.6. Residential Customers events will be triggered the day- ahead by a CAISO Flex Alert or by a CAISO EEA watch. Events may occur between May 1st and October 31st and the event hours will be between 4:00 PM and 9:00 PM.

5. Pilot Incentives. Participants who have participated in events will receive an incentive for Event participation in 2022 and 2023. The incentive value has been set by the CPUC at \$2 per kilowatt hour as based on the incremental load reduction during Event hours. SDG&E retains sole discretion for the calculation of the incremental load reduction. The incentive will be paid as a bill credit to Participants who have an active service agreement.

6. Communications. Participant has the option to provide and maintain a valid email address or cellular phone number for Pilot communications, accepts responsibility for the receipt of these communications and any consequences of not receiving them. Participant may not unsubscribe from the pilot e-mail communications associated with their account or bill but may terminate pilot enrollment at any time for any reason contacting DRP@SDGE.com in which case the participant will no longer receive Pilot communications. Participant may unsubscribe from Pilot text notifications at any time by following instructions in event notifications or as directed on the website. It may take up to 10 days for the Participant to stop receiving text notifications.

7. Participant Information. I consent to allow SDG&E to share my energy usage and associated account and billing data to carry out the Pilot's purpose. Such information includes, but is not limited to, my energy consumption and billing data, SDG&E billing records, billing history, meter usage data, and rate information. My checking account and payment information will not be shared. I understand and acknowledge that SDG&E may also be required to disclose my energy usage information to its regulators, such as the California Public Utilities Commission, or other authorities, upon request. I understand that SDG&E will maintain the confidentiality of my energy use data and other personal information in accordance with its privacy and security policies and applicable law.

8. Costs. SDG&E is not responsible for providing any costs associated with equipment that might aid Participant in the Pilot, *i.e.*, devices, internet access, or, if any, impact to Participant's electric bills.

9. No Warranty; Disclaimer. SDG&E expressly disclaims all warranties of any kind relating to the Pilot, whether express, implied or statutory (including, without limitation, any implied warranties for conditions or merchantability, fitness for a particular purpose, title, non-infringement or misappropriation of intellectual property rights).

10. Limitation of Liability. To the fullest extent permitted by applicable law, under no circumstances shall SDG&E be liable for any indirect, incidental, special or consequential damages, arising in connection with the Pilot. If Participant is dissatisfied with the Pilot, any of these Terms, or believes SDG&E has breached these Terms in any way, Participant's sole and exclusive remedy is to discontinue participation in the Pilot.

11. Pilot Participation Termination.

- i. Termination By SDG&E.* SDG&E has the sole discretion to terminate the Pilot, or Participant's participation in the Pilot, at any time without cause by providing Participant written notice.
- ii.* A customer participating in ELRP A.6 is permitted, at any time, to enroll in a market-integrated DR program offered by the IOU, third-party DRP, or CCA. After SDG&E becomes aware that the Participant's service account has been enrolled in a market-integrated DR program, SDG&E will de-enroll the service account from ELRP A.6.
- iii. Termination by Participant.* Participant may terminate their enrollment in the Pilot at any time for any reason contacting DRP@SDGE.com.

12. General.

- i. Entire Agreement.* These Terms are the entire agreement between SDG&E Participant concerning the Pilot's eligibility and participation requirements.
- ii. No Assignment.* These Terms may not be assigned by Participant without SDG&E's prior written consent.
- iii. Severability and Waiver.* If any provision herein is invalid or unenforceable, the remaining provisions will remain in full force and effect.
- iv. Survival.* Termination of the Participant's enrollment in the Pilot's will not affect the parties' obligations and rights under these Terms which by their sense and context are intended to survive such termination.
- v. CPUC Jurisdiction.* These Terms shall be subject to all legal and regulatory requirements applicable to ELRP (including, without limitation, any decisions, orders or rules of the CPUC).
- vi. Amendments.* These Terms may be changed by SDG&E from time to time and any changes will be published in revisions to this document and/or posted to SDG&E's website.

Attachment I

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 and
Decision 21-12-015

February 16, 2023

Group B

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1. 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 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 (SDG&E) 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.

These terms and conditions are meant to enhance the understanding of the ELRP pilot. These terms and Conditions are only for Group B of the ELRP. Group A is covered in a separate Terms and Conditions Document. Group B is defined as follows:

Group B: Market-integrated proxy demand response (PDR) resources

- Sub-Group B.1. – Third-party DR Providers (DRPs)
- Sub-Group B.2. – SDG&E Capacity Bidding Programs (CBPs)

2. Program Eligibility and Enrollment

2.1. Program Participant Criteria

ELRP eligible participants are divided into two groups (Group A and Group B), each of which is further divided into sub-groups. All customers must be located in SDG&E’s service territory and must have an SDG&E approved interval meter or Smart meter that can measure energy consumption, at least hourly, and if applicable, can measure exported energy. The following terms and conditions pertain to Group B and its two sub-groups (a separate set of terms and conditions has been provided for Group A), as defined in Attachment 1 to D.21-03-056.

Group B: Market-integrated proxy demand response (PDR) resources

- Sub-Group B.1. – Third-party DR Providers (DRPs)
- Sub-Group B.2. – SDG&E Capacity Bidding Programs (CBPs)

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

2.1.1 Sub-Group B.1 – Third Party Demand Response Providers (DRPs)

A third Party DRP with a market-integrated Proxy Demand Resource (PDR) is eligible to participate in the ELRP.

For each registered service account, the third-party DRP must provide information about the service account’s back-up generation (BUG) 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. See Compensation in Section 4 for baseline, settlement, and invoicing requirements pertaining to the third-party DRP’s PDR Resource ID.

2.1.2 Sub-Group B.2 – Capacity Bidding Program (CBP) PDR Resources

Third-party aggregators (Aggregators) or self-aggregated customers (Participants) enrolled and participating in SDG&E’s Capacity Bidding Program are eligible to participate in the ELRP.

Third Party Providers involved in Sub-Group B are required to affirm each year their intent to Participate in the ELRP, including acceptance of the Terms and Conditions and any agreements that may be developed to support third- party providers participation in the ELRP. This intent must be submitted prior to the 1st of the month in order to be eligible for compensation for ELRP events during the month.

If applicable, for each nominated account, the CBP Aggregator or Participant must provide information about the customer's back-up generation (BUG) location, type of fuel used, and the capacity of the generator, and the notice or ramp time for the generator that may be used during ELRP events.

See Compensation in [Section 4](#) for baseline, settlement, and invoicing requirements

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 maximum limit of sixty (60) hours.

3.2 Program Trigger

ELRP Group B will be activated after the CAISO issues or declares an Energy Emergency Alert (EEA) Watch, EEA 1, EEA2, or EEA3. Energy Emergency Alert is defined in CAISO Operating Procedure 4420. The start time and duration specified in the CAISO’s declaration defines the Group B ELRP event window.

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

The duration of the ELRP event (*e.g.*, the start and end time) shall follow the possible system reserve deficiency stated in the Alert Notice. For example, in the Statewide Alert Notice below, CAISO forecasted a possible system reserve deficiency between the hours of 17:00 (5 p.m.) and 21:00 (9 p.m.). Therefore, in this example, an ELRP Event for Group B would be from 17:00-21:00 (5 p.m. to 9 p.m.). Sample below:

STATEWIDE ALERT NOTICE [202002418]

The California ISO hereby issues a CAISO Grid
ALERT Notice,
effective 08/14/2020 17:00 through
08/14/2020 21:00.

Reason:

The CAISO is forecasting a possible system
reserve deficiency between the hours of
1700-2100 and is requesting additional
Ancillary Service and energy bids.

3.2.1 Group B Event Notifications

SDG&E will not notify Group B participants of the start time and duration of the ELRP event. ELRP Events for Group B participants will be specified in the CAISO Alert Notice.

3.3 Group B Test Events

There are no ELRP Test Events for Group B participants.

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.

If applicable, SDG&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.. 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.

4.1 Incentive Rate

The ELRP Compensation Rate (ECR) is \$2 per kilowatt-hour (\$2/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 B varies. Details are provided below.

4.2.1 Group B1

To construct the ELRP baseline for measuring a Group B PDR's ILR contribution during an ELRP event, the applicable CAISO baseline will be modified to account for the following:

- 1) Count net exports to the distribution grid by customer locations within the PDR aggregation that comply with Rule 21 and other applicable permits;
- 2) Exclude prior days with other ELRP events when selecting the set of "non- event, but similar" days when calculating the baseline;
- 3) Exclude applicable preceding hours with either CAISO market awards or another ELRP event on the day of the ELRP event when calculating the same-day adjustment (SDA) to the calculated baseline in step 2, and
- 4) Allow the SDA in step 3 to be no greater than +/-100%.

4.2.2 Group B2

To construct the ELRP baseline for measuring a Group B2 PDR's ILR contribution during an ELRP event, the applicable Capacity Bidding baseline will be modified to account for the following:

- 1) Count net exports to the distribution grid by customer locations within the PDR aggregation that comply with Rule 21 and other applicable permits;
- 2) Exclude prior days with other ELRP events when selecting the set of "non- event, but similar" days when calculating the baseline;
- 3) Exclude applicable preceding hours with either a CBP event or another ELRP event on the day of the ELRP event when calculating the same-day adjustment (SDA) to the calculated baseline in step 2.

4.3 Baseline and Settlement Calculations

4.3.1 Group B1

For participation in ELRP under Group B1, a DRP must construct a PDR Portfolio consisting of only 1) PDRs with RA assignment or PDRs without RA assignment (but not both) and 2) PDRs limited to SDG&E's service territory (thus, a DRP may have up to six PDR portfolios participating in ELRP).

The CAISO settled aggregated load during an ELRP event is modified to count net energy exported to the distribution grid by any customer location within the PDR aggregation, subject to each customer's exporting limit under its Rule 21 interconnection agreement.

Following an ELRP event, the DRP's scheduling coordinator (SC) is responsible for determining the following:

- 1) ELRP Event Performance (total load reduction during the ELRP event) of each PDR in the DRP's PDR Portfolio by applying the applicable ELRP modified baseline to the PDR's modified aggregated load settled during the ELRP event.
- 2) ILR of each PDR by subtracting the CAISO scheduled award quantities, inclusive of day-ahead market (DAM) and real-time market (RTM), from the PDR's ELRP Event Performance. If the total market award for the PDR during the ELRP event is zero, then ILR of the PDR equals the ELRP Event Performance.
- 3) The ELRP Event Compensation due for each PDR by adding all interval specific ELRP Compensations across all applicable intervals of the ELRP event, subject to the following:
 - a) The interval-specific ELRP Compensation in each applicable interval of the ELRP event is obtained by subtracting 1) any CAISO market payments for any portion of the load reduction counted in the interval-specific ILR and 2) the interval-specific CAISO Opportunistic Revenue (COR), defined below, from 3) the interval-specific Product of the ECR and the interval-specific ILR (see illustration below).

If the interval-specific ILR is negative, then the interval-specific ELRP Compensation is set to zero in that interval. If the interval-specific COR is greater than the interval-specific Product, then the interval-specific ELRP Compensation is set to zero in that interval.

- b) The interval-specific COR is the product of the interval-specific Market Eligible Capacity (MEC), defined below based on the interval-specific CAISO Market Event Performance (MEP) determined under applicable CAISO market baseline, and the interval-specific CAISO Clearing Price Delta (CCPD), defined below.

i. MEC:

1. If the total CAISO scheduled award quantity in an interval is non-zero and the interval-specific MEP is less than or equal to the total CAISO scheduled award quantity in the interval, then the interval-specific MEC is set to zero.
2. If the total CAISO scheduled award quantity in an interval is non-zero and if the interval-specific MEP is greater than the total CAISO scheduled award quantity in the interval and less than or equal to the Qualifying Capacity (QC) of the PDR in that interval, then the interval-specific MEC is equal to the interval-specific MEP minus the interval-specific total CAISO scheduled award quantity.
3. If the total CAISO scheduled award quantity in an interval is non-zero 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.

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.

Additionally, if the PMin value is less than the total CAISO scheduled award quantity in an interval, then the interval specific MEC is set to zero.

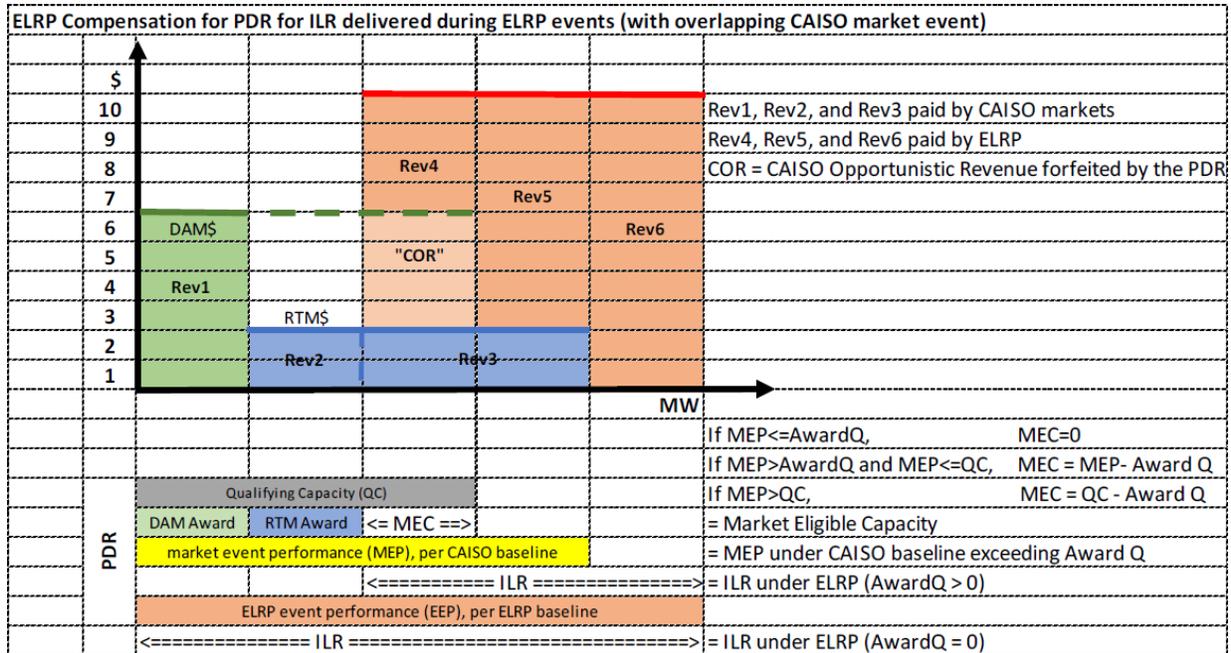
If the total CAISO scheduled award quantity in an interval is zero, then the interval-specific MEP in the above cases is set to the interval-specific ILR.

ii. CAISO Clearing Price Delta (CCPD):

For a PDR participating in the DAM only (that is, "long-start" PDR), the interval-specific CCPD is the DAM clearing price in that interval.

For a PDR participating in the RTM, the interval specific CCPD is equal to the higher of the DAM or RTM clearing price in that interval minus the lower of the DAM or RTM clearing price in that interval.

1. PDR Portfolio Level Net Event Compensation across all PDRs in the DRP's Portfolio.



4.2.3 Baseline and settlement calculation for ELRP

Following an ELRP event, SDG&E is responsible for determining the following:

- a. ELRP Event Performance (total load reduction during the ELRP event) of each CBP Portfolio for each event hour by applying the applicable ELRP modified baseline to the CBP portfolio's modified aggregated load settled during the ELRP event.
- b. ILR of each CBP portfolio. If the CBP product the aggregator has submitted a nomination for was not activated for the given ELRP event hour then the IRL is equal to the ELRP event performance. If the CBP product was activated the IRL will be calculated by subtracting the monthly CBP nomination from the CBP portfolio's ELRP Event Performance.
- c. The ELRP Event Compensation due for each CBP aggregator portfolio by adding all interval specific ELRP Compensations across all applicable intervals of the ELRP event, subject to the following:
 - i. The interval-specific ELRP Compensation in each applicable interval of the ELRP event is obtained by subtracting any CBP program energy payments
 - ii. If the interval-specific ILR is negative, then the interval- specific ELRP Compensation is set to zero in that interval.

4.2.4 Invoicing for Sub-Group B.1

To receive ELRP compensation, the DRP shall submit an aggregate invoice each quarter for the Cumulative Portfolio Level Net Event Compensation of each PDR Portfolio.

For the purposes of invoicing, the quarterly period and applicable invoicing dates are as follows:

- First quarter consists of May, June and July. Invoices for the First Quarter period are due by September 30 of the same calendar year.
- Second Quarter consists of August, September, and October. Invoices for the Second Quarter period are due by December 31 of the same calendar year.
- DRPs shall submit their invoices to SDG&E's ELRP program administrator or designee.
- The Cumulative Portfolio Level Net Event Compensation of a PDR Portfolio over one Quarter is determined by summing the Portfolio Level Net Event Compensation across all ELRP events in that Quarter. If applicable, any impact on DRAM performance is the responsibility of the seller.
- The invoice shall be accompanied with the supporting data and/or templates as defined by the ELRP Program Administrator, including but not limited to PDR-specific ELRP Event Performance, ILR, applicable market awards during the event, applicable CAISO market payments for load reductions counted in the ILR, and ELRP Event Compensation.
- SDG&E reserves the right to audit and verify the invoice as needed. SDG&E will settle the invoice within 60 days of the invoice date absent the need for additional information, which would set the 60 days from the time all additional information is received in order to process the invoice. (*e.g.*, SDG&E will settle invoices within 60 days after a disputed or incomplete invoice has been resolved to SDG&E's satisfaction).

4.2.5 Invoicing for Sub-Group B.2.

SDG&E's designated program administrator will be responsible for calculating ELRP B.2 baselines, ELRP B.2 settlements, and issuing payments to CBP Aggregators and/or Participants. who affirmed their intent to participate in ELRP.

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

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP Engineers and Scientists of California	Pioneer Community Energy
Alta Power Group, LLC Anderson & Poole	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF	Public Advocates Office Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc.
Atlas ReFuel BART	iCommLaw International Power Technology Intertie	Resource Innovations SCD Energy Solutions San Diego Gas & Electric Company
Barkovich & Yap, Inc. Braun Blaising Smith Wynne, P.C. California Cotton Ginners & Growers Assn California Energy Commission	Intestate Gas Services, Inc.	SPURR San Francisco Water Power and Sewer Sempra Utilities
California Hub for Energy Efficiency Financing	Johnston, Kevin Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	Sierra Telephone Company, Inc. Southern California Edison Company Southern California Gas Company Spark Energy Sun Light & Power Sunshine Design Stoel Rives LLP
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	Modesto Irrigation District NLine Energy, Inc. NRG Solar	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
Chevron Pipeline and Power City of Palo Alto	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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 Dish Wireless L.L.C.		