

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 7816E
As of April 9, 2026

Subject: Joint Submittal of Proposed Modifications to the Emergency Load Reduction Program Pilot Pursuant to Decision 23-12-005

Division Assigned: Energy

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PUBLIC UTILITIES COMMISSION
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To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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January 15, 2026

Advice 4789-E

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

Advice 7816-E

(Pacific Gas and Electric Company ID U 39-E)

Advice 5735-E

(Southern California Edison Company U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: JOINT SUBMITTAL OF PROPOSED MODIFICATIONS TO THE EMERGENCY LOAD REDUCTION PROGRAM PILOT PURSUANT TO DECISION 23-12-005

I. PURPOSE

In accordance with Ordering Paragraph (OP) 14(a) of Decision (D.)23-12-005, San Diego Gas & Electric Company (SDG&E) hereby submits this advice letter to request approval from the California Public Utilities Commission (Commission or CPUC) to update and modify the Emergency Load Reduction Pilot Program (ELRP) Terms and Conditions, as outlined in the following sections. Pursuant to Rule 1.8(d), SDG&E certifies that it has been fully authorized by Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) to submit this advice letter on their behalf.

II. BACKGROUND

On November 19, 2020, the 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 Southern California Edison (SCE), Pacific Gas and Electric (PG&E), and San Diego Gas & Electric Company (SDG&E) (collectively the investor-owned utilities or 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.

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 adding a residential sub-group (Sub-Group A.6).

On May 2, 2022, the IOUs filed their respective 2023-2027 DR Applications which were consolidated by the assigned ALJs on May 25, 2022 (A.22-05-002 et al.). On December 20, 2023, the Commission issued Decision Directing Certain Investor-Owned Utilities' Demand Response (DR) Programs, Pilots, and Budgets for the Years 2024-2027 (D.23-12-005), authorizing certain DR programs and related budgets for IOUs for 2024-2027. Pursuant to D.23-12-005, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E), are authorized to submit Mid-Cycle Review (MCR) proposals for their DR programs. As part of this process, the utilities may jointly propose modifications to the ELRP on a uniform statewide basis, with limited deviations to accommodate utility specific implementations due to information technology and billing systems, through a Tier 2 advice letter due no later than January 15, 2026.¹

Each respective IOU's redlined and clean ELRP Terms and Conditions documents are included as attachments to this advice letter.

III. DISCUSSION

The IOUs are not proposing any modifications to the program design of the ELRP itself in this advice letter. Rather, the IOUs are seeking to clarify provisions in the ELRP Terms and Conditions (T&Cs) pertaining to payment provisions and operational processes, including but not limited to settlements, payment, enrollment, and de-enrollment processes. In addition, IOUs seek to withdraw the Power Saver Rewards Terms and Conditions (T&Cs pertaining to ELRP Sub-Group A.6).

III.A. Modifications Applicable to All IOUs

1. *Remove ELRP Sub-Group A.6. (also known as Power Saver Rewards) from ELRP Group A T&Cs*

In 2021, the Commission issued D.21-12-015 establishing a residential sub-group of the ELRP (e.g. ELRP Sub-Group A.6.) beginning May 2022. In February 2022, each investor-owned utility submitted its respective advice letter proposing the program design and parameters for the customer facing name, Power Saver Rewards (i.e., ELRP Sub-Group A.6). On December 20, 2023, the Commission issued D.23-12-005 which authorized IOUs' 2024-2027 DR budgets, including ELRP, but ELRP Sub-Group A.6. (Power Saver Rewards) was only approved through 2025. With the closure of Power Saver Rewards at the end of 2025, the IOUs seek to close ELRP Sub-Group A.6. This advice letter will make the appropriate updates to each IOU's respective ELRP Group A T&Cs accordingly and IOU's Power Saver Rewards T&Cs will be withdrawn and removed.

¹ Decision (D). 23-12-005, Ordering Paragraph (OP) 14(a).

a) Updates to SDG&E's ELRP Terms and Conditions due to the closure of ELRP A.6.

- i) SDG&E's terms and conditions for ELRP A.6² are hereby retired.
- ii) The following references to ELRP A.6 within SDG&E's ELRP Group A terms and conditions³ are hereby removed.

Section 4 Customer Eligibility and Enrollment subsection A.4 Virtual Power Plant Aggregators Eligibility and Enrollment

- ~~A customer participating in ELRP A.6 is permitted, at any time, to enroll in ELRP A.4. After SDG&E becomes aware that the Participant's service account has been enrolled in ELRP A.4, SDG&E will de-enroll the service account from ELRP A.6.~~

Section 4 Customer Eligibility and Enrollment subsection A.5 Vehicle-Grid-Integration Aggregators Eligibility.

- ~~A customer participating in ELRP A.6 is permitted, at any time, to enroll in ELRP A.5. After SDG&E becomes aware that the Participant's service account has been enrolled in ELRP A.5, SDG&E will de-enroll the service account from ELRP A.6.~~

SDG&E also proposes to remove the language, "~~excluding A.6 Residential, found in attachment G~~" from the statement at the close of the Terms and Conditions on pg. 12 (End of Terms and Conditions for Group A)

b) Removal of A.6 language and references from SCE's ELRP Group A Terms and Conditions, as well as the sunseting of SCE's A.6. Power Saver Rewards website.

Specifically, the following language is hereby deleted from the Program Overview Section and Program Eligibility and Enrollment Section in SCE's ELRP Group A T&Cs:

Program Overview

~~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.⁴~~

~~Footnote 1: SCE established separate Terms and Conditions for ELRP Sub-Group A.6. in Advice 4774-E on April 28, 2022.~~

² AL 4397-E-A Attachment 1

³ AL 4397-E Attachment A

1. Program Eligibility and Enrollment

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

These modifications do not affect the operation, eligibility, or compensation provisions applicable to ELRP Sub-Groups A.1 through A.5, which remain subject to these Terms and Conditions for the approved program period.

With the conclusion of the Power Saver Rewards Program on December 31, 2025, SCE's Power Saver Rewards webpage (<https://powersaver.sce.com/>) and its Terms and Conditions (<https://powersaver.sce.com/terms-and-conditions/>) are being retired.

c) Sunsetting of PG&E's A.6 Power Saver Rewards website

PG&E's A.6 Power Saver Rewards concluded on December 31, 2025. The webpage (powersaver.pge.com) and its [Terms and Conditions](#) are being retired.

III.B. Modifications Applicable to SDG&E

Updates to SDG&E's ELRP Group A Terms and Conditions

1. Addition of a Disenrollment section to SDG&E's Group A Terms and Conditions.

SDG&E proposes adding the underlined disenrollment language below, to its Group A T&Cs.

Disenrollment process for Sub-Group A.1

Sub-group A.1 participants can disenroll from ELRP at any time, by contacting the program administrator at support@elrp.sdge.com with a written notice. The disenrollment will become effective within 30 days after the written notice is received.

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.sdge.com with a written notice.

Disenrollment process for Sub-Group A.3

Sub-group A.3 participants can disenroll from ELRP at any time, by contacting the program administrator at support@elrp.sdge.com with a written notice. The disenrollment will become effective within 30 days after the written notice is received.

Disenrollment process for Sub-Group A.4

Sub-Group A.4 participants can disenroll from the ELRP at any time, by contacting the program administrator at support@elrp.sdge.com with a written notice.

Disenrollment process for Sub-Group A.5

Sub-Group A.5 participants can disenroll from the ELRP at any time, by contacting the program administrator at support@elrp.sdge.com with a written notice.

2. Addition of language describing the potential impact of missing data on incentive payments.

SDG&E proposes adding the underlined language below to its ELRP Group A Section 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. 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 SDG&E's ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations.

3. Addition of language to specify what happens to a participant's ELRP incentive, if the service account closes before the incentive is issued as a bill credit.

SDG&E proposes adding the underlined language below to section 6 on Compensation. Adding this language will communicate to participants how their ELRP incentive will be impacted if their SDG&E service account closes.

For customers participating in ELRP A.1 and ELRP A.3, if a participant's service account is closed before the ELRP incentive is issued as a bill credit, the participant forfeits any ELRP incentive earned for that program year. No ELRP bill credit will be provided for any load reduction delivered prior to, during, or after the date the account closed. However, if a participant's service account changes, and the customer remains at the same premise, the customer will remain eligible to receive the ELRP bill credit.

4. Addition of language to explicitly specify the difference between Service Providers vs. Aggregators.

SDG&E proposes adding the new underlined service provider language below within Section 4 for the Customer Eligibility and Enrollment subsections, for both the ELRP A.4 and ELRP A.5 subgroups, to add text to explicitly identify the distinction between an aggregator and a service provider.

Section 4 Customer Eligibility and Enrollment subsection A.4 Virtual Power Plant (VPP) Aggregators Eligibility and Enrollment.

Net Energy Metering (NEM) customers meeting the above requirements are eligible to participate in ELRP. Third-party Service Providers meeting the above requirements are also

eligible to participate in ELRP under this Group. VPP aggregators and Service Providers 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 and Service Providers to clarify other requirements, as necessary, including potential administration fees, to support implementation of the Minimum Dispatch Hours and related ELRP compensation. If applicable, VPP Aggregators and Service Providers must provide information about their customer's back-up generation (BUG), including (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

Section 4 Customer Eligibility and Enrollment subsection A.5 Vehicle-Grid-Integration (VGI) Aggregators Eligibility.

NEM customers with electric vehicles meeting the above requirements are eligible to participate in the VGI aggregation. Third-party Service Providers meeting the above requirements are also eligible to participate in ELRP under this Group.

The use of a virtual aggregation may be elected by an aggregator or Service Provider at the time of enrollment. A virtual aggregation permits separately metered Electric Vehicle Supply Equipment (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 adding Service Providers 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 and Service Providers to clarify other requirements as needed, including potential administration fees, to implement the Minimum Dispatch Hours and related ELRP compensation. If applicable, the VGI Aggregators and Service Providers must provide information about their customer's back-up generation (BUG), including (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

SDG&E also proposes to add language to the compensation section for ELRP A.4 and ELRP A.5 that clarifies that the baselines used to determine the payments to VPP aggregators are calculated at the aggregate level and the baselines for service providers are calculated at the individual customer level.

5. Virtual Power Plant Aggregators Compensation

The baseline for ELRP A.1 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 VPP aggregators will be calculated at the aggregated level. **The baselines for Service Providers will be calculated at the individual customer level.**

~~The baseline for residential A4 aggregations is described below. If submeter data is used the day-of adjustment will not be applied. The baseline for VPP aggregators will be calculated at the aggregated level.~~

The A.5 baseline calculations for VPP aggregators and Service Providers will be the same as the A.4 baseline calculations described above.

III.C. Modifications Applicable to PG&E

PG&E ELRP Group A Terms and Conditions Updates

PG&E proposes the following changes to its Group A T&Cs to add information about how to initiate disenrollment, remove language specifying enrollment and disenrollment deadlines, describe conditions that can impact a Participant's eligibility to receive an incentive payment, provide detail and clarity around how the baseline is calculated. Redlined and clean versions of PG&E's updated T&C's are available as Attachments C and D to this advice letter.

1. Addition of the ELRP Administrator email address to Disenrollment sections and removal of language specifying an enrollment and disenrollment deadline for certain sub-groups.

PG&E proposes revising the T&Cs to add the PG&E ELRP administrator email address, pge-elrp@olivineinc.com, to each sub-group's Disenrollment section. This revision provides consumers with a simple and direct way to initiate disenrollment. PG&E also proposes removing language specifying an enrollment deadline for sub-group A.2 and disenrollment deadline for A.2, A.4, and A.5. In practice, these deadlines do not provide any programmatic or operational benefits. Proposed contract revisions are as follows:

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 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.~~

1.1.1.2 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 to pge-elrp@olivineinc.com. The disenrollment will become effective within 30 days after the written notice is received.

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 at pge-elrp@olivineinc.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.~~

1.1.3.3 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 to pge-elrp@olivineinc.com. The disenrollment will become effective within 30 days after the written notice is received.

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 to pge-elrp@olivineinc.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.~~

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.

1.1.5.3 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 at pge-elrp@olivineinc.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.~~

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. Addition of language describing the impact of missing data on incremental load reduction (ILR) calculation and incentive payment.

PG&E proposes adding language clarifying that, when missing meter data hinders its ability to calculate ILR, the affected service account may be deemed ineligible for an incentive or may be excluded from an aggregation's ILR calculation. This reflects current business practice. If a Participant's meter data is missing for the event or baseline periods, it may impact PG&E's ability to calculate the Participant or an aggregation's ILR. Proposed contract revisions are as follows:

3 Compensation (2nd paragraph)

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 PG&E's ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations.**

3. Addition of language describing the requirement for a Participant to have an active service account to receive ELRP incentives via bill credit.

PG&E proposes language that clarifies that a Participant must have an active service account at the time the ELRP incentive is ready for disbursement. PG&E cannot issue an ELRP incentive through a bill credit to a service account that has been closed. Prior to issuing the incentive, PG&E will verify whether Participants with closed service accounts have established new service accounts at the same premise. If this is confirmed, the applicable bill credit will be issued. Proposed contract revisions are as follows:

3 Compensation (5th paragraph, new)

A Participant is only eligible to receive the ELRP incentive if their service account remains open and active at the time the ELRP bill credit is issued. If a Participant's service account is closed before the ELRP incentive is issued as a bill credit, the Participant forfeits any ELRP incentive earned that program year. No ELRP bill credit will be provided for any load reduction delivered prior to, during, or after the date of account closure, including load reductions delivered during ELRP events that occurred before the account was closed. If a Participant's service account changes, but the Participant remains at the same premise, the Participant will remain eligible to receive the ELRP bill credit. A Participant who ends their enrollment during the season will still qualify for any incentives earned, as long as their account remains active, regardless of enrollment status.

4. Change meter data requirement from 10 days to 15 days. Clarify that the requirement also applies to sub-metered data.

PG&E proposes updating the meter data requirement from 10 days to 15 days of interval meter data to ensure that PG&E has enough data to calculate a baseline for events occurring on either a weekday or a weekend. The requirement applies to aggregators using sub-metered data, which must be provided to PG&E or its Program Administrator. Proposed contract revisions are as follows:

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:

- 1) Calculate the Energy Baseline (EB) – A service account must have at least ~~40~~15 days of interval meter data available in PG&E's billing system **or provided to PG&E or its Program Administrator, if using sub-metered data**, to have a valid baseline. Only the hourly average usage for the hours included in the event will be included in the EB determination.

5. Add language clarifying how the Day-Of Adjustment Value (DOAV) is calculated.

PG&E proposes adding language clarifying that the DOAV is set to 1.0 in these situations which reflects the current implementation of the DOAV calculation. The DOAV is the ratio of the average load during a period on the event day compared to the average load during the same period of the Energy Baseline. If a Participant or aggregation is a net exporter in the event or baseline DOA period, the resulting DOAV may be a negative number which may lead to unexpected results. Proposed contract revisions are as follows:

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

- 2) Calculate the Day-Of Adjustment Value (DOAV) – A DOAV shall not be less than 0.60 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. **If either (a) or (b) are negative, the DOAV is 1.0. The DOAV will be 1.0 if sub-metered data is used for baseline calculations.**

6. Separate residential and non-residential baselines into distinct sub sections.

PG&E proposes separating the descriptions of how residential and non-residential baselines are calculated. Each section will describe how the baselines are calculated in more detail, providing clarity to prospective A.4 and A.5 Participants.

a) Rename non-residential and mixed baseline section name and add residential baseline section.

3.2.1.1 Non-Residential, or Mixed Non-Residential and Residential Baseline

3.2.1.2 Residential Baseline

b) Update the footnotes describing baseline day selection and calculation for weekday and weekend events.

PG&E proposes the following edits to improve clarity by providing more detail about how similar days are selected for the baselines of weekday and weekend events. Proposed contract revisions are as follows:

3.2.1.1 Non-Residential, or Mixed Non-Residential and Residential Baseline

- 3) 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 basis using the average of the preceding similar days[1], 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.

Footnotes:

[1] For weekday events, the 10 immediate non-excluded weekdays prior to the event day will be selected for weekday events. For weekend and holiday events, the 4 immediate non-excluded weekend and holiday days prior to the event will be selected.

3.2.1.2 Residential Baseline

4) 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 basis using the average of the preceding similar days[1], excluding those days when 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 event days will not be excluded from the similar days in order to capture incrementality for ILR.

Footnotes:

[1] For weekday events, a simple average of the highest 5 out of the 10 non-excluded weekdays with the highest energy consumed over the event period shall be selected. For weekend and holiday events, the highest 3 out of the 5 past non-excluded weekend and holiday days with the highest energy consumed over the event period shall be selected, with weights of 50-, 30-, and 20-percent applied to the baseline days in order by most recent.

- c) **The proposed Residential Baseline section (3.2.1.2) will have the same body text language as Non-Residential Baseline in subparagraphs 1, 2, and 4. Subparagraph 3 describes the DOAV calculation for the residential baseline. Proposed contract revisions are as follows:**

3) Calculate the Day-Of Adjustment Value (DOAV) – A DOAV shall not be less than 0.60 or greater than 1.40. The DOAV is a ratio of (a) the average load of the first two hours of the four hours prior to the ELRP event and last two of the four hours after the ELRP event[1] 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 DOAV is 1.0. The DOAV will be 1.0 if sub-metered data is used for baseline calculations.

Footnotes:

[1] 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 one hour, 11p – 12am, for the after-event period.)

PG&E ELRP Add Delete Form Updates

PG&E proposes the following changes to its ELRP Add Delete Form that provide more detail for review and approval. The Redlined and Clean updated PG&E ELRP Add Delete form is available as Attachments E and F to this advice letter.

1. Add link to Group A Terms and Conditions document.

PG&E proposes inserting a link to provide the customer with an easy way to access a document where they can read the Group A Terms and Conditions. Proposed contract revisions are as follows:

Customer designates the above-named Aggregator to act on its behalf as its Aggregator pursuant to [PG&E's ELRP Group A Terms and Conditions \[link\]](#) for all purposes, including, but not limited to, the receipt of payments and the receipt of all notices sent by PG&E under the ELRP. Customer agrees that PG&E will have no obligations to Customer with respect to Customer's participation in the ELRP Sub-Group. Customer agrees to look solely to the Aggregator to carry out the responsibilities associated with the Aggregator's services and that any Customer inquiries concerning an Aggregator's services should be directed to the Aggregator.

2. Addition of language specifying when sharing is authorized and the specific types of data that is shared.

PG&E proposes adding language specifying that the customer is providing authorization to share data with their designated Aggregator, starting upon submission of the add/drop form. This change will improve and streamline the customer experience by reducing the number of interactions between the customer, the Aggregator, and PG&E required to resolve enrollment-related issues. PG&E will automatically cancel the data sharing authorization associated with ELRP if the customer does not complete the enrollment process is not completed in a timely manner or when the site disenrolls from ELRP. PG&E also proposes clarifying types of data that will be shared, ensuring customers receive transparency of the data being disclosed to a third party, and understand that only data relevant to ELRP participation will be provided to the Aggregator. Proposed contract revisions are as follows:

SUMMARY OF INFORMATION AUTHORIZED TO BE RELEASED

Upon submission of this form, you understand and agree to have PG&E release the following information to your authorized Aggregator: (1) customer information (e.g., name, service address, electric rate schedule); (2) access up to 48 months historical and ongoing electric interval meter data and/or electric monthly usage data; (3) current PG&E demand response programs in which you are known to participate.

If a site is not enrolled in a timely manner, then the request to enroll and its associated data sharing authorization will be automatically canceled. Once a site is enrolled in ELRP, its associated data sharing authorization will continue until the time of site's disenrollment from ELRP.

~~Customer understands and agrees that PG&E will provide its electric usage and electric meter data for the Service Agreements to Aggregator.~~ Customer also agrees to allow personnel from the California Energy Commission (CEC), PG&E, and their contracting agents, reasonable access to conduct a site visit for measurement and evaluation, access to the Customer's interval meter data, and agree to complete any surveys needed to enhance this program.

III.D. Modifications Applicable to SCE

1. **Addition of language describing the requirement for a Participant to have an active service account to receive ELRP incentives via bill credit.**

SCE's billing system is unable to apply bill credits service accounts that are closed, furthermore, as a best practice, incentives should not be issued to service accounts with billing issues (e.g. estimated bills) or are under dispute. SCE proposes language clarifying that ELRP incentives only be disbursed to directly enrolled Participants (e.g. participants in ELRP Sub-Groups A.1. and A.3.) that have an active service account or when the service account has no billing or data issues at the time the ELRP incentive is calculated or credited to the account. Prior to issuing the ELRP bill credit, SCE will verify whether Participants with a closed service account(s) have established new a service account at the same premise location. If this is confirmed, SCE will issue the ELRP bill credit to the ELRP Participant's new service account.

3 Compensation (5th paragraph, new)

For customers participating in ELRP A.1 and ELRP A.3, certain circumstances may result in a participating service account to not receive an ELRP bill credit. Such circumstances include, but are not limited to, when a service account is inactive or closed prior to the issuance of the ELRP incentive as a bill credit or when billing or data issues prevent application of the credit. However, if a participant's service account number changes and the same customer remains at the same premise, the customer shall remain eligible to receive the ELRP bill credit.

IV. **TERMS AND CONDITIONS**

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

- Attachment A – SDG&E Terms and Conditions for Group A (Redline)
- Attachment B – SDG&E Terms and Conditions for Group A (Clean)
- Attachment C – PG&E Terms and Conditions for Group A (Redline)
- Attachment D – PG&E Terms and Conditions for Group A (Clean)
- Attachment E – PG&E ELRP Add Delete Form (Redline)
- Attachment F – PG&E ELRP Add Delete Form (Clean)
- Attachment G – SCE Terms and Conditions for Group A (Redline)
- Attachment H – SCE Terms and Conditions for Group A (Clean)

V. EFFECTIVE DATE

SDG&E believes this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B and D.23-12-005, OP 14. SDG&E respectfully requests that this submittal become effective February 14, 2026 which is 30 days from the date of this submittal.

VI. PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be submitted electronically and must be received no later than February 4, 2026, which is 20 days from the date this Advice Letter was submitted with the Commission. There is no restriction on who may submit a protest.

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

For SDG&E:

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

For PG&E:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
Email: PGETariffs@pge.com

For SCE:

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

and

Adam Smith
Director, Regulatory Relations
Southern California Edison Company
c/o Karyn Gansecki
E-mail: Karyn.Gansecki@sce.com

VII. NOTICE

A copy of this submittal has been served on the utilities and interested parties shown on the attached list, and to service list A. 22-05-002 et al and R.25-09-004 by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by email to SDGETariffs@sdge.com.

/s/ Clay Faber

CLAY FABER
Director – Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

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

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:

No. of tariff sheets:

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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

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

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

Public Utilities Commission
CA. Public Advocates (CalPA)

R. Pocta
F. Oh
P. Cunningham
C. Li
M. Halperin

Energy Division

M. Ghadessi
M. Salinas
L. Tan
R. Ciupagea
Tariff Unit

CA Energy Commission

B. Penning
B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Biofuels Energy, LLC

K. Frisbie

Braun & Blaising, P.C.

S. Blaising
D. Griffiths

Buchalter

K. Cameron
M. Alcantar

CalCCA

Regulatory

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Cameron-Daniel, P.C.

General

City of Poway

Poway City Hall

City of San Diego

H. Werner
W. Smith
A. Salas

Clean Energy Renewable Fuels, LLC

P. DeVille

Clean Power Research

T. Schmid
G. Novotny

Commercial Energy

J. Martin

regulatory@commercialenergy.net

Davis Wright Tremaine LLP

J. Pau

Del Mar Fair

S. Walls

Douglass & Liddell

D. Douglass

Ellison Schneider Harris & Donlan LLP

C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg
J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

Stoel Rives LLP

S. Hilton, L. McKenna
M. O'Brien, regulatory@stoel.com

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson
M. Huffman
Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

SD Community Power

L. Fernandez
L. Utouh

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing

Communities Association

S. Dey

Copies to

AddisScott9@aol.com
ckingaiei@yahoo.com
clower@earthlink.net
hpayne3@gmail.com
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AKanzler@anaheim.net
Sue Walls
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M. Cade

Service List

A.22-05-002
R.25-09-004

ATTACHMENT A (REDLINES)

San Diego Gas and Electric Company Emergency Load
Reduction Program (ELRP) Pilot Terms and Conditions Pursuant
to California Public Utilities Commission Decisions 21-03-056,
21-06-027, 21-12-015, and 23-12-005
Group A1-A5

SDG&E Advice Letter 4789-E
January 15, 2026

Emergency Load Reduction Program (ELRP) Terms and Conditions Group A1-A5

February

26th

202~~6~~4

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, D.21-12-015, and D.23-12-005 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 seven years (2021-2027), 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:

- Sub-Groups A.1., A.2., A.3.: 1-hour minimum; 5-hour maximum
- Sub-Groups A.4., A.5.: 1-hour minimum, 3-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).

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, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

[Disenrollment Process for Sub-Group A.1](#)

[Sub-group A.1 participants can disenroll from the ELRP at any time, by contacting the Program Administrator at support@elrp.sdge.com with a written notice. The disenrollment will become effective within 30 days after the written notice is received.](#)

A.2. Non-Residential Aggregators Eligibility and Enrollment

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

Non- Residential 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

At the time of enrollment, or at designated times during the ELRP pilot, aggregators 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, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

[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.sdge.com with a written notice.](#)

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, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

Disenrollment Process for Sub-Group A.3

Sub-group A.3 participants can disenroll from the ELRP at any time, by contacting the Program Administrator at support@elrp.sdge.com with a written notice. The disenrollment will become effective within 30 days after the written notice is received.

A.4. Virtual Power Plant (VPP) 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, unless the ELRP A.4. payments to the aggregator are based on end use data and the customer site is enrolled in AC Saver.
- 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.
- ~~A customer participating in ELRP A.6 is permitted, at any time, to enroll in ELRP A.4. After SDG&E becomes aware that the Participant's service account has been enrolled in ELRP A.4 SDG&E will de-enroll the service account from ELRP A.6~~

NEM customers meeting the above requirements are eligible to participate in ELRP. Third-party Service Providers meeting the above requirements are also eligible to participate in ELRP under this group.

VPP aggregators and Service Providers 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 and Service Providers to clarify other requirements, as needed necessary, including potential administration fees, to implement the Minimum Dispatch Hours and related ELRP compensation. If applicable, VPP Aggregators and Service Providers must provide information about their customer's back-up generation (BUG), including (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

Disenrollment process for Sub-Group A.4

Sub-Group A.4 participants can disenroll from the ELRP at any time, by contacting the program administrator at support@elrp.sdge.com with a written notice

A.5. Vehicle-Grid-Integration (VGI) 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 A5 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.
- ~~A customer participating in ELRP A.6 is permitted, at any time, to enroll in ELRP A.5. After SDG&E becomes aware that the Participant's service account has been enrolled in ELRP A.5 SDG&E will de-enroll the service account from ELRP A.6.~~

NEM customers with electric vehicles meeting the above requirements are eligible to participate in the VGI aggregation. Third-party Service Providers meeting the above requirements are also eligible to participate in ELRP under this group.

The use of a virtual aggregation may be elected by an aggregator or Service Provider at the time of enrollment. A virtual aggregation permits separately metered Electric Vehicle Supply Equipment (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 and Service Providers 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 and Service Providers to clarify other requirements as needed, including potential administration fees, to implement the Minimum Dispatch Hours and related ELRP compensation.

If applicable, the VGI Aggregators must provide information about their customer's back-up generation (BUG), including (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

Disenrollment process for Sub-Group A.5

Sub-group A.5 participants can disenroll from the ELRP at any time, but contacting the program administrator at support@elrp.sdge.com with a written notice.

5. Program Event Triggers

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.

Minimum Aggregation Dispatch Hours

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

- Sub-Group A.2. (Non- Residential Aggregators) = 10 hours
- Sub-Group A.4. (VPP Aggregators) = 20 hours
- Sub-Group A.5. (VGI Aggregators) = 30 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. 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. [If there is insufficient data that impacts SDG&E's ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations.](#)

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).

The ILR for an ELRP event is calculated by summing the differences (both positive and negative) between the participant's baseline and the recorded energy used for all intervals of the ELRP event.

For customers participating in ELRP A.1 and ELRP A.3, if a participant's service account is closed before the ELRP incentive is issued as a bill credit, the participant forfeits any ELRP incentive earned for that program year. No ELRP bill credit will be provided for any load reduction delivered prior to, during, or after the date the account closed. However, if a participant's service account changes, and the customer remains at the same premise, the customer will remain eligible to receive the ELRP bill credit.

Any load reduction technology may be used during an ELRP event to achieve ILR. BUGs or Prohibited resources, except those located in a Disadvantaged Community³, 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.

³ Pursuant to Section 39711 of the Health and Safety Code, Disadvantaged Communities are defined as (1) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation and (2) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment. See also Health and Safety Code Section 116426.

- 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.
- ii. The CSEB and Adjusted CSEB (ACSEB) will all be calculated at the service account level for customers directly enrolled in ELRP. If the ELRP event occurs on a non-holiday weekday the CSEB 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 CSEB 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 account: (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.

- iii. 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 similar days used to calculate the CSEB in step 1 above. If either a or b are negative the DOA is equal to 1.
- iv. Calculate the Adjusted Customer Specific Energy Baseline (ACSEB) – An account’s ACSEB for an ELRP event hour is calculated by multiplying the CSEB by the DOA. If the CSEB is negative, then the ACSEB is set equal to the CSEB.

Special Considerations

1. 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.
2. 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. Non-Residential Aggregators Compensation

The ~~S~~same baseline guidelines as A.1 apply for ELRP A.2 with the exception that the baseline will be calculated at the aggregated level.

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 VPP aggregators will be calculated at the aggregated level. The baselines for Service Providers will be calculated at the individual level.

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

- 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 will count net exports to the distribution grid. If the ELRP event occurs on a non-holiday weekday the CSEB 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 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.

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.

- ii. 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.

- iii. Calculate the Customer Specific Adjusted Energy Baseline (CSAEB) – when the CSEB is greater than zero, the CSAEB will be calculated by multiplying the CSEB by the DOA. If the CSEB is less than zero, then the CSAEB is set equal to the CSEB.

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. non-residential aggregation baseline and residential aggregation calculations will be the same as the A.4 baseline calculations described above. 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. Upon adoption by the CPUC, EVSE sub-meter, including the use of telematics, must meet applicable standards established by the CPUC.

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 G}~~

ATTACHMENT B (CLEAN)

San Diego Gas and Electric Company Emergency Load
Reduction Program (ELRP) Pilot Terms and Conditions Pursuant
to California Public Utilities Commission Decisions 21-03-056,
21-06-027, 21-12-015, and 23-12-005
Group A1-A5

SDG&E Advice Letter 4789-E
January 15, 2026

Emergency Load Reduction Program (ELRP) Terms and Conditions Group A1-A5

February

26th

2026

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, D.21-12-015, and D.23-12-005 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 seven years (2021-2027), 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:

- Sub-Groups A.1., A.2., A.3.: 1-hour minimum; 5-hour maximum
- Sub-Groups A.4., A.5.: 1-hour minimum, 3-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).

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, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

Disenrollment Process for Sub-Group A.1

Sub-group A.1 participants can disenroll from the ELRP at any time, by contacting the Program Administrator at support@elrp.sdge.com with a written notice. The disenrollment will become effective within 30 days after the written notice is received.

A.2. Non-Residential Aggregators Eligibility and Enrollment

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

Non- Residential 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

At the time of enrollment, or at designated times during the ELRP pilot, aggregators 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, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

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.sdge.com with a written notice.

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, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

Disenrollment Process for Sub-Group A.3

Sub-group A.3 participants can disenroll from the ELRP at any time, by contacting the Program Administrator at support@elrp.sdge.com with a written notice. The disenrollment will become effective within 30 days after the written notice is received.

A.4. Virtual Power Plant (VPP) 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, unless the ELRP A.4. payments to the aggregator are based on end use data and the customer site is enrolled in AC Saver.
- 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. Third-party Service Providers meeting the above requirements are also eligible to participate in ELRP under this group.

VPP aggregators and Service Providers 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 and Service Providers to clarify other requirements, as necessary, including potential administration fees, to implement the Minimum Dispatch Hours and related ELRP compensation. If applicable, VPP Aggregators and Service Providers must provide information about their customer's back-up generation (BUG), including (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

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.sdge.com with a written notice.

A.5. Vehicle-Grid-Integration (VGI) 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 A5 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. Third-party Service Providers meeting the above requirements are also eligible to participate in ELRP under this group.

The use of a virtual aggregation may be elected by an aggregator or Service Provider at the time of enrollment. A virtual aggregation permits separately metered Electric Vehicle Supply Equipment (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 and Service Providers 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 and Service Providers to clarify other requirements as needed, including potential administration fees, to implement the Minimum Dispatch Hours and related ELRP compensation.

If applicable, the VGI Aggregators must provide information about their customer's back-up generation (BUG), including (1) location (address), (2) type of fuel used (e.g., diesel, natural gas, battery, etc.), (3) the nameplate capacity, (4) the notice time, and (5) the ramp time for generators that may be used during ELRP events.

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.sdge.com with a written notice.

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- Residential Aggregators) = 10 hours

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.

- Sub-Group A.4. (VPP Aggregators) = 20 hours
- Sub-Group A.5. (VGI Aggregators) = 30 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. 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. If there is insufficient data that impacts SDG&E's ability to calculate ILR, the account may not receive an incentive or may be excluded from ILR calculations.

The ILR for an ELRP event is calculated by summing the differences (both positive and negative) between the participant's baseline and the recorded energy used for all intervals of the ELRP event.

For customers participating in ELRP A.1 and ELRP A.3, if a participant's service account is closed before the ELRP incentive is issued as a bill credit, the participant forfeits any ELRP incentive

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).

earned for that program year. No ELRP bill credit will be provided for any load reduction delivered prior to, during, or after the date the account closed. However, if a participant's service account changes, and the customer remains at the same premise, the customer will remain eligible to receive the ELRP bill credit.

Any load reduction technology may be used during an ELRP event to achieve ILR. BUGs or Prohibited resources, except those located in a Disadvantaged Community³, 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.

³ Pursuant to Section 39711 of the Health and Safety Code, Disadvantaged Communities are defined as (1) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation and (2) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment. See also Health and Safety Code Section 116426.

~~ii.~~ iii. The CSEB and Adjusted CSEB (ACSEB) will all be calculated at the service account level for customers directly enrolled in ELRP. If the ELRP event occurs on a non-holiday weekday the CSEB 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 CSEB 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 account: (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.

~~iii.~~ iii. 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 similar days used to calculate the CSEB in step 1 above. If either a or b are negative the DOA is equal to 1.

~~iv.~~ iv. Calculate the Adjusted Customer Specific Energy Baseline (ACSEB) – An account's ACSEB for an ELRP event hour is calculated by multiplying the CSEB by the DOA. If the CSEB is negative, then the ACSEB is set equal to the CSEB.

Special Considerations

1. 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.
2. 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. Non-Residential Aggregators Compensation

The same baseline guidelines as A.1 apply for ELRP A.2 with the exception that the baseline will be calculated at the aggregated level.

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 VPP aggregators will be calculated at the aggregated level. The baselines for Service Providers will be calculated at the individual level.

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

- 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 will count net exports to the distribution grid. If the ELRP event occurs on a non-holiday weekday the CSEB will be calculated on an hourly basis using the average of the highest five (5) of the ten (1) preceding similar non-holiday weekdays. If the ELRP event occurs on a weekend or holiday the CSEB 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.

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.

- ii. 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.
- iii. Calculate the Customer Specific Adjusted Energy Baseline (CSAEB) – when the CSEB is greater than zero, the CSAEB will be calculated by multiplying the CSEB by the

DOA. If the CSEB is less than zero, then the CSAEB is set equal to the CSEB.

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. non-residential aggregation baseline and residential aggregation calculations will be the same as the A.4 baseline calculations described above. 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. Upon adoption by the CPUC, EVSE sub-meter, including the use of telematics, must meet applicable standards established by the CPUC.

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

ATTACHMENT C (REDLINES)

Pacific Gas and Electric Company Emergency Load Reduction Program (ELRP) Pilot Terms and Conditions Pursuant to California Public Utilities Commission Decisions 21-03-056, 21-06-027, 21-12-015, and 23-12-005

SDG&E Advice Letter 4789-E
January 15, 2026

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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, D. 21-11-015, and D. 23-12-005 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, 2027.

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 [to pge-elrp@olivineinc.com](mailto:pge-elrp@olivineinc.com). 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 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 [at pge-elrp@olivineinc.com](mailto:pge-elrp@olivineinc.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.~~

1.1.3 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 [to pge-elrp@olivineinc.com](mailto:pge-elrp@olivineinc.com). The disenrollment will become effective within 30 days after the written notice is received.

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

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."

deployed with residential (bundled or unbundled) and/or non-residential (bundled or unbundled) customers, whose VPP meet all of the following criteria, is 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 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.

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 [to pge-elrp@olivineinc.com](mailto:pge-elrp@olivineinc.com). ~~Disenrollment requests are processed on an annual basis~~

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

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

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 or subsequent supplement requirements or Smart Inverter Working Group-recommended functions, 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.

- 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.

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 [at pge-elrp@olivineinc.com](mailto:pge-elrp@olivineinc.com). ~~Disenrollment requests are processed on an annual 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."

~~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
 - A.1, A.2, A.3: 5-hour maximum; A.4, A.5: 3-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	20
A.5 Vehicle-Grid Integration Aggregators	30

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. [If there is insufficient data that impacts PG&E'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. BUGs or Prohibited Resources, except those located in a Disadvantaged Community⁸, may be used

⁸ Pursuant to Section 39711 of the Health and Safety Code, Disadvantaged Communities are defined as (1) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects,

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.

A Participant is only eligible to receive the ELRP incentive if their service account remains open and active at the time the ELRP bill credit is issued. If a Participant's service account is closed before the ELRP incentive is issued as a bill credit, the Participant forfeits any ELRP incentive earned that program year. No ELRP bill credit will be provided for any load reduction delivered prior to, during, or after the date of account closure, including load reductions delivered during ELRP events that occurred before the account was closed. If a Participant's service account changes, but the Participant remains at the same premise, the Participant will remain eligible to receive the ELRP bill credit. A Participant who ends their enrollment during the season will still qualify for any incentives earned, as long as their account remains active, regardless of enrollment status.

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 event ILR and ECR, where the event ILR is defined as the sum of

exposure, or environmental degradation and (2) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment. See also Health and Safety Code Section 116426.

the positive and negative⁹ ILR calculated at the interval level across all intervals of a given event. 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 Non-Residential, or Mixed Non-Residential and Residential Baseline Sub-Groups A.1, A.2, A.3, A.4 and A.5.~~

Steps for calculating a participant's ELRP baseline:⁴⁰

- 1) Calculate the Energy Baseline (EB) – A service account must have at least ~~40-15~~ days of interval meter data available in PG&E's billing system or provided to PG&E or its Program Administrator, if using sub-metered data, 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 basis using the average of the preceding *similar* days¹¹, 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 0.60 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~~

⁹ Load increase relative to the baseline for non-exporting resources.

⁴⁰ ~~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.~~

¹¹ ~~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. For weekday events, the 10 immediate non-excluded weekdays prior to the event day will be selected. For weekend and holiday events, the 4 immediate non-excluded weekend and holiday days prior to the event will be selected.~~

accordance with Step 2 above. -If either (a) or (b) are negative, the DOAV is 1.0. The DOAV will be 1.0 if sub-metered data is used for baseline calculations.

- 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 Residential Baseline

Steps for calculating a residential aggregation's ELRP baseline:

- 1) Calculate the Energy Baseline (EB) – To be included in the aggregation, a service account must have at least 15 days of interval meter data available in PG&E's billing system or provided to PG&E or its Program Administrator, if using sub-metered data, 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 basis using the average of the preceding similar days¹², excluding those days when 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 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 0.60 or greater than 1.40. The DOAV is a ratio of (a) the average load of the first two hours of the four hours prior to the ELRP event and last two of the four hours after the ELRP event¹³ to (b) the average load of the same hours from the days selected in accordance

¹² For weekday events, a simple average of the highest 5 out of the 10 non-excluded weekdays with the highest energy consumed over the event period shall be selected. For weekend and holiday events, the highest 3 out of the 5 past non-excluded weekend and holiday days with the highest energy consumed over the event period shall be selected, with weights of 50-, 30-, and 20-percent applied to the baseline days in order by most recent.

¹³ 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 one hour, 11p – 12am, for the after-event period.)

with Step 2 above. If either (a) or (b) are negative, the DOAV is 1.0. The DOAV will be 1.0 if sub-metered data is used for baseline calculations.

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.

3.2.1.23.2.1.3 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.
- 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.

3.2.1.33.2.1.4 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.

3.2.1.43.2.1.5 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 methods, as specified in Sections 3.2.1.1 and 3.2.1.2, 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.

3.2.1.53.2.1.6 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 methods, as specified in Sections 3.2.1.1 and 3.2.1.2, 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 D (CLEAN)

Pacific Gas and Electric Company Emergency Load Reduction Program (ELRP) Pilot Terms and Conditions Pursuant to California Public Utilities Commission Decisions 21-03-056, 21-06-027, 21-12-015, and 23-12-005

SDG&E Advice Letter 4789-E
January 15, 2026

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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, D. 21-11-015, and D. 23-12-005 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, 2027.

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 to pge-elrp@olivineinc.com. 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 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.

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 at pge-elrp@olivineinc.com.

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 to pge-elrp@olivineinc.com. The disenrollment will become effective within 30 days after the written notice is received.

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 to participate in ELRP:

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."

- 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.

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 to pge-elrp@olivineinc.com.

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.

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

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 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.

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 or subsequent supplement requirements or Smart Inverter Working Group-recommended functions, 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.

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.

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 at pge-elrp@olivineinc.com.

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:

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."

- Program Availability:
 - May – October
 - Seven (7) days per week
 - 4 p.m. to 9 p.m. (Pacific Time Zone)

- Event Duration:
 - 1-hour minimum
 - A.1, A.2, A.3: 5-hour maximum; A.4, A.5: 3-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	20
A.5 Vehicle-Grid Integration Aggregators	30

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. If there is insufficient data that impacts PG&E'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. BUGs or Prohibited Resources, except those located in a Disadvantaged Community⁸, 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

⁸ Pursuant to Section 39711 of the Health and Safety Code, Disadvantaged Communities are defined as (1) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation and (2) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment. See also Health and Safety Code Section 116426.

capacity of the generator, the notice time for the generator and, the ramp time for the generator that may be used during ELRP events.

A Participant is only eligible to receive the ELRP incentive if their service account remains open and active at the time the ELRP bill credit is issued. If a Participant's service account is closed before the ELRP incentive is issued as a bill credit, the Participant forfeits any ELRP incentive earned that program year. No ELRP bill credit will be provided for any load reduction delivered prior to, during, or after the date of account closure, including load reductions delivered during ELRP events that occurred before the account was closed. If a Participant's service account changes, but the Participant remains at the same premise, the Participant will remain eligible to receive the ELRP bill credit. A Participant who ends their enrollment during the season will still qualify for any incentives earned, as long as their account remains active, regardless of enrollment status.

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 event ILR and ECR, where the event ILR is defined as the sum of the positive and negative⁹ ILR calculated at the interval level across all intervals of a given event. 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 Non-Residential, or Mixed Non-Residential and Residential Baseline

Steps for calculating a participant's ELRP baseline:

- 1) Calculate the Energy Baseline (EB) – A service account must have at least 15 days of interval meter data available in PG&E's billing system or provided to PG&E or its Program Administrator, if using sub-metered

⁹ Load increase relative to the baseline for non-exporting resources.

data, 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 basis using the average of the preceding *similar days*¹⁰, 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 0.60 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. If either (a) or (b) are negative, the DOAV is 1.0. The DOAV will be 1.0 if sub-metered data is used for baseline calculations.
- 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 Residential Baseline

Steps for calculating a residential aggregation's ELRP baseline:

- 1) Calculate the Energy Baseline (EB) – To be included in the aggregation, a service account must have at least 15 days of interval meter data available in PG&E's billing system or provided to PG&E or its Program Administrator, if using sub-metered data, to have a valid baseline. Only the hourly average usage for the hours included in the event will be included in the EB determination.

¹⁰ For weekday events, the 10 immediate non-excluded weekdays prior to the event day will be selected. For weekend and holiday events, the 4 immediate non-excluded weekend and holiday days prior to the event will be selected.

- 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 basis using the average of the preceding similar days¹¹, excluding those days when 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 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 0.60 or greater than 1.40. The DOAV is a ratio of (a) the average load of the first two hours of the four hours prior to the ELRP event and last two of the four hours after the ELRP event¹² 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 DOAV is 1.0. The DOAV will be 1.0 if sub-metered data is used for baseline calculations.
- 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.

3.2.1.3 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.
 - 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).

¹¹ For weekday events, a simple average of the highest 5 out of the 10 non-excluded weekdays with the highest energy consumed over the event period shall be selected. For weekend and holiday events, the highest 3 out of the 5 past non-excluded weekend and holiday days with the highest energy consumed over the event period shall be selected, with weights of 50-, 30-, and 20-percent applied to the baseline days in order by most recent.

¹² 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 one hour, 11p – 12am, for the after-event period.)

- 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.
- 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.

3.2.1.4 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.

3.2.1.5 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 methods, as specified in Sections 3.2.1.1 and 3.2.1.2, 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.

3.2.1.6 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 methods, as specified in Sections 3.2.1.1 and 3.2.1.2, 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 (REDLINES)

Pacific Gas and Electric Company Emergency Load Reduction
Program (ELRP) Pilot Notice to Add or Delete Customers
Pursuant to California Public Utilities Commission Decisions 21-
03-056, 21-06-027, 21-12-015, and 23-12-005

SDG&E Advice Letter 4789-E
January 15, 2026



NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

Instructions: Aggregators and Customers use this notice to officially notify Pacific Gas and Electric Company (PG&E) of their intent to add or delete PG&E customers from the Aggregator’s Emergency Load Reduction Program (ELRP) _____¹ (Sub-Group) portfolio

PG&E may verify the information on this notice with the Customer.

Aggregator Company Name:	
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This [notice form](#) adds or deletes a customer’s Service Agreements from the above named Aggregator’s ELRP Sub-Group portfolio. PG&E will review and approve each Service Agreement to be added to determine if it meets the minimum requirements for that Sub-Group as specified in PG&E’s ELRP Group A Terms and Conditions.² PG&E must approve each Service Agreement before the Service Agreement can be included in the Aggregator’s portfolio for the ELRP Sub-Group. Additions to the portfolio will be effective upon PG&E’s approval date. Deletions from the portfolio will be effective upon the date processed by PG&E.

By signing this [notice form](#), Aggregator and Customer understand that the Aggregator has the authority to act on behalf of the Customer in connection with the ELRP Sub-Group for the Customer’s Service Agreements. Such authority is subject to PG&E’s ELRP Group A Terms and Conditions, the Agreement for Aggregators Participating in the Emergency Load Reduction Program (Group A) and any associated legal or regulatory requirements.

Customer designates the above-named Aggregator to act on its behalf as its Aggregator pursuant to [PG&E’s ELRP Group A Terms and Conditions \[link\]](#) for all purposes, including, but not limited to, the receipt of payments and the receipt of all notices sent by PG&E under the ELRP. Customer agrees that PG&E will have no obligations to Customer with respect to Customer’s participation in the ELRP Sub-Group. Customer agrees to look solely to the Aggregator to carry out the responsibilities associated with the Aggregator’s services and that any Customer inquiries concerning an Aggregator’s services should be directed to the Aggregator.

SUMMARY OF INFORMATION AUTHORIZED TO BE RELEASED

Upon submission of this form, you understand and agree to have PG&E release the following information to your authorized Aggregator: (1) customer information (e.g., name, service address, electric rate schedule); (2) access up to 48 months historical and ongoing electric interval meter data and/or electric monthly usage data; (3) current PG&E demand response programs in which you are known to participate.

If a site is not enrolled in a timely manner, then the request to enroll and its associated data sharing authorization will be automatically canceled. Once a site is enrolled in ELRP, its associated data sharing authorization will continue until the time of site’s disenrollment from ELRP.

~~Customer understands and agrees that PG&E will provide its electric usage and electric meter data for the Service Agreements to Aggregator.~~ Customer also agrees to allow personnel from the California Energy Commission (CEC), PG&E, and their contracting agents, reasonable access to conduct a site visit for measurement and evaluation, access to the Customer’s interval meter data, and agree to complete any surveys needed to enhance this program.

Customer acknowledges that Aggregator is not PG&E’s agent for any purpose. PG&E shall not be liable to Customer for any damages caused to the Customer by, or resulting from: (1) any failure by Aggregator to comply with PG&E’s ELRP Group A Terms and Conditions, the Agreement for Aggregators Participating in the Emergency

¹ Specify applicable sub-group: A.2, Non-Residential Aggregators, / A.4, Virtual Power Plant (“VPP”) Aggregators, / A.5, A.5, Electric Vehicle (“EV”) and Vehicle-Grid-Integration (“VGI”) Aggregators.

² 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, 21-12-015, and 23-12-005 and Resolution E-5267. Such terms and conditions are subject to periodic update.



NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

Load Reduction Program (Group A) and any associated legal or regulatory requirements, (2) Aggregator’s failure to perform any commitment to the Customer or (3) any acts, omissions, or representations made by Aggregator in connection with Aggregator’s solicitation of Customer or with the Aggregator’s performance of any of its functions as an aggregator in the ELRP

This agreement at all times shall be subject to such modifications as the California Public Utilities Commission may direct from time to time in the exercise of its jurisdiction.

Customer [Company] ³ Name:		Aggregator Company Name:	
Signature:		Signature:	
[Name:]		Name:	
[Title:]		Title:	
Date:		Date:	

³ Bracketed information to be included if Customer is a legal entity; otherwise delete.



NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

Aggregators must provide the information listed below as an attachment to this notice using the provided template.

Notice by Aggregator to Add/Delete Customers (Please Print or Type Clearly)							
Aggregator Company Name: _____							
	Add/ Delete	Customer Site Name	PG&E Account Number	Electric Meter Number	Service Address and City	EVSE Nameplate Capacity (kW)	Export Election (Yes / No)
1.							
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NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

18.							
19.							
20.							

Additional Declarations

CUSTOMER DECLARATIONS

Non-residential customers enrolling in the ELRP Sub-Group are required to declare whether they intend to utilize each back-up generator (BUG) to respond to ELRP events located on any sites they are enrolling and provide a brief description of the generator for identification purposes. For each of the BUGs that the customer indicates they will use in response to ELRP events, the customer must specify the following:

1. The nameplate capacity (kW) of the generator
2. The fuel/energy type (i.e. diesel, natural gas, etc.) of the generator
3. Specify whether or not the service agreement where the generator is located is a co-generation site
4. Attest that the service agreement where the generator is located does not have a power purchase agreement
5. (Optional) The notice time needed to utilize backup generation
6. (Optional) The ramp time of the backup generator

Aggregators must provide the information listed above as an attachment to this notice using the template provided below.

The Customer attests that any site not listed in the Back-up Generation attachment does not have backup generation.

#	PG&E Account Number	PG&E Meter Number	Generator Description	Intend to Utilize in Response to Event (if permitted ⁴) (Yes / No)	[Required if Intent to Utilize = Yes]				[Optional]	
					Nameplate Capacity (kW)	Fuel / Energy Type	Co-generation Site (Yes/No)	Power Purchase Agreement (PPA) Attestation (Yes/No)	Notice Time (HH:M M:SS)	Ramp Time (HH:M M:SS)
1.										
2.										
3.										
4.										
5.										
6.										
7.										

⁴ If the service agreement is in a disadvantaged community, a participant may not use back-up generation to achieve incremental load reduction (ILR) if the back-up generation is designated as a Prohibited Resource per California Public Utilities Commission Resolution E-4906. If the service agreement is not located in a disadvantaged community, the participant may only utilize the prohibited resource to achieve ILR during an ELRP event when permitted by a Governor’s Executive Order and in compliance with Rule 21 and other applicable regulations and permits, including those imposed by the local air district.



NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

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AGGREGATOR DECLARATIONS

If the Aggregator is in the A.2, Non-Residential Aggregator Sub-Group, the Aggregator nominates an estimated, portfolio load reduction quantity to be achieved during an ELRP event after giving effect to the addition(s) or deletion(s) requested by this notice as follows: _____.

If the Aggregator is a non-BIP aggregator in the A.2, Non-Residential Aggregator Sub-Group, the Aggregator hereby declares that after giving effect to the addition or deletion requested by this notice, the aggregated resource capacity of it's portfolio meets or exceeds 500 kW.

If the Aggregator is in the A.4, VPP Aggregator Sub-Group, the Aggregator nominates an estimated target load reduction for their VPP aggregation to be achieved during an ELRP event, after giving effect to the addition(s) or deletion(s) requested by this notice, as follows: _____.

If the Aggregator is in the A.5, EV or VGI Aggregator Sub-Group, the Aggregator nominates an estimated target load reduction quantity for their VGI aggregation to be achieved during an ELRP event, after giving effect to the addition(s) or deletion(s) requested by this notice, as follows: _____.

ATTACHMENT F (CLEAN)

Pacific Gas and Electric Company Emergency Load Reduction
Program (ELRP) Pilot Notice to Add or Delete Customers
Pursuant to California Public Utilities Commission Decisions 21-
03-056, 21-06-027, 21-12-015, and 23-12-005

SDG&E Advice Letter 4789-E
January 15, 2026



NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

Instructions: Aggregators and Customers use this notice to officially notify Pacific Gas and Electric Company (PG&E) of their intent to add or delete PG&E customers from the Aggregator’s Emergency Load Reduction Program (ELRP) _____¹ (Sub-Group) portfolio

PG&E may verify the information on this notice with the Customer.

Aggregator Company Name:	
--------------------------	--

This form adds or deletes a customer’s Service Agreements from the above named Aggregator’s ELRP Sub-Group portfolio. PG&E will review and approve each Service Agreement to be added to determine if it meets the minimum requirements for that Sub-Group as specified in PG&E’s ELRP Group A Terms and Conditions.² PG&E must approve each Service Agreement before the Service Agreement can be included in the Aggregator’s portfolio for the ELRP Sub-Group. Additions to the portfolio will be effective upon PG&E’s approval date. Deletions from the portfolio will be effective upon the date processed by PG&E.

By signing this form, Aggregator and Customer understand that the Aggregator has the authority to act on behalf of the Customer in connection with the ELRP Sub-Group for the Customer’s Service Agreements. Such authority is subject to PG&E’s ELRP Group A Terms and Conditions, the Agreement for Aggregators Participating in the Emergency Load Reduction Program (Group A) and any associated legal or regulatory requirements.

Customer designates the above-named Aggregator to act on its behalf as its Aggregator pursuant to [PG&E’s ELRP Group A Terms and Conditions \[link\]](#) for all purposes, including, but not limited to, the receipt of payments and the receipt of all notices sent by PG&E under the ELRP. Customer agrees that PG&E will have no obligations to Customer with respect to Customer’s participation in the ELRP Sub-Group. Customer agrees to look solely to the Aggregator to carry out the responsibilities associated with the Aggregator’s services and that any Customer inquiries concerning an Aggregator’s services should be directed to the Aggregator.

SUMMARY OF INFORMATION AUTHORIZED TO BE RELEASED

Upon submission of this form, you understand and agree to have PG&E release the following information to your authorized Aggregator: (1) customer information (e.g., name, service address, electric rate schedule); (2) access up to 48 months historical and ongoing electric interval meter data and/or electric monthly usage data; (3) current PG&E demand response programs in which you are known to participate.

If a site is not enrolled in a timely manner, then the request to enroll and its associated data sharing authorization will be automatically canceled. Once a site is enrolled in ELRP, its associated data sharing authorization will continue until the time of site’s disenrollment from ELRP.

Customer also agrees to allow personnel from the California Energy Commission (CEC), PG&E, and their contracting agents, reasonable access to conduct a site visit for measurement and evaluation, access to the Customer’s interval meter data, and agree to complete any surveys needed to enhance this program.

Customer acknowledges that Aggregator is not PG&E’s agent for any purpose. PG&E shall not be liable to Customer for any damages caused to the Customer by, or resulting from: (1) any failure by Aggregator to comply with PG&E’s ELRP Group A Terms and Conditions, the Agreement for Aggregators Participating in the Emergency Load Reduction Program (Group A) and any associated legal or regulatory requirements, (2) Aggregator’s failure to perform any commitment to the Customer or (3) any acts, omissions, or representations made by Aggregator in

¹ Specify applicable sub-group: A.2, Non-Residential Aggregators, / A.4, Virtual Power Plant (“VPP”) Aggregators, / A.5, A.5, Electric Vehicle (“EV”) and Vehicle-Grid-Integration (“VGI”) Aggregators.

² 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, 21-12-015, and 23-12-005 and Resolution E-5267. Such terms and conditions are subject to periodic update.



NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

connection with Aggregator's solicitation of Customer or with the Aggregator's performance of any of its functions as an aggregator in the ELRP

This agreement at all times shall be subject to such modifications as the California Public Utilities Commission may direct from time to time in the exercise of its jurisdiction.

Customer [Company] ³ Name:		Aggregator Company Name:	
Signature:		Signature:	
[Name:]		Name:	
[Title:]		Title:	
Date:		Date:	

³ Bracketed information to be included if Customer is a legal entity; otherwise delete.



NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

Aggregators must provide the information listed below as an attachment to this notice using the provided template.

Notice by Aggregator to Add/Delete Customers							
(Please Print or Type Clearly)							
Aggregator Company Name: _____							
Add/ Delete	Customer Site Name	PG&E Account Number	Electric Meter Number	Service Address and City	EVSE Nameplate Capacity (kW)	Export Election (Yes / No)	
1.							
2.							
3.							
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NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

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20.							

Additional Declarations

CUSTOMER DECLARATIONS

Non-residential customers enrolling in the ELRP Sub-Group are required to declare whether they intend to utilize each back-up generator (BUG) to respond to ELRP events located on any sites they are enrolling and provide a brief description of the generator for identification purposes. For each of the BUGs that the customer indicates they will use in response to ELRP events, the customer must specify the following:

1. The nameplate capacity (kW) of the generator
2. The fuel/energy type (i.e. diesel, natural gas, etc.) of the generator
3. Specify whether or not the service agreement where the generator is located is a co-generation site
4. Attest that the service agreement where the generator is located does not have a power purchase agreement
5. (Optional) The notice time needed to utilize backup generation
6. (Optional) The ramp time of the backup generator

Aggregators must provide the information listed above as an attachment to this notice using the template provided below.

The Customer attests that any site not listed in the Back-up Generation attachment does not have backup generation.

#	PG&E Account Number	PG&E Meter Number	Generator Description	Intend to Utilize in Response to Event (if permitted ⁴) (Yes / No)	[Required if Intent to Utilize = Yes]				[Optional]	
					Nameplate Capacity (kW)	Fuel / Energy Type	Co-generation Site (Yes/No)	Power Purchase Agreement (PPA) Attestation (Yes/No)	Notice Time (HH:M M:SS)	Ramp Time (HH:M M:SS)
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⁴ If the service agreement is in a disadvantaged community, a participant may not use back-up generation to achieve incremental load reduction (ILR) if the back-up generation is designated as a Prohibited Resource per California Public Utilities Commission Resolution E-4906. If the service agreement is not located in a disadvantaged community, the participant may only utilize the prohibited resource to achieve ILR during an ELRP event when permitted by a Governor's Executive Order and in compliance with Rule 21 and other applicable regulations and permits, including those imposed by the local air district.



NOTICE TO ADD OR DELETE CUSTOMERS PARTICIPATING IN THE EMERGENCY LOAD REDUCTION PROGRAM (GROUP A)

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AGGREGATOR DECLARATIONS

If the Aggregator is in the A.2, Non-Residential Aggregator Sub-Group, the Aggregator nominates an estimated, portfolio load reduction quantity to be achieved during an ELRP event after giving effect to the addition(s) or deletion(s) requested by this notice as follows: _____.

If the Aggregator is a non-BIP aggregator in the A.2, Non-Residential Aggregator Sub-Group, the Aggregator hereby declares that after giving effect to the addition or deletion requested by this notice, the aggregated resource capacity of it's portfolio meets or exceeds 500 kW.

If the Aggregator is in the A.4, VPP Aggregator Sub-Group, the Aggregator nominates an estimated target load reduction for their VPP aggregation to be achieved during an ELRP event, after giving effect to the addition(s) or deletion(s) requested by this notice, as follows: _____.

If the Aggregator is in the A.5, EV or VGI Aggregator Sub-Group, the Aggregator nominates an estimated target load reduction quantity for their VGI aggregation to be achieved during an ELRP event, after giving effect to the addition(s) or deletion(s) requested by this notice, as follows: _____.

ATTACHMENT G (REDLINES)

Southern California Edison Company Emergency Load Reduction Program (ELRP) Pilot Notice to Add or Delete Customers Pursuant to California Public Utilities Commission Decisions 21-03-056, 21-06-027, 21-12-015, and 23-12-005 (Sub-Groups A.1., A.2., A.3., A.4., and A.5.)

SDG&E Advice Letter 4789-E
January 15, 2026

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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. On December 20, 2023, the Commission issued D.23-12-005 *Decision Directing Certain Investor-Owned Utilities’ Demand Response Programs, Pilots, and Budgets for the Years 2024-2027*. In that Decision, the Commission approved SCE’s 2024-2027 ELRP budget and adopted certain program modifications, including a maximum three-hour dispatch window for Sub-Groups A.4. and A.5.

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, D.23-12-005, 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.~~⁴—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™

⁴—~~SCE established separate Terms and Conditions for ELRP Sub-Group A.6. in Advice 4774-E on April 28, 2022.~~

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, 2027.

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

A participant (customers and aggregators) accepts these Terms and Conditions by their enrollment and participation in ELRP.

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

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 will calculate annual ELRP incentives in good faith based on available usage data. 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 15 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).

- Is not simultaneously enrolled in another DR program offered by SCE, a demand response provider (DRP), or a Community Choice Aggregator (CCA), with the exception that dual enrollment in SCE’s Base Interruptible Program (BIP), Agricultural and Pumping Interruptible (AP-I) program, Summer Discount Plan Program-Commercial (SDP-C),⁶ or Smart Energy Program (SEP) 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

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

⁷ The amount of kilowatts (kW) 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 kW.

written notice. The disenrollment will become effective within 30 days after the written notice is received.

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 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, 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

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

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 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.

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."

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 at 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 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, 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
 - Sub-Groups A.1., A.2., A.3.: 1-hour minimum; 5-hour maximum
 - Sub-Groups A.4., A.5.: 1-hour minimum; 3-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).

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.

2.3 Group A Notifications

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

2.4 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	20
A.5. Vehicle-Grid Integration Aggregators	30

2.5 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.

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.

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 Resources,¹⁵ except those operated by non-residential customers located in a Disadvantaged Community (DAC),¹⁶ 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. If applicable, participants will be asked 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

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](#).

¹⁶ Pursuant to Section 39711 of the Health and Safety Code, Disadvantaged Communities are defined as (1) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation and (2) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment. See also Health and Safety Code Section 116426.

capacity of the generator, and (4) the minimum notification time required to dispatch their generator that may be used during ELRP events.

For customers participating in ELRP A.1 and ELRP A.3, certain circumstances may result in a participating service account to not receive an ELRP bill credit. Such circumstances include, but are not limited to, when a service account is inactive or closed prior to the issuance of the ELRP incentive as a bill credit or when billing or data issues prevent application of the credit. However, if a participant's service account number changes and the same customer remains at the same premise, the customer shall remain eligible to receive the ELRP bill credit.

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 ILR (as defined in Sections [3.2.1.4.](#), [3.2.1.5.](#), [3.2.1.6.](#), [3.2.1.7.](#), and [3.2.1.8.](#)) multiplied by the ECR. Only ELRP Events that result in a net positive ILR are eligible for compensation. ELRP incentive calculations will be calculated within a reasonable timeframe and will be processed by March 31st of the next calendar year.¹⁷ 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 15 similar days of interval meter data¹⁸ available in SCE's billing system or provided to SCE or its Program Administrator, if using sub-

¹⁷ ELRP incentives to directly enrolled customers will be in the form of a bill credit. Aggregators will receive a check.

¹⁸ Interval meter data should be complete and validated.

metered data, to have a valid EB. Only the average usage for the intervals 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 for ELRP Event intervals using the average of the preceding *similar* days,¹⁹ 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, SEP), if applicable, or (3) was 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.²⁰

- 3) Calculate the Day-Of Adjustment Value (DOAV)²¹ – A DOAV shall not be less than 0.60 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 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 DOAV 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 15 similar days of

¹⁹ 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.

²⁰ For CPP and RTP dual participants, see [Section 3.2.1.2.\(2\)](#).

²¹ Sub-metered data is used for baseline calculations.

interval meter data²² 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 average usage for the intervals 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 available intervals using the average²³ of the preceding *similar* days,²⁴ excluding those days when 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)²⁵ – A DOAV shall not be less than 0.60 or greater than 1.40. The DOAV 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 Event²⁶ 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 DOAV 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.

²² Interval meter data should be complete and validated.

²³ A simple average shall be used for 5-in-10 baseline and a weighted average shall be used for 3-in-5 baseline calculations

²⁴ 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.

²⁵ The adjustment factor will be 1.0 if sub-metered data is used for baseline calculations.

²⁶ 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.)

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 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 is not eligible for ELRP compensation).
- 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 intervals 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 the sum of the performance, positive and negative, for all intervals during an ELRP

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.

Event, where performance is calculated by subtracting the recorded kWh from the service account's AEB.²⁸

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

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 the sum of the performance, positive and negative, for all intervals during an ELRP Event, where performance is calculated by subtracting the aggregated recorded kWh from the aggregated AEB.

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

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 the sum of the performance, positive and negative, for all intervals during an ELRP Event, where performance is calculated by subtracting the recorded kWh from the service account's AEB, 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.

²⁸ If a day-of ELRP event occurs, the ELRP performance intervals could occur at any 15-minute interval (i.e. 6:30pm or 5:15pm). If 15-minute interval data is not available, the customer's hourly interval data will be prorated (i.e. hourly interval usage (kWh) x 0.75, if event begins at 5:15pm).

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 the sum of the performance, positive and negative, for all intervals during an ELRP Event, where performance is calculated by subtracting the aggregated recorded kWh from the aggregated AEB.

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.²⁹ 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 the sum of the performance, positive and negative, for all intervals during an ELRP Event, where performance is calculated by subtracting the aggregated recorded kWh from the aggregated AEB.

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.³⁰ Upon adoption by the CPUC, EVSE sub-meter, including the use of telematics, 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 sub-meter data for settlement purposes shall comply with submetering requirements and provisions in the ELRP Aggregator Agreement.

³⁰ 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 H (CLEAN)

Southern California Edison Company Emergency Load Reduction Program (ELRP) Pilot Notice to Add or Delete Customers Pursuant to California Public Utilities Commission Decisions 21-03-056, 21-06-027, 21-12-015, and 23-12-005 (Sub-Groups A.1., A.2., A.3., A.4., and A.5.)

SDG&E Advice Letter 4789-E
January 15, 2026

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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. On December 20, 2023, the Commission issued D.23-12-005 *Decision Directing Certain Investor-Owned Utilities’ Demand Response Programs, Pilots, and Budgets for the Years 2024-2027*. In that Decision, the Commission approved SCE’s 2024-2027 ELRP budget and adopted certain program modifications, including a maximum three-hour dispatch window for Sub-Groups A.4. and A.5.

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, D.23-12-005, 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, 2027.

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

A participant (customers and aggregators) accepts these Terms and Conditions by their enrollment and participation in ELRP.

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 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.¹

Group A: Select Customers and Aggregators²

- 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;³ 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),

¹ Participation under these Terms and Conditions is subject to meter or meter programming availability. SCE will calculate annual ELRP incentives in good faith based on available usage data. 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 15 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).

² 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.

³ 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, Summer Discount Plan Program-Commercial (SDP-C),⁴ or Smart Energy Program (SEP) 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,⁵ 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.

⁴ The minimum size requirement is not applicable to SDP-C customers.

⁵ The amount of kilowatts (kW) 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 kW.

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 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, 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 customers⁶ 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 contiguous⁷ 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

⁶ Net Energy Metering (NEM) customers that meet the requirements are eligible to participate.

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."

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 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, 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 SA⁸ 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 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, 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

⁸ 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 contiguous⁹ 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.

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."

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
 - Sub-Groups A.1., A.2., A.3.: 1-hour minimum; 5-hour maximum
 - Sub-Groups A.4., A.5.: 1-hour minimum; 3-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 4420.¹⁰ 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).

¹⁰ 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.

2.3 Group A Notifications

SCE shall notify participants of the start time and duration of the ELRP event. Notification can occur through email or text.¹¹ Customers or participants with connected Automated Demand Response (AutoDR or ADR) technology may also receive an AutoDR notification.

2.4 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	20
A.5. Vehicle-Grid Integration Aggregators	30

2.5 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.

¹¹ 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 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.¹² 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 Resources,¹³ except those operated by non-residential customers located in a Disadvantaged Community (DAC),¹⁴ 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. If applicable, participants will be asked 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

¹² If dual participating, participants are not eligible to receive more than one incentive payment for the same interrupted/curtailed load.

¹³ 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](#).

¹⁴ Pursuant to Section 39711 of the Health and Safety Code, Disadvantaged Communities are defined as (1) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation and (2) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment. See also Health and Safety Code Section 116426.

capacity of the generator, and (4) the minimum notification time required to dispatch their generator that may be used during ELRP events.

For customers participating in ELRP A.1 and ELRP A.3, certain circumstances may result in a participating service account to not receive an ELRP bill credit. Such circumstances include, but are not limited to, when a service account is inactive or closed prior to the issuance of the ELRP incentive as a bill credit or when billing or data issues prevent application of the credit. However, if a participant's service account number changes and the same customer remains at the same premise, the customer shall remain eligible to receive the ELRP bill credit.

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 ILR (as defined in Sections [3.2.1.4.](#), [3.2.1.5.](#), [3.2.1.6.](#), [3.2.1.7.](#), and [3.2.1.8.](#)) multiplied by the ECR. Only ELRP Events that result in a net positive ILR are eligible for compensation. ELRP incentive calculations will be calculated within a reasonable timeframe and will be processed by March 31st of the next calendar year.¹⁵ 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 15 similar days of interval meter data¹⁶ available in SCE's billing system or provided to SCE or its Program Administrator, if using sub-

¹⁵ ELRP incentives to directly enrolled customers will be in the form of a bill credit. Aggregators will receive a check.

¹⁶ Interval meter data should be complete and validated.

metered data, to have a valid EB. Only the average usage for the intervals 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 for ELRP Event intervals using the average of the preceding *similar* days,¹⁷ 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, SEP), if applicable, or (3) was 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.¹⁸

- 3) Calculate the Day-Of Adjustment Value (DOAV)¹⁹ – A DOAV shall not be less than 0.60 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 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 DOAV 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 15 similar days of

¹⁷ 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.

¹⁸ For CPP and RTP dual participants, see [Section 3.2.1.2.\(2\)](#).

¹⁹ Sub-metered data is used for baseline calculations.

interval meter data²⁰ 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 average usage for the intervals 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 available intervals using the average²¹ of the preceding *similar* days,²² excluding those days when 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)²³ – A DOAV shall not be less than 0.60 or greater than 1.40. The DOAV 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 Event²⁴ 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 DOAV 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.

²⁰ Interval meter data should be complete and validated.

²¹ A simple average shall be used for 5-in-10 baseline and a weighted average shall be used for 3-in-5 baseline calculations

²² 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.

²³ The adjustment factor will be 1.0 if sub-metered data is used for baseline calculations.

²⁴ 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.)

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 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 is not eligible for ELRP compensation).
- 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 intervals 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.²⁵

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 the sum of the performance, positive and negative, for all intervals during an ELRP

²⁵ 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.

Event, where performance is calculated by subtracting the recorded kWh from the service account's AEB.²⁶

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

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 the sum of the performance, positive and negative, for all intervals during an ELRP Event, where performance is calculated by subtracting the aggregated recorded kWh from the aggregated AEB.

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

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 the sum of the performance, positive and negative, for all intervals during an ELRP Event, where performance is calculated by subtracting the recorded kWh from the service account's AEB, 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.

²⁶ If a day-of ELRP event occurs, the ELRP performance intervals could occur at any 15-minute interval (i.e. 6:30pm or 5:15pm). If 15-minute interval data is not available, the customer's hourly interval data will be prorated (i.e. hourly interval usage (kWh) x 0.75, if event begins at 5:15pm).

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 the sum of the performance, positive and negative, for all intervals during an ELRP Event, where performance is calculated by subtracting the aggregated recorded kWh from the aggregated AEB.

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.²⁷ 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 the sum of the performance, positive and negative, for all intervals during an ELRP Event, where performance is calculated by subtracting the aggregated recorded kWh from the aggregated AEB.

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.²⁸ Upon adoption by the CPUC, EVSE sub-meter, including the use of telematics, must meet applicable standards established by the CPUC. The election to utilize submetering will apply to all locations within a single aggregation.

²⁷ Aggregators that elect to use sub-meter data for settlement purposes shall comply with submetering requirements and provisions in the ELRP Aggregator Agreement.

²⁸ 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.

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

AT&T	Ellison Schneider & Harris LLP	Pacific Gas and Electric Company
Albion Power Company		Peninsula Clean Energy
Alta Power Group, LLC	Electrical Power Systems, Inc. Fresno	Pioneer Community Energy
Anderson & Poole	Engie North America	Public Advocates Office
BART	Engineers and Scientists of California	Redwood Coast Energy Authority
Ava Community Energy		Regulatory & Cogeneration Service, Inc.
BART		Resource Innovations
Buchalter	GenOn Energy, Inc.	Rockpoint Gas Storage
Barkovich & Yap, Inc.	Green Power Institute	
Biering & Brown LLP		San Diego Gas & Electric Company
Braun Blasing Smith Wynne, P.C.	Hanna & Morton LLP	San Jose Clean Energy
		SPURR
California Community Choice Association	ICF consulting	
California Cotton Ginners & Growers Association	iCommLaw	Sempra Utilities
California Energy Commission	International Power Technology	Sierra Telephone Company, Inc.
California Hub for Energy Efficiency	Intertie	Southern California Edison Company
California Alternative Energy and Advanced Transportation Financing Authority	Intestate Gas Services, Inc.	Southern California Gas Company
California Public Utilities Commission		Spark Energy
Calpine	Kaplan Kirsch LLP	Sun Light & Power
Cameron-Daniel, P.C.	Kelly Group	Sunshine Design
Casner, Steve	Ken Bohn Consulting	Stoel Rives LLP
Center for Biological Diversity	Keys & Fox LLP	
Chevron Pipeline and Power	Leviton Manufacturing Co., Inc. Los Angeles County Integrated	Tecogen, Inc.
		TerraVerde Renewable Partners
		Tiger Natural Gas, Inc.
Clean Power Research	Waste Management Task Force	
Coast Economic Consulting		Utility Cost Management
Commercial Energy	MRW & Associates	
Crossborder Energy	Manatt Phelps Phillips	
Crown Road Energy, LLC	Marin Energy Authority	Water and Energy Consulting
	McClintock IP	
	McKenzie & Associates	
Davis Wright Tremaine LLP	Modesto Irrigation District	
Day Carter Murphy	NLine Energy Inc.	Yep Energy
Dept of General Services	NOSSAMAN LLP	
Douglass & Liddell	NRG Energy Inc.	
Downey Brand LLP		