August 22, 2014

Megan Scott-Kakures
Vice President, Regulatory Operations
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770

SUBJECT: Update of Dispatch Conditions for Interruptible Demand Response Programs to Reflect CAISO System Emergency Procedures

Dear Ms. Scott-Kakures:

Advice Letter 3077-E is effective as of January 1, 2015.

Sincerely,

Edward Randolph, Director
Energy Division
ADVICE 3077-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Update of Dispatch Conditions for Interruptible Demand Response Programs to Reflect CAISO System Emergency Procedures

Southern California Edison Company (SCE) hereby submits for filing the following changes to its tariffs. The revised tariff sheets are listed on Attachment A and are attached hereto.

PURPOSE

The purpose of this advice letter is to modify Schedule TOU-BIP, Time-Of-Use General Service Base Interruptible Program, and Schedule AP-I, Agricultural and Pumping – Interruptible to align with revised California Independent System Operator (CAISO) procedure.

BACKGROUND

CAISO’s System Emergency Procedure 4420, Version 8.3, was made effective on July 1, 2013. In its revised procedure, the CAISO changes the sequence of events in section 3.3.2 such that it calls on reliability Demand Response (DR) programs prior to canvassing other entities and balancing authorities. Additionally, the revised procedure moves the Warning Notice Actions with Emergency Stage 1 Imminent to take place after calling on reliability DR.

Currently, SCE does not dispatch BIP and AP-I programs prior to the CAISO’s canvassing of other entities and balancing authorities. In fact, SCE’s BIP and API tariffs state that the programs will be dispatched only after CAISO has notified SCE that a Stage 1 Emergency is imminent. Therefore, SCE proposes to modify the program dispatch condition language in Special Condition 4 of Schedule TOU-BIP and Special
Condition 3 of Schedule AP-I to align with the revised CAISO System Emergency Procedure 4420.

SCE proposes staggered effective dates for the advice letter and tariffs of August 1, 2014 and January 1, 2015, respectively. By implementing the advice letter on August 1, 2014, SCE will be able to communicate BIP and AP-I program changes to customers well before the BIP and AP-I annual opt-out window (November 1 to December 1). SCE requests the tariff changes to become effective January 1, 2015 to allow customers time to consider staying or leaving their applicable interruption program prior to event dispatch change implementation.

These changes are consistent with the Reliability-Based Demand Response Settlement Agreement.1

**PROPOSED TARIFF CHANGES**

SCE proposes to modify Schedules TOU-BIP and AP-I as follows:

- **Schedule BIP**
  - Modify Special condition 4. a.
    
    After the California Independent System Operator (CAISO) has (i) forecasted a Stage 1 Emergency and publicly declared issued a Warning Notice, Stage 1, Stage 2, Stage 3, or Transmission Emergency; and (ii) has taken all necessary steps to prevent the further degradation of its operating reserves according to Operating Procedure 4420; and (iii) notified SCE that a Stage 1 Emergency is imminent; or

  - Remove Special condition 4. b.
    
    After the CAISO has declared a Stage 2 Emergency; or

- **Schedule AP-I**
  - Modify Special condition 3. a.
    
    After the California Independent System Operator (CAISO) has (i) forecasted a Stage 1 Emergency and publicly declared issued a Warning Notice, Stage 1, Stage 2, Stage 3, or Transmission Emergency; and (ii) has taken all necessary steps to prevent the further degradation of its operating reserves according to Operating Procedure 4420; and (iii) notified SCE that a Stage 1 Emergency is imminent; or

  - Remove Special condition 3. b.

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1 Attachment A of Decision 10-06-034 in the DR Phase 3 of CPUC Rulemaking 07-01-041.
After the CAISO has declared a Stage 2 Emergency; or

These proposed tariff changes to Schedules TOU-BIP and AP-I will be effective January 1, 2015. SCE will upload the proposed changes to these Schedules on its website, www.sce.com, on January 1, 2015.

No cost information is required for this advice filing.

This filing will not increase any rate or charge, conflict with any other schedule or rule, or cause the withdrawal of service.

TIER DESIGNATION

Pursuant to D.12-04-045, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

This advice letter will become effective on August 10, 2014 while the tariff changes will become effective on January 1, 2015.

NOTICE

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

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

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

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

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2 D.12-04-045 at page 198 states, “[w]e authorize the Utilities to request non-controversial changes to program tariffs and implementation procedures via a Tier 2 Advice Letter.”
There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with Section 4 of General Order (GO) 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B and A.11-03-001 et al service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission’s Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

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

For questions, please contact Amy Liu at (626) 302-4019 or by electronic mail at Amy.Liu@sce.com.

Southern California Edison Company

/s/ Megan Scott-Kakures
Megan Scott-Kakures

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

Utility type: ☑ ELC □ GAS □ PLC □ HEAT □ WATER  
Contact Person: Darrah Morgan  
Phone #: (626) 302-2086  
E-mail: Darrah.Morgan@sce.com  
E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

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

Advice Letter (AL) #: 3077-E  
Tier Designation: 2

Subject of AL: Update of Dispatch Conditions for Interruptible Demand Response Programs to Reflect CAISO System Emergency Procedures

Keywords (choose from CPUC listing): Compliance

AL filing type: ☑ Monthly □ Quarterly □ Annual ☑ One-Time □ Other

If AL filed 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 AL1:

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: 8/10/14  
No. of tariff sheets: -5-

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: Schedule TOU-BIP, Schedule AP-I and Table of Contents

Service affected and changes proposed1:

Pending advice letters that revise the same tariff sheets: None

1 Discuss 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 filing, unless otherwise authorized by the Commission, and shall be sent to:

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

Megan Scott-Kakures
Vice President, Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Leslie E. Starck
Senior Vice President, Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com
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3. Firm Service Level (FSL): FSL is the Maximum Demand SCE is expected to supply and/or deliver during any Period of Interruption. The FSL shall be specified by the customer and by the Aggregator for each of its Aggregated Groups. During a Period of Interruption, the participant is expected to interrupt load to its specified FSL. Increases or decreases in FSL may be made no more often than once per year, upon written request by the participant between November 1 and December 1 and execution of an Amendment To Contract For Interruptible Service (Form 14-332) for customers, and Attachment E to the Time-of-Use Base Interruptible Program Aggregator Agreement (Form 14-780) for Aggregators. Participants served under this Schedule shall establish a FSL of zero or greater. An Essential Use Customer shall establish its FSL as described in the special conditions section of this tariff.

4. Notice of Interruption: A Notice of Interruption will be received on the customer’s dedicated telephone. SCE may give a Notice of Interruption under this Schedule:

   a. After the California Independent System Operator (CAISO) has (i) publicly declared a Warning, Stage 1, Stage 2, Stage 3, or Transmission Emergency and (ii) has taken all necessary steps to prevent the further degradation of its operating reserves according to Operating Procedure 4420; or
   
   b. Upon determination by SCE’s grid control center of the need to implement load reductions in SCE’s service territory; or
   
   c. At the discretion of SCE for program evaluation or system contingencies.

Upon receipt by a participant of a Notice of Interruption from SCE, the participant shall reduce the demand imposed on the electric system to its FSL in accordance with Special Condition 2 above. SCE will not be responsible for notifying the customers within an Aggregated Group of an interruption. The Aggregator will be solely responsible for notifying the customers within its Aggregated Group of an interruption.

5. Period of Interruption: A Period of Interruption is a time interval which commences 15 minutes after Notice of Interruption for participants on Participation Option A and 30 minutes after a Notice of Interruption for participants on Participation Option B. For Participation Option A and Participation Option B participants, a Period of Interruption ends for participants upon notification by SCE of the end of a Period of Interruption.

6. Excess Energy: Excess Energy is the number of kWh consumed in each Period of Interruption which exceeds the product of the FSL kW multiplied by the total number of hours within the Period of Interruption.
3. Period of Interruption: SCE may initiate a Period of Interruption under this Schedule:
   a. After the California Independent System Operator (CAISO) has (i) publicly declared a Warning, Stage 1, Stage 2, Stage 3, or Transmission Emergency; and (ii) has taken all necessary steps to prevent the further degradation of its operating reserves according to Operating Procedure 4420; or
   b. Upon determination by SCE’s grid control center of the need to implement load reductions in SCE’s service territory; or
   c. At the discretion of SCE for program evaluation or system contingencies.

4. Number and Duration of Interruption: The number of Periods of Interruption will not exceed one (1) per day, four (4) in any calendar week, and 25 times per calendar year. The duration of the Periods of Interruption will not exceed 6 hours each, 40 hours per calendar month, and a total of 150 hours per calendar year. Under this Schedule all interruptions are controlled by SCE.

5. Ownership and Control of Facilities: Communication, metering, and interrupting facilities, as specified by SCE, will be installed, owned, and maintained in accordance with SCE specifications. These facilities will be solely under operational control of SCE unless otherwise specified by SCE.

Such communications and interrupting facilities may include, but will not be limited to, the following:
   a. Necessary facilities between the customer and SCE to provide Period of Interruption.
   b. Equipment to permit remote monitoring of the customer's load.

6. Non compliance: SCE may, at its discretion remove customer from this Schedule if the load control device is bypassed or tampered with to avoid interruption.
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