

Rulemaking No.: 13-09-011

(U39 E)

Exhibit No: PGE-04

Date: _____

PG&E's Demand Response OIR 2013
Southern California Edison Data Request Response
DR OIR-PG&E-SCE-001

Southern California Edison
2013 DR OIR R.13-09-011

DATA REQUEST SET R.13-09-011 DR OIR-PG&E-SCE-001

To: PG&E
Prepared by: Muir Davis
Title: Sr. Project Manager, Power Supply
Dated: 05/21/2014

Question 01:

Has SCE identified waivers that it needs from CAISO requirements in order to bid its DR programs into the CAIS market beginning in 2014?

Response to Question 01:

Yes, SCE has identified both waivers and other accommodations that it needs from CAISO requirements in order to bid its DR programs into CAISO markets beginning in 2014. Generally speaking SCE recognizes that none of its DR programs can be bid into CAISO markets without some accommodation or waiver. The waivers and accommodations that SCE has requested are:

- 1) Waiver from the telemetry requirement for PDR resources over 10 megawatts;
- 2) accommodation to aggregate multiple registrations across different LSEs per Resource (either PDR or RDRR) in order to not strand resources that are too small;
- 3) accommodation of a simplified registration process for handling thousands of service accounts and the data required to register the resources; and
- 4) a recognition that PDR resources bid into the market cannot be partially dispatched and would respond to CAISO instructions in a limited manner.

Of these waivers and accommodations, the most important accommodation is the simplified registration process. While CAISO indicated that the simplified registration requested did not violate their tariff, ultimately CAISO determined that they could not support a simplified registration process. CAISO will shortly begin the process of providing a technical solution which should automate the registration process. That automated registration process will hopefully accommodate SCE's needs with respect to registering the many service accounts within its DR programs.

Southern California Edison
2013 DR OIR R.13-09-011

DATA REQUEST SET R.13-09-011 DR OIR-PG&E-SCE-001

To: PG&E
Prepared by: Muir Davis
Title: Sr. Project Manager, Power Supply
Dated: 05/21/2014

Question 02:

If SCE has identified waivers that it needs, please describe each waiver and the DR program(s) for which it is needed?

Response to Question 02:

The telemetry waiver is needed for the AMP DR contracts. The aggregation of registrations across LSEs per Resource is needed for all DR programs (API, BIP, SDP, CBP, and AMP DR Contracts). Simplified registration is also needed for all DR programs. Recognition of the limited ability to respond to CAISO dispatches is needed for CBP and AMP DR Contracts.

Southern California Edison
2013 DR OIR R.13-09-011

DATA REQUEST SET R.13-09-011 DR OIR-PG&E-SCE-001

To: PG&E
Prepared by: Muir Davis
Title: Sr. Project Manager, Power Supply
Dated: 05/21/2014

Question 03:

If SCE has requested one or more waivers from the CAISO, please provide copies of the document(s) in which SCE made the request(s) and the document(s) in which the CAISO approved the request, or denied the request.

Response to Question 03:

CAISO denied supporting the simplified registration process via email (see attached). No decisions have been received as yet on the other requested waivers and accommodations.

Southern California Edison
2013 DR OIR R.13-09-011

DATA REQUEST SET R.13-09-011 DR OIR-PG&E-SCE-001

To: PG&E
Prepared by: Muir Davis
Title: Sr. Project Manager, Power Supply
Dated: 05/21/2014

Question 04:

Are there any DR programs which SCE intends to bid into the CAISO market this summer for which SCE does not need any waivers from the CAISO. If yes, please identify the program(s).

Response to Question 04:

No, every DR program needed at least one waiver or accommodation from CAISO in order to be bid into the CAISO market.



Fw: Registration solution update
Raymond Johnson to: David Lowrey, David LeBlond
Cc: Muir Davis

05/22/2014 04:46 PM

History: This message has been forwarded.



FOR INTERNAL USE ONLY

Here you go.
Raymond.

----- Forwarded by Raymond Johnson/SCE/EIX on 05/22/2014 04:44 PM -----

From: "Sanders, Heather" <HSANDERS@caiso.com>
To: "Raymond.Johnson@sce.com" <Raymond.Johnson@sce.com>, "Muir.Davis@sce.com" <Muir.Davis@sce.com>, "eric.yu@sce.com" <eric.yu@sce.com>
Cc: "Kelley, Kristen" <kkelley@caiso.com>, "Miremadi, Ali" <AMiremadi@caiso.com>, "Goodin, John" <JGoodin@caiso.com>, "Powers, Jill" <JPowers@caiso.com>
Date: 05/20/2014 08:21 AM
Subject: Registration solution update

Raymond, Muir, and Eric,

Thank you for your continued engagement with us to find solutions for demand response integration.

Unfortunately, the spreadsheet attachment option cannot be supported as an interim registration process. We spent a lot of time trying to figure out how to make this work but finally determined that we needed a technical solution to support the larger than anticipated number of service accounts. We are moving forward on a technical solution and expect to have technical specifications available in July. We are in the process of finalizing the project plan for the technical solution. Based on our internal assessment, the technical solution will not be available to support demand response integration for programs with large numbers of service accounts this summer. The solution will be available before the end of this year. We are encouraged that SCE continues to explore ways to use the ISO Demand Response System as is and we will continue to actively support this work. In addition, we will include in our testimony something to this effect:

The ISO operations and systems are prepared to support demand response participation this summer, however several issues have been discovered through our experience with SCE and others during demand response integration. While these issues reduce the amount of demand response that can feasibly be bid in the summer of 2014, we expect through the programs that are able to be feasibly integrated, it gives the ISO and participants opportunities to learn and make system, policy and process adjustments. The ISO continues to work with SCE, PG&E, Olivine and other stakeholders to uncover and resolve these issues to be prepared for full-scale demand response integration prior to the summer of 2015. The ISO appreciates the work done by SCE, PG&E, and Olivine. This effort represents positive steps forward for supply-side demand response integration and provides confidence that demand response can be successfully integrated into the ISO market.

Please let me know what else we can do to help set expectations with the CPUC. We have been putting pressure on to get DR moving forward into the market, we have not said it all needs to be done at once or it all needs to be done by this summer.

Thanks,
Heather

Heather Sanders
California ISO
Director, Regulatory Affairs, Distributed Energy Resources

O: (916) 608-5850 | Assistant: Brittany Goytia (916) 351-2414
250 Outcropping Way, Folsom, CA 95630

Please consider the environment before printing this email

The foregoing electronic message, together with any attachments thereto, is confidential and may be legally privileged against disclosure other than to the intended recipient. It is intended solely for the addressee(s) and access to the message by anyone else is unauthorized. If you are not the intended recipient of this electronic message, you are hereby notified that any dissemination, distribution, or any action taken or omitted to be taken in reliance on it is strictly prohibited and may be unlawful. If you have received this electronic message in error, please delete and immediately notify the sender of this error.

