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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

I.D. # 11314

ENERGY DIVISION RESOLUTION E-4502

May 24, 2012

R E S O L U T I O N

Resolution E-4502: Southern California Edison Company (SCE) Advice Letter 2721-E and San Diego Gas and Electric Company (SDG&E) Advice Letter 2351-E

PROPOSED OUTCOME: This Resolution approves SCE's new Schedule 10/10, SCE Rebate Program (the "10 For 10 Program"), to help reduce summer demand for electricity in the Orange County, California area of SCE's service territory and SCE's request to shift funds from the Summer Discount Plan Transition, which was approved in Decision (D.) 11-11-002, in an amount sufficient to cover the costs of SCE's 10 For 10 Program. This Resolution also approves SDG&E's proposed modifications to its existing Peak Time Rebate (PTR) Program for the summer of 2012 and SDG&E's request to shift funds from its Capacity Bidding Program to the PTR Program, consistent with fund shifting rules directed in D.12-04-045. This Resolution does not address SDG&E's proposed SummerGen 2012 Program, which will be considered separately.

ESTIMATED COST: No new funding. For SCE, approximately $3.3 million to be transferred from unspent funds previously approved in D.11-11-002 for SCE's Summer Discount Plan Transition. For SDG&E, approximately $6.4 million to be shifted from SDG&E's existing Capacity Bidding Program to fund SDG&E's proposed PTR Program modifications.

By SCE Advice Letter 2721-E, filed on April 27, 2012
By SDG&E Advice Letter 2351-E, filed on April 30, 2012

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SUMMARY

This Resolution addresses the following: (1) SCE's Advice Letter 2721-E, which requests a new Schedule 10/10 for the summer of 2012;, (2) SDG&E's Advice Letter 2351-E, which requests modifications to its PTR Program, and (3) SDG&E's request to establish a new SummerGen 2012 Program.

This Resolution approves SCE's new Schedule 10/10, SCE Rebate Program, to help reduce summer demand for electricity in the Orange County area and SCE's request to shift funds from the Sumer Discount Plan Transition, which was approved in Decision D.11-11-002, in an amount sufficient to cover the costs of its proposed program.

This Resolution also approves SDG&E's proposed modifications to its existing PTR Program for the summer of 2012 and SDG&E's request to shift funds from its Capacity Bidding Program to the PTR Program, consistent with the fund shifting rules set forth in D.12-04-045.

This Resolution does not address SDG&E's proposed SummerGen 2012 Program, which will be considered separately.

This Resolution directs SCE and SDG&E to incorporate a new trigger for their price-responsive, non-emergency programs. The new trigger is a CAISO formal request for the utility to call a price-responsive, non-emergency program whenever CAISO has issued an alert or warning.

BACKGROUND

On April 19, 2012, the Commission issued D.12-04-045, which adopted 2012—2014 budgets for the Demand Response (DR) programs of SCE, SDG&E, and Pacific Gas and Electric Company (PG&E). These programs were adopted to promote shifts in electricity consumption in response to either price signals or financial incentives, primarily during times when reliability is compromised or the electricity system is vulnerable to extremely high prices.

On January 9, 2012, San Onofre Nuclear Generating Station (SONGS) Unit 2 was taken out of service for a planned outage, and on January 31, 2012, Unit 3 was taken offline after station operators detected a leak in one of the unit's steam generator tubes. SONGS provides substantial capacity to the Southern California region and these units will not be brought back into service until the cause of this leak is determined.

The California Independent System Operator (CAISO) has determined that there is sufficient capacity to meet electricity requirements in Southern California this summer under most scenarios, but that an unexpected outage or loss of transmission capacity could strain the electrical system if SONGS is not brought back into service. The CAISO, the California Public Utilities Commission (CPUC or Commission) and SCE and SDG&E are working on a number of contingencies to address reliability during the summer peak period.

In an effort to make the most of existing opportunities to protect the state's electrical system reliability, Energy Division Director, Edward Randolph, sent a letter to SCE and SDG&E on April 25, 2012, requesting that they submit Tier 3 Advice Letters proposing augmentations and improvements to their existing DR programs. Specifically, the Energy Division letter proposed the consideration of targeted incentive energy conservation programs (e.g., a 20/20 program or similar variation) and/or the expansion of existing PTR programs to additional customer classes. Furthermore, Energy Division requested that SCE and SDG&E focus their efforts on areas potentially affected by the SONGS outage (e.g., south Orange County and the greater San Diego region). The Energy Division also requested that SCE and SDG&E provide estimates of the costs of these programs and propose existing funding mechanisms that could be used for these programs on an emergency basis.

In response to the Energy Division request, SCE submitted Advice Letter 2721-E on April 27, 2012, proposing a new program outlined in its Schedule 10/10 to help reduce summer demand for electricity in the Orange County area. SCE's proposed 10 For 10 Program would provide a bill credit of 10 percent for those customers who reduce usage by 10 percent or greater between July 1, 2012 and September 30, 2012, as compared to the same period in 2011. Schedule 10/10 would be available only in 2012 and would be applicable only to eligible General Service and agricultural and pumping bundled service customers not already enrolled in a DR program in specified Orange County cities and communities.

SDG&E submitted Advice Letter 2351-E on April 30, 2012, proposing modifications to its Schedule PTR and the establishment of a new program, called SummerGen 2012. The modifications to the PTR schedule include the following:

1. Expanding PTR to eligible bundled service small commercial customers,
2. Allowing SDG&E to cancel a PTR event to prevent PTR payments for load reductions not attributable to customer action (e.g., due to outages),
3. Deleting the PTR Pilot Program from the tariff, and
4. Expanding the definition of "enabling technology" within the PTR credit to include non-meter connected Programmable Communicating Thermostats (PCTs) and meter connected In-Home Displays.

SDG&E also proposes a new program, SummerGen 2012, under which participating customers with on-site, customer-owned or leased backup generation facilities would enter into agreements under which those facilities would be available for call by SDG&E to operate during periods when load reduction would help assure grid reliability. In exchange for that commitment, participating customers would be paid a monthly per-kW capacity incentive during the summer months to make their generation facilities available for call by SDG&E and would be subject to penalties should they fail to respond as committed.

On May 1, Energy Division Director Edward Randolph approved a shortened protest and response period for these Advice Letters, consistent with General Order 96-B, General Rule 1.3.

NOTICE

SCE states that a copy of Advice Letter 2721-E was served in accordance with Section IV of General Order 96-B and served on parties in A.11-03-001 et al.

SDG&E states that a copy of this Advice Letter 2351-E was served on its General Order 9-B Advice Letter mailing list and on parties in A.11-03-002.

PROTESTS AND COMMENTS

On May 3, 2012, protests and comments on these Advice Letters were received, as follows: (1) the Division of Ratepayer Advocates (DRA) protested SDG&E's Advice Letter 2351-E; (2) Mr. Frank F. Chiang, P.E. commented on SDG&E's proposed Schedule SGP; (3) Alarm.com wrote in support of SDG&E's proposed modifications to its Schedule PTR, and (4) the CAISO submitted comments on both SDG&E's Advice Letter 2351-E and SCE's Advice Letter 2721-E. SCE and SDG&E responded to the protests and comments on May 4, 2012.

In its protest, DRA contends that "SDG&E's proposal to use Demand Response (DR) funds for its proposed SummerGen 2012 program (SGP) is contrary to the Commission's policy prohibiting fossil-fueled back-up generation (BUG) to provide demand reduction."[1] Specifically, DRA asserts that the "use of fossil-fueled BUGs defeats one of the main objectives of demand response (to mitigate environmental impacts), and would disturb a long line of Commission decisions prohibiting its use in DR."[2] However, DRA also indicates that it does not object to SDG&E's proposed enhancements to its PTR program. In sum, DRA recommends that the Commission reject SDG&E's SGP program and replace it with "a demand response program that is not based on fossil-fueled back up generation" and demonstrate that the proposed new program is "actually needed to meet the shortages caused by the SONGS shutdown."[3]

In his comments, Mr. Frank F. Chiang, P.E. provides editorial feedback on Schedule SGP (e.g., changing references to Special Conditions, table captions,

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[1] Protest of the Division of Ratepayer Advocates of SDG&E's Advice Letter (AL) 2351-E; Modifications to Schedule Peak Time Rebate (PTR) and establishment of the SummerGen 2012 Program (SGP) For Summer 2012, May 3, 2012, p. 1.

[2] *Id.*.

[3] *Id.* at 3.

and dates), and questions whether SDG&E intended the baseline to be the 10 highest of the previous 10 days.[4]

Alarm.com wrote in support of SDG&E's proposed modifications to its Schedule PTR. Specifically, Alarm.com supports SDG&E's proposal to expand the definition of "enabling technology."

In its comments, CAISO requests that the Commission ensure that the IOUs' DR programs and tariffs incorporate the following trigger for price-responsive non-emergency triggered programs:

> Whenever the ISO has issued an alert or warning notice, the ISO shall be entitled to request that the utility, in its discretion, call the price-response, non-emergency triggered programs.[5]

In its reply, SCE indicates that it does not oppose CAISO's suggestions, but contends that its existing price-responsive non-emergency programs already reflect the CAISO's suggestions. To support its position, SCE provides an attachment which outlines existing event triggers for its non-emergency demand response programs and provides excerpts of the applicable tariffs.

In its reply, SDG&E acknowledges the Commission's policy against the use of back-up generation as a demand response resource, but argues that the potential generation shortages this summer justify an exception to this policy. SDG&E argues that it has proposed the SummerGen 2012 program due to "the current shutdown of SONGS, the uncertainty over when SONGS will return to service and the sheer magnitude of the impact to the State's generation portfolio

[4] Mr. Frank F. Chiang Comments on Advice Letter 2351-E, May 3, 2012.

[5] CAISO Comments on SCE Advice Letter 2721-E and SDG&E Advice Letter 2351-E, p. 1.

represented by the loss of the approximately 2,200 MW SONGS generation provides."[6]

In response to the CAISO's comments, SDG&E explains that its existing "soft" triggers, under which events can be activated at SDG&E's discretion for a wide variety of reasons, already support the approach advocated by CAISO. SDG&E further clarifies that it intends to coordinate its operations with CAISO, among others.

DISCUSSION

SCE's Schedule 10/10, Summer Rebate Program

Under SCE's proposed 10 for 10 Program, SCE proposes to provide a bill credit of 10 percent to those customers who reduce usage by 10 percent or greater between July 1, 2012 and September 30, 2012, in comparison to the same period last year. This program would be available only for 2012 and only in specified Orange County cities and communities and would be applicable only to eligible General Service and agricultural and pumping bundled service customers not already enrolled in a DR program.

SCE estimates total program costs of approximately $3.3 million and proposes to use previously authorized funds to implement this program. SCE estimates implementation costs to be approximately $1.0 million, including billing system enhancements, $100,000 for customer outreach and $100,000 for post-summer measurement and evaluation. SCE estimates customer rebates to be $2 million to $2.3 million. In addition, SCE proposes to use unspent funds previously authorized for the Summer Discount Plan Transition, approved in D.11-11-002, to cover the cost of this program.

[6] Response of San Diego Gas & Electric (SDG&E) to the Division of Ratepayer Advocates (DRA) and the California Independent System Operator (CAISO) Comments/Protest to SDG&E's Advice Letter 2351 (Modifications to Schedule Peak Time Rebate (PTR) and Establishment of the SummerGen 2012 Program (SGP) for Summer 2012), p. 2.

We will approve this program for this summer for a number of reasons. First, this is a simple and transparent program that has been used in SCE's service territory previously, and, as a result, SCE can quickly have this program in operation during the summer peak period, which is critical in light of the continuing outage at SONGS.

Second, this program is targeted only at non-residential customers in Orange County not already enrolled in a DR program and implements only a modest 10 percent bill credit. Consequently, this program will be considerably less costly to operate than a system-wide "20/20" program, while achieving the objective of increasing reliability during the summer peak period.

Furthermore, this is a "pay for performance" program, meaning that if energy use reductions are not realized, the program will cost less. Because the credit is capped at 10 percent, the cost of the program will accrue only to the extent customers achieve the 10 percent savings goal, but will not increase if customers achieve savings reductions above the 10 percent level.

Third, the likelihood of free ridership in this program will be reduced because last summer was relatively cool. Thus, it is less likely that customers will be paid the 10 percent billing credit in the absence of substantial affirmative actions to reduce energy consumption.

Finally, in the event of the continued outage of SONGS, we believe that it is important to enable all customer classes to participate in some type of DR program, and this program achieves this objective. With this customer coverage, we hope that this program can work synergistically with other media and DR programs to raise customer awareness of their ability to help to ensure the reliable operation of the electrical system during the upcoming summer peak period.

At this point, we conclude that it is appropriate to use the unspent funds authorized for SCE's Summer Discount Plan Transition for this program. In D.11-11-002, the Commission authorized $26.6 million primarily to fund the cost of override switches for customers enrolled in SCE's Summer Discount Plan. Energy Division staff understand that few customers have requested these override switches and that most funds remain unspent. Accordingly, given the potential reliability contingencies this summer, it is both appropriate and consistent with Commission policy and rules to approve shifting these funds to a function that is more likely to expand DR activities and assure grid reliability.

Finally, we specifically approve funds to measure and evaluate the effectiveness of this program. This program provides a unique opportunity to compare customer usage in Orange County with customers in surrounding areas that are not enrolled in the program. In addition, if the SONGS outage continues, the ensuing media coverage may make this program incrementally more effective than otherwise would be the case. Thus, SCE may be able to determine, to some extent, whether reductions in electricity usage are due to this particular program or to more general customer awareness. For these reasons, SCE should work with Energy Division staff before beginning the measurement and evaluation process to review the scope of the study. Moreover, in order to improve DR programs on a going forward basis, SCE should provide its evaluation report to Energy Division staff on or before January 31, 2013.

SDG&E's Proposed Modifications to its Peak Time Rebate Schedule

In Advice Letter 2351-E, SDG&E proposes the following modifications to its Schedule PTR: (1) expanding PTR to eligible bundled service small commercial customers, (2) allowing SDG&E to cancel a PTR event to prevent PTR payments for load reductions not attributable to customer action (e.g., due to outages), (3) deleting the PTR Pilot Program from the tariff, and (4) expanding the definition of "enabling technology" within the PTR credit..

SDG&E estimates that the cost of expanding the PTR program to eligible small commercial customers would be approximately $6.4 million and proposes to fund this by shifting funds from its existing Capacity Bidding program.

We will approve SDG&E's proposal to expand PTR eligibility to bundled small commercial customers for reasons similar to those discussed above with regard to SCE's 10 For 10 program. PTR is a relatively simple and transparent program that is already approved for residential customers. SDG&E has indicated that it can expand the eligibility to small customers by July 1, 2012, and this expansion could help address reliability issues if the SONGS outage continues.

In addition, this program is a "pay for performance" program, meaning that SDG&E will pay the incentive only if an event is called and only if customers reduce their consumption compared to a baseline. Accordingly, if SONGS comes back online, we would expect fewer PTR events and, as a result, fewer incentive payments and lower overall program costs. Moreover, if customers do not reduce demand compared to a baseline, payments are not made. Finally, SDG&E has substantial flexibility in calling these events,[7] and therefore has substantial control over the cost of the program. In this way, the program provides considerable utility flexibility. We see no reason not to expand this flexibility to an additional class of customers, which will provide further DR capacity to address summer reliability concerns, if necessary.

This program is also targeted at those customers not currently covered by a DR program. We believe that it is important to enable all customer classes to participate in some type of DR program this summer, given potential reliability concerns.

We also approve SDG&E's proposals to cancel a PTR event in the event of an outage or other similar circumstance, to delete the PTR pilot program and expand the definition of "enabling technology." These proposal elements were not protested and we agree that these modifications are likely to enhance the effectiveness of the program and eliminate unnecessary tariff provisions.

We approve SDG&E's proposal to transfer of funds from its existing Capacity Bidding Program to fund the expansion of the PTR program to small commercial customers. As discussed by SDG&E in its Advice Letter, D.12-04-045, Ordering Paragraph 4 requires the utilities to submit Advice Letters before shifting more than 50 percent of a program's fund to a different program within the same budget category.

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[7] "Every time a CPP event is triggered a PTR event ***may*** also be triggered" (emphasis added). SDG&E Schedule PTR, Special Condition 6.

The PTR and Capacity Bidding Program for SDG&E are both contained in Category 2 (Price-Responsive Programs) and shifting $6.4 million of the $12.3 million in Category 2 shifts more than 50 percent of the programs funds to a different program within the same budget category. In this Advice Letter, SDG&E has requested to shift these funds from its Capacity Bidding Program to its PTR program. Given the potential exigencies of the current situation, we approve SDG&E's proposal.

Finally, we specifically approve funds to measure and evaluate the commercial PTR program as well as the effect of the expanded definition of the "enabling technology." Measurement and evaluation will allow us to continually improve and target our DR programs in the future. Accordingly, SDG&E should work with Energy Division staff before beginning the measurement and evaluation process to help define the scope of the study and, to help improve DR programs on a going forward basis, SDG&E should provide the report to Energy Division staff on or before January 31, 2013.

SDG&E's Proposed SummerGen 2012 Program

SDG&E proposes a new program, SummerGen 2012, under which participating customers with on-site, customer-owned or leased backup generation facilities would enter into agreements under which those facilities would be available for call by SDG&E to operate during periods of load reduction need.

SDG&E's SummerGen 2012 proposal raises complex questions, including whether SDG&E can propose a new demand response program without an application, whether the proposed program is consistent with Commission policy, and whether the program would be consistent with applicable air quality rules and regulations. Energy Division staff hope to work with parties to address these questions and issues and will address this program separately from this Resolution. This program likely needs shorter lead time because it will not involve a large customer education campaign. Therefore, we believe that more thorough consideration of this program will not jeopardize a possible July 1, 2012 implementation date, if we find this program to be necessary and/or helpful to address reliability this summer.

CAISO's Proposal for Additional Tariff Language

In its comments, the CAISO proposes additional tariff language allowing it to request the utilities to call price-responsive, non-emergency triggered demand response programs.

Both SCE and SDG&E indicate that they believe their existing tariffs provide sufficient flexibility for them to activate their programs under a wide variety of circumstances and that changes to their tariffs are unnecessary.

Nonetheless, in light of the current circumstances, we believe this request to be reasonable and would further clarify the circumstances under which events could be triggered. Accordingly, SCE and SDG&E should file Tier 1 Advice Letters within 10 days of the effective date of this Resolution that inserts a new trigger for their price-responsive, non-emergency programs. That new trigger shall be that whenever the CAISO has issued an alert or warning notice, CAISO may formally request that the utility, at its discretion, trigger a price-responsive non-emergency program.

COMMENTS

Public Utilities Code Section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(3) allows the Commission to establish additional categories of decisions subject to waiver or reduction of the time period for comment. The Commission's Rules of Practice and Procedure, Rule 14.6, provides that the Commission may reduce or waive the comment period due to public necessity. Although the CAISO believes that currently available capacity will be adequate to meet expected load this summer, the potential emergent need for supplemental resources such as DR if unexpected generation or transmission outages arise render the decisions addressed here within the scope of public necessity. The contingency plans approved herein will function as an insurance policy in case grid reliability is threatened due to further unexpected outages in Southern California.

Consistent with these provisions, we hereby reduce the comment period to 11 days and the response to comments to 15 days. Accordingly, this draft was mailed to parties for comments and will be placed on the Commission's agenda on May 24, 2012. Comments are due on May 18, 2012. Reply comments are due May 22, 2012.

FINDINGS AND CONCLUSIONS

1. On April 19, 2012, the Commission issued D.12-04-045, which adopted 2012—2014 budgets for Demand Response (DR) programs of Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E) and Pacific Gas and Electric Company (PG&E), including directions regarding how funds may be shifted between applicable DR programs.
2. On January 9, 2012, San Onofre Nuclear Generating Station (SONGS) Unit 2 was taken out of service for a planned outage and on January 31, 2012, Unit 3 was taken off line after station operators detected a leak in one of the unit's steam generator tubes.
3. SONGS provides substantial capacity to the Southern California region and these units will not be brought back into service until the cause of this leak is determined.
4. The California System Operator (CAISO) has determined that there is sufficient capacity to meet electricity requirements in Southern California this summer in most circumstances, but that an unexpected outage or loss of transmission capacity could strain the electrical system if SONGS is not brought back into service.
5. The Energy Division sent a letter to SCE and SDG&E on April 25, 2012, requesting that they submit Tier 3 Advice Letters proposing augmentations and improvements to their existing DR programs.
6. SCE submitted Advice Letter 2721-E on April 27, 2012, proposing a new program outlined in its Schedule 10/10, SCE Rebate Program, to help mitigate summer demand for electricity in Orange County. SCE estimates total program costs of approximately $3.3 million and proposes to use previously authorized funds to implement this program.
7. SDG&E submitted Advice Letter 2351-E on April 30, 2012, proposing modifications to its Schedule Peak Time Rebate (PTR) and establishment of a new program, called SummerGen 2012. SDG&E estimates that the cost of expanding the PTR program to eligible small commercial customers would be

approximately $6.4 million and proposes to fund this by shifting funds from its existing Capacity Bidding program.

8. On May 1, Energy Division Director, Edward Randolph, approved a shortened protest and response period for these Advice Letters, consistent with General Order 96-B, General Rule 1.3.
9. We conclude that SCE's 10 For 10 Program is a simple and transparent program that has been used in SCE's service territory previously and, therefore, SCE can quickly have this program in operation during the summer peak period, which is critical in light of the continuing outage at SONGS. Thus, we will approve SCE's 10 For 10 Program.
10. We conclude that it is appropriate to use the unspent funds authorized for SCE's Summer Discount Plan Transition for SCE's proposed 10 For 10 Program.
11. We conclude that PTR is a relatively simple and transparent program and expanding eligibility could help address reliability issues if the SONGS outage continues. Therefore, we will approve SDG&E's proposal to expand PTR eligibility to eligible bundled small commercial customers.
12. We conclude that SDG&E's proposal to shift funds to its PTR program from its Capacity Bidding Program is in compliance with the fund shifting rules in D.12-04-045 and, given current exigencies, we will approve it.
13. SDG&E's SummerGen 2012 proposal raises complex questions. Energy Division will work with parties to address these questions and issues and will address this program in a separate Resolution.
14. The CAISO proposes additional tariff language allowing it to request the utilities to call price-responsive, non-emergency triggered demand response programs whenever it (CAISO) has issued an alert or warning notice. This request is reasonable in light of current circumstances and will lead to further coordination between CAISO and the utilities.
15. In compliance with Section 311(g)(3) and the Commission's Rules of Practice and Procedure, Rul1 14.6, we are reducing the comment period on this Resolution to 11 days and the response to 15 days due to public necessity.

THEREFORE IT IS ORDERED THAT:

1. SCE is authorized to create Schedule 10/10 for SCE bundled General Service and Agricultural and Pumping customers not already enrolled in a DR program who take service on an eligible rate for summer 2012 for selected cities and communities in Orange County.

2. SCE is authorized to track the implementation costs including system enhancements, outreach, measurement, and evaluation for the program in the Demand Response Program Balancing Account (DRPBA) and to fund shift from the Summer Discount Plan Transition funding as needed to cover those costs.
3. SCE is authorized to recover the cost of the customer rebate and to record that cost in SCE's generation subaccount of the DRPBA.
4. SCE will consult with the Energy Division prior to the initiation of its measurement and evaluation of this program.
5. SCE will provide the Energy Division with the measurement and evaluation results of this program by January 31, 2013.
6. SCE will provide the Energy Division with the final costs of the program, including a breakdown of the implementation, customer outreach, measurement and evaluation and customer rebates by January 31, 2013.
7. SDG&E is authorized to modify its Schedule PTR to (1) expand PTR to eligible bundled service small commercial customers, (2) allow SDG&E to cancel a PTR event to prevent PTR payments for load reductions not attributable to customer action (e.g., due to outages), (3) delete the PTR Pilot Program from the tariff, and (4) expand the definition of "enabling technology."
8. SDG&E is authorized to shift $6.4 million in funds from its Capacity Bidding Program to the PTR program, consistent with fund shifting rules established in D.12-04-045.
9. SDG&E will consult with the Energy Division prior to the initiation of its measurement and evaluation of this program.
10. SDG&E will provide the Energy Division with the measurement and evaluation results of this program by January 31, 2013.
11. SDG&E will provide the Energy Division with the final costs of the program, including a breakdown of the implementation, customer outreach, measurement, and evaluation and incentives by January 31, 2013.
12. SCE and SDG&E should file Tier 1 Advice Letters within 10 day of the effective date of this Resolution that inserts a new trigger for their price-responsive, non-emergency programs. That new trigger shall be that whenever the CAISO has issued an alert or warning notice, CAISO may formally request that the utility, at its discretion, trigger a price-responsive, non-emergency program.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on May 24, 2012; the following Commissioners voting favorably thereon:

Paul Clanon
Executive Director