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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Southern California Edison
Company (U 338-E) for Approval of Demand
Response Programs, Goals and Budgets for
2009- 2011.

Application 08-06-001
(Filed June 2, 2008)

And Related matters

Application 08-06-002
Application 08-06-003

**PACIFIC GAS AND ELECTRIC COMPANY AND SAN FRANCISCO COMMUNITY
POWER JOINT COMMENTS ON ALJ HECHT'S RULING REQUESTING
UPDATED INFORMATION ISSUED JUNE 26, 2012**

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Dated: July 25, 2012

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U 338-E) for Approval of Demand Response Programs, Goals and Budgets for 2009- 2011.	Application 08-06-001 (Filed June 2, 2008)
And Related matters	Application 08-06-002 Application 08-06-003

**PACIFIC GAS AND ELECTRIC COMPANY AND SAN FRANCISCO COMMUNITY POWER
JOINT COMMENTS ON ALJ HECHT’S RULING REQUESTING
UPDATED INFORMATION ISSUED JUNE 26, 2012**

On June 26, 2012, Administrative Law Judge Hecht issued a ruling requesting additional information from San Francisco Community Power (SF Power or SFCP) and Pacific Gas and Electric Company (PG&E) on a Petition for Modification (Petition) of Decision (D.) 09-08-027 filed January 2011 by SF Power. The ALJ stated that most of the information requested in her ruling consists of factual data and historical tariff documents. For that reason, the ALJ encouraged SF Power and PG&E to file their response to the ruling as joint comments.

SF Power and PG&E have conferred and cooperated to develop the data requested in the ruling. The responses to the ALJ’s questions follow.

1. What amount of load reduction in Kilowatts (kW) did SF Power nominate in each month of 2009?

2009 Nominated Load Reduction in Kilowatts (kW)				
Aggregator	Jun-09	Jul-09	Aug-09	Sep-09
SF Community Power	3,135	3,379	2,881	4,700

2. According to information provided previously, SF Power participated in one two-hour test event in 2009.

- a. Please provide the specifics of that event, including the event date, beginning and ending time, advance notice of the event received by SF Power, amount of load nominated for that event, and any other relevant information.
- b. Please also provide a copy of the tariff under which SF Power was operating its load reduction program during 2009.

The November 2009 Tariff, Sheet No. 27217-E, is attached.

- c. What amount of load reduction (in kW) did SF Power deliver during that event, calculated using the baseline in place at the time?
- d. If possible, please estimate the load reduction (in kW) SF Power would have been credited with delivering if the 2010 baseline had been in place during that test event.

Event Date	Beginning Time	End Time	Day-Ahead or Day-Of	Advance Notice	Hour	Amount of Load Nominated (in kW) under 2009 Baseline	Amount of Load Reduction (in kW) delivered under 2009 Baseline	Estimate Load Reduction (in kW) under 2010 Baseline with Adjustment
July 27, 2009	2pm	4pm	Day-Ahead	2:00 pm the day before event	14	3,379	5,225	1,877
					15	3,379	5,093	1,719

3. What amount of load reduction (in kW) did SF Power nominate in each month of 2010?

2010 Nominated Load Reduction (in kW)				
Aggregator	Jun-10	Jul-10	Aug-10	Sep-10
SF Community Power, Day-Of	232	257	0	0
SF Community Power, Day -Ahead	6,082	5,975	4,000	2,356

4. What amount of load reduction (in kW) did SF Power deliver in each month of 2010, under the baseline in place at that time?¹

¹ The load reductions reflected in the tables to Questions 4 and 5 are not the same as the estimates SF Power developed during the summer 2009 or 2010 nomination periods. Since SF Power voluntarily got out of the demand response business at the end of 2010, it no longer maintains sufficient analytical capabilities to independently verify the data in the tables for Questions 4 and 5, although SF Power has no reason to believe that the numbers provided by PG&E are inaccurate.

2010 Actual Load Reduction (in kW)*				
Aggregator	Jun-10	Jul-10	Aug-10	Sep-10
SF Community Power, Day-Of	31	65	0	0
SF Community Power, Day -Ahead	0	747	(4,994)	(55)

*Average hourly delivery based on totals in Table 5.

5. According to information provided previously, SF Power participated in nine actual events under the Capacity Bidding Program (CBP) in 2010.
 - a. Please provide the specifics of each event, including the event date, beginning and ending time, advance notice of the event received by SF Power, amount of load nominated for that event, and any other relevant information.
 - b. Please also provide a copy of the tariff under which SF Power was operating its load reduction program during 2010 (E-CBP, and any other that may be applicable).

The May 2010 Tariff, Sheet No. 29528-E, is attached.

- c. What amount of load reduction (in kW) did SF Power deliver during each event in 2010, calculated using the baseline in place at the time?
- d. If possible, please estimate the load reduction (in kW) SF Power would have been credited with delivering if the 2009 baseline had been in place during that event.

Event Date	Beginning Time	End Time	Day-Ahead or Day-Of	Advance Notice	Hour	Amount of Load Nominated in (kW) under 2010 Baseline with Adjustment	Amount of Load Reduction (in kW) delivered under 2010 Baseline with Adjustment*	Estimate Load Reduction (in kW) under 2009 Baseline*
June 28, 2010	4pm	6pm	Day-Of	At least 3 hours before event	16	232	37	(30)
					17	232	25	(28)
July 15, 2010	3pm	7pm	Day-Of	At least 3 hours before event	15	257	75	(140)
					16	257	96	(122)
					17	257	67	(129)
					18	257	20	(155)
July 16, 2010	3pm	6pm	Day-Ahead	2:00 pm the day before event	15	5,975	637	2,101
					16	5,975	778	2,346
					17	5,975	826	2,367

Event Date	Beginning Time	End Time	Day-Ahead or Day-Of	Advance Notice	Hour	Amount of Load Nominated in (kW) under 2010 Baseline with Adjustment	Amount of Load Reduction (in kW) delivered under 2010 Baseline with Adjustment*	Estimate Load Reduction (in kW) under 2009 Baseline*
August 16, 2010	4pm	6pm	Day-Ahead	2:00 pm the day before event	16	4,000	1,064	2,118
					17	4,000	792	1,945
August 24, 2010	3pm	7pm	Day-Ahead	2:00 pm the day before event	15	4,000	(7,341)	(4,906)
					16	4,000	(7,328)	(4,826)
					17	4,000	(7,745)	(5,226)
					18	4,000	(7,909)	(5,419)
August 25, 2010	3pm	7pm	Day-Ahead	2:00 pm the day before event	15	4,000	(5,756)	(3,320)
					16	4,000	(5,479)	(2,978)
					17	4,000	(5,192)	(2,673)
					18	4,000	(5,050)	(2,559)
September 2, 2010	4pm	6pm	Day-Ahead	2:00 pm the day before event	16	2,356	26	928
					17	2,356	(74)	887
September 28, 2010	4pm	6pm	Day-Ahead	2:00 pm the day before event	16	2,356	(344)	543
					17	2,356	(353)	495
September 29, 2010	4pm	6pm	Day-Ahead	2:00 pm the day before event	16	2,356	215	1,102
					17	2,356	200	1,049

*Penalties are incurred when delivered load is below 50% of nominated value.

6. Did SF Power receive any capacity payments or other incentives during 2010? If so, what is the dollar amount of incentive or other funding SF Power earned, and received (if different), in 2010 through to its participation in the CBP? Please separately provide the same information for SF Power for 2009.
 - a. Total;
 - b. In each month; and

c. For each event.

2010 Capacity Payments/Incentives				
Event Date	Capacity Payment	Energy Payment	Total Payment	Monthly Total
June 28, 2010	*	*	\$22,564.22	\$22,564.22
July 16, 2010	\$4,836.00	\$0.00	\$4,836.00	\$4,836.00
August 16, 2010	\$293.16	\$0.00	\$293.16	\$293.16
September 29, 2010	\$143.24	\$0.00	\$143.24	\$143.24
Total:				\$27,836.62

2009 Capacity Payments/Incentives				
Event Date	Capacity Payment	Energy Payment	Total Payment	Monthly Total
July 27, 2009	\$52,712.40	\$538.97	\$53,251.37	\$53,251.37
Total:				\$53,251.37

*No Day- Ahead Event was called, SF Power was paid for full performance for Day- Ahead and penalized for Day-Of Event

7. What dollar amount of penalties did SF Power incur in 2010? Please separately provide the same information for SF Power for 2009.
- Total;
 - In each month; and
 - For each event.

2010 Penalties				
Event Date	Capacity Penalty	Energy Penalty	Total Penalty	Monthly Total
June 28, 2010	(\$362.89)	(\$23.25)	(\$386.14)	(\$386.14)
July 15, 2010	(\$1,147.29)	(\$72.56)	(\$1,219.85)	
July 16, 2010	(\$42,152.89)	(\$1,001.77)	(\$43,154.66)	(\$44,374.51)
August 16, 2010	(\$4,246.55)	(\$198.42)	(\$4,444.97)	
August 24, 2010	(\$17,255.96)	(\$815.36)	(\$18,071.32)	
August 25, 2010	(\$17,067.87)	(\$822.64)	(\$17,890.51)	(\$40,406.80)
September 2, 2010	(\$5,056.10)	(\$805.44)	(\$5,861.54)	
September 28, 2010	(\$5,144.88)	(\$280.98)	(\$5,425.86)	
September 29, 2010	(\$4,396.98)	(\$1,467.28)	(\$5,864.26)	(\$17,151.66)
Total:				(\$102,319.11)

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2009 Penalties				
Event Date	Jun-09	Jul-09	Aug-09	Sep-09
July 27, 2009	no penalties	no penalties	no penalties	no penalties

* This amount is not included in the uncollected Balance owed.

8. What is the maximum load reduction that SF Power achieved in any event in 2009 or 2010 during an event, under each baseline?

Events Maximum Load Reduction	2009 Baseline (Actual)	2010 Baseline with Adjustment (Estimated)
July 27, 2009	5,225	1,877

Respectfully Submitted,

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By: _____ /s/
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