

**ADOPTED MODIFICATIONS TO  
DECISION (D.)21-03-056 IN REDLINE**

**1. Modification to D.21-03-056 at 23-24**

**5.6 Event Triggers**

ELRP will utilize ~~both a~~ day-ahead (DA) and day-of (DO) event triggers.

The ELRP DA trigger for both Group A and Group B resources is tied to a DA Alert, per the Alert, Warning, Emergency (AWE) process defined by the CAISO Operating Procedure 4420, declaration by CAISO. An ELRP event cannot be triggered by an IOU for a localized transmission or distribution emergency.

Following ~~an~~ DA Alert declaration by the CAISO, the IOUs will exercise discretion to activate the DA trigger for Group A participants, either selectively staggered over time or all ~~DA~~ participants at the same time. The start time and duration specified by the IOU will define the ELRP event window for the Group A participants called by the IOU.

Following any AWE declaration by the CAISO, the IOUs will exercise discretion to activate the DO trigger for Group A participants, either selectively staggered over time or all participants at the same time. The start time and duration specified by the IOU defines the ELRP event window for the Group A participants called by the IOU for the DO trigger.

There was significant party support for having the program event triggers controlled by CAISO.<sup>1</sup> PG&E<sup>2</sup> and DR Coalition<sup>3</sup> support having an ELRP event

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<sup>1</sup> Exhibit PGE-1 at 3-2, Exhibit SDGE-1 at 7, Exhibit SCE-1 at 8, and Exhibit DRC-1 at 14, and Exhibit PIO-1 at 12.

<sup>2</sup> Exhibit PGE-1 at 3-1.

<sup>3</sup> Exhibit DRC-1 at 12.

called during declared CAISO Warning or Emergency stage with a 30-minute notice. Including a day ahead trigger, as supported by SCE,<sup>4</sup> is intended to address IOU concerns that customers will not have enough time to produce meaningful load reductions in the real time market. The CAISO expressed concern that triggering too early could distort the market. While we understand CAISO's concern, the practical need for participants to have time to respond in time to provide the benefit overrides the market distortion concern.

**2. Modification to D.21-03-056 at 57-58**

Regarding ELRP, we make the following modifications to the proposed decision in response to comments. In response to comments from SCE, we remove the option for customers to pre-select only a day-ahead or day-of notification day-of trigger option, keeping only the day-ahead trigger. In response to comments from California Large Energy Consumers Association and DR Coalition, we allow for compensation for ELRP test events at rate of \$1/kWh (for one 2-hour test per season for Group A only).

**3. Modifications to D.21-03-056 at Finding of Fact 24**

24. The appropriate triggers for ELRP are both day-of and day-ahead ~~is day-ahead~~.

**4. Modification to ATTACHMENT 1 of D.21-03-056 at Pages 7-8**

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<sup>4</sup> Exhibit SCE-1 at 8.

## **Program Event Triggers**

ELRP will utilize ~~a~~both day-ahead (DA) and day-of (DO) triggers.

### **Day-Ahead (DA) Trigger**

The ELRP DA trigger for Group B resources is activated when a DA Alert, per the “Alert, Warning, Emergency (AWE)” process defined by the CAISO Operating Procedure 4420, is declared by the CAISO. The start time and duration specified in the DA Alert defines the Group B ELRP event window.

Following a DA Alert declaration by the CAISO, the IOUs will exercise discretion to activate the DA trigger for Group A participants, either selectively staggered over time or all ~~DA~~ participants at the same time. The start time and duration specified by the IOU defines the ELRP event window for the Group A participants called by the IOU.

### **Day-Of (DO) Trigger**

Following any AWE declaration by the CAISO, the IOUs will exercise discretion to activate the DO trigger for Group A participants, either selectively staggered over time or all participants at the same time. The start time and duration specified by the IOU defines the ELRP event window for the Group A participants called by the IOU for the DO-trigger.

There is no ELRP Day-Of ttrigger for ~~Group A or~~ Group B defined at this time.

**(END OF ATTACHMENT 1)**