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EXECUTIVE SUMMARY

(Witness: Stephen Castello)

I. INTRODUCTION & RECOMMENDATIONS

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this opening testimony in the *Application of Pacific Gas and Electric Company (U39E) for Approval of its Demand Response Programs, Pilots and Budgets for Program Years 2023-2027* (PG&E Application), filed May 2, 2022. Pursuant to the Administrative Law Judge (ALJ) Ruling issued on May 25, 2022, by ALJ Garrett Toy, PG&E's Application was consolidated with *Application of San Diego Gas & Electric Company (U902E) Requesting Approval and Funding of its Demand Response Portfolio for Bridge Year 2023 and Program Years 2024-2027* (SDG&E Application), and the *Application of Southern California Edison Company (U338E) for Approval of Demand Response Programs and Budgets for 2023-2027* (SCE Application). Per the *Assigned Commissioner's Scoping Memo and Ruling* (Scoping Memo), this proceeding will be addressed in two phases. Phase 1 is limited to the consideration of the 2023 Bridge Year Funding as proposed by the Investor-Owned Utilities' (IOUs). The Scoping Memo also creates a separate track within Phase 1 to consider if the IOUs should be directed to conduct Demand Response Auction Mechanism (DRAM) solicitations in 2023 as a continued pilot without further technical refinements and, if so, what budget should be authorized.¹

This testimony presents Cal Advocates’ analysis and recommendations regarding the continuation of the DRAM pilot in 2023. Based on the results of the DRAM pilot, the Commission should not approve any additional DRAM auctions and the DRAM pilot should conclude.

¹ Scoping Memo, p. 4.

1 **List of Public Advocates Office Witnesses and Respective Chapters**

Chapter Number	Description	Witnesses
-	Introduction	Stephen Castello
1	The Demand Response Auction Mechanism Pilot	Stephen Castello

2

3

CHAPTER 1 : THE DEMAND RESPONSE AUCTION MECHANISM PILOT

I. INTRODUCTION

This chapter addresses Cal Advocates' position on the future of the Demand Response Auction Mechanism (DRAM). The Commission, through Decision (D.) 14-12-024, required the IOUs to design and implement the DRAM pilot for 2016 and 2017. The DRAM Pilot is a pay-as-bid solicitation through which these IOUs seek monthly demand response system capacity, local capacity, and flexible capacity, which contributes to their resource adequacy obligation.² The objective of the DRAM pilot is to investigate whether a competitive procurement mechanism for supply side resources outside of traditional utility programs is viable while also providing experience in the California Independent System Operator (CAISO) markets.³ The Commission extended the DRAM pilot to 2018 through deliveries in 2023.⁴

Given the results of the DRAM Pilot, the Commission should conclude the DRAM program and not authorize additional DRAM auctions.

II. DISCUSSION

Cal Advocates recommends the DRAM pilot be concluded based on the results of the most recent DRAM evaluation, Cal Advocates' analysis of DRAM invoices, and changed DR market conditions.

A. No additional Demand Response Auction Mechanism (DRAM) pilot auctions should be approved, and the DRAM pilot should be concluded.

In D.16-09-056, the Commission directed the Commission's Energy Division to conduct an evaluation of the 2016 and 2017 DRAM Pilot auctions and subsequent

² D.19-12-040, p. 3.

³ D.14-12-024, p. 12 and D.16-06-029, p. 43.

⁴ D.16-06-029, Ordering Paragraphs 19 and 21, pp. 91-92; D.17-10-017, Ordering Paragraphs 7 and 8, p. 89; D.19-07-009, later modified by D.19-09-041, p. 31 and Ordering Paragraphs 1-2, pp. 106-107.

1 deliveries.⁵ The Commission required that evaluation of the DRAM pilot base its
2 assessment of success on the following criteria:

- 3 1. Were new, viable third-party providers engaged;
- 4 2. Were new customers engaged;
- 5 3. Were bid prices competitive;
- 6 4. Were offer prices competitive in the wholesale markets;
- 7 5. Did Demand Response Providers (DRPs) aggregate the capacity
8 they contracted, or replace it with demand response from another
9 source in a timely manner; and
- 10 6. Were resources reliable when dispatched.⁶

11 The Energy Division issued its *Evaluation of Demand Response Auction*
12 *Mechanism Final Report* on January 4, 2019. In its examination of DRAM auctions and
13 deliveries between 2015 and 2017, Commission Staff found that DRAM failed to achieve
14 three of the six evaluation criteria⁷ necessary⁸ to be deemed successful.²

15 In D.19-07-009, the Commission authorized the IOUs to contract with a consultant
16 to evaluate the continuation of DRAM. The evaluation was to include performance of
17 delivery years 2018 through 2021, and the solicitation process for years 2019, 2020, and
18 2021.¹⁰ The DRAM Evaluation (Nexant Evaluation) was noticed to parties of the
19 proceeding on June 24, 2022. Despite changes and improvements made in the pilot since
20 the release of the first evaluation report, DRAM continued to fail to satisfy the same three
21 criteria¹¹ that it previously failed to satisfy in the first evaluation. DRAM has not met the
22 criteria the Commission set to determine success of the pilot and, after 8 years of

⁵ D.16-09-056, Ordering Paragraph 10, p. 98.

⁶ D.16-09-056, Ordering Paragraph 10, p. 98.

⁷ Criteria 4, 5, and 6 were not met.

⁸ “We [the Commission] will treat these criteria as objectives that the demand response auction mechanism must meet in order to expand its role in the resource adequacy market,” D.16-09-056, p. 66.

² Energy Division’s Evaluation of Demand Response Auction Mechanism, January 4, 2019, p. 12.

¹⁰ D.19-07-009 Ordering Paragraph 16, p. 112.

¹¹ Demand Response Auction Mechanism Evaluation Submitted by Nexant in Partnership with Gridwell Consulting (Nexant Evaluation), p. 2.

1 auctions, it is unreasonable to assume there will be improvement. Therefore, the
2 Commission should not authorize further DRAM auctions and allow the DRAM pilot to
3 end with the deliveries already contracted for 2023.

4 High performing DRPs who previously participated in DRAM will still have
5 ample opportunities to participate in DR. In D.21-12-025, the Commission ordered the
6 IOUs to procure DR for 2022 and 2023 through bilateral contracts.¹² Pacific Gas and
7 Electric Company (PG&E)¹³ and Southern California Edison Company (SCE)¹⁴ both
8 procured DR contracts for deliveries starting in 2022 with DRPs that have participated in
9 DRAM. Additionally, DRPs can and do sell their Resource Adequacy (RA) products to
10 Community Choice Aggregators (CCAs).¹⁵ As such, DRPs are able to sell IOUs their
11 products outside of the DRAM carveout.¹⁶ Based on the lessons learned in the DRAM
12 pilot, DRPs can and should compete in IOU “all-resource” solicitations or other
13 procurements. This is preferable to DRAM since it will foster greater competition among
14 resource types.

15 Moreover, it will ensure that IOUs are procuring to their forecast needs instead of
16 to a budget target. Under DRAM, IOUs are required to spend as much of their allocated
17 budget as possible to buy DRAM bids whether the IOUs requires that resource for
18 reliability or not.¹⁷ Eliminating DRAM will allow IOUs to conduct solicitations for the
19 DR the system needs and will create a healthier marketplace for sellers by allowing the
20 IOUs to send accurate signals about actual resource need. DRPs are able to compete on
21 the open market and no longer require the DRAM carve-out. For these reasons, the
22 Commission should decline to authorize further DRAM auctions and allow DRAM to
23 conclude with the deliveries in 2023.

¹² D.21-12-025 Ordering Paragraph 13, p. 164.

¹³ PG&E Advice Letter 6619-E.

¹⁴ SCE Advice Letter 4797-E.

¹⁵ Nexant Evaluation, p. 29.

¹⁶ In D.19-12-040 OP 11, p. 81 the Commission found that DRAM is a carve-out procurement mechanism.

¹⁷ D.19-12-040 OP 11, p. 81.

1 **B. DRAM resources were not reliable during the times of greatest**
2 **need.**

3 The following table shows contract and performance data from DRAM sellers
4 contracted by PG&E to provide capacity in August 2020. August 2020 provides a good
5 example of a time of grid stress given that on August 14, 2020, and August 15, 2020, the
6 CAISO was forced to institute rotating electricity outages.¹⁸

7 **Table 1**
8 **PG&E DRAM Sellers' August 2020 Performance¹⁹**

DRAM Seller	Contracted Quantity megawatts (MW)	Supply Plan MW	Demonstrated ²⁰ Capacity (DC) MW	Percent Supply Plan/ Contract Quantity	Percent DC Invoice Claim/Supply Plan	DC Invoice/Contracted Quantity
Enel X	████	████	████	████	████	████
Leapfrog Power	████	████	████	████	████	████
Stem	████	████	████	████	████	████
Tesla	████	████	████	████	████	████
Voltus	████	████	████	████	████	████

0 “Contracted Quantity MW” shows the capacity purchased up to one year ahead
1 during the annual DRAM auction. “Supply Plan MW” shows the capacity that DRAM
2 Sellers submit at least 60 days prior to the start of the delivery period. The Supply Plan
3 capacity represents a more accurate view of what capacity will be available. As seen in
4 Table 1, [REDACTED], as compared
5 to their Contracted Quantity. [REDACTED]

7 These findings are consistent with the Nexant Evaluation findings that in August, DRAM
8 sellers provided demonstrated capacity that was far below its contracted capacity (about

¹⁸Final Root Cause Analysis, Mid-August 2020 Extreme Heat Wave, January 13, 2021, p. 1.

¹⁹ Response to Question 2, Data Request - CalAdvocates-SC-PGE-2020-03.

²⁰ August DRAM Demonstrated Capacity (DC) invoices must be supported by 2 hours of continuous test and/or dispatch. If a resource was dispatched or tested for more than 2 hours, the Seller can select which 2 hours to report, D. 19-12-040 Appendix B.

65% in 2019, 67% in 2020, and 57% in 2021).²¹ This pattern shows the manifest risk of DRAM sellers being unsuccessful in aggregating contracted capacity in a timely manner. Currently, ratepayers shoulder this risk, because IOUs must replace that capacity through other means, and the DRAM provider is not required to make the IOU whole as if it were a standard energy supply contract. This may result in significantly higher costs due to the short procurement timeline for replacement resources.



C. DRAM resources have failed to meet their contractual obligations.

The problems with DRAM Proxy Demand Resource (PDR) reliability were evident when examining the same DRAM resources' invoices across different months. Historically, most invoices were settled through the Must Offer Obligation (MOO) method.²² For MOO Demonstrated Capacity (DC) invoices, sellers demonstrate capacity by bidding their resource during the required hours without any dispatch of the resource. There is no requirement to bid at a particular price, which creates an opportunity for gaming. Bidding at or near the market price cap greatly decreases the likelihood of a resource being dispatched. In its analysis of Day Ahead Market (DAM) scheduling rates²³, Energy Division staff found that DRAM resources were the least likely resource group to win DAM awards.²⁴ The Nexant Evaluation found the same trend continued in

²¹ P. 110.

²² 2021 is an expectation in that MOO was the second most used DC invoice settlement method with 44% of DC invoices being MOO based, Nexant Evaluation, p. 134.

²³ Defined as the aggregate energy awarded divided by the aggregate energy offered. This can be used as a proxy for bid price.

²⁴ Energy Division's Evaluation of Demand Response Auction Mechanism, January 4, 2019, p.82.

2018 – 2021.²⁵ The remaining invoices are settled based on the results of a dispatch and/or test.

The Nexant Evaluation assessed the DRPs ability to align Supply Plan and demonstrated capacity with contracted capacity and found that alignment has decreased over time and reached its lowest alignment in 2021 at 65%.²⁶ This is consistent with Cal Advocates’ analysis as shown in more detail below.

The following table shows the difference in PG&E’s 2019 DRAM resource performance by settlement method. Invoices that were disputed or had contractual disputes were not included in Table 2, below, showing PG&E DRAM PDR sellers’ performance by settlement type.

Table 2
Aggregate PG&E DRAM PDR Sellers’ 2019 Performance
by Settlement Type²⁷

Settlement Method	Number of Invoices included	Total Supply Plan MW	Total Demonstrated Capacity (DC) MW	Percent DC MW/Supply Plan MW
■	■	■	■	■
■	■	■	■	■

As shown above, ■% of Supply Plan MWs are alleged to have been available when invoices are backed only by market bids. However, when a test or dispatch was conducted, only ■% of those Supply Plan MWs were available. This suggests that some PDR Sellers are reporting more Supply Plan Capacity than will ultimately be available.

■²⁸ ■

■

²⁵ Nexant Evaluation, Table 7-10, p. 101.

²⁶ Nexant Evaluation, Table 8-4, p. 134.

²⁷ Response to Question 1, Data Request - CalAdvocates-SC-PGE-2020-03. System RA only.

²⁸ Response to Question 1, Data Request - CalAdvocates-SC-PGE-2020-03.

Table 2-3

Selected [REDACTED] Invoice Data

DRAM Seller	Delivery Month	Contracted Quantity (CQ)	Supply Plan MW	Demonstrated Capacity (DC) MW	DC Type
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED] The Commission should not rely on the claimed values of third-party DRPs when promised performance is so different from actual delivered performance. Third-party PDR resources have not shown a consistent ability to provide real and reliable capacity. Given this performance, it would be unjust and unreasonable for the Commission to require the utilities to conduct an additional DRAM solicitation in 2023 at ratepayers' expense.

D. Some DRAM Demonstrated Capacity invoices have been greatly overstated.

Investigation and analysis of 2019 and 2020 DRAM Resource invoices²⁹ and CAISO Settlement and Bid Data³⁰ revealed some concerning discrepancies between performance claimed on DRAM invoices to the IOUs and performance claimed the CAISO.

The following two tables show a sample of the results from analysis done for DRAM deliveries from August 1, 2020 to August 31, 2020. The August 2020 data is instructive when analyzing DRAM resource performance because all August DRAM

²⁹ Data Request - CalAdvocates-SC-PGE-2020-03; Data Request - CalAdvocates-SC-SCG-2020-03; Data Request - CalAdvocates-SC-SDGE-2020-03.

³⁰ Combined Subpoena for General RA information necessary for the CPUC to evaluate Resource Adequacy program and policies, March 6, 2020.

1 invoices must be substantiated by actual performance³¹ and a dispatch or test must be
2 sustained for at least two hours. The analysis below further supports the conclusions that
3 DRAM DRPs are not all meeting their contractual capacity obligations and are not
4 reliably providing energy reductions when dispatched.³²

5 Table 3 compares 1-hour interval settlement quality meter data from the CAISO to
6 the Demonstrated Capacity claimed by DRAM sellers. Column F shows how much
7 larger the capacity claimed on the DRAM invoice is compared to the maximum MW
8 value according to CAISO settlement data. Seventy resource IDs were identified
9 invoicing over 100% of the performance reported to CAISO. The 20 resource IDs with
10 the greatest percentage discrepancy are included.

³¹ DRPs cannot calculate invoices using its Must Offer Obligation (MOO) for the month of August.

³² See Nexant Evaluation's summary of evaluation criteria, Nexant Evaluation, p. 2.

Table 3 – Comparison of CAISO 1-hour Interval Settlement Data to August 2020 DRAM Invoices

A	B	C	D	E	F
IOU	DRAM Seller	CAISO Resource ID	DRAM Demonstrated Capacity Claimed (MW) ³³	MAX MW Available to be Claimed (CAISO Data Item 5) ³⁴	Discrepancy Between DRAM Invoice and CAISO Settlement (Column D / Column E (%))

Table 4 compares 5-minute interval settlement data from the CAISO to the Demonstrated Capacity claimed by DRAM sellers. Column F shows how much larger the capacity claimed on the DRAM invoice is compared to the maximum MW value

³³ Pacific Gas and Electric Company (PG&E) Confidential Response to CalAdvocates-SC-PGE-2020-03, Question 2; Southern California Edison Company (SCE) Confidential Response to CalAdvocates-SC-SCE-2020-03, Question 2; San Diego Gas & Electric Company (SDG&E) Confidential Response to CalAdvocates-SC-SDGE-2020-03, Question 2.

³⁴ CAISO Response to Combined Subpoena for General RA information necessary for the CPUC to evaluate Resource Adequacy program and policies, Item 5, Settlement Quality Meter Data.

according to CAISO settlement data. Ninety-six resource IDs were identified invoicing over 100% of the performance reported to CAISO. The 20 resource IDs with the greatest percentage discrepancy are included.

Table 4 – Comparison of CAISO 5-min Interval Settlement Data to August 2020 DRAM Invoices

A	B	C	D	E	F
IOU	DRAM Seller	CAISO Resource ID	DRAM Demonstrated Capacity Claimed (MW) ³⁵	MAX MW Available to be Claimed (CAISO Data Item 13) ³⁶	Discrepancy Between DRAM Invoice and CAISO Settlement (Column D / Column E (%))

³⁵ Pacific Gas and Electric Company (PG&E) Confidential Response to CalAdvocates-SC-PGE-2020-03, Question 2; Southern California Edison Company (SCE) Confidential Response to CalAdvocates-SC-SCE-2020-03, Question 2; San Diego Gas & Electric Company (SDG&E) Confidential Response to CalAdvocates-SC-SDGE-2020-03, Question 2.

³⁶ CAISO Response to Combined Subpoena for General RA information necessary for the CPUC to evaluate Resource Adequacy program and policies, Item 13, Demand Response (PDR/RDRR) and Non-generating (NGR) Settlement Data Files.

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[REDACTED]

[REDACTED]

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[REDACTED]

³⁸

Table 5
PDR 107 Settlement Data August 2020³⁹

[REDACTED]

³⁷ Response to Question 2, Data Request - CalAdvocates-SC-SCE-2020-03, [REDACTED]

³⁸ Combined Subpoena for General RA information necessary for the CPUC to evaluate Resource Adequacy program and policies, March 6, 2020, Item 5.

³⁹ Combined Subpoena for General RA information necessary for the CPUC to evaluate Resource Adequacy program and policies, March 6, 2020, Item 5.

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[REDACTED] ⁴⁰ [REDACTED]
[REDACTED]
[REDACTED] ⁴¹ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] Moreover, the facts above call into
question the ability of some third party DRPs to provide energy when the grid is in need.
Given this evidence, the Commission should not impose further costs on ratepayers by
ordering the IOUs to conduct an additional DRAM auction in 2023.

⁴⁰ Rows where MWh were equal to zero, indicating no dispatch, have been omitted.

⁴¹ [REDACTED]
[REDACTED] Combined Subpoena for General RA information necessary for the
CPUC to evaluate Resource Adequacy program and policies, March 6, 2020, Item 13.

APPENDIX A
Witness of Qualification

WITNESS QUALIFICATIONS
OF
STEPHEN CASTELLO

Q.1 Please state your name and business address.

A.1 My name is Stephen Castello. My business address is 505 Van Ness Avenue, San Francisco, California.

Q.2 By whom are you employed and in what capacity?

A.2 I am employed by the Public Advocates Office at the California Public Utilities Commission as a Senior Public Utilities Regulatory Analyst in the Electricity Pricing and Customer Programs Branch.

Q.3 Briefly state your educational background and experience.

A.3 I hold a Master of Science in Economics from California State University, East Bay (2018). I also received a Bachelor of Arts in Political Science from the University of California, Berkeley (2014). I joined the Commission on May 1, 2019 in the Public Advocates Office, Electricity Pricing and Customer Programs Branch. I have previously provided testimony in the Rulemaking to Ensure Reliable Electric Service in California in the Event of an Extreme Weather Event in 2021 (R.20-11-003), the Integrated Distributed Energy Resources Rulemaking (R.14-10-003) and the Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation, and Related Issues (R.13-11-005).

Q.4 Does this complete your testimony at this time?

A.4 Yes, it does.

LIST OF ATTACHMENTS

#	Attachment	Description
PG&E Documents		
1	Data Request - CalAdvocates-SC-PGE-2020-03.pdf	Cal Advocates' Data Request to PG&E
2	DemandResponseOIR-2013_DR_CalAdvocates_019-Q01.pdf	PG&E's Response to Cal Advocates' Data Request Question 1
3	DemandResponseOIR-2013_DR_CalAdvocates_019-Q01Atch01CONF.pdf	PG&E's Response to Cal Advocates' Data Request Question 1, Excel Attachment Contains confidential information.
4	DemandResponseOIR-2013_DR_CalAdvocates_019-Q02.pdf	PG&E's Response to Cal Advocates' Data Request Question 2
5	DemandResponseOIR-2013_DR_CalAdvocates_019-Q02Atch01CONF.pdf	PG&E's Response to Cal Advocates' Data Request Question 2, Excel Attachment Contains confidential information.
6	Nonprocurement_Confidentiality_Declaration_Neda.pdf	PG&E's Response to Cal Advocates' Data Request Confidentiality Declaration
SCE Documents		
7	Data Request - CalAdvocates-SC-SCE-2020-03.pdf	Cal Advocates' Data Request to SCE
8	CalAdvocates-SC-SCE-2020-03 - Q. 002 Answer.pdf	SCE's Response to Cal Advocates' Data Request Question 2
9	CONFIDENTIAL 2020-07 July 2020 DRAM Invoice - Leap - 10112.pdf	SCE's Response to Cal Advocates' Data Request Question 2, Leap Invoice July (1) Contains confidential information.
10	CONFIDENTIAL 2020-07 July 2020 DRAM Invoice - Leap - 10118.pdf	SCE's Response to Cal Advocates' Data Request Question 2, Leap Invoice July (2) Contains confidential information.

11	CONFIDENTIAL SCE - August 2020 DRAM Invoice - Leap - Contract 1.pdf	SCE's Response to Cal Advocates' Data Request Question 2, Leap Invoice August (1) Contains confidential information.
12	CONFIDENTIAL SCE - August 2020 DRAM Invoice - Leap - Contract 2.pdf	SCE's Response to Cal Advocates' Data Request Question 2, Leap Invoice August (2) Contains confidential information.
13	CONFIDENTIAL SCE - September 2020 DRAM Invoice - Leap - 10112.pdf	SCE's Response to Cal Advocates' Data Request Question 2, Leap Invoice September (1) Contains confidential information.
14	CONFIDENTIAL SCE - September 2020 DRAM Invoice - Leap - 10118.pdf	SCE's Response to Cal Advocates' Data Request Question 2, Leap Invoice September (2) Contains confidential information.
15	Confidentiality Declaration David Iversen 20201230 Q. 002.pdf	SCE's Response to Cal Advocates' Data Request Confidentiality Declaration
Other Documents		
16	Data Request - CalAdvocates-SC-SDGE- 2020-03.pdf	Cal Advocates' Data Request to SDG&E
17	Master-2020-21-CPUC-RA- Subpoena.pdf	The Public Advocates Office Master Resource Adequacy Subpoena to the California Independent System Operator

ATTACHMENT 1

Cal Advocates' Data Request to PG&E



Public Advocates Office
California Public Utilities Commission

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San Francisco, CA 94102
Phone: (415) 703-2544
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<http://publicadvocates.cpuc.ca.gov>

PUBLIC ADVOCATES OFFICE DATA REQUEST
No. CalAdvocates-SC-PGE-2020-03

Date: Monday, December 14, 2020

Response Requested: **Wednesday, December 30, 2020**

To: **Bobby Silicani**
Regulatory Affairs for PG&E

Phone: (415) 973-2990
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INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the Public Advocates Office (Cal PA) contact(s) above with a copy to the Public Advocates Office attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be

provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify the Public Advocates Office as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Any objection to a Data Request should clearly indicate to which part or portion of the Data Request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.

If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office as soon as possible. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “PGE,” and “PG&E” mean Pacific Gas and Electric Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1st of January and the 31st of

January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- H. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

DATA REQUEST

1. Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2019.
2. Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2020.
3. Please provide all DRAM monthly DC invoices for deliveries in 2021 as they become available.
4. For each 2019, 2020 and/or 2021 DRAM seller, please provide the total number of Rule 24 authorizations.

5. Has PG&E requested “additional information” under the pro forma contract section 1.6¹ from any DRAM sellers in 2019 or 2020?
 - a. If yes, please identify the seller and month the information was requested.
 - b. If yes, please provide the additional information received.
6. Please provide the results of any audits of DRAM sellers for deliveries in 2019 and 2020.
7. Please identify any ongoing audits including the sellers being audited and the month(s) being investigated.

END OF REQUEST

¹ Section 1.6(k) in the 2021 DRAM pro forma contract. Earlier years might be a different subsection.

ATTACHMENT 2

PG&E's Response to Cal Advocates' Data Request Question 1

PACIFIC GAS AND ELECTRIC COMPANY
Demand Response OIR 2013
Rulemaking 13-09-011
Data Response

PG&E Data Request No.:	CalAdvocates 019-Q01		
PG&E File Name:	DemandResponseOIR-2013 DR CalAdvocates 019-Q01		
Request Date:	December 14, 2020	Requester DR No.:	CalAdvocates-SC-PGE-2020-03
Date Sent:	December 30, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Neda Oreizy	Requester:	Stephen Castello

QUESTION 01

Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2019.

ANSWER 01

The attachments to this response contain PG&E's Confidential information described in the declaration of Neda Oreizy, dated December 30, 2020—Do Not Disclose. Therefore, confidential files are being submitted via the CPUC FTP's secure server.

PG&E sought additional clarification on this question, but was unable to receive a response in time for the due date of this request. PG&E believes that this request was intended to seek the *data* behind the invoices, not the voluminous set of invoice documentation, which includes invoice cover sheets, Demonstrated Capacity forms (Exhibit C), and supporting documentation. If this assumption is incorrect, PG&E will seek to provide an expedited response with the full set of documentation.

The Demonstrated Capacity data can be found in the following attachment to this response:

DemandResponseOIR-2013_DR_CalAdvocates_019-Q01Atch01CONF.xlsx

ATTACHMENT 3

**PG&E's Response to Cal Advocates'
Data Request Question 1,
Excel Attachment
(Contains confidential information)**

This attachment to this response contains PG&E's Confidential information described in the declaration of Neda Oreizy, dated December 30, 2020—Do Not Disclose.

DRAM Contract	DRAM Seller	Res/ NonRes	PDR/ RDRR	Product Type	Delivery Month	Contract Year	Contracted Quantity (CQ)	Supply Plan MW	DC MW	DC Type	Notes
Autogrid 1	Autogrid	N	PDR	System	Jan-19	2018-19					
Enernoc 1	Enel X	N	RDRR	System	Jan-19	2018-19					
OhmConnect 1	OhmConnect	N	PDR	System	Jan-19	2018-19					
OhmConnect 2	OhmConnect	R	PDR	System	Jan-19	2018-19					
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Jan-19	2018-19					
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Jan-19	2018-19					
Sunrun 1	Sunrun	R	PDR	Fresno	Jan-19	2018-19					
Tesla 1	Tesla	N	PDR	System	Jan-19	2018-19					
Tesla 2	Tesla	N	PDR	Greater Bay	Jan-19	2018-19					
Tesla 3	Tesla	N	PDR	North Coast	Jan-19	2018-19					
Autogrid 1	Autogrid	N	PDR	System	Feb-19	2018-19					
Enernoc 1	Enel X	N	RDRR	System	Feb-19	2018-19					
OhmConnect 1	OhmConnect	N	PDR	System	Feb-19	2018-19					
OhmConnect 2	OhmConnect	R	PDR	System	Feb-19	2018-19					
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Feb-19	2018-19					
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Feb-19	2018-19					
Sunrun 1	Sunrun	R	PDR	Fresno	Feb-19	2018-19					
Tesla 1	Tesla	N	PDR	System	Feb-19	2018-19					
Tesla 2	Tesla	N	PDR	Greater Bay	Feb-19	2018-19					
Tesla 3	Tesla	N	PDR	North Coast	Feb-19	2018-19					
Autogrid 1	Autogrid	N	PDR	System	Mar-19	2018-19					
Enernoc 1	Enel X	N	RDRR	System	Mar-19	2018-19					
OhmConnect 1	OhmConnect	N	PDR	System	Mar-19	2018-19					
OhmConnect 2	OhmConnect	R	PDR	System	Mar-19	2018-19					
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Mar-19	2018-19					
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Mar-19	2018-19					
Sunrun 1	Sunrun	R	PDR	Fresno	Mar-19	2018-19					
Tesla 1	Tesla	N	PDR	System	Mar-19	2018-19					
Tesla 2	Tesla	N	PDR	Greater Bay	Mar-19	2018-19					
Tesla 3	Tesla	N	PDR	North Coast	Mar-19	2018-19					
Autogrid 1	Autogrid	N	PDR	System	Apr-19	2018-19					
Enernoc 1	Enel X	N	RDRR	System	Apr-19	2018-19					
OhmConnect 1	OhmConnect	N	PDR	System	Apr-19	2018-19					
OhmConnect 2	OhmConnect	R	PDR	System	Apr-19	2018-19					
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Apr-19	2018-19					
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Apr-19	2018-19					
Sunrun 1	Sunrun	R	PDR	Fresno	Apr-19	2018-19					
Tesla 1	Tesla	N	PDR	System	Apr-19	2018-19					
Tesla 2	Tesla	N	PDR	Greater Bay	Apr-19	2018-19					
Tesla 3	Tesla	N	PDR	North Coast	Apr-19	2018-19					
Autogrid 1	Autogrid	N	PDR	System	May-19	2018-19					

Enernoc 1	Enel X	N	RDRR	System	May-19	2018-19	
OhmConnect 1	OhmConnect	N	PDR	System	May-19	2018-19	
OhmConnect 2	OhmConnect	R	PDR	System	May-19	2018-19	
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	May-19	2018-19	
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	May-19	2018-19	
Sunrun 1	Sunrun	R	PDR	Fresno	May-19	2018-19	
Tesla 1	Tesla	N	PDR	System	May-19	2018-19	
Tesla 2	Tesla	N	PDR	Greater Bay	May-19	2018-19	
Tesla 3	Tesla	N	PDR	North Coast	May-19	2018-19	
Autogrid 1	Autogrid	N	PDR	System	Jun-19	2018-19	
Enernoc 1	Enel X	N	RDRR	System	Jun-19	2018-19	
OhmConnect 1	OhmConnect	N	PDR	System	Jun-19	2018-19	
OhmConnect 2	OhmConnect	R	PDR	System	Jun-19	2018-19	
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Jun-19	2018-19	
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Jun-19	2018-19	
Sunrun 1	Sunrun	R	PDR	Fresno	Jun-19	2018-19	
Tesla 1	Tesla	N	PDR	System	Jun-19	2018-19	
Tesla 2	Tesla	N	PDR	Greater Bay	Jun-19	2018-19	
Tesla 3	Tesla	N	PDR	North Coast	Jun-19	2018-19	
Autogrid 1	Autogrid	N	PDR	System	Jul-19	2018-19	
Enernoc 1	Enel X	N	RDRR	System	Jul-19	2018-19	
OhmConnect 1	OhmConnect	N	PDR	System	Jul-19	2018-19	
OhmConnect 2	OhmConnect	R	PDR	System	Jul-19	2018-19	
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Jul-19	2018-19	
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Jul-19	2018-19	
Sunrun 1	Sunrun	R	PDR	Fresno	Jul-19	2018-19	
Tesla 1	Tesla	N	PDR	System	Jul-19	2018-19	
Tesla 2	Tesla	N	PDR	Greater Bay	Jul-19	2018-19	
Tesla 3	Tesla	N	PDR	North Coast	Jul-19	2018-19	
Autogrid 1	Autogrid	N	PDR	System	Aug-19	2018-19	1.00
Enernoc 1	Enel X	N	RDRR	System	Aug-19	2018-19	25.00
OhmConnect 1	OhmConnect	N	PDR	System	Aug-19	2018-19	29.97
OhmConnect 2	OhmConnect	R	PDR	System	Aug-19	2018-19	13.99
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Aug-19	2018-19	9.99
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Aug-19	2018-19	8.91
Sunrun 1	Sunrun	R	PDR	Fresno	Aug-19	2018-19	0.15
Tesla 1	Tesla	N	PDR	System	Aug-19	2018-19	0.10
Tesla 2	Tesla	N	PDR	Greater Bay	Aug-19	2018-19	0.80
Tesla 3	Tesla	N	PDR	North Coast	Aug-19	2018-19	0.10
Autogrid 1	Autogrid	N	PDR	System	Sep-19	2018-19	
Enernoc 1	Enel X	N	RDRR	System	Sep-19	2018-19	
OhmConnect 1	OhmConnect	N	PDR	System	Sep-19	2018-19	
OhmConnect 2	OhmConnect	R	PDR	System	Sep-19	2018-19	
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Sep-19	2018-19	

OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Sep-19	2018-19
Sunrun 1	Sunrun	R	PDR	Fresno	Sep-19	2018-19
Tesla 1	Tesla	N	PDR	System	Sep-19	2018-19
Tesla 2	Tesla	N	PDR	Greater Bay	Sep-19	2018-19
Tesla 3	Tesla	N	PDR	North Coast	Sep-19	2018-19
Autogrid 1	Autogrid	N	PDR	System	Oct-19	2018-19
Enernoc 1	Enel X	N	RDRR	System	Oct-19	2018-19
OhmConnect 1	OhmConnect	N	PDR	System	Oct-19	2018-19
OhmConnect 2	OhmConnect	R	PDR	System	Oct-19	2018-19
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Oct-19	2018-19
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Oct-19	2018-19
Sunrun 1	Sunrun	R	PDR	Fresno	Oct-19	2018-19
Tesla 1	Tesla	N	PDR	System	Oct-19	2018-19
Tesla 2	Tesla	N	PDR	Greater Bay	Oct-19	2018-19
Tesla 3	Tesla	N	PDR	North Coast	Oct-19	2018-19
Autogrid 1	Autogrid	N	PDR	System	Nov-19	2018-19
Enernoc 1	Enel X	N	RDRR	System	Nov-19	2018-19
OhmConnect 1	OhmConnect	N	PDR	System	Nov-19	2018-19
OhmConnect 2	OhmConnect	R	PDR	System	Nov-19	2018-19
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Nov-19	2018-19
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Nov-19	2018-19
Sunrun 1	Sunrun	R	PDR	Fresno	Nov-19	2018-19
Tesla 1	Tesla	N	PDR	System	Nov-19	2018-19
Tesla 2	Tesla	N	PDR	Greater Bay	Nov-19	2018-19
Tesla 3	Tesla	N	PDR	North Coast	Nov-19	2018-19
Autogrid 1	Autogrid	N	PDR	System	Dec-19	2018-19
Enernoc 1	Enel X	N	RDRR	System	Dec-19	2018-19
OhmConnect 1	OhmConnect	N	PDR	System	Dec-19	2018-19
OhmConnect 2	OhmConnect	R	PDR	System	Dec-19	2018-19
OhmConnect 3	OhmConnect	N	PDR	Greater Bay	Dec-19	2018-19
OhmConnect 4	OhmConnect	R	PDR	Greater Bay	Dec-19	2018-19
Sunrun 1	Sunrun	R	PDR	Fresno	Dec-19	2018-19
Tesla 1	Tesla	N	PDR	System	Dec-19	2018-19
Tesla 2	Tesla	N	PDR	Greater Bay	Dec-19	2018-19
Tesla 3	Tesla	N	PDR	North Coast	Dec-19	2018-19
Enernoc 1	Enel X	N	PDR	System	Jan-19	2019
Leapfrog 1	Leap	N	PDR	System	Jan-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Jan-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Jan-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Jan-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Jan-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Jan-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Jan-19	2019
Stem 1	Stem	N	PDR	System	Jan-19	2019

Enernoc 1	Enel X	N	PDR	System	Feb-19	2019
Leapfrog 1	Leap	N	PDR	System	Feb-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Feb-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Feb-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Feb-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Feb-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Feb-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Feb-19	2019
Stem 1	Stem	N	PDR	System	Feb-19	2019
Enernoc 1	Enel X	N	PDR	System	Mar-19	2019
Leapfrog 1	Leap	N	PDR	System	Mar-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Mar-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Mar-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Mar-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Mar-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Mar-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Mar-19	2019
Stem 1	Stem	N	PDR	System	Mar-19	2019
Enernoc 1	Enel X	N	PDR	System	Apr-19	2019
Leapfrog 1	Leap	N	PDR	System	Apr-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Apr-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Apr-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Apr-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Apr-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Apr-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Apr-19	2019
Stem 1	Stem	N	PDR	System	Apr-19	2019
Enernoc 1	Enel X	N	PDR	System	May-19	2019
Leapfrog 1	Leap	N	PDR	System	May-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	May-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	May-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	May-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	May-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	May-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	May-19	2019
Stem 1	Stem	N	PDR	System	May-19	2019
Enernoc 1	Enel X	N	PDR	System	Jun-19	2019
Leapfrog 1	Leap	N	PDR	System	Jun-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Jun-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Jun-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Jun-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Jun-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Jun-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Jun-19	2019

Stem 1	Stem	N	PDR	System	Jun-19	2019
Enernoc 1	Enel X	N	PDR	System	Jul-19	2019
Leapfrog 1	Leap	N	PDR	System	Jul-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Jul-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Jul-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Jul-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Jul-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Jul-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Jul-19	2019
Stem 1	Stem	N	PDR	System	Jul-19	2019
Enernoc 1	Enel X	N	PDR	System	Aug-19	2019
Leapfrog 1	Leap	N	PDR	System	Aug-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Aug-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Aug-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Aug-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Aug-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Aug-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Aug-19	2019
Stem 1	Stem	N	PDR	System	Aug-19	2019
Enernoc 1	Enel X	N	PDR	System	Sep-19	2019
Leapfrog 1	Leap	N	PDR	System	Sep-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Sep-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Sep-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Sep-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Sep-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Sep-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Sep-19	2019
Stem 1	Stem	N	PDR	System	Sep-19	2019
Enernoc 1	Enel X	N	PDR	System	Oct-19	2019
Leapfrog 1	Leap	N	PDR	System	Oct-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Oct-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Oct-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Oct-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Oct-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Oct-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Oct-19	2019
Stem 1	Stem	N	PDR	System	Oct-19	2019
Enernoc 1	Enel X	N	PDR	System	Nov-19	2019
Leapfrog 1	Leap	N	PDR	System	Nov-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Nov-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Nov-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Nov-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Nov-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Nov-19	2019

6.74

10.00

10.00

10.00

5.00

10.00

11.00

8.00

2.00

OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Nov-19	2019
Stem 1	Stem	N	PDR	System	Nov-19	2019
Enernoc 1	Enel X	N	PDR	System	Dec-19	2019
Leapfrog 1	Leap	N	PDR	System	Dec-19	2019
Leapfrog 2	Leap	N	PDR	Greater Bay	Dec-19	2019
Leapfrog 3	Leap	N	PDR	Fresno	Dec-19	2019
Leapfrog 4	Leap	N	PDR	Flex 2 - System	Dec-19	2019
Leapfrog 5	Leap	N	PDR	Flex 3- System	Dec-19	2019
OhmConnect 1	OhmConnect	R	PDR	System	Dec-19	2019
OhmConnect 2	OhmConnect	R	PDR	Greater Bay	Dec-19	2019
Stem 1	Stem	N	PDR	System	Dec-19	2019

ATTACHMENT 4

PG&E's Response to Cal Advocates' Data Request Question 2

PACIFIC GAS AND ELECTRIC COMPANY
Demand Response OIR 2013
Rulemaking 13-09-011
Data Response

PG&E Data Request No.:	CalAdvocates 019-Q02		
PG&E File Name:	DemandResponseOIR-2013 DR CalAdvocates 019-Q02		
Request Date:	December 14, 2020	Requester DR No.:	CalAdvocates-SC-PGE-2020-03
Date Sent:	December 30, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Neda Oreizy	Requester:	Stephen Castello

QUESTION 02

Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2020.

ANSWER 02

The attachments to this response contain PG&E's Confidential information described in the declaration of Neda Oreizy, dated December 30, 2020—Do Not Disclose. Therefore, confidential files are being submitted via the CPUC FTP's secure server.

PG&E sought additional clarification on this question, but was unable to receive a response in time for the due date of this request. PG&E believes that this request was intended to seek the *data* behind the invoices, not the voluminous set of invoice documentation, which includes invoice cover sheets, Demonstrated Capacity forms (Exhibit C), and supporting documentation. If this assumption is incorrect, PG&E will seek to provide an expedited response with the full set of documentation.

The Demonstrated Capacity data can be found in the following attachment to this response:

DemandResponseOIR-2013_DR_CalAdvocates_019-Q02Atch01CONF.xlsx

ATTACHMENT 5

**PG&E's Response to Cal Advocates'
Data Request Question 2,
Excel Attachment
(Contains confidential information)**

This attachment to this response contains PG&E's Confidential information described in the declaration of Neda Oreizy, dated December 30, 2020—Do Not Disclose.

DRAM Contract	DRAM Seller	Res/ NonRes	PDR/ RDRR	Product Type	Delivery Month	Contract Year	Contracted Quantity (CO)	Supply Plan MW	DC MW	DC Type	Notes	
Enel X 1	Enel X	N	PDR	System	Jun-20	2020						
Leapfrog Power 1	Leapfrog Power	N	PDR	System	Jun-20	2020						
Stem 1	Stem	N	PDR	System	Jun-20	2020						
Tesla 1	Tesla	N	PDR	System	Jun-20	2020						
Voltus 1	Voltus	N	PDR	System	Jun-20	2020						
Enel X 1	Enel X	N	PDR	System	Jul-20	2020						
Leapfrog Power 1	Leapfrog Power	N	PDR	System	Jul-20	2020						
Stem 1	Stem	N	PDR	System	Jul-20	2020						
Tesla 1	Tesla	N	PDR	System	Jul-20	2020						
Voltus 1	Voltus	N	PDR	System	Jul-20	2020						
Enel X 1	Enel X	N	PDR	System	Aug-20	2020						18.60
Leapfrog Power 1	Leapfrog Power	N	PDR	System	Aug-20	2020						35.00
Stem 1	Stem	N	PDR	System	Aug-20	2020	8.92					
Tesla 1	Tesla	N	PDR	System	Aug-20	2020	13.40					
Voltus 1	Voltus	N	PDR	System	Aug-20	2020	23.00					
Enel X 1	Enel X	N	PDR	System	Sep-20	2020						
Leapfrog Power 1	Leapfrog Power	N	PDR	System	Sep-20	2020						
Stem 1	Stem	N	PDR	System	Sep-20	2020						
Tesla 1	Tesla	N	PDR	System	Sep-20	2020						
Voltus 1	Voltus	N	PDR	System	Sep-20	2020						
Enel X 1	Enel X	N	PDR	System	Oct-20	2020						
Leapfrog Power 1	Leapfrog Power	N	PDR	System	Oct-20	2020						
Stem 1	Stem	N	PDR	System	Oct-20	2020						
Tesla 1	Tesla	N	PDR	System	Oct-20	2020						
Voltus 1	Voltus	N	PDR	System	Oct-20	2020						
Enel X 1	Enel X	N	PDR	System	Nov-20	2020						
Leapfrog Power 1	Leapfrog Power	N	PDR	System	Nov-20	2020						
Stem 1	Stem	N	PDR	System	Nov-20	2020						
Tesla 1	Tesla	N	PDR	System	Nov-20	2020						
Voltus 1	Voltus	N	PDR	System	Nov-20	2020						
Enel X 1	Enel X	N	PDR	System	Dec-20	2020						
Leapfrog Power 1	Leapfrog Power	N	PDR	System	Dec-20	2020						
Stem 1	Stem	N	PDR	System	Dec-20	2020						
Tesla 1	Tesla	N	PDR	System	Dec-20	2020						
Voltus 1	Voltus	N	PDR	System	Dec-20	2020						

ATTACHMENT 6

PG&E's Response to Cal Advocates' Data Request Confidentiality Declaration

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Neda Oreizy, Principal Product Manager, Energy Storage and Load Management, of Pacific Gas and Electric Company (“PG&E”), a California corporation. Fong Wan, Senior Vice President, Energy Policy and Procurement of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
77 Beale Street, Mail Code B9F
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): R.13-09-011, A.17-01-012 et al

3. Title and description of document(s): CalAdvocates 019 Data Response.
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input checked="" type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data</p> <p>(Protected under Civ. Code §§ 3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code § 1060; D.11-01-036)</p>	<p>DemandResponseOIR-2013_DR_CalAdvocates_019-Q01Atch01CONF.xlsx; DemandResponseOIR-2013_DR_CalAdvocates_019-Q02Atch01CONF.xlsx; DemandResponseOIR-2013_DR_CalAdvocates_19-Q05CONF.pdf; DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch01CONF.xlsx; DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch02CONF.xlsx; DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch03CONF.xlsx; DemandResponseOIR-2013 DR CalAdvocates 019-</p>

	<p>Q05Atch04CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch05CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch06CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch07CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch08CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch09CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_19- Q06CONF.pdf; DemandResponseOIR- 2013_DR_CalAdvocates_19- Q07CONF.pdf</p>
<input type="checkbox"/>	<p>Corporate financial records (Protected under Govt. Code §§ 6254(k), 6254.15)</p>
<input checked="" type="checkbox"/>	<p>Third-Party information subject to non-disclosure or confidentiality agreements or obligations (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)</p> <p>DemandResponseOIR- 2013_DR_CalAdvocates_019- Q01Atch01CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q02Atch01CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_19- Q05CONF.pdf; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch01CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch02CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch03CONF.xlsx; DemandResponseOIR- 2013_DR_CalAdvocates_019- Q05Atch04CONF.xlsx;</p>

DemandResponseOIR-
2013_DR_CalAdvocates_019-
Q05Atch05CONF.xlsx;
DemandResponseOIR-
2013_DR_CalAdvocates_019-
Q05Atch06CONF.xlsx;
DemandResponseOIR-
2013_DR_CalAdvocates_019-
Q05Atch07CONF.xlsx;
DemandResponseOIR-
2013_DR_CalAdvocates_019-
Q05Atch08CONF.xlsx;
DemandResponseOIR-
2013_DR_CalAdvocates_019-
Q05Atch09CONF.xlsx;
DemandResponseOIR-
2013_DR_CalAdvocates_19-
Q06CONF.pdf;
DemandResponseOIR-
2013_DR_CalAdvocates_19-
Q07CONF.pdf

☐

Other categories where disclosure would be against the
public interest (Govt. Code § 6255(a)):

-
5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 30th day of December, 2020 at Piedmont, California.



Neda Oreizy
Principal Product Manager
Energy Storage and Load Management
Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

**A.17-01-012 et al, Data Response CalAdvocates_019
ATTACHMENT TO DECLARATION
12/30/2020**

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
DemandResponseOIR-2013_DR_CalAdvocates_019-Q01Atch01CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q01Atch01CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q01Atch01CONF.xlsx, cells marked in grey
DemandResponseOIR-2013_DR_CalAdvocates_019-Q02Atch01CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q02Atch01CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q02Atch01CONF.xlsx, cells marked in grey
DemandResponseOIR-2013_DR_CalAdvocates_19-Q05CONF.pdf	DemandResponseOIR-2013_DR_CalAdvocates_19-Q05CONF.pdf	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_19-Q05CONF.pdf, text marked in grey
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch01CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch01CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch01CONF.xlsx, entire contents
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch02CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch02CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch02CONF.xlsx, entire contents

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch03CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch03CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch03CONF.xlsx, entire contents
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch04CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch04CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch04CONF.xlsx, entire contents
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch05CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch05CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch05CONF.xlsx, entire contents
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch06CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch06CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch06CONF.xlsx, entire contents
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch07CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch07CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch07CONF.xlsx, entire contents
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch08CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch08CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch08CONF.xlsx, entire contents

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch09CONF.xlsx	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch09CONF.xlsx	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_019-Q05Atch09CONF.xlsx, entire contents
DemandResponseOIR-2013_DR_CalAdvocates_19-Q06CONF.pdf	DemandResponseOIR-2013_DR_CalAdvocates_19-Q06CONF.pdf	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_19-Q06CONF.pdf, text marked in grey
DemandResponseOIR-2013_DR_CalAdvocates_19-Q07CONF.pdf	DemandResponseOIR-2013_DR_CalAdvocates_19-Q07CONF.pdf	Market sensitive data subject to non-disclosure or confidentiality agreements	DemandResponseOIR-2013_DR_CalAdvocates_19-Q07CONF.pdf, text marked in grey

ATTACHMENT 7

Cal Advocates' Data Request to SCE



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2544
Fax: (415) 703-2057

<http://publicadvocates.cpuc.ca.gov>

PUBLIC ADVOCATES OFFICE DATA REQUEST
No. CalAdvocates-SC-SCE-2020-03

Date: Monday, December 14, 2020

Response Requested: **Wednesday, December 30, 2020**

To: Jerilyn Lopez Mendoza Regulatory Affairs for SCE	Phone: (626) 302-3444 Email: Jerilyn.L.Mendoza@sce.com
Robin Meidhof Attorney for SCE	Phone: (626) 302-6054 Email: Robin.Meidhof@sce.com
From: Stephen Castello Analyst for the Public Advocates Office	Phone: (415) 703-1063 Email: Stephen.Castello@cpuc.ca.gov
Christopher Clay Attorney for the Public Advocates Office	Phone: (415) 703-1123 Email: Christopher.Clay@cpuc.ca.gov

INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the Public Advocates Office (Cal PA) contact(s) above with a copy to the Public Advocates Office attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be

provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify the Public Advocates Office as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Any objection to a Data Request should clearly indicate to which part or portion of the Data Request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.

If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office as soon as possible. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “SCE,” and “Edison” mean Southern California Edison Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1

through January 31” should be understood to include both the 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- H. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

DATA REQUEST

1. Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2019.
2. Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2020.
3. Please provide all DRAM monthly DC invoices for deliveries in 2021 as they become available.
4. For each 2019, 2020 and/or 2021 DRAM seller, please provide the total number of Rule 24 authorizations.

5. Has SCE requested “additional information” under the pro forma contract section 1.6¹ from any DRAM sellers in 2019 or 2020?
 - a. If yes, please identify the seller and month the information was requested.
 - b. If yes, please provide the additional information received.
6. Please provide the results of any audits of DRAM sellers for deliveries in 2019 and 2020.
7. Please identify any ongoing audits including the sellers being audited and the month(s) being investigated.

END OF REQUEST

¹ Section 1.6(k) in the 2021 DRAM pro forma contract. Earlier years might be a different subsection.

ATTACHMENT 8

SCE's Response to Cal Advocates' Data Request Question 2

Southern California Edison
A.17-01-012 A.17-01-018 A.17-01-019 – SCE 2018-2022 DR App

DATA REQUEST SET CalAdvocates-SC-SCE-2020-03

To: Cal Advocates
Prepared by: Dave Iversen
Job Title: Senior Advisor
Received Date: 12/14/2020

Response Date: 12/30/2020

Question 002:

Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2020.

Response to Question 002:

-CONFIDENTIAL-
Protected Materials Pursuant to CPUC Decisions and Applicable Law as described in the
Accompanying Declaration
-PUBLIC DISCLOSURE RESTRICTED-

SCE has provided the Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2020, in the folders titled:

- CONFIDENTIAL DRAM Invoices - June - July 2020.zip; and
- CONFIDENTIAL DRAM Invoices - August - December 2020.zip.

The folders and the files within them contain confidential information as described in the accompanying declaration of David Iversen.

ATTACHMENT 9

**SCE's Response to Cal Advocates'
Data Request Question 2,
Leap Invoice July (1)**

**(Contains confidential information)
(Entire document redacted)**

ATTACHMENT 10

**SCE's Response to Cal Advocates'
Data Request Question 2,
Leap Invoice July (2)**

(Contains confidential information)

(Entire document redacted)

ATTACHMENT 11

**SCE's Response to Cal Advocates'
Data Request Question 2,
Leap Invoice August (1)**

(Contains confidential information)

(Entire document redacted)

ATTACHMENT 12

**SCE's Response to Cal Advocates'
Data Request Question 2,
Leap Invoice August (2)**

**(Contains confidential information)
(Entire document redacted)**

ATTACHMENT 13

**SCE's Response to Cal Advocates'
Data Request Question 2,
Leap Invoice September (1)**

**(Contains confidential information)
(Entire document redacted)**

ATTACHMENT 14

**SCE's Response to Cal Advocates'
Data Request Question 2,
Leap Invoice September (2)**

**(Contains confidential information)
(Entire document redacted)**

ATTACHMENT 15

SCE's Response to Cal Advocates' Data Request Confidentiality Declaration

**DECLARATION OF DAVID IVERSEN REGARDING THE CONFIDENTIALITY OF
CERTAIN DATA**

I, David Iversen, declare and state:

1. I am a Power Marketing, Sr. Advisor in the Southern California Edison (SCE) Energy Procurement and Management Department. As such, I had responsibility for preparing the response to the data request titled “CalAdvocates-SC-SCE-2020-03” (DATA REQUEST). William Walsh, Vice President of Energy Procurement & Management, delegated authority to me to sign this declaration.

2. I am making this declaration in accordance with California Public Utilities Commission (Commission) Decision (D.) 16-08-024 and D.17-09-023 and General Order 66-D, which govern the submission of confidential documents to the Commission. I also make this declaration in accordance with Commission Decisions (D.) 06-06-066 (as modified by D.06-12-030, D.07-05-032, D.08-04-023, and D.11-07-028), issued in Rulemaking 05-06-040. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

3. Listed below are the data provided in response to question 2 in the DATA REQUEST for which SCE is seeking confidential protection and the bases for SCE’s confidentiality request, including the relevant Commission decisions, applicable law, or the categories of the Matrix of Allowed Confidential Treatment Investor Owned Utility (IOU) Data (Matrix) appended to D.06-06-066 to which these data correspond.

Data	Location (Pages)	Basis for SCE’s Confidentiality Claim
DRAM Demonstrated Capacity Invoices.	All files within the Attachments titled: <ul style="list-style-type: none">• CONFIDENTIAL DRAM Invoices - June - July 2020.zip;• CONFIDENTIAL DRAM Invoices - August - December 2020.zip;	Protected under Gov’t Code § 6254 D.06-06-066, Appendix 1, Matrix Category VII.B Revealing price and performance data to the public could lead to unfair advantages in the market place. D.06-06-066, Appendix 1, Matrix Category VIII Administration of terms and conditions of competitive solicitation contracts [i.e., DRAM] confidential for three years.

		Section 13.1 (Confidentiality Obligation) of the DRAM Contract
--	--	---

4. Where applicable, SCE is complying with the limitations on confidentiality specified in the Matrix that pertain to data listed in the table above.

5. I am informed and believe and thereon allege that the data in the table in paragraph 3 above cannot be aggregated, redacted, summarized, masked or otherwise protected in a manner that would allow partial disclosure of the data while still protecting confidential information, because the DATA REQUEST requires that the data be provided in this form.

6. I am informed and believe and thereon allege that the data in the table in paragraph 3 above has never been made publicly available.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 30, 2020 at Pacific Palisades, California.

/S/ David Iversen
David Iversen

ATTACHMENT 16

Cal Advocates' Data Request to SDG&E



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2544
Fax: (415) 703-2057

<http://publicadvocates.cpuc.ca.gov>

PUBLIC ADVOCATES OFFICE DATA REQUEST

No. CalAdvocates-SC-SDGE-2020-03

Date: Monday, December 14, 2020

Response Requested: **Wednesday, December 30, 2020**

To: **Todd Schavrien**
Regulatory Affairs for SDG&E

Phone: (858) 503-5164
Email: tschavrien@sdge.com

Roger Cerda
Attorney for SDG&E

Phone:
Email: rcerda@sdge.com

From: **Stephen Castello**
Analyst for the
Public Advocates Office

Phone: (415) 703-1063
Email: Stephen.Castello@cpuc.ca.gov

Christopher Clay
Attorney for the
Public Advocates Office

Phone: (415) 703-1123
Email: Christopher.Clay@cpuc.ca.gov

INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the Public Advocates Office (Cal PA) contact(s) above with a copy to the Public Advocates Office attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be

provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify the Public Advocates Office as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Any objection to a Data Request should clearly indicate to which part or portion of the Data Request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.

If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office as soon as possible. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “SDGE,” and “SDG&E” mean San Diego Gas & Electric Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1

through January 31” should be understood to include both the 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- H. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

DATA REQUEST

1. Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2019.
2. Please provide all Demand Response Auction Mechanism (DRAM) monthly Demonstrated Capacity (DC) Invoices for deliveries in 2020.
3. Please provide all DRAM monthly DC invoices for deliveries in 2021 as they become available.
4. For each 2019, 2020 and/or 2021 DRAM seller, please provide the total number of Rule 32 authorizations.

5. Has SDG&E requested “additional information” under the pro forma contract section 1.6¹ from any DRAM sellers in 2019 or 2020?
 - a. If yes, please identify the seller and month the information was requested.
 - b. If yes, please provide the additional information received.
6. Please provide the results of any audits of DRAM sellers for deliveries in 2019 and 2020.
7. Please identify any ongoing audits including the sellers being audited and the month(s) being investigated.

END OF REQUEST

¹ Section 1.6(k) in the 2021 DRAM pro forma contract. Earlier years might be a different subsection.

ATTACHMENT 17

The Public Advocates Office Master Resource Adequacy Subpoena to the California Independent System Operator

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 6, 2020

Via E-mail and U.S. Mail

Mr. John Spomer, Senior Counsel
California Independent System Operator Corporation
250 Outcropping Way
Folsom, CA 95630

**Re: Combined Subpoena for General RA information necessary for the CPUC to
evaluate Resource Adequacy program and policies**

Dear Mr. Spomer:

The California Public Utility Commission's ("CPUC"), pursuant to its duties to establish and administer California's Resource Adequacy requirements for load serving entities under the CPUC's jurisdiction, subpoenas information and data in the possession of the California Independent System Operator ("CAISO"). The attached subpoena requests certain data and information necessary for the CPUC to evaluate the Resource Adequacy program and policies as detailed in Exhibit A.

This letter confirms that all confidential information contained in any documents produced by the CAISO in response to the above-referenced subpoena will be treated consistent with the terms of the Confidentiality Letter Agreement between the Commission and the CAISO, dated April 28, 2004. Should you have any questions or concerns, please feel free to contact me at (415) 703-1123.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Clay", written over a light blue circular stamp.

Christopher Clay
Assistant General Counsel

cc: Nick Dahlberg, CPUC

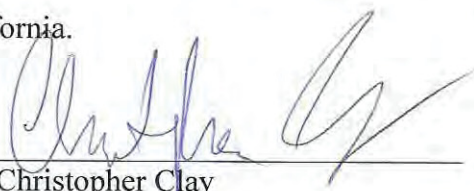
**DECLARATION IN SUPPORT
OF SUBPOENA DUCES TECUM**

I, Christopher Clay declare as follows:

1. I am an attorney duly licensed to practice in the State of California and am employed as a staff attorney for the California Public Utilities Commission (hereinafter "CPUC"). My business address is 505 Van Ness, San Francisco, California. Good cause exists for the production of the documents requested in the Subpoena Duces Tecum issued by the CPUC to the California Independent System Operator Corporation ("CAISO"), as set forth with particularity in Exhibit A attached to the Subpoena Duces Tecum, in that the documents are material to the Commission's on-going implementation of the Resource Adequacy Requirements in Rulemaking 14-10-010, pursuant to Public Utilities Code § 380, and implementation of General Order 167.

2. It is my understanding and belief that the documents requested are in the custody, control and/or possession of the CAISO.

Executed under penalty of perjury under the laws of the State of California, on this 6th day of March, 2020, at San Francisco, California.



Christopher Clay

PROOF OF SERVICE BY MAIL

I am employed with the California Public Utilities Commission and I am over 18 years of age. My business address is 505 Van Ness Avenue, San Francisco, California 94102.

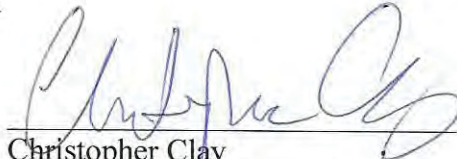
On March 6th, 2020 I caused to be sent by email and by U.S. Mail the following document(s):

SUBPOENA DUCES TECUM

by depositing in a U.S. mailbox in stamped sealed envelopes, and by sending via email to the address and email address below.

Mr. John Spomer. Senior Counsel
California Independent System Operator Corporation
250 Outcropping Way, Folsom CA 95630
jspomer@caiso.com

Executed under penalty of perjury under the laws of the State of California, on this 6th day of March, 2020 at San Francisco, California.


Christopher Clay

PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Re: Combined Subpoena for General RA information necessary for the CPUC to evaluate Resource Adequacy program and policies	SUBPOENA OR SUBPOENA DUCES TECUM (Cal. Pub. Util. Code § 311)
---	--

THE PEOPLE OF THE STATE OF CALIFORNIA,

**TO: The Custodian of Record for the California Independent System Operator Corporation, 250
Outcropping Way Folsom, CA 95630**

1. Pursuant to section 311(a) of the Public Utilities Code, you are ordered to appear before the California Public Utilities Commission, located at 505 Van Ness Avenue, San Francisco, California, 94102 to testify as a witness in this matter unless your appearance is excused as indicated in box 2c below or you make an agreement with the person named in item 4 below.
2. You are:
 - a. ☐ Ordered to appear in person.
 - b. ☐ Ordered to appear in person and produce the documents described in Exhibit A. The personal attendance of the custodian or other qualified witness and the production of the original records is required by this subpoena.
 - c. ☒ Not required to appear in person if you produce copies of the documents described in Exhibit A to the persons named in item 4, below, and in Exhibit A, prior to the dates and times set forth in Exhibit A.
3. If you have been subpoenaed as a witness, you are entitled to witness fees and mileage actually traveled, as provided by law. You may request one day's witness and mileage fees for travel to and from the place you are required to appear. You may demand these fees at the time of service from the process server or from the party or attorney requesting the subpoena. If they are not paid or tendered at that time, or unless the subpoena was obtained by the Commission staff, you are not required to appear (Public Utilities Code Section 1791).
4. IF YOU HAVE ANY QUESTIONS ABOUT THIS SUBPOENA OR YOU WANT TO BE CERTAIN WHETHER YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON:

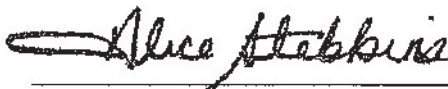
Name: Chris Clay

Telephone: (415) 703-1123

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COMMISSION

By Order of the Public Utilities Commission of the State of California.

Dated this 6th day of March, 2020



By: Alice Stebbins
Title: Executive Director

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



**Exhibit A to
Subpoena for data and information necessary to evaluate
Resource Adequacy program and policies**

INSTRUCTIONS AND DEFINITIONS

The following instructions and definitions apply to each Request for Production of Documents ("Request") herein, and each Request is to be responded to as if these instructions and definitions were set forth in full with regard to it.

Each Request calls for all documents responsive to that Request that are in your possession, custody or control, including documents in the possession of your attorneys, investigators, representatives or others acting on your behalf or under your direction or control. You must make a diligent search of your records and of other papers and any materials in your possession or available to you or to persons subject to your influence and control.

If you claim privilege as to any documents, state the nature of the privilege, all facts that support the claim of privilege, the person claiming the privilege and a full and complete description of the document, including its title, date, author, nature, the job titles of the document's author(s), recipients(s), and persons copied (e.g., "cc" or "bcc"), form (e.g., letter, memorandum, etc.), subject matter and the name and address of the present custodian of the original or any copies of the document known to you.

The singular number and masculine gender as used herein also mean the plural, feminine or neuter, as is necessary to give the broadest possible scope to each Request.

The following definitions apply to each Request for Production of Documents ("Request") herein, and each Request is to be responded to as if these definitions were set forth in full with regard to it:

"DOCUMENT" means any written, printed, typed, recorded, magnetic, punched, copied, graphic or other tangible thing in, upon, or from which information may be conveyed, embodied, translated, or stored, including, but not limited to, papers, records, books, telegrams, telexes, dictation or other audio tapes, video tapes, computer tapes, computer disks, diskettes, CD roms, computer printouts, microfilm, microfiche, laser disks, diaries, calendars, photographs, charts, viewgraphs, drawings, sketches and all other writings or drafts thereof, as well as any other writings as defined in California Evidence Code Section 250. This definition expressly includes, without limitation, all originals, drafts, non-conforming copies, reproductions, facsimiles of written, typed or printed material of any kind, books, letters,

contracts, minutes of meetings, memoranda, notes on desk calendars and appointment books, canceled checks, invoices, correspondence, telegrams, telex messages, intra-office communications, electronic mail messages, photographs and films, art work and information stored on tape, computer disk or any other type of data storage device. If copies of a document are not identical by reason of hand notations, initials, identification marks or any other modification, each such non-identical copy is a separate document within the meaning of this definition.

"PERSON" means any natural person and any other cognizable entity, including without limitation, corporations, proprietorships, partnership, joint ventures, consortiums, Limited Liability Company, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders. As used in the document requests, the acts and knowledge of a "person" are defined to include the acts and knowledge of that person's directors, officers, members, employees, licensees, representatives, agents and attorneys.

"RESPONDENT" and "CAISO or ISO" refer to the California Independent System Operator Corporation (CAISO), its officers, directors, employees, agents, representatives and attorneys, responding party (ies), their predecessor(s) and successor(s) in interest, their agents, employees, servants, officers, representatives, counsel, and anyone else acting on its behalf or at its request.

"RELATE" and "RELATING TO" mean consisting of, summarizing, identifying, explaining, reflecting, describing, discussing, pertaining to, containing, mentioning, concerning, illustrating, referring to, alluding to, responding to, commenting on, in respect of, about, regarding, discussing, involving, analyzing, constituting or referring to in any way.

"ANY" includes and encompasses "all" and "all" includes and encompasses "any". "Or" includes and encompasses "and" and "and" includes or encompasses "or." Each of these terms shall be interpreted to give the broadest possible scope to each Request.

MATERIALITY

Currently, the CAISO provides the CPUC with ongoing access to the CAISO Outage Management System (OMS) Web Client and to the CAISO Daily Outage Report, pursuant to a CPUC subpoena dated September 30, 2003. As described in that subpoena, the CPUC developed General Order 167 (GO 167) to meet its obligations under Public Utilities Code §761.3, which require the CPUC to, among other things, implement and enforce maintenance and operation standards for electric generating facilities. The CPUC's Safety and Enforcement Division (SED) accesses OMS on a daily basis to obtain scheduling and outage information regarding individual generators.

California Assembly Bill 380, now PU Code §380, requires that the CPUC, in consultation with the CAISO, establish resource adequacy requirements for all load serving entities within the CPUC's jurisdiction. Per §380, RA requirements must facilitate the development of new generating capacity, equitably allocate the cost of generating capacity, and minimize enforcement requirements and costs.

The CPUC's RA program annually establishes minimum capacity obligation requirements for CPUC jurisdictional load serving entities (LSEs) on a one year-ahead basis at both the system and local level. D. 05-10-043 established system RA requirements and D.06-06-064 established local RA requirements. The CPUC also adopted a flexible RA capacity requirement in D.13-06-024. Through R.19-11-009, the CPUC currently administers its Resource Adequacy (RA) program and requires all Load Serving Entities ("LSEs") to demonstrate compliance by entering capacity contracts with generators on a year-ahead and month-ahead basis, and in specific local areas. The CPUC's Energy Division (ED) administers the RA program, reviews all RA-related compliance filings, and advises the presiding Administrative Law Judge in the ongoing RA proceeding(s).

Since 2017, with the passage of SB 350, now PU code §454.51 and §454.52, the CPUC administers the Integrated Resource Planning program that among other things requires the CPUC to "Identify a diverse and balanced portfolio of resources needed to ensure a reliable electricity supply that provides optimal integration of renewable energy in a cost-effective manner." This will require modeling of reliability and cost constraints on the electrical generators, and usage of accurate and detailed information about the CAISO's electric operations.

Finally, the CPUC is also tasked in PU Code §714 with studying the "feasibility of minimizing or eliminating use of the Aliso Canyon natural gas storage facility" and is ordered to use the best available data in making the determination of how to perform that study. For that reason, the data requested in this subpoena specifically will be used to inform modeling and analysis in the RA, IRP, and Aliso proceedings. If there are additional unanticipated uses, in accordance with Public Utilities Code sections 311 and 701, of this data that the CPUC encounters in the future, the CPUC will notify and confer with the CAISO on the scope of use for the data at issue.

This subpoena requests critical data and information which will allow the CPUC to evaluate the success of the RA program on an annual and monthly basis, and to determine whether program modifications could improve the CPUC's ability to fulfill its statutory duties in future program years. ED staff also requests the data in support of the IRP proceeding, the Aliso Canyon OII, and other modeling efforts. Specifically, ED staff uses plant specific information for generators that are dispatched to serve CAISO and other California electricity demand in simulating their dispatch over hourly and potentially subhourly time steps. Calculating, predicting, and planning for reliability, cost, and GHG impacts related to IRP procurement in the future, as well as possible curtailment of the Aliso Canyon gas storage field, requires ED staff to have accurate and complete resource specific operating characteristics of generating facilities. If ED staff needs to broaden the use of the requested data for additional purposes in accordance with Public Utilities Code Sections 311 and 701, it will notify and confer with the CAISO on the scope of use for the data at issue.

As such, this subpoena is meant to be an inclusive subpoena, renewed annually. The subpoena requests that the CAISO deliver data to the CPUC at scheduled intervals, to reflect the availability of the data at CAISO. The CPUC requests data in twenty-one broad categories: (1) RA import allocations, (2) Supply Plans Filed by generators and Monthly Supply Plan Validations for RA resources (3) List of Units Confirmed to Provide Resource Adequacy, (4) Economic Bids and Self-Schedules, (5) CAISO settlement quality meter data, (6) Access to OMS application, (7) Quarterly Masterfile Data (8) Flexible Capacity Needs Assessment Data and Allocations, (9) Access to Customer Interface for Resource Adequacy (CIRA), (10) Energy Management Systems (EMS) data, (11a) Capacity Procurement Mechanism (CPM) and Capacity Solicitation Process (CSP) results, (11b) Capacity Procurement Mechanism (CPM) and Reliability Must Run (RMR) Settlement Data, (12) Reliability Event Reports sent to WECC, (13) Demand Response (PDR/RDRR) Settlement Data Files, (14) CPUC Jurisdictional LSE Annual and Monthly Deficiency Notices, (15) Local Capacity Study Data, (16) Local Residual Analysis, (17) CPM and RMR Designation Capacity Costs and Allocations, (18) Notices of Intent to Retire, Mothball, or Return to Service, (19) CEC Subpoena Data, (20) RAAIM Data, and (21) DR Registration System Information.

The field names in the data files shall not be changed over the course of the year. CPUC requests that all data and notifications identified in this subpoena be sent to the following two e-mail addresses:

RAFiling@cpuc.ca.gov and Eric.Dupre@cpuc.ca.gov.

DESCRIPTION OF DATA REQUESTED

1. Resource Adequacy Import Allocations

The CPUC now has access to CAISO's CIRA application and no longer needs the CAISO to provide this Import Allocation file. However, if CIRA becomes inaccessible or if the data contained therein becomes inaccurate, CAISO will provide the import allocation information to the CPUC at a time mutually agreeable by the parties.

Specifically, the CAISO will provide the final numerical values per branch group and per LSE of import allocations received by LSEs applicable for the 2020 and 2021 compliance years. Please format the information similar to the chart posted here, including the source data for previous steps in the import allocation process: <http://www.caiso.com/Documents/2020HoldersImportCapability.pdf>

2. Supply Plans Filed and Monthly Supply Plan Validations for RA resources

The CPUC currently has access to supply plan validation files through the CIRA application. However, if CIRA becomes inaccessible or if the data contained therein becomes inaccurate, CAISO will provide to the CPUC, at a time mutually agreeable by the parties, two spreadsheets which show validation of Year Ahead, as well as monthly System, Local, and Flexible RA Filings by all LSEs serving load in CAISO. The CAISO will also include both the monthly supply files and the annual supply files submitted at the end of October. The validation spreadsheets will list all RA capacity committed to provide RA to any LSE. The CPUC specifically requests two sets of files, an initial validation and a final validation. The initial validation is to be performed before any corrections or communications with suppliers is performed, to allow the CPUC to validate filings as of the RA Filing due date (currently at T-45 days

before the beginning of the RA compliance or trade month). A second validation is to be performed after all corrections and re-filings have been performed. This is to ensure that after remediation by LSEs and suppliers, all RA Filings are ready for approval. In addition to these two sets, the CPUC requests that the ISO provide, on an as needed basis as requested by CPUC staff, any additional updated cross validation files between the T-45 and T-30 sets. Please provide a spreadsheet in MS Excel with a tab for all RA resources (both physical resources internal to CAISO and system resources external to CAISO) committed as RA, both those resources where suppliers confirmed RA capacity that was listed in RA Filings, and that capacity committed by suppliers as RA that did not match with any LSE RA Filing. Also note that this subpoena requests data for all system and flexible RA resources, including those resources listed by non-CPUC jurisdictional LSEs. Within the System RA Validation file, please include the following columns:

Columns for the System RA Validation File:

RA Validation Status	<p>“Passed”= LSE gets credit for RA Capacity MW</p> <p>“Error”= LSE does not get credit for RA Capacity MW</p>
Supply Validation Status	<p>“Pass” or “Warning”= Resource ID is committed for Supply Capacity MW</p> <p>“Error”= Resource ID is not committed for Supply Capacity MW</p>
RA LSE	The name of the LSE claiming the facility as RA capacity
Resource ID	The facility’s identification used for scheduling
SCID/Scheduling Coordinator ID	The Scheduling Coordinator for the facility
Effective Start Date	When the RA Capacity MW starts
Effective End Date	When the RA Capacity MW ends
RA Capacity (MW)	RA Capacity shown on LSE’s RA plan
Supply Capacity (MW)	Total RA Capacity shown on supplier’s supply plan
Comments	Description of error or warning

Within the Flexible RA Validation file, please include the following columns:

Columns for Flexible RA Validation File:

RA Validation Status	<p>“Passed”= LSE gets credit for RA Capacity MW</p> <p>“Error”= LSE does not get credit for RA Capacity MW</p>
Supply Validation Status	<p>“Pass” or “Warning”= Resource ID is committed for Supply Capacity MW</p> <p>“Error”= Resource ID is not committed for Supply Capacity MW</p>
RA LSE	The name of the LSE claiming the facility as RA capacity
Resource ID	The facility’s identification used for scheduling

SCID/Scheduling Coordinator ID	The Scheduling Coordinator for the facility
Effective Start Date	When the RA Capacity MW starts
Effective End Date	When the RA Capacity MW ends
RA Flex Category	Flexible Capacity category shown on LSE's RA plan
Supply Flex Category	Flexible Capacity category shown on supplier's supply plan
RA Flexible Capacity (MW)	Flexible RA Capacity shown on LSE's RA plan
Supply Flexible Capacity (MW)	Flexible RA Capacity shown on supplier's supply plan
Comments	Description of error or warning

Specifications of data: The CAISO is requested to provide the data in MS Excel format. A template for the supply plan validation file is provided as Appendix A with a format for the CAISO to fill out and send to the CPUC. Please provide two files, one for the system RA validations and the other for the flexible RA validations. Please provide both files again for final validations.

Dates covered by this item: Year Ahead Filings for 2020 RA compliance year, as well as all month-ahead filings for the months of 2020. In addition, this subpoena requests access to the Year Ahead Filings of 2021 and the first Month Ahead Filings for January through March, 2021.

3. List of Units Confirmed to Provide Resource Adequacy to the CAISO

The CPUC now has access to CAISO's CIRA application and no longer needs the CAISO to provide these files. However, if CIRA becomes inaccessible or if the data contained therein become inaccurate, CAISO will provide to the CPUC (1) a monthly list of all Resource IDs that are confirmed as RA capacity for the following operational month and (2) a spreadsheet in MS Excel with a tab for each month, adding information for each month as it becomes available after RA units are confirmed for the operational month. Within each tab, CAISO will create and fill in the following columns:

- a. **Resource Name** – all Resources confirmed to provide RA capacity that month
- b. **SCID for the Resource** – the SCID for the resource that is providing RA capacity
- c. **SCID for the LSE** that the resource is committed to provide RA capacity to
- d. **Resource ID** – the Resource ID of the unit providing RA
- e. **Supply RA Capacity** – Amount in MW of RA capacity that the unit has confirmed to provide to the CAISO
- f. **Scheduled Outage Replacement Capacity** – Amount in MW of replacement capacity on each unit that is being replaced for the month.
- g. **Start and End Dates** of confirmed capacity or replacement capacity on same line as the capacity

4. Economic Bids and Self-Schedules

In order to evaluate DRAM Resources in the CAISO Market, verify compliance with the CPUC Flexible, Local, and System RA compliance obligations, evaluate net qualifying capacity of pre-dispatch resources, and assist staff in evaluating energy procurement and scheduling patterns, the CPUC requests that the

CAISO provide unit specific hourly bid or self-schedule data for every generator, RDRR, PDR and import energy provider that participates in the CAISO electricity market. CPUC staff must assess patterns in bidding or scheduling of import energy as staff develops import and export assumptions about future load and resource balance for IRP modeling. This request covers generators, demand response providers and import energy providers.

Based on ease of production, the following data may be provided in a single file or potentially multiple files based on the resource type (generator, demand response provider, or import energy provider) with the following fields, except for the RUC Dispatch Quantity, which may be limited to demand response providers. For bid segment data, the CPUC is requesting all bid segments. This data allows the CPUC to analyze behavior of each individual generator, import energy resource, and DR program and aggregate quantities either bid or self-scheduled in the CAISO. All files will be in .csv format.

Generator and Demand Response (PDR/RDRR) – Information is requested for all of 2020 beginning on 1/1/2020 and continuing for each month through 2020.

Imported energy – The CPUC requests the following information for import energy resources that participate in the CAISO electricity market starting from January 1, 2020 through December 31, 2020. The CPUC will use the requested data to assess patterns in resource bidding and scheduling to enhance IRP modeling. CPUC will also use these data to adequately evaluate the current RA import rules (including qualifying capacity and Must Offer Obligation) developed in prior Commission decisions (D.05-10-042, 06-07-031, and D.06-12-067). Current Commission rules exempt non-dynamic, non-specific imports from the real-time must offer obligation, and bidding data will allow staff to assess the current exception.

Multiple bid segments are noted below as “segment [X].”

<u>CPUC Field Name</u>	<u>ISO Native Field Name</u>
Unit Type	UNIT_TYPE
Resource ID	RESOURCE_NAME
Scheduling Coordinator ID	SCID
Trade Date	TRADE_DATE
Trade Hour	TRADE_HOUR
Real Time Market Dispatch Quantity	RTM_DISPATCH_QUANTITY
Real Time Market Dispatch Price	RTM_DISPATCH_PRICE
Real Time Bid Segment [X] Quantity	RTM_BID_QUANTITY
Real Time Bid Segment [X] Price	RTM_BID_PRICE
Real Time Market Self-Schedule Capacity (MW)	RTM_SELFCHEDMW
RUC Dispatch Quantity	RUC_DISPATCH_QUANTITY
Day Ahead Market Dispatch Quantity	DAM_DISPATCH_QUANTITY
Day Ahead Market Dispatch Price	DAM_DISPATCH_PRICE
Day Ahead Bid Segment [X] Quantity	DAM_BID_QUANTITY
Day Ahead Bid Segment [X] Price	DAM_BID_PRICE
Day Ahead Market Self-Schedule Capacity (MW)	DAM_SELFCHEDMW

Definition of each field name:

- a. **Unit Type** – To help differentiate generator, demand response, or import energy
- b. **Resource ID** – The Resource ID for each unit
- c. **Scheduling Coordinator ID** – The four letter SCID that represents the SC for the resource
- d. **Trade Date** – Please include every day of the month
- e. **Trade Hour** – Please include all 24 hours each day
- f. **Real Time Market Dispatch Quantity**– Please provide the hourly integrated MW quantity at which the resource was dispatched during the hour in the real time market.
- g. **Real Time Market Dispatch Price** – Please provide the hourly integrated dollar value dispatch price paid to the resource in the real time market.
- h. **Real Time Bid Segment [X] Quantity** – Please provide the MW range of each individual real time bid segment for the given hour in a separate field (replace “[X]” with “1,” “2,” etc.). If the resource does not bid, leave this field blank. Do not enter 0.
- i. **Real Time Bid Segment [X] Price** - Please provide the price of each individual real time bid segment for the given hour in a separate field (replace “[X]” with “1,” “2,” etc.). If the resource does not bid, leave this field blank. Do not enter 0.
- j. **Real Time Market Self-Schedule Capacity (MW)** – Please provide the MW quantity scheduled into the RTM if scheduled. If the resource bids and does not self-schedule leave this field blank. Do not enter 0.
- k. **RUC Dispatch Quantity** – Please provide the hourly MW quantity committed for this resource via the RUC process. If CAISO did not commit capacity via the RUC process for the resource in a given hour, leave this field blank. Do not enter 0.
- l. **Day Ahead Market Dispatch Quantity** – Please provide the hourly integrated MW quantity at which the resource was dispatched during the hour in the day ahead market.
- m. **Day Ahead Market Dispatch Price** – Please provide the hourly integrated dollar value dispatch price the resource received in the day ahead market.
- n. **Day Ahead Bid Segment [X] Quantity** – Please provide the MW range of each individual day ahead bid segment for the given hour in a separate field (replace “[X]” with “1,” “2,” etc.). If the resource does not bid, leave this field blank. Do not enter 0.
- o. **Day Ahead Bid Segment [X] Price** - Please provide the price of each individual day ahead bid segment for the given hour in a separate field (replace “[X]” with “1,” “2,” etc.). If the resource does not bid, leave this field blank. Do not enter 0.
- p. **Day Ahead Market Self-Schedule Capacity (MW)** – Please provide the MW quantity scheduled into the IFM if scheduled. If the resource bids and does not self-schedule leave this field blank. Do not enter 0.

5. Settlement Quality Meter Data

CPUC requests provision of settlement quality meter data from all resources that participate in the CAISO electricity market. CPUC staff requires access to these data in order to properly evaluate performance of LSE contracted generation, develop QC for non-dispatchable resources in the RA program, develop accurate production profiles for non-dispatchable resources in IRP and RA modeling, and properly assess patterns of import and export to validate hourly modeling in the RA and IRP proceedings. CPUC staff are also evaluating patterns of energy flow and dispatch in order to inform long term procurement guidelines for LSEs and to inform our comments related to CAISO market design.

Classes of generation covered: All generator types including (but not limited to) wind, hydro, solar, geothermal, biomass, cogeneration, import resources, and demand response.

Time period of data requested: The CPUC requests provision of the latest version of the Actual Settlement Quality Meter Data from 1/1/20 through 12/31/20 for all resources.

Specifications of data: The CAISO is requested to prepare a settlement file that contains hourly (8,760 entries per year) actual settlement quality meter data reported by all Resource IDs. Each current Resource ID should be reported separately. Data should be listed using the current (i.e., applicable in 2020) Resource ID; previous Resource IDs are not needed. Data should be sent in a comma separated value (.csv) file. Five columns are needed:

- a. **Scheduling Coordinator ID** – the four letter SCID that represents the SC for the resource
- b. **Res_ID** - Resource ID
- c. **Date** - The standardized date in the format MM/DD/YYYY
- d. **Hour** - The hour in which the MWh to be reported was generated. All hours should be in the hour-ending (1 through 24) format. For example, a data field with the number “4” will represent all the MWh produced in the hour from 0300 through 0359.59. There should be no adjustment for Daylight Savings Time. A year is presumed to have 8,760 hours occurring in it, except for leap years, which would have 8,784 hours.
- e. **MWh** - The total MWh metered (either positive for generation or negative for demand response) in the 60 minutes for the hour being reported. Missing data should be represented as a blank cell and periods of no generation should be marked as a zero.

Description of intended use -The CPUC intends to use the requested data primarily for the purpose of preparing and posting to its website the following reports:

- a. Annual Net Qualifying Capacity Report for the subsequent compliance year: The CPUC or the CEC on the CPUC’s behalf will use the settlement quality meter data to compute Qualifying Capacity values for intermittent resources subject to the CPUC counting conventions and will post the Net Qualifying Capacity totals on the CPUC website.
- b. Oversight of the DRAM Pilot: CPUC staff will use this data to oversee general DR program activities including the DRAM pilot.
- c. The CPUC may retain this data and use it for other analytical purposes, although the CPUC will not publicly disclose the data in any other way without prior ISO notification and consultation.

6. Access to OMS application

CPUC requests online access to transmission and generation outage information contained in the OMS application.

7. Quarterly MasterFile data request

The CPUC requests the CAISO to provide quarterly updates of data entered by generators into the MasterFile database in order to monitor generator performance, reliability and compliance with GO 167, and to implement key features of the RA Program related to system physical and operational needs. The CPUC is responsible for directing the construction of sufficient generating and transmission facilities in order to meet the CPUC’s established reliability criteria in both the RA proceeding and the CPUC’s Integrating Resource Planning (IRP) Proceeding. As more of the physical and operational needs of the system reflect specific performance qualities of specific plants (e.g. ancillary service capabilities, ramp rates, minimum start times etc.) for purposes of renewable integration, once through cooling mitigation, and general IRP system needs assessments, the CPUC will need to monitor the quality and level of operational flexibility particular to each plant and across the generation fleet in general.

The CPUC seeks access to all listings by all Scheduling Coordinator IDs (SCIDs). In particular, CPUC requests data corresponding to all fields listed in (1) the “Intertie RDT - RESOURCE” tab and (2) the

“Generator RDT - RESOURCE” tab in the most recent “GRDT and IRDT Definitions” table posted to the CAISO website as of the date of this subpoena.¹ CPUC also requests SEGMENT data corresponding to the fields listed in Appendix B, referring also to the “GRDT and IRDT Definitions” document.

Energy Division will use this data for purposes of reliability modeling as well as other purposes of procurement oversight. The CPUC will publish a limited range of the unit specific data to the CPUC website to allow for stakeholders to understand the inputs to reliability modeling. The CPUC will maintain confidentiality for the MasterFile data.

Specifications of data: Please provide these files in .csv format. The CAISO is requested to submit data to the CPUC via the Commission’s SFTP application, accessible via the link here:

<https://cpucftp.cpuc.ca.gov/>

8. 2021 Flexible Capacity Needs Assessment Data and Allocations

The CPUC requests the CAISO provide the CPUC with the following information:

- a. Complete LSE responses to the CAISO data request made pursuant to Tariff section 40.10.1.2, asking for information on each wind, solar, and behind the meter resources owned, in whole or in part, by the LSE or entity under contractual commitment to the LSE for all or a portion of its capacity.
- b. Work papers used to add together wind, solar and behind the meter resources contained in the LSE data request responses.
- c. The time-shifted 2019 minute-by-minute variable energy output profiles used to calculate variable energy profiles. Please indicate which if any actual facilities are taken as models for the output data.
- d. Work papers used to scale the production data.
- e. The time-shifted 2019 minute-by-minute load data used to calculate the flexible capacity requirement.
- f. Work papers used to develop the monthly ISO minute-by-minute forecast from the CEC Integrated Energy Policy Report (IEPR) 1-in-2 monthly peak load forecast (Mid Demand Scenario, with mid AAEE) and/or from the CEC hourly load forecast (Mid Demand with mid AAEE and mid AAPV).
- g. The ISO’s simulated minute-by-minute forecast of net load curves for the time frame of the annual study.
- h. Work papers used to calculate the minute-by-minute net load curves.
- i. The monthly peak load ratios used in the Flexible need equation.
- j. Work papers used to calculate the Seasonal Percentages Needed in each Category.
- k. Work papers used to allocate the CPUC its Flex RARs.
- l. Any new or additional data or workpapers in the 2021 assessment process that are not identified above and that would be considered necessary for Energy Division to review.

Specifications of data: Please provide the data listed above in MS Excel or SAS file format, and include any additional information that would enable CPUC to understand and replicate the underlying calculations in the spreadsheets or data files.

¹ GRDT and IRDT Definitions file posted to the CAISO website here:
<http://www.caiso.com/Documents/GRDTandIRDTDefinitions.xls>

9. Access to California ISO Interface for Resource Adequacy (CIRA) database

CPUC staff requests live access to the CIRA database for a limited number of CPUC staff. This access is necessary (as opposed to requests for periodic data reports) in order to enable coordination with the CAISO Reliability Requirements process and to enable CPUC enforcement of RA program rules. Due to the complexity of the RA program, and differing submission requirements and formats, CPUC staff needs to verify the form and content of information submitted to the CAISO and to review automated or manual communication between the LSE and CAISO through the CIRA system.

Specifications of Data:

CPUC staff requests the ability to do the following actions:

1. Log securely into the CIRA system as needed throughout the month.
2. Review and export uploaded RA Filing data (both year ahead and month ahead) from all SCs that submit RA Plan data to CAISO (both CPUC jurisdictional and non-jurisdictional) on as needed basis by CPUC staff.
3. Review and export supply plan data submitted by all SCs that submit supply plans for RA compliance to CAISO whether the LSE being supported is CPUC jurisdictional or non-jurisdictional.
4. Review and export CEC forecasts uploaded by CEC staff for all LSEs whether CPUC jurisdictional or non-jurisdictional. Review of all calculations performed in CIRA to calculate RA obligations for LSEs.
5. Review and export any filing status, cross validation results, error logs, or communication/compliance logs developed by CIRA pertaining to RA plan data submitted by any SC for an LSE to CAISO.

Time period of data requested:

CPUC staff expects the CAISO to provide ongoing access to CIRA.

10. Energy Management System (EMS) Data

The CPUC requests the CAISO provide the CPUC with monthly actual hourly EMS load data for each month of 2020.

Specification of the Data:

The monthly files should include actual hourly EMS load data for the subareas used in the CAISO internal load forecast process, including PG&E-Bay Area, PG&E-Non-Bay Area without Pump Load, PG&E-Non-Bay Area Pump Load, SCE without Pump Load, SCE Pump Load, SDG&E, and VEA TAC.

11a. Capacity Procurement Mechanism and Capacity Solicitation Process (CSP) results:

The CPUC now has access to CAISO's CIRA application and does not need the CAISO to provide this CSP result. However, if CIRA becomes inaccessible or if the data contained therein becomes inaccurate, CAISO will provide the CSP information to the CPUC at a time mutually agreeable by the parties.

The CPUC requests the CAISO provide the CPUC with the monthly, intra-monthly and annual CSP and CPM data. The CPUC would like these data in order to identify if CAM resources are bidding into the CSP. Additionally, the CPUC would like to examine the effectiveness of the CSP as it relates to CPM designations. The CSP data will include all bids that were locked into the CSP after the adjustment period ended. This would be the finalized offer set that gets locked in after the CAISO validates that the

offer is not shown on a supply plan. The CPM designation data may overlap with a CSP bid or they may be without one.

The CPUC requests three types of files:

- i. One annual file - The annual data should include any CPM designations that came out of the YA validation processes and all locked in CSP bids that were submitted in the YA CSP process.
- ii. Twelve monthly files - The monthly data should include any CPM designation, made in the prior month for the coming month, in addition to locked in CSP bids, submitted in the prior month for the coming month (whether they were designated or not).
- iii. Twelve intra-monthly files - These files will include the results of the CSP bids and CPM designations for the each identified time period. The intra-monthly data should include data from the prior month that was designated intra-monthly for the prior month.

Specifications of data: Please provide the data listed above in MS Excel format file. The format of the data should include the following fields:

- a.) **Resource ID** - this should include all resources that bid into the monthly CSP and any resource that was assigned a CPM designation that may have not bid into the CSP
- b.) **Type of CSP or CPM** (if resource did not submit through CSP) - monthly, intra-monthly, or annual
- c.) **System MW Amount** - the generic MW amount the resource bid into the CSP. If the resource did not bid in system MW, then leave blank
- d.) **Flexible MW Amount** - the flexible MW amount the resource bid into the CSP. If the resource did not bid in flexible MW, then leave blank
- e.) **Flexible Category** - the flexible category designation of the flexible MW entered in the bid. If the resource did not bid in flexible MW then leave blank.
- f.) **Bid Price** - reflect the price of the bid. If no bid was submitted, leave blank.
- g.) **Designated** - If the resource was designated a CPM, then select Y. If no, then select N.
- h.) **CPM Event Covered** - If the resource was designated, show the CPM event covered.
- i.) **Duration of the Designation** - If the resource was designated a CPM, reflect the duration of the designation. (e.g., 30 days, 60 days, 90 days)
- j.) **Date of the Designation** - reflect the date the designation was noticed
- k.) **Accepted or Declined CPM Designation** - reflect whether the resource's SC accepted or declined the designation. Only applies if the resource was exceptionally dispatched.

Note - If the CAISO is not able to access this data through CIRA, the CPUC requests access to any data that is available that would allow for an assessment of the CSP (e.g., data made available to DMM).

11b. Capacity Procurement Mechanism (CPM) and Reliability Must Run (RMR) Settlement Data:

Please provide the CPUC with the following information for all CPM designations for 2020:

Trade_DATE – In this data set, the only use of the Trade_DATE is to track the month and year.

Charge_Name – Has the following three categories:

BA_MTH_RSRC_CPM_CAP_HRLY_AVG_DESIGNATED@QUANTITY – The MW quantity

BA_MTH_RSRC_CPM_CAP_PMT@PRICE – The CPM price (\$/MW-year)

BA_MTH_RSRC_CPM_STLMT@AMOUNT – Total payment (price x quantity), expressed as a negative number

Attribute1 - Business Associate ID (for CAISO Settlements use)

SC_ID - SC Short Name that corresponds to Attribute1 (Business Associate ID)

Attribute2 - Resource Name

Attribute17 - Bill Period Start Date

Attribute18 - Bill Period End Date

Attribute22 – CPM Type

Interval_Total – The total quantity, amount or price associated with Charge_Name

Please provide the CPUC with the following information for all RMR designations for 2020:

START_DATE – Start date of the RMR designation.

END_DATE – End date of the RMR designation.

BPID - Estimated (_EST_) payments/charges or final adjusted (_ADJ_) payments/charges per RMR resource.

CHARGE_NAME – Charge code reference name (for CAISO Settlements use)

ATTRIBUTE1 - Business Associate ID (for CAISO Settlements use)

SC_ID - SC Short Name that corresponds to Attribute1 (Business Associate ID)

ATTRIBUTE2 - Resource Name

INTERVAL_TOTAL – Payment (expressed as a negative number) or charge (expressed as a positive number) to the Scheduling Coordinator. This column should be read in conjunction with the BPID to distinguish between estimated (_EST_) payments/charges versus or final adjusted (_ADJ_) payments/charges. The final adjusted amounts override prior estimates.

Specification of the data: Please provide the CPUC quarterly files in .csv format.

12. Reliability Event Reports sent to WECC

The CPUC requests that CAISO send to the CPUC the following three reliability event reports based on the specific event types listed for each:

- (a) Appendix C: Brief Template sent to WECC for all CPUC jurisdictional PTOs.
- (b) EOP-004 event reports sent to WECC for the following specific event types:
 - 1. BES Emergency requiring public appeal for load reduction
 - 2. BES Emergency requiring manual firm load shedding
 - 3. BES Emergency resulting in automatic firm load shedding
 - 4. Loss of firm load
 - 5. System separation (islanding)
 - 6. Generation loss
- (c) OE-417 report sent to WECC when initiated by the CAISO (rather than a single PTO) or if the event impacts more than one PTO for the following specific event types:
 - 1. Uncontrolled loss of 300 Megawatts or more of firm system loads for more than 15 minutes from a single incident
 - 2. Load shedding of 100 Megawatts or more implemented under emergency operational policy
 - 3. Loss of electric service to more than 50,000 customers for 1 hour or more
 - 4. Fuel supply emergencies that could impact electric power system adequacy or reliability

Specifics of data: The completed event report sent to WECC following a reliability event.

13. Demand Response (PDR/RDRR) and Non-generating Resource (NGR) Settlement Data Files:

The CPUC requests settlement data related to demand response resource performance covering 2020. CPUC requests a summary file of any PDR/RDRR resource payment or charge with these specifications (all at 5 minute granularity). CPUC also asks that non-generating resources (NGR) be included in this file. If it is possible to separate storage NGRs from other NGRs, CPUC requests that only the storage NGRs be included. If it is not possible to separate these resources, CPUC requests data for all participating NGRs.

Specifications of settlement data file (CAISO native field name in parentheses):

- a.) Trade Date (TRADE_DATE)
- b.) Scheduling Coordinator ID (BA_ID, conversion to Scheduling Coordinator ID is provided separately)
- c.) Resource ID (ATTRIBUTE2)
- d.) Day-ahead scheduled quantity (DA_SCH_QUANTITY)
- e.) Day-ahead energy payment (DA_AMOUNT)
- f.) Fifteen minute market instructed imbalance energy (FMM_IIE_QUANTITY)
- g.) Fifteen minute market instructed imbalance energy payment or charge (FMM_IIE_AMOUNT)
- h.) Five minute market instructed imbalance energy (RTD_IIE_QUANTITY)
- i.) Five minute market instructed imbalance energy payment or charge (RTD_IIE_AMOUNT)
- j.) Standard ramping energy (SRE_QUANTITY)
- k.) Total expected energy (EXP_ENRGY_QUANTITY)
- l.) Uninstructed energy (UIE_QUANTITY)
- m.) Uninstructed energy payment or charge (UIE_AMOUNT)
- n.) Metered energy (METER_QUANTITY)

Files will be provided in .csv format. To save space, if any of the fields from (d) through (n) are zero, the field will be omitted from the data file.

14. CPUC jurisdictional LSE Annual and Monthly Deficiency Notifications

The CPUC currently has access to CIRA as a Local Reliability Authority (LRA), which allows the CPUC to see LSE deficiencies directly after the submission deadlines. CPUC also receives direct notification of deficiencies, though CAISO and CPUC continue to coordinate which CPUC e-mail addresses should receive these notifications. If CIRA becomes inaccessible (or the data within CIRA become inaccurate) and if the direct notification functionality becomes inoperative, CPUC requests that CAISO notify CPUC of any LSE RA deficiencies as indicated in Table 1 at the end of this document.

Please provide a table containing the following information for LSEs with system RA deficiencies:

- a.) Month
- b.) SCID – SCID of deficient LSE
- c.) TAC – TAC in which deficiency exists
- d.) REQ – System RA requirement in TAC
- e.) DR – System DR credit in TAC
- f.) ADJ_DR – Adjusted system DR credit in TAC
- g.) RMR – System RMR credit in TAC
- h.) CAM – System CAM credit in TAC
- i.) TOT_ADJ – Total system credit adjustment in TAC
- j.) REQ+PRM – RA requirement in TAC, adjusted for PRM
- k.) ADJ_OBL – REQ+PRM minus TOT_ADJ

- l.) Local RA – Total local RA shown by LSE in the TAC
- m.) System RA – Total non-local system RA shown by LSE in the TAC
- n.) Total RA – Sum of Local RA and System RA

Please provide a table containing the following information for LSEs with local RA deficiencies:

- a.) Month
- b.) SCID – SCID of deficient LSE
- c.) TAC – TAC in which deficiency exists
- d.) REQ – Local RA requirement in TAC
- e.) DR – Local DR credit in TAC
- f.) CAM – Local CAM credit in TAC
- g.) TOT_ADJ – Total local credit adjustment in TAC
- h.) ADJ_OBL – REQ minus TOT_ADJ
- i.) Local RA – Total local RA shown by LSE in the TAC

Please provide a table containing the following information for LSEs with flexible RA deficiencies. Please include all flex categories, even if LSE is not deficient in all categories.

- a.) Month
- b.) SCID – SCID of deficient LSE
- c.) TAC – TAC in which deficiency exists
- d.) CATEGORY – Flex category
- e.) OBL – Flexible RA requirement for given category
- f.) SHOW – LSE flexible RA showing for given category
- g.) QUAL – Qualified flexible RA showing for LSE in given category
- h.) SHORT/LONG – QUAL minus OBL

15. Local Capacity Study Data

Access to the following data requires executing a separate non-disclosure agreement for qualified individuals. In order to better evaluate the results of CAISO's annual Local Capacity Study, the CPUC requests that the CAISO send the following files. These files should be sent for the draft LCR study and the final LCR study. The term "LCR study" incorporates all timeframes for which CAISO assesses local capacity.

Dispatched base case PSLF files used for each local area and sub-area. This will include flat files of the generators and MW being dispatched in the power flow study to mitigate the N-1 and N-1-1 contingencies for each local area and sub-area in the draft and final studies.

16. Local Residual Analysis

Access to the following data requires executing a separate non-disclosure agreement for qualified individuals. If the CAISO executes an annual year-ahead CPM, then the CPUC requests the CAISO provide the base case or proof of need for the impacted local area or sub-area.

17. CPM and RMR Designation Capacity and Costs Allocations

Please provide the CPUC with the following information for all CPM and RMR designations for 2020 and 2021 that were not provided pursuant to the 2019 Subpoena:

- 1.) RA capacity allocations broken down by LSE (non-jurisdictional and jurisdictional) for each month of the designation.

18. Notices of Intent to Retire, Mothball, or Return to Service

From time to time, the CAISO receives notices from generating resources about the planned retirement or mothball of certain resources. The CAISO posts a list of these resources pursuant to its Generator Management Business Practice Manual. The list provides stakeholders with information regarding requests to change a resource status from active to retired, mothballed, or otherwise unavailable to the grid. In addition, there is an RSS feed available to the public which provides automatic notification when the list is updated. This is available at: <http://www.caiso.com/Pages/GlobalRSS.aspx>.

Under Section 41.2.1 of the CAISO Tariff, as approved by FERC on September 27, 2019, an intent to retire or mothball must be documented by a notarized affidavit (e.g., *Notice of Generating Unit Retirement or Mothball Including Rescission of Retirement or Mothball*) that provides the reason for the change in status, among other information. The CPUC requests these notarized affidavits as described in Table 1 at the end of this document.

Upon request by the CPUC, the CAISO will also provide the CPUC with copies of all letters or other notifications received from generating resources or the owners of generating resources related to the intent to retire the resource(s), mothball the resource(s), or return the resource(s) to service. This information will allow CPUC to remain apprised of market conditions affecting RA capacity as they arise.

19. CEC Subpoena Data

Please provide the CPUC with all files sent to the California Energy Commission pursuant to the latter's subpoena of CAISO. This information will allow CPUC to more closely monitor CEC development of the RA load forecast, in particular by ensuring CPUC has access to the same data as CEC.

20. Resource Adequacy Availability Incentive Mechanism (RAAIM) Data

Please provide the CPUC with a list of resource adequacy availability incentive mechanism (RAAIM) Availability Incentive Payments and Non-Availability Charges assessed in 2018 and 2019. The list should identify the month of the Availability Incentive Payments and Non-Availability Charges, the resource penalized or rewarded, and the amount of the Availability Incentive Payments and Non-Availability Charges.

The format of the data should include the following fields (but omit fields where the data is zero):

- a) SCID
- b) Resource ID
- c) Month
- d) Availability Incentive Payments or Non-Availability Charges

21. DR Registration System Information

Energy Division seeks to better understand DR registration activity, particularly the frequency of movement of individual service accounts between Resource IDs. This information will aid in determining Net Qualifying Capacity values and in assessing total available capacity within a given month and between months. Given the volume of data, the CPUC will make specific tailored requests by Distribution Resource Provider (DRP) and month and year for a reporting of Location IDs (with service accounts and their effective dates), cross referenced with Registration IDs (with their effective dates) and Resource IDs.

Please provide the requested information to the CPUC, by the Close of Business (“COB”) according to the following schedule:

Table 1 Submission Dates

Item	Delivery Date to CPUC
1. Resource Adequacy Import Allocations	If CIRA access is not available or data in CIRA are inaccurate, please provide data within three business days of the date when CIRA becomes inaccessible or the data become inaccurate.
2. Supply Plans Filed and Monthly Supply Plan Validations for RA resources	<p>If CIRA access is not available or data in CIRA are inaccurate, please provide data as follows:</p> <p>Monthly supply plan files and initial validation file within three calendar days of the RA Filing due date. Please provide final validation files no less than four calendar days before the start of the compliance (trade) month.</p> <p>For annual supply plans and supply plan validations, provide files within 10 calendar days after the annual RA submission filing due date.</p>
3. List of Units Confirmed to Provide Resource Adequacy to the CAISO	If CIRA access is not available or data in CIRA are inaccurate, please provide data within three business days of the date when CIRA becomes inaccessible or the data become inaccurate.
4. Economic Bids and Self-Schedules	Please provide data for all resources, including import resources, monthly, by the last day of the month following the reporting month.
5. Settlement Quality Meter Data	Please provide data monthly, by the last day of the month following the reporting month.
6. Access to OMS Application	Ongoing, immediately
7. Quarterly MasterFile Data Request	Quarterly (January 24, April 24, July 24, October 26, 2020)
8. 2021 Flexible Capacity Needs Assessment Data and Allocations	Please provide all data relative to the draft analysis (all items in Item 9) by April 27, 2020. Please provide all data relative to the final assessment (all items in Item 9 that were modified since the draft assessment) within five business days of posting the final assessment.
9. Access to California ISO Interface for Resource Adequacy (CIRA) database	Ongoing, immediately
10. Energy Management System (EMS) Data	The monthly 2020 data should be provided to the CPUC by the 25 th of each month for the prior month.
11a. Capacity Procurement Mechanism and Capacity Solicitation Process (CSP) results	If CIRA access is not available or data in CIRA are inaccurate, please provide data as follows:

	<p>Provide monthly CSP/CPM data on coming compliance month by the 4th day of each month.</p> <p>Provide annual data by November 16, 2020 for 2021 YA requirements</p> <p>Provide intra-monthly data on the prior compliance month by the 4th day of each month.</p>						
11b. Capacity Procurement Mechanism (CPM) and Reliability Must Run (RMR) Settlement Data	Please provide data quarterly, within 60 calendar days after the quarter.						
12. Reliability Event Reports sent to WECC	Please provide WECC reliability reports to staff the next business day after delivery to WECC.						
13. Demand Response (PDR/RDRR) and Non-generating Resource (NGR) Settlement Data Files	Please provide monthly by the last day of the month following the reporting month.						
14. CPUC Jurisdictional LSE Annual and Monthly Deficiency Notifications	If CIRA access is not available (or data in CIRA are inaccurate) and if the direct notification functionality becomes inoperative, please provide data within five business days following the relevant annual or monthly RA filing deadline.						
15. Local Capacity Study Data	For cases that are in PSLF format, data will be provided within one business day of posting the final draft. For cases that are in other formats (and thus require conversion), data will be provided within 10 business days of posting the final draft.						
16. Local Residual Analysis	Provide information within 1 calendar week of posting CPM designation report.						
17. CPM and RMR Designation Capacity and Costs Allocations	Please provide the allocation spreadsheet no later than 30 business days after issuing a designation.						
18. Notices of Intent to Retire, Mothball, or Return to Service	Please provide a notarized affidavit (e.g., <i>Notice of Generating Unit Retirement or Mothball Including Rescission of Retirement or Mothball</i>) within five business days of receipt by the CAISO Regulatory Contracts group. Upon request by CPUC, please provide other letters or notices to CPUC within five business days of receipt by the CAISO Regulatory Contracts group.						
19. CEC Subpoena Data	Please provide CEC Subpoena files to CPUC on the same schedule as CAISO provides the files to CEC.						
20. RAAIM Data	<p>Please provide the requested data by April 1, 2020.</p> <p>Data for 2018 to begin on May 1, 2018 and to be provided per the schedule below:</p> <table border="1"> <tr> <td>May and July 2018</td><td>T plus 18</td></tr> <tr> <td>August 2018 – April 2019</td><td>T plus 9</td></tr> <tr> <td>May 2019 – November 2019</td><td>T plus 55</td></tr> </table>	May and July 2018	T plus 18	August 2018 – April 2019	T plus 9	May 2019 – November 2019	T plus 55
May and July 2018	T plus 18						
August 2018 – April 2019	T plus 9						
May 2019 – November 2019	T plus 55						

	December 2019	T plus 12
21. DR Registration System Information	Delivery time dependent upon data request volume. To be discussed pursuant to a CPUC request.	

Should full production of any information item not be possible within these time frames, please provide whatever partial information is available, together with a brief explanation of the circumstances preventing full production on that date, identify the date on which full production of the requested information will be made, and fulfill production of the remaining documents by such date.