

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 17, 2020

Mr. Robert Kenney  
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Ms. Carla Peterman  
Southern California Edison Company  
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Mr. Dan Skopec  
San Diego Gas & Electric Company  
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**EMERGENCY ACTION TO COMBAT HEATWAVE**

Dear Mr. Kenney, Ms. Peterman, and Mr. Skopec:

Under the rules of Decision (D.)16-09-056, non-residential customers who are enrolled in Demand Response (DR) programs must attest that they will not use prohibited resources to fulfill their load curtailment requirements in a DR event. These rules apply to all DR programs including the Base Interruptible Program (BIP) which is triggered by the California Independent System Operator (CAISO) after a grid warning has been issued in an effort to avoid further grid instability that could result in rotating outages. However, D.16-09-056 provides that a prohibited resource can be used outside a DR program load curtailment commitment and/or “in cases where the customer is required to use the prohibited resource for safety reasons.”

The CAISO has forecasted that they are likely to trigger grid warnings until the end of August 19, 2020 and there is a high risk of entering a stage three emergency that would trigger rotating outages. Given the impacts of Covid-19 and the need for all Californians to socially distance there are few options for residents of California to seek needed assistance if their electricity is turned off even for a short period of time, thus even short power outages can create safety risk for all Californians. Efforts by the participants of BIP programs to reduce their impact on the grid by shedding the load required by BIP enrollment and taking additional efforts to seek additional incremental reductions of grid reliance are currently necessary for safety reasons. Consequently, any action taken by a participant in the BIP program to operate a prohibited resource during the heat storm that is forecast to continue through the end of August 19, 2020 while also responding to a directive to reduce load under the BIP program is consistent with the intent of D.16-09-056, subsequent tariff rules, and relevant attestations to allow for the use of prohibited resources for safety reasons or as incremental load curtailment. Such action should not make the customer ineligible for participation in the BIP program, provided that the customer is

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able to document that the use of the prohibited resources creates an incremental reduction to the customer's dependence on the grid beyond the BIP obligations. This clarification applies to all attestation categories.

Sincerely,

 for

Alice Stebbins  
Executive Director