

SDG&E 2014 All Source RFO

Questions & Answers / FAQs

Demand Response (DR) Product Type Specific Questions

1. For the KYZ pulse meter, who is responsible for the cost of installing and equipment costs?

The bidder is responsible for all cost of installing any equipment in order to provide the committed load reduction.

2. Are there any meters in SDG&E's territory that cannot have a KYZ pulse equipment included?

Yes, there are meters in SDG&E's territory that cannot have a KYZ pulse equipment, for example the electro-mechanical meter types.

3. What is the minimum interval for SDG&E's Smart Meters?

The smart meters are capable of recording 5 minute intervals, but due to network bandwidth constraints we are limited to using 15 minute intervals for non-residential customers and one hour intervals for residential customers, with the exception of a small population using 5 minute voltage intervals for grid analysis. Gas meters provide daily interval reads.

4. Are Technical Incentives (TI) allowed or not?

SDG&E requires the bidders to bid without expecting to receive any Technical Incentive (TI) funds to conform to the Incremental requirement. The current TI PIP requirements include the following: "potential customers are those that can or are participating in one of the following programs: CPP-D, CBP, or any authorized pilot."

5. When does the collateral have to be posted?

The timing of collateral required under the contract is currently under review and a response will be posted shortly. Also note that shortlisted projects will owe a Shortlist Acceptance Fee, which is the greater of \$100,000 or \$2 per kW of project nameplate/aggregate program capacity and shall be required to be paid to SDG&E within ten (10) business days of notification by SDG&E that the offer has been shortlisted.

6. If there are questions about how to fill out the E3, whom do we ask?

Questions about the E3 for this RFO must be submitted via email to AllSourceRFO@semprautilities.com. There will also be additional E3 training sessions at the upcoming Pre-Bid Conference/Outreach Events in October and November.

7. Do you need to have a physical location for a DR program where customers will be marketed and identified after contract signing and thus will not be known beforehand?

SDG&E does not require a physical location where customers will be marketed, but the bidder should describe in their offer the Target Market, how the DR resources is incremental, as further described in Attachment A Project Description Form in the DR RFO documents.

8. Does each site in an aggregator's bid need to meet the deliverability requirement (4 consecutive hours for 3 consecutive days), or can the aggregator's bid meet the delivery requirement as an aggregated unit?

Assuming this question pertains to demand response or energy storage, for an aggregator, each individual site does not need to meet the deliverability requirement (4 consecutive hours for 3 consecutive days), but together, as an aggregated unit, the facilities must meet this requirement. See D. 14-06-050 Appendix B, 11.2 and 13.4. Elements of aggregated resources need not individually meet RA eligibility requirements; rather, the resource as a whole must demonstrate eligibility. Aggregated storage resources and aggregated DR resources will be granted a composite qualifying capacity and effective flexible capacity, based on both the duration over which the individual facilities can operate and the magnitude of their output.

9. In Section B, paragraph 5 from the Demand Response RFO document, it states that the use of fossil-fuel backup-generation will not qualify. If the generation is not permitted as backup-generation but is permitted as a stationary source, with the flexibility to run more than just during emergencies, will that qualify as a Demand Response Resource under this RFO, or is all fossil-fuel generation precluded in the DR category?

No, this type of resources should be bid into the Distributed Generation (DG).

10. Regarding Section B, paragraph 5 from the Demand response RFO document, is there a benchmark or measure for "innovative" for DR products/ offerings given the forward nature of the RFO (e.g. 2022 delivery)? How should we go about proving today that it is innovative? Please provide any additional clarification that you might be able to offer.

The Demand Response resource must be demonstrably incremental to the assumptions used in the California ISO studies. Sellers are required to explain and/or show how their proposed Demand Response resource is incremental. Sellers are encouraged to reference 1) SDG&E's current 2012-2014 DR program portfolio (see: <http://www.sdge.com/business/demand-response-overview>); (2) SDG&E's approved 2015-2016 DR program portfolio (see: <http://www.sdge.com/regulatory-filing/10486/oir-enhance-role-dr-meeting-state-resource-planning-ops-reqmt>); and / or 3) 2013 Integrated Energy Policy Report ("IEPR") DR forecast (see: http://www.energy.ca.gov/2013_energypolicy/documents/demand-forecast_CMF/mid_case/; click on SDGE Mid.xls). Incremental resources that are similar to existing Demand Response resources must demonstrate, to the satisfaction of both SDG&E and the IE, that the resource is "incremental", for example, by being innovative or by targeting previously hard to reach markets or customers that have not been addressed to date.

11. Should customer-side storage be bid in as a DR product in this RFO? If so, can you elaborate on the definition of "permanent load shifting" and the intent of Section B of paragraph 3 shown below?

"Permanent load shifting based on technology or behavior change will not be considered."

Please see the most recent version of the DR RFO. Section 3.0 (Eligibility Requirements) has been updated.

Permanent Load Shifting (PLS) exclusively refers to Thermal Energy Storage (TES) technologies eligible for incentive under SDG&E's PLS program. Non-dispatchable TES will not be considered as a part of this RFO.

If the respondent is proposing behind-the-meter energy storage, and believes that their offer is incremental to that included in SDG&E's current program (see: <http://www.sdge.com/business/demand-response/permanent-load-shifting>) the respondent should describe how their program is incremental (for example, by capturing a customer segment not covered by the existing program) and could be dispatched by CAISO (or SDG&E) in the program description form.

Customer side storage technology will only be considered if SDG&E has dispatch rights to the resources.

The Seller shall also ensure that the project has not obtained, and will not obtain, any compensation or other benefits pursuant to the Self-Generation Incentive Program (SGIP), as defined in CPUC Decision 01-03-073, the California Solar Initiative, as defined in CPUC Decision 06-01-024, SDG&E's net energy metering tariff, or other similar program that exists now or in the future.

12. In its DR RFO document, SDG&E says that "behavior change" will not be considered. Our company has recently deployed a behavioral demand response capability that sends information to customers before, during, and after peak events. Would SDG&E be open to this solution?

As stated in Section 3.0, B. (Resource Criteria), 3: Permanent load shifting based on technology or behavior change will not be considered.

SDG&E will consider such product only when:

- It could be dispatched by CAISO (or SDG&E);
- It can be assessed and credited RA credit to the benefit of SDG&E.

13. Regarding the forthcoming Model Agreement, would SDG&E please provide some further information?

Currently as stated on page 18 of 24 in SDG&E's Demand Response 2014 Local Capacity Requirement Request for Offers ("RFO") seeking Demand Response Resource, version 3 - updated 10/21/2014 "For load reduction products only: Redline forms of the Pro-Forma Agreement (Attachment B). For all supply/generation products: SDG&E shall supply bidder with applicable template when and if bid is shortlisted." SDG&E is working on a Pro-Forma Agreement which will be modeled similar to SDG&E's Resource Adequacy Capacity Product.

14. In a similar procurement last year, SCE included model terms and conditions that required vendors to commit to delivering kW Capacity in the future at a specific price, with the contract structure requiring the vendors to a guarantee (in the form of a down-payment) for kW's delivered. Is SDG&E going to do something similar?

SDG&E also requires the committed kW Capacity in the future with guidelines for competitive prices. The bidding price is the bidder's responsibility. The bidder assumes responsibility for adherence to CAISO guidelines and Must Offer Obligations.

15. In last year's SCE procurement, the utility required a 1-hour dispatch time. Is SDG&E going to require this same dispatch time?

SDG&E requires the bidding supply resource DR to meet the Local Capacity Requirements set forth by CAISO. All things being equal, faster responding resources will be given a higher value.

16. My question regarding Energy Storage pertains to entering that asset into the E3 Calculator. So to clarify, if we have an Energy Storage asset that we're submitting under DR then we would not include it in the calculator.

Any resource that bids into the DR RFO will need to meet the cost effective test, i.e., the E3 Calculator for the TRC to be 0.9 and above.

17. With regard to the E3 calculator, can a bidder input a custom load shape (and explain it) rather than one of the stock choices?

The E3 Calculator does not allow entry of custom load shapes; however, E3 has stated that a workaround would be to add and/or subtract two or more existing load shapes for each measure to get the desired load shape. If you intend to take this workaround approach, please explain your methodology and the rationale for it.

18. Regarding the conformance of back-up generation as a DR resource: is biogas based back-up generation or hydrogen from renewables eligible?

SDG&E may consider these types of resources as Distributed Generation (DG).

19. The DR pro forma contract is still not available. What will happen to if we have questions after the question deadline (November 14)?

SDG&E is working on the DR pro forma agreement and will post it as soon as possible. Respondents will have an opportunity – at some point in time - to provide a red-lined version of DR pro forma, either as a part its offer package submitted on January 5th or at a later date if SDG&E provides the pro-forma later than January 5.

20. How does grid-level (non-customer sited) storage fit into the DR equation? And what about utility-scale solar coupled with storage?

Grid level storage will either be at the transmission or distribution level, and does not have any effect on the DR portfolio. In terms of coupling utility scale solar with storage, please see question #51 in the Energy Storage Q&A document.

21. Please clarify the required physical location of DR participants?

DR participants must be within the service territory of SDG&E (essentially San Diego County and a portion of southern Orange County).

22. Please clarify whether fossil fuel back up generation is acceptable as part of a DR offering?

No, fossil fueled back-up generation will not be considered conforming based on the Commission's policy statement regarding fossil fuel emergency back-up generation in D.11-10-003.

23. Can storage be used for DR and/or EE?

Energy Storage cannot be used as EE unless the respondent can clearly show that the application more than overcomes the round trip energy losses inherent in energy storage applications. Energy storage may be used for DR provided that it is behind the customer meter, the DR program is a supply side program that bids into the CAISO, and is dispatched by the CAISO (or SDG&E) and meets the other conformance requirements outlined in the DR RFO document.

24. How would one meet the interconnection requirements for storage behind the meter?

The interconnection process for generating facilities, including energy storage, behind a customer billing meter is governed by SDG&E's Electric Rule 21. The process to interconnect with SDG&E's electric distribution system behind the meter begins with submitting a completed Interconnection Request. Behind the meter storage should complete the same generation Interconnection Request applicable for a comparably sized generator. Please refer to <http://www.sdge.com/generation-interconnections/electric-rule-21> for interconnection details.

25. In the previous session, it was suggested that Energy Storage which is behind the meter may be considered as a Demand Response offer. Can you please explain how you might go about entering an Energy Storage asset into the E3 model?

The E3 calculator is used in conjunction with EE and DR offers. To the degree the energy storage asset is behind the customer meter, it could qualify as a DR offer (not EE) if it meets the conformance requirements outlined in the Energy Storage RFO. With regard to entering information into E3 calculator associated with that offer, please see the E3 model presentation given as part of the 11/10 bidder's conference, available here:

<https://www.sdge.com/sites/default/files/documents/817616969/All-Source-RFO-EE-DR-ONLY-Bidders-Conference-Presentation-11-10-2014.pdf?nid=12841>

27. In Section B, paragraph 5 from the Demand response RFO document (shown below), Is there a benchmark or measure for “innovative” for DR products/ offerings given the forward nature of the RFO (e.g. 2022 delivery)? How should we go about proving today that it is innovative? Please provide any additional clarification that you might be able to offer.

The Demand Response resource must be demonstrably incremental to the assumptions used in the California ISO studies. Sellers are required to explain and/or show how their proposed Demand Response resource is incremental. Sellers are encouraged to reference 1) SDG&E’s current 2012-2014 DR program portfolio; (2) SDG&E’s approved 2015-2016 DR program portfolio; and / or (3) 2013 Integrated Energy Policy Report (“IEPR”) DR forecast. Incremental resources that are similar to existing Demand Response resources must demonstrate, to the satisfaction of both SDG&E and the IE, that the resource is “incremental”, for example, by being innovative or by targeting previously hard to reach markets that have not been addressed to date.

28. Should customer-side storage be bid in as a DR product in this RFO? If so, can you elaborate on the definition of “permanent load shifting” and the intent of Section B of paragraph 3 shown below?

Please refer to Question #11.

29. Does customer-side energy storage bid in as DR help SDG&E meet its customer domain energy storage goals?

Yes - qualifying energy storage equipment installed behind customer meters can count toward SDG&E’s customer domain energy storage goals that are included in D.13-10-040 and as further detailed in D.14-10-045 (decision approving the IOU’s energy storage applications).

30. What are the must-offer requirements in CAISO for a DR resource to count toward SDG&E’s local capacity requirement? The baseline DR requirement for availability is three consecutive days with four consecutive hours. Can SDG&E provide additional detail on when (by season, day of week, time of day) the load will be required to be offered in the energy market and what, if any, bid price restrictions there might be?

Please see

<http://www.aiso.com/informed/Pages/StakeholderProcesses/FlexibleResourceAdequacyCriteria-MustOfferObligations.aspx> for information related to the must offer obligation.

31. How should a bidder handle potential EE savings from a DR product? The DR product (smart thermostat), can achieve significant energy savings beyond the energy savings directly achieved from DR events. Should the bidder complete both the E3 energy efficiency calculator and E3 demand response calculator, and provide a supplemental schedule of the combined TRC benefits relative to total TRC cost?

In the case described here, the bidder should provide E3 calculators for both Energy Efficiency and Demand Response if they believe there are significant EE savings in the DR product they provide. And the bidders should also provide the breakdown of the total costs into EE and DR components appropriately. The requirements of cost effectiveness would be applicable to both.

32. Can SDG&E provide clarity around the requirements to claim T&D deferral benefit in the E3 DR calculator? How do SDG&E define “enabling technology”?

If the proposed program includes installation of technology that will enable automatically dispatching load curtailment and the technology is expected to last 10 or more years, then distribution benefits may be claimed. In addition, if the proposed program targets constrained circuits and can be dispatched solely to those circuits, then distribution benefits may be claimed.

33. Can a bidder submit their own A-factor analysis if their DR program dispatch limits do not conform to the E3 A-factor calculator’s parameters? For example, the proposed program might limit calls to a certain number of hours per year, rather than hours per month. Can the bidder submit their own a-factor analysis if it better reflects the program’s dispatch requirements? (Assuming the hourly capacity value assignments in the E3 A-factor calculator are used.)

No. If there is no limit to the number of hours per month, then use the A-factor result for the maximum available hours per month.

34. Does SDG&E plan to continue the Summer Saver program in 2017 and beyond?

SDG&E has not determined whether or not it will continue the Summer Saver program when the existing program expires.

35. How does SDG&E plan to handle customers exiting current SDG&E DR programs to participate in new programs, since there are no restrictions on customer recruitment?

One of the conforming criteria of any eligible resource in this RFO is that it has to be incremental. One issue with existing customers in a program moving to a new program would be potential issues related to the incremental criteria, unless the bidder could identify and clearly show that there are incremental load reductions being achieved.

36. The DR Product Highlight (Slide 44) of the Pre Bidders Conference Meeting on 11.10.14 states SDG&E will not provide an energy payment. As a result, what does the energy payment in the DR Offer Form (Excel file) represent?

This will be removed from the DR offer form file. It was originally included to allow for the possibility of an energy payment, which was subsequently excluded.

37. Will selected vendors have access to customer information, including AMI data for recruiting and settlement purposes?

SDG&E will not share any customer information with third party without a signed and executed contract and Non-Disclosure Agreement with the vendor, and unless the vendor obtains customer authorization in the form of a signed Customer Information Standardized Request (CISR) form.

38. Will selected vendors be able to market their program with the SDG&E logo, with prior approval?

An exceptional business case must exist and careful consideration given to potential risks prior to approving the use of the SDG&E logo on any vendor marketing materials.

39. Will a residential DR program be required to register every endpoint with CAISO or will it be able to be registered in aggregate?

The answer depends on how the DR resource is registered with CAISO. It is possible that the registration could be done at the aggregation level.

40. From the Demand Response solicitation, please specify from page 7 what is meant by "Permanent load shifting based on technology or behavior change will not be considered." Is standalone energy storage for demand reduction considered to be 'permanent load shifting.'?

See question #11, above. Stand-alone energy storage behind the customer meter as part of a DR program is not necessarily considered 'permanent load shifting'.

41. From the Demand Response solicitation, please define CPUC-regulated program or rate schedule. Does this include the Self-Generation Incentive Program (SGIP)? Where can we find out more specifics about the penalties for not achieving commitments in future years? Specifically, the question deals with two different potential failures: coming close to but not reaching the full commitment (day-of shortfalls), or knowing well in advance (e.g. a year) that there would be no capacity available. What are the respective repercussions? And in the latter case, can the obligation be sub-contracted out?

Two examples of the CPUC-regulated program or rate schedule are Self-Generation Incentive Program (SGIP) and Net Energy Metering (NEM). With regard to the under-performance of the selected DR resources, SDG&E will pay the capacity based on the CAISO granted Net Qualifying Capacity (NQC). Please refer to the following link for CAISO requirements: <http://www.caiso.com/planning/Pages/ReliabilityRequirements/Default.aspx>

42. Are there specific dispatch parameters or constraints that we should consider in our proposal? (Aside from the four-hour duration, 3 consecutive day requirement.) For example, would a day-ahead notification resource be acceptable? Is there a specific available window that should be considered? Are summer-only resources acceptable?

Yes, summer only resources could be deemed eligible assuming the program meets all the other conformance requirements. All other things being equal, SDG&E prefers faster responding resources (that is, less prior notice).

43. There's a requirement to disclose other relationships with Sempra. If there's an ongoing pilot unrelated to DR and we're only submitting a DR RFO response, does that require disclosure? What details need to be shared?

As stated in the RFO, the respondent must state any affiliate relationship with Sempra Energy, if one exists.

44. Page 7 B4 of the DR RFO says the "Bids that are supported by resources that are already being subsidized under another CPUC-regulated program or rate schedule shall not be considered." Likewise, in the Q&A from 11/10, in the EE slide 2 of 6 the response says "Projects associated with an RFO Project are not eligible for incentives through any other program." For a DR response to the RFO, does this include potential EE programs that do not include DR? For example, if SDG&E were to offer an EE incentive for a device that could in principle be used to reduce load, but the program is not specifically geared at that purpose, is there an issue?

Yes, the DR portion on top of the EE savings of the resource will be considered, please refer to the DR RFO document for all the conformance requirements.

45. Does a DR resource also need to meet the min TRC of 0.9, or is this just for EE resources?

The DR resource needs to meet the minimum TRC of 0.9 requirement.

46. Given that the EE RFO is focused on capacity - how is this different than the DR RFO?

All of the product types that make up the all source RFO are / should be focused on providing capacity. Demand Response resources are required to be dispatched by CAISO (or SDG&E).

47. What's functionally different other than dispatch parameters?

As defined here, are "work papers" specifically those approved by third parties (M&V providers or the CPUC); or, do company-based research studies and white papers qualify as work papers?

EE respondents provide whitepapers, DR respondents do not.

48. Who pays for M&V? Is that expense to be paid by the bidder and recovered, or does SDG&E have a resource on hand that would implement the proposed M&V strategy?

With an M&V strategy agreed to by SDG&E, in general, costs for M&V activities that are performed by SDG&E or by consultants/contractors hired by SDG&E will be covered by SDG&E. However, if there are M&V/testing activities that need to be performed by the aggregator these costs may not be covered by SDG&E.

49. Can we change the scope of how we obtain load reduction (e.g. what type of devices generate the savings) at any point as long as the load is delivered from similar strategies?

SDG&E must approve any changes to the resource including device/technology changes.

50. Can we ask questions about the use of E3 after 11/14?

The question deadline was 11/14. Beyond that date questions will not be accepted. Please refer to the presentation materials related to the E3 calculator and other E3 calculator questions for more information.

51. Can we fill out two different A-Factor tools for different notifications prior to /durations of events?

If the proposal includes options for different notification strategies or different event durations, then include a separate analysis for each set of program options.

52. On the DR Reporting template, is the 88% discount the only "penalty" for load derived from a day ahead notification? Can we assume that we can bid in as much day-ahead as day-of?

Yes, Factor B is the only adjustment for day-ahead versus day-of notification. If the proposal includes options for day-ahead and day-of, include a separate analysis for each.

53. In the "calls per month" field on the A Factor tool, does that number assume we would run no more than 3 consecutive events?

No, that assumption is not included in the Factor A calculation.

54. SDG&E notes that "eligible customer side storage technology will only be considered [for DR] if SDG&E has exclusive rights to the resources". Does this exclusive right to the resource include only the specified Delivery Days, Delivery Hours, and Delivery Months in the offer form, or is it more expansive than that?

The word 'exclusive' has been removed from the answer to question 11. Given that SDG&E has expressed a strong preference for supply side DR resources, generally the CAISO will dispatch these resources likely through their ADS (Automated Dispatch System – see:

<http://www.aiso.com/Documents/AutomatedDispatchSystemOverview.pdf>) or a similar system. Additionally, in addition to these least-cost, normal course of business dispatches, SDG&E will reserve rights to dispatch the DR program as well.

55. If a product is offered that provides supply side DR and RA value to SDG&E, why is it necessary that SDG&E have exclusive rights to the resource?

The word 'exclusive' has been removed from the answer to question 11. Given that SDG&E has expressed a strong preference for supply side DR resources, generally the CAISO will dispatch these resources likely through their ADS (Automated Dispatch System – see:

<http://www.aiso.com/Documents/AutomatedDispatchSystemOverview.pdf>) or a similar system. Additionally, in addition to these least-cost, normal course of business dispatches, SDG&E will reserve rights to dispatch the DR program as well.

58. How does ES count against DR (if ES is used to reduce use)? – formerly Q10 on Energy Storage Q&As.

SDG&E would evaluate the project as a DR resource, and would count the ES component towards its Energy Storage Decision (D.13-10-040) ES procurement target based on the interconnection point.

59. Does customer-side energy storage bid in as DR help SDG&E meet its customer domain energy storage goals?

Yes – qualifying energy storage equipment installed behind customer meters can count toward SDG&E's customer domain energy storage goals that are included in D.13-10-040 and as further detailed in D.14-10-045 (decision approving the IOU's energy storage applications).

60. For ESSPPTA, is behind the meter storage explicitly allowed or not allowed?

Behind the meter storage / customer domain storage should follow the guidance provided in the DR RFO document.

61. What form of site control would be required for behind the meter storage projects?

See question/answer #7, above.

62. What form of consent if any is required to bid customer sites storage?

The purpose of the consent referred to is not clear from this question. The type or form of consent would depend on the particular circumstances of the program or situation.

63. Which type of resource should behind the meter storage be bid as if any?

Behind the meter storage resources would be bid as a DR resource in this RFO and must meet the conformance requirements set forth in the DR RFO document and FAQs.

64. Can behind the meter storage be bid into the storage track without a CAISO deliverability study required?

Behind the meter storage should bid into the DR RFO. Behind the meter storage resources does not have to have a CAISO deliverability study in order to bid. These resources must go through an interconnection process, however. The interconnection process for energy storage resources is similar to that of other generating facilities, and is governed by SDG&E's Electric Rule 21. The process to interconnect with SDG&E's electric distribution system behind the meter begins with submitting a completed Interconnection Request. Behind the meter storage should complete the same generation Interconnection Request applicable for a comparably sized generator. Please refer to <http://www.sdge.com/generation-interconnections/electric-rule-21> for interconnection details.

65. Should storage which acts as a resource to take load off the system for a specific amount of time be considered a Demand Response resource, or another type of resource?

Based on this very short description, it sounds as if the storage would be behind a customer meter and, when discharging, take load off the system. If this is the case, then yes - please follow the requirements in the DR RFO document.

66. Does a behind the meter energy storage resource that takes load off count as RA, and does it require a CAISO deliverability study?

A behind the meter energy storage resource can provide RA. Behind the meter storage resources does not have to have a CAISO deliverability study in order to bid. These resources must go through an interconnection process, however. The interconnection process for energy storage resources is similar to that of other generating facilities, and is governed by SDG&E's Electric Rule 21. The process to interconnect with SDG&E's electric distribution system behind the meter begins with submitting a completed Interconnection Request. Behind the meter

storage should complete the same generation Interconnection Request applicable for a comparably sized generator. Please refer to <http://www.sdge.com/generation-interconnections/electric-rule-21> for interconnection details.

67. Regarding an issue that was raised in the November 10 meeting, please confirm that partial battery capacity, that would otherwise not be used for peak shaving at the time that the battery is dispatched under the agreement through this RFO (though comes from the same system that is installed for peak shaving) is not considered to be “double-dipping.”

Please see above answer to Question #11. As long as the portion of the capacity being bid as Demand Response has not been and will not be incentivized under any other program, it may be considered.

68. Please also confirm that receiving SGIP for the entire battery capacity, assuming SGIP is allowed, would also not be considered “double-dipping.”

As clearly stated in the answer to Question #11, such action is considered cross subsidization, thus it will not be considered.

69. How should an energy storage device providing permanent load shifting be bid into this RFO?

Behind the meter energy storage projects should be bid into the DR product type. Please see DR FAQ #11 for additional guidance on permanent load shifting.

70. There is a footnote that indicates that the energy storage RFO might be considered by a respondent interested in providing a permanent load shifting result from an energy storage device.

a. In particular, does this potential consideration include customer side storage that provides permanent load shifting?

Behind the meter energy storage projects should be bid into the DR product type. Please see DR FAQ #11 for additional guidance on permanent load shifting.

71. What do you mean by “dispatchable” Demand Response?

SDG&E will accept bids for the Demand Response resource when it could be dispatched by CAISO, or SDG&E. In another word, the resource has to be event-based.