DOCKETED		
Docket Number:	17-IEPR-07	
Project Title:	Integrated Resource Planning	
TN #:	221491	
Document Title:	ADVICE LETTER (AL) SUSPENSION NOTICE	
Description:	SCE proposes to modify Schedule V2G Pilot to allow the Los Angeles Air Force Base (LAAFB) to continue to access the California Independent System Operator's (CAISO's) markets.	
Filer:	Tami Haas	
Organization:	California Public Utilities Commission	
Submitter Role:	Public Agency	
Submission Date:	10/12/2017 4:40:29 PM	
Docketed Date:	10/12/2017	

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



December 12, 2016

Advice Letter 3479-E

Russell G. Worden Director, State Regulatory Operations Southern California Edison Company 8631 Rush Street Rosemead, CA 91770

SUBJECT: Modifications to SCE's Schedule V2G Pilot Pursuant to Resolution E-4595

Dear Mr. Worden:

Advice Letter 3479-E is effective as of October 23, 2016.

Sincerely,

Edward Randolph

Director, Energy Division

Edward Rambofah

ADVICE LETTER (AL) SUSPENSION NOTICE ENERGY DIVISION

Utility Name: Southern California Edison Utility No./Type: U 338-E Advice Letter No.: 3479-E Date AL filed: September 23, 2016 Utility Phone No.: (626) 302-2086	Date Utility Notified: September 28, 2016 via: e-mail [x] E-Mail to: Darrah.morgan@sce.com Fax No.: (626) 302-4829 ED Staff Contact: Noel Crisostomo For Internal Purposes Only: Date Calendar Clerk Notified:/
[X] INITIAL SUSPENSION (up to 120	
29, 2016 for the following reason(s) to Commission's deliberation on the re	red AL is suspended for up to 120 days beginning September below. If the AL requires a Commission resolution and the solution prepared by Energy Division extends beyond the riod, the advice letter will be automatically suspended for up ion period.
[] Section 455 Hearing is Required. advice letter.	A Commission resolution may be required to address the
[] Advice Letter Requests a Commiss	sion Order.
[X] Advice Letter Requires Staff Re	view
Expected duration of initial suspension	n period: 120 days.
[] FURTHER SUSPENSION (up to	o 180 DAYS beyond initial suspension period)
prepared by Energy Division has exte	lution and the Commission's deliberation on the resolution ended beyond the expiration of the initial suspension period. o 180 days beyond the initial suspension period.
If you have any questions regarding th or via e-mail at Noel.Crisostomo@cpucc: Melicia Charles Maria Salinas, Energy Division Tataadvicetariffmanager@sce.com Karyn.gansecki@sce.com	
Shiela.linao@sce.com	

Protestants to the advice letter:

N/A



September 23, 2016

ADVICE 3479-E (U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA ENERGY DIVISION

SUBJECT: Modifications to Southern California Edison Company's

Schedule V2G Pilot Pursuant to Resolution E-4595

In compliance with the California Public Utilities Commission's (CPUC or Commission) Resolution E-4595 (the Resolution), Southern California Edison Company (SCE) hereby submits for filing the following changes to Schedule V2G Pilot, SCE Vehicle to Grid Experimental Pilot. The proposed tariff changes are detailed below, with the revised tariff sheets attached hereto as Attachment A.

PURPOSE

Pursuant to the Ordering Paragraph (OP) 4 of the Resolution, SCE proposes to modify Schedule V2G Pilot to allow the Los Angeles Air Force Base (LAAFB) to continue to access the California Independent System Operator's (CAISO's) markets. Additionally, in Attachment B hereto, SCE submits a report on the pilot's initial operations and the costs to the customer related to the third provision under the Rates section of Schedule V2G Pilot.

BACKGROUND

On April 23, 2013, SCE filed Advice 2889-E seeking authorization to facilitate a demand response pilot in which two retail customers – the Los Angeles Air Force Base (LAAFB) and the Naval Air Weapons Station at China Lake (China Lake), under the auspices of the United States Department of Defense (DoD) – would be allowed to participate in the CAISO wholesale markets (V2G pilot). As of the date of this filing, the DoD has not elected to pursue the China Lake option so the following changes apply only to the LAAFB.

The pilot allows LAAFB to provide energy, regulation, and other ancillary services to the CAISO market using batteries from plug-in vehicles. Under the pilot and because CAISO does not settle with individual end-use customers of SCE, SCE serves as the Scheduling Coordinator (SC) for the behind-the-meter Plug-in Electric Vehicle (PEV) load participating in CAISO's wholesale markets. In its role, SCE also transmits bids to CAISO based on the bidding strategy the customer develops and communicates. SCE applies CAISO's settlement invoices, as appropriate, to LAAFB's monthly retail bills.

On July 15, 2013, the Commission issued the Resolution that approved SCE's Schedule V2G Pilot tariff for a period of one year with an option to continue for an additional six (6) months at the mutual consent of SCE and the DoD.¹ The Resolution also instructed SCE to file tariff changes via a Tier 2 Advice Letter that would provide the DoD the option to:

- 1. Use a third-party SC in lieu of Southern California Edison. If or when the option to use a third party SC to participate in the CAISO markets is available, the Customer should consider using a third party to do so.
- 2. Maintain Southern California Edison as the SC.2

Accordingly, OP 4 of Resolution stated:

SCE is directed to file no later than nine months after the Start of the Pilot a tariff that allows the Customer to continue to access the CAISO markets as a Tier 2 Advice letter and a report on the initial operations and costs to the customer related to Rates Provision 3.3

On February 9, 2016, the Commission's Energy Division approved SCE's Advice Letters 3313-E, 3313-E-A, 3313-E-B, and 3313-E-C (Advice Letters) with an effective date of January 1, 2016. The approval of these Advice Letters fully implemented the provisions of Rule 24 that established the terms and conditions that apply to customers wishing to take part in Demand Response Service offered by the CAISO and allowed a Demand Response Provider or a retail customer to participate or "bid-in" directly into the CAISO wholesale energy market for compensation by the CAISO.

SCE shall offer its service as a SC for the V2G pilot as an option for the DoD at the LAAFB but encourages the DoD to consider using a third party SC as the Commission stated in Resolution E-4595.⁴ Consistent with OP 4 of Resolution E-4595, SCE proposes to modify Schedule V2G Pilot as described below.

Furthermore, SCE notes that its existing retail tariff programs, such as Schedule CBP - Capacity Bidding Program or Schedule TOU-8-RTP-2, may be suitable for the DoD to meet its objectives and allow for the pilot to conclude on December 24, 2016 (one year after its launch).

See Resolution E-4595 at p. 12.

² Id. at p. 13.

 $[\]frac{3}{}$ Id. at p. 25.

⁴ Id. at p. 13.

PROPOSED TARIFF CHANGES

SCE proposes revisions to the following sections of Schedule V2G Pilot to reflect the option for the DoD to continue using SCE as the SC for the second phase of the V2G pilot. 5

APPLICABILITY:

This Schedule is applicable to customer accounts receiving service on the main meter of the Los Angeles Air Force Base (LAAFB) and the Naval Air Weapons Station at China Lake (China Lake) and who elect SCE to serve as the Scheduling Coordinator to participate in the California Independent System Operator's (CAISO's) wholesale markets.

RATES:

<u>Eligible</u> customers <u>eligible for service</u> under this Schedule, <u>who elect SCE to serve as their at CAISO's wholesale markets</u>, will be billed according to their Otherwise Applicable Tariff (OAT) subject to the following three adjustments:

SPECIAL CONDITION 2:

Bidding. For purposes of this pilot only, if the customer elects Although SCE will to serve as the customer's Scheduling Coordinator (SC) at CAISO's wholesale markets, for purposes of this pilot only, and SCE will transmit bids to CAISO based on the customer's bidding instructions as communicated to SCE. The customer will be solely responsible for the strategy it chooses in relation to making its battery resource available to respond to the CAISO's wholesale markets.

Furthermore, SCE requests to extend Schedule V2G Pilot through September 30, 2017 for LAAFB only. This extension will coincide with the DoD's interest and plan to complete the pilot in September 2017. Accordingly, SCE proposes to revise the Applicability section of Schedule V2G Pilot as follows:

This Schedule implements a twelve-month pilot program beginning from the date on which each military base first uses vehicle batteries to participate in the California Independent System Operator's (CAISO's) wholesale markets (battery resource). The pilot may be suspended at any time at the election of the customer., and the The pilot expires for China Lake on December 24, 2016 and it is extended for LAAFB until September 30, 2017.

SCE's proposed additions to the existing tariff language are shown in underline, while the proposed deletions are shown in strikethrough.

In addition, SCE proposes other non-substantive text changes to the following sections of Schedule V2G Pilot to correct grammatical errors or make minor wording changes: Rates Section 3, Special Conditions 1,3, 4, 5, 6, and 7.

REPORT ON INITIAL OPERATIONS AND COSTS

In the Resolution, the Commission approved the third provision under the Rates section of Schedule V2G Pilot (Rates Provision 3) as filed in Advice 2889-E that states:

Should the CAISO issue dispatch instructions to discharge the battery or interrupt the charging of the battery in a way that may impact the metering of load at the rest of the military base, SCE will make the appropriate adjustments to the energy and kW demand registered on the customer's retail ("master") meter to ensure that the change resulting from responding to CAISO's instruction is not used for both peak load shaving at the retail level and simultaneously participating in the CAISO's market. This will be accomplished by adding all 15-minute changes to the PEV station load associated with a CAISO instruction back into the load registered on the master meter. Adjustments to the metered load will not be made in circumstances where "peak shaving" occurs in the absence of a simultaneous CAISO instruction.⁶

Consistent with the Commission's order in OP 4 of the Resolution, SCE submits in this advice filing its report on the initial operations and costs related to Rates Provision 3. The report is included in Attachment B of this filing.

No cost information is required for this advice filing.

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to Resolution E-4595 and General Order (GO) 96-B, Energy Industry Rule 5.2, this advice letter is submitted with a Tier 2 designation.

6 Advice 2889-E at p.3.

EFFECTIVE DATE

This advice filing will become effective on October 23, 2016, the 30th calendar day after the date filed.

NOTICE

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be submitted to:

CPUC, Energy Division Attention: Tariff Unit 505 Van Ness Avenue

San Francisco, California 94102 E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Russell G. Worden
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-4177

Telephone: (626) 302-4177 Facsimile: (626) 302-4829

E-mail: AdviceTariffManager@sce.com

Michael R. Hoover
Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102

Facsimile: (415) 929-5544

E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B, R.13-09-011, R13-11-007, R.15-03-011 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-3719. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at https://www.sce.com/wps/portal/home/regulatory/advice-letters.

For questions, please contact Shiela Linao at (626) 302-4506 or by electronic mail at Shiela.Linao@sce.com.

Southern California Edison Company

/s/ Russell G. Worden Russell G. Worden

RGW:sl:cm Enclosures

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On page 10 of Resolution E-4595, the Commission instructed SCE to serve the report to the Commission via the service lists for R.07-01-041, R.09-08-009, and R.10-12-007. However, these proceedings are now closed. As such, SCE is serving the report to the service lists of the related successor proceedings as indicated in this filing.

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)					
Company name/CPUC Utility No.: Sout	Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)				
Utility type:	Contact Person: Darrah Morgan				
☑ ELC ☐ GAS	Phone #: (626) 30	02-2086			
□ PLC □ HEAT □ WATER	E-mail: Darrah.Mo	organ@sce.com			
	E-mail Disposition	Notice to: AdviceTariffN	Manager@sce.com		
EXPLANATION OF UTILITY TYP	PE	(Date Filed/ Re	eceived Stamp by CPUC)		
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat	WATER = Water				
Advice Letter (AL) #: 3479-E		Tier Designation:	2		
Subject of AL: Modifications to Sout Resolution E-4595	hern California Edi	son Company's Schedul	e V2G Pilot Pursuant to		
Keywords (choose from CPUC listing):	Complia	ance			
AL filing type: ☐ Monthly ☐ Quarterly ☐	☐ Annual ☑ One-T	ime □ Other			
If AL filed in compliance with a Commiss	sion order, indicate	relevant Decision/Resol	lution #:		
	Resolution	E-4595			
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:					
Summarize differences between the AL and the prior withdrawn or rejected AL:					
Confidential treatment requested? ☐ Yes ☑ No					
If yes, specification of confidential information: Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/access to confidential information:					
Resolution Required? ☐ Yes ☑ No					
Requested effective date: 10/23/	/16	No. of tariff sheets:	-5-		
Estimated system annual revenue effec	t: (%):				
Estimated system average rate effect (%	%):				
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).					
Tariff schedules affected: See Attachment A					
Service affected and changes proposed ¹ :					
Pending advice letters that revise the same tariff sheets: N/A					

¹ Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division Attention: Tariff Unit 505 Van Ness Avenue

San Francisco, California 94102 E-mail: <u>EDTariffUnit@cpuc.ca.gov</u> Russell G. Worden

Managing Director, State Regulatory Operations

Southern California Edison Company

8631 Rush Street

Rosemead, California 91770 Telephone: (626) 302-4177 Facsimile: (626) 302-4829

E-mail: AdviceTariffManager@sce.com

Michael R. Hoover Director, State Regulatory Affairs c/o Karyn Gansecki Southern California Edison Company 601 Van Ness Avenue, Suite 2030 San Francisco, California 94102 Facsimile: (415) 929-5544

E-mail: Karyn.Gansecki@sce.com

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 60384-E	Schedule V2G PILOT	Original 52577-E
Revised 60385-E	Schedule V2G PILOT	Original 52578-E
Revised 60386-E	Schedule V2G PILOT	Original 52579-E*
Revised 60387-E	Table of Contents	Revised 60210-E
Revised 60388-E	Table of Contents	Revised 58648-E



Cancelling Original

Revised

Sheet 1

Cal. PUC Sheet No. 52577-E

Cal. PUC Sheet No.

Schedule V2G PILOT SCE VEHICLE TO GRID EXPERIMENTAL PILOT

APPLICABILITY

This Schedule is applicable to customer accounts receiving service on the main meter of the Los Angeles Air Force Base (LAAFB) and the Naval Air Weapons Station at China Lake (China Lake) and who elect SCE to serve as the Scheduling Coordinator to participate in the California Independent System Operator's (CAISO's) wholesale markets.

(C) (C)

60384-E

This Schedule implements a twelve-month pilot program beginning from the date on which each military base first uses vehicle batteries (battery resources) to participate in the CAISO's wholesale markets. The pilot may be suspended at any time at the election of the customer. The pilot expires for China Lake on December 24, 2016 and it is extended for LAAFB until September 30, 2017.

(T) (C) (C)

(T)

CAISO's existing wholesale market functionality will support participation by non-generator resources (NGRs), such as batteries from plug-in electric vehicles (PEVs), in both the energy and ancillary services markets. These resources have the capability to serve as both generation and load, and can be dispatched to any operating level within their entire capacity range but are also constrained by a megawatt-hour (MWh) limit to (1) generate energy, (2) curtail the consumption of

(T)

energy in the case of demand response, or (3) consume energy.

TERRITORY

Within SCE's territory only at LAAFB and China Lake.

RATES

Eligible customers under this Schedule, who elect SCE to serve as their Scheduling Coordinator (C) at CAISO's wholesale markets, will be billed according to their Otherwise Applicable Tariff (OAT) (C) subject to the following three adjustments:

- 1. The customer's bill will include a credit or debit reflecting the invoice amount provided to SCE by CAISO for the resource(s). However, to the extent the CAISO invoices include charges for energy procurement by the battery resource at each military base; SCE will not pass that cost to the customer because the customer's energy procurement costs are already accounted for in the customer's OAT bill.
- 2. SCE will collect service fees on a monthly basis, per customer, for incremental expenses it incurs, as follows:

Manual Billing.....\$ 118.46 Meter Data Feed to Billing.....\$ 216.50

(D)

(Continued)

(To be inserted by utility) 3479-E Advice Decision

Issued by Caroline Choi Senior Vice President

(To be inserted by Cal. PUC) Date Filed Sep 23, 2016 Oct 23, 2016 Effective Resolution E-4595

Schedule V2G PILOT SCE VEHICLE TO GRID EXPERIMENTAL PILOT

Cancelling

Revised

Original

Sheet 2

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52578-E

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Cal. PUC Sheet No.

Cal. PUC Sheet No.

(Continued)

RATES (Continued)

These fees are good faith estimates only. Actual costs will be tracked throughout the pilot and will be reconciled with the amounts billed at the conclusion of the pilot. Any excess costs will be billed to the customer, and any excess charges will be reimbursed to the customer.

3. Should the CAISO issue dispatch instructions to discharge the battery or interrupt the charging of the battery in a way that may impact the metering of load at the rest of the military base, SCE will make the appropriate adjustments to the energy and kW demand registered on the customer's retail ("master") meter to ensure that the change resulting from responding to CAISO's instruction is not used for both peak load shaving at the retail level and for participation in the CAISO's wholesale market simultaneously. This will be accomplished by adding all 15-minute changes to the PEV station load associated with a CAISO instruction back into the load registered on the master meter. Adjustments to the metered load will not be made in circumstances where "peak shaving" occurs in the absence of a simultaneous CAISO instruction.

SPECIAL CONDITIONS

- Metering. The customer shall install, solely at the customer's expense, sufficient metering to allow the CAISO to measure performance of the customers' battery resource being bid into the CAISO's wholesale markets and to accurately bill under SCE's net energy metering tariffs (T) or other applicable SCE tariffs.
- 2. Bidding. For purposes of this pilot only, if the customer elects SCE to serve as the customer's Scheduling Coordinator at CAISO's wholesale markets, SCE will transmit bids to CAISO based on the customer's bidding instructions as communicated to SCE. The customer will be solely responsible for the strategy it chooses in relation to making its battery resource available to respond to the CAISO's wholesale markets.
- 3. CAISO Settlements. CAISO's payments for the battery resource will be based on its tariff, as approved by the Federal Energy Regulatory Commission (FERC). SCE will not be responsible for disputing with CAISO the debits or credits it includes on the invoices it submits to SCE respecting the customer's resource performance in the CAISO's wholesale markets. Should the customer wish to have SCE dispute the invoices on the customer's behalf, the customer must pay dispute resolution fees, as determined by SCE.
- 4. Payment Allocation. To trace with specificity the payments CAISO provides (or that CAISO charges) for the battery resources under this Schedule, SCE will use a specific Scheduling (T) Coordinator Identification (Resource ID) for the battery resources at LAAFB and China Lake, each of which will bear its own Resource ID. This will enable SCE to isolate the CAISO-issued invoices containing payments/debits for the battery resources in this pilot. To the extent SCE cannot trace charges or payments directly back to an individual Resource ID, SCE will apply the charges or credits to LAAFB and China Lake in proportion to participating load for the applicable period.

(Continued)

(To be inserted by utility)	Issued by	(To be inserted by Cal. PUC)	
Advice 3479-E	Caroline Choi	Date Filed Sep 23, 2016	
Decision	Senior Vice President	Effective Oct 23, 2016	
2C9		Resolution E-4595	



Revised Cal. PUC Sheet No. 60386-E Cancelling Original Cal. PUC Sheet No. 52579-E*

SCE VEHICLE TO GRID EXPERIMENTAL PILOT

Sheet 3

(T)

(Continued)

SPECIAL CONDITIONS (Continued)

- 5. Communication Protocol. SCE and eligible customers under this Schedule shall agree to a communications protocol for submitting bids to SCE for transmittal to CAISO.
- 6. Indemnity and Liability.
 - 6.1 SCE shall not be liable to the customers for consequential damages incurred by the customers.
 - 6.2 Nothing in this Schedule shall create any duty to, any standard of care with reference to, or any liability to any person other than SCE and the customers, who are each a party to this Schedule.
 - 6.3 The customers shall be responsible for protecting their facilities from damage by reason of preparing for or executing this pilot, including, but not limited to, the PEVs and their batteries, and all equipment associated with the pilot, and SCE shall not be liable for any such damage so caused.
- 7. Governing Law. Matters involving the interpretation of this Schedule are subject to the jurisdiction and regulation of the California Public Utilities Commission except to the extent that same are determined to be preempted by Federal law.
- 8. All Other Rules Apply. All SCE rules apply to this rate schedule.

(To be inserted by utility)
Advice 3479-E
Decision

Issued by
<u>Caroline Choi</u>
Senior Vice President

(To be inserted by Cal. PUC)
Date Filed Sep 23, 2016
Effective Oct 23, 2016

Effective Oct 23, Resolution E-4595

Southern California Edison Rosemead, California (U 338-E)

Revised Cal. PUC Sheet No. 60387-E Cancelling Revised Cal. PUC Sheet No. 60210-E

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Issued by

Caroline Choi

Senior Vice President

(To be inserted by Cal. PUC)

Date Filed

Effective Resolution Sep 23, 2016

Oct 23, 2016

E-4595

1H8

Advice

Decision

(To be inserted by utility)

3479-E



Southern California Edison Rosemead, California (U 338-E) Revised Cal. PUC Sheet No. 60388-E Cancelling Revised Cal. PUC Sheet No. 58648-E

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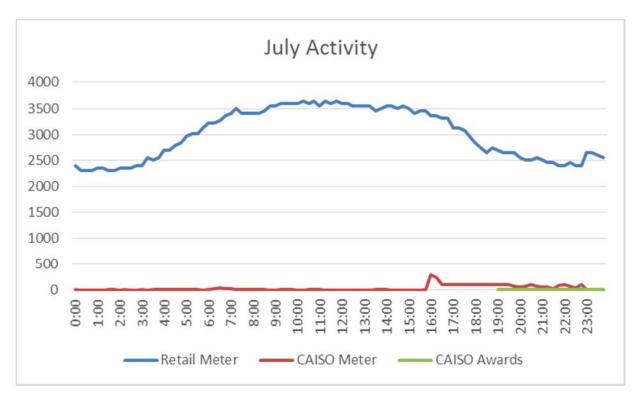
(To be inserted by utility)Issued by
Caroline Choi(To be inserted by Cal. PUC)Advice3479-ECaroline ChoiDate FiledSep 23, 2016DecisionSenior Vice PresidentEffectiveOct 23, 20169H9ResolutionE-4595

ATTACHMENT B

REPORT ON INITIAL OPERATIONS AND COSTS RELATED TO RATE PROVISION 3

In compliance with the Commission's order in Ordering Paragraph (OP) 4 of Resolution E-4595, SCE submits this report on the initial operations and costs to the Los Angeles Air Force Base (LAAFB) related to the third provision under the Rates section of Schedule V2G Pilot (Rates Provision 3).

To date, participation in the California Independent System Operator (CAISO) wholesale markets has been limited to the evening and early morning hours. As exemplified in the chart below, titled "July Activity", the CAISO Awards show "market activity" beginning at 1900 hours for the LAAFB. It is also apparent that the customer's peak load occurs between the hours of 0800 hours and 1700 hours. The chart also shows the LAAFB's discharging activities. The red line, labeled "CAISO Meter," shows when the electric vehicles (EV) are discharging the batteries for the purposes of peak shaving or providing CAISO regulation up market service.



Because the CAISO wholesale market participation occurred outside of LAAFB's peak load, it was not necessary to adjust the meter data in order to address any simultaneous participation in retail peak shaving and in the CAISO market.

Accordingly, because there were no adjustments to the meter data, there were no costs incurred by the base related to Rates Provision 3.