CHRISTENSEN A S S O C I A T E S ENERGY CONSULTING

2010 Load Impact Evaluation of California Statewide Demand Bidding Programs (DBP) for Non-Residential Customers: Ex Post and Ex Ante Report

CALMAC Study ID SCE0298.01

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Abstract

This report documents an ex post and ex ante load impact evaluation for the Demand Bidding Program ("DBP") administered by Pacific Gas and Electric Company ("PG&E") and Southern California Edison ("SCE"). The evaluation first reports on the estimation of DBP load impacts that occurred on the event days called during the 2010 program year at PG&E and SCE. Ex ante forecasts of load impacts are then reported based on enrollment forecasts provided by the utilities and the per-customer load impacts observed in 2010.

DBP is a voluntary demand response bidding program that provides enrolled customers with the opportunity to receive financial incentives in payment for providing load reductions on event days. Credits are based on the difference between the customers' actual metered load during an event to a baseline load that is calculated from each customer's usage data prior to the event. Customers are notified of events by 12:00 noon on the previous day.

PG&E called one four-hour test event on August 25th. SCE called nine DBP events in 2010, all lasting from noon to 8 p.m.

Enrollment in PG&E's DBP was 1,052 service accounts in 2010. Total DBP load, represented by the sum of enrolled customers' individual maximum demands, amounted to 1,168 MW. Enrollment in SCE's DBP was 1,421 service accounts in 2010. Total DBP load was 1,461 MW.

Ex post load impacts were estimated from regression analysis of customer-level hourly load data, where the equations modeled hourly load as a function of variables that control for factors affecting consumers' hourly demand levels. DBP load impacts for each event were obtained by summing the estimated hourly event coefficients for all customers who submitted a bid for that event.

The total program load impact for PG&E's test event averaged 68.2 MW, or 7.5 percent of enrolled load. For SCE, average hourly program load impacts averaged approximately 61.5 MW across nine events, or 5.9 percent of the total reference load. The load impacts showed some variation across event days, with a low of 41 MW and a high of 99 MW.

We separately summarized average event-hour load impacts for customers participating in the Technical Assistance and Technology Incentives (TA/TI) program or the Automated Demand Response (AutoDR) program. For PG&E, TA/TI service accounts provided 383 kW of load impacts and AutoDR service accounts provided 1,658 kW. For SCE, TA/TI service accounts provided 6,345 kW of load impacts and AutoDR service accounts provided 14,478 kW.

In the ex ante evaluation, SCE forecasts that DBP customer enrollment to increase substantially in 2013, decline slightly in 2014 and remain at that level through 2021. During this period, SCE's average event-hour load impact is approximately 87 MW. Because PG&E has proposed to end its DBP program at the end of 2012, we have only

forecast ex ante load impacts through that year. The forecast load impact for August 2011 is approximately 70 MW. For both utilities, the portfolio-level load impacts are substantially less than the program-level load impacts because of the high level of load response provided by customers dually enrolled in the Base Interruptible Program (BIP). For SCE, the portfolio-level load impact is 17.8 MW from 2014-2021. For PG&E, the 2011 portfolio-level load impact is 7.7 MW.

Executive Summary

This report documents ex post and ex ante load impact evaluations for the statewide Demand Bidding Program ("DBP") in place at Pacific Gas and Electric Company ("PG&E") and Southern California Edison ("SCE") in 2010. (San Diego Gas and Electric Company discontinued its program in 2009.) The report first provides estimates of ex post load impacts that occurred during events called in 2010. The report then documents an ex ante forecast of load impacts for 2011 through 2021 (2011 only for PG&E) that is based on utility enrollment forecasts and the ex post load impacts estimated for 2010.

The primary research questions addressed by this evaluation are:

- 1. What were the DBP load impacts in 2010?
- 2. How were the load impacts distributed across industry groups?
- 3. How were the load impacts distributed across CAISO local capacity areas?
- 4. What were the effects of TA/TI and AutoDR on customer-level load impacts?
- 5. What are the ex ante load impacts for 2011 through 2021?

ES.1 Resources covered

DBP Program

DBP, which was created in 2001, is a voluntary Internet-based demand response bidding program that provides enrolled customers with the opportunity to receive financial incentives in payment for load reductions on event days. Credits are paid based on the difference between the customers' actual metered load during an event to a reference load, or baseline, which is calculated from each customer's usage data prior to the event. Customers are notified of events by 12:00 noon on the previous day.

PG&E called one DBP event in 2010, a four-hour test event on August 25th that lasted from 2 p.m. to 6 p.m. SCE called nine DBP events in 2010, all lasting eight hours, from noon to 8 p.m.

Enrollment

Enrollment in PG&E's DBP declined slightly from 1,127 customer service accounts in 2009 to 1,052 in 2010. Total DBP load, represented by the sum of enrolled customers' individual maximum demands¹, amounted to 1,168 MW. The manufacturing; and offices, hotels, health care and services industry groups made up the majority of PG&E's DBP enrollment. Figure ES.1 illustrates the distribution of DBP load across the indicated industry types.

¹ Customer-level demand is calculated as the average of the monthly maximum demands during the program months.

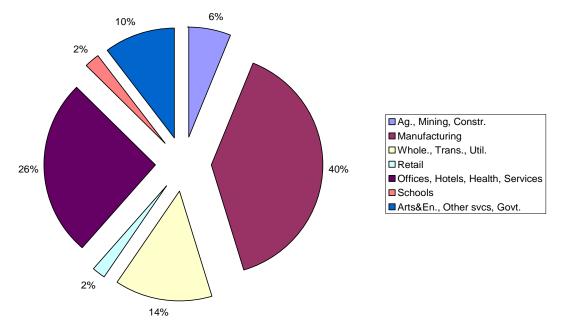


Figure ES.1 Distribution of DBP Enrollment by Industry Type – PG&E

SCE's enrollment in DBP has expanded from 1,369 customer service accounts in 2009 to 1,421 in 2010. These accounted for 1,461 MW of maximum demand. Manufacturers continued to make up more than half of the enrolled load, as shown in Figure ES.2.

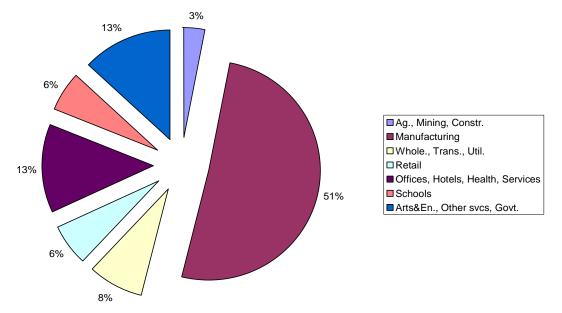


Figure ES.2 Distribution of DBP Enrollment by Industry Type – SCE

Bidding Behavior

As in previous years, only a relatively small percentage of the customer accounts enrolled in DBP actually submitted bids for most events. Fewer than 200 PG&E customers, representing approximately 30 percent of the enrolled load, submitted a bid for the test event. At SCE, 470 customer accounts, representing 46 percent of the enrolled load, submitted at least one bid during 2010.

ES.2 Evaluation Methodology

We estimated ex post load impacts using regression analysis of customer-level hourly load data. Individual-customer regression equations modeled hourly load as a function of several variables designed to control for factors affecting consumers' hourly demand levels, including:

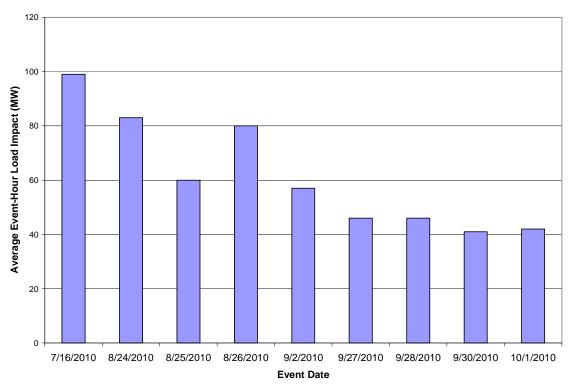
- Seasonal and hourly time patterns (*e.g.*, year, month, day-of-week, and hour, plus various hour/day-type interactions);
- Weather (*e.g.*, cooling degree hours, including hour-specific weather coefficients);
- Event indicator (dummy) variables. A series of variables was included to account for each hour of each event day, allowing us to estimate the load impacts for each hour of each event day.

DBP load impacts for each event were obtained by summing the estimated hourly event coefficients for all customers who submitted a bid for that event. The individual customer models allow the development of information on the distribution of load impacts across industry types and geographical regions, by aggregating customer load impacts for the relevant industry group or local capacity area.

ES.3 Ex Post Load Impacts

The total program load impact for PG&E's test event averaged 68.2 MW, or 7.5 percent of enrolled load. Of this, 60 MW came from customers enrolled in both DBP and BIP. These dually enrolled customers averaged a 31 percent load reduction during event hours. In contrast, customers enrolled only in DBP reduced load by an average of 8 MW, or 1 percent of their load.

For SCE, average hourly program load impacts averaged approximately 61.5 MW across nine events. Figure ES.3 shows the average hourly load impacts for each event, and for the average event day. The load impacts showed some variation across event days, with a low of 41 MW and a high of 99 MW. On average, the load impacts were about 5.9 percent of the total reference load.





On a summary level, the average per-customer event-hour load impact was 65 kW for PG&E's program and 46 kW for SCE's program.

ES.4 TA/TI and AutoDR Effects

We separately summarized average event-hour load impacts for customers participating in the Technical Assistance and Technology Incentives (TA/TI) program or the Automated Demand Response (AutoDR) program. In addition, we attempted to estimate the *incremental* load impacts provided by customers participating in TA/TI and AutoDR. The incremental load impact is the observed load impact on TA/TI or AutoDR less the load impact that one would expect from the customer in the absence of the program. Because of data limitations, it can be quite difficult to accurately estimate incremental load impacts, as is reflected in the number of wrong-signed results that we estimated (indicating that TA/TI or AutoDR *reduced* demand responsiveness). Table ES.1 summarizes the total and incremental load impacts by utility and program. The large wrong-signed incremental load impact for SCE's TA/TI program is due to one industry group, in which the non-TA/TI service accounts consistently provide high percentage load impacts. The largest TA/TI service account is capable of providing a similarly high percentage load impact, but does so in only two events. The lack of response during the remaining events (in which the service account also submitted a bid) reduces the average percentage load impact significantly, creating the negative incremental load impact.

Utility	Program	Total Load Impact (kW)	% Total Load Impact	Incremental Load Impact (kW)
PG&E	TA/TI	383	8.3%	229
IGAL	AutoDR	1,658	3.1%	-336
SCE	TA/TI	6,345	13.9%	-12,832*
SCE	AutoDR	14,478	48.8%	2,472

Table ES.1: 2010 Total and Incremental Load In	npacts from TA/TI and AutoDR
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* This incremental impact is reduced to -690 kW when one very large industrial group is excluded from the comparison.

ES.5 Ex Ante Load Impacts

Scenarios of ex ante load impacts are developed by combining enrollment forecasts with per-customer reference loads and load impacts, which were developed using the data and results of the ex post load impact evaluation.

Because PG&E is proposing to close its DBP program at the end of 2012, enrollments are only forecast through that year. The Brattle Group forecasts enrollments to be 1,066 customers in 2011 and 1,162 in 2012.

SCE anticipates enrollment in DBP of 1,456 customers in 2011 and 1,529 customers in 2012. SCE forecasts DBP enrollments to increase substantially to 4,069 customers in 2013 and then decline to 3,200 customers in 2014, where enrollment remains for the duration of the forecast period.

Figures ES.4 and ES.5 show the ex ante load impacts for SCE and PG&E, respectively. Both figures illustrate the large difference between program-level load impacts (which include all customers enrolled in DBP) and portfolio-level load impacts (which exclude customers dually enrolled in the Base Interruptible Program, or BIP). This is because customers dually enrolled in BIP tend to be larger and more demand responsive than other DBP customers. SCE load impacts increase substantially in 2013 to match the increase in enrollments.

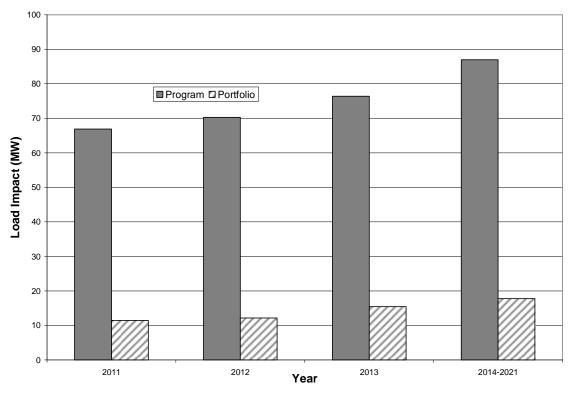
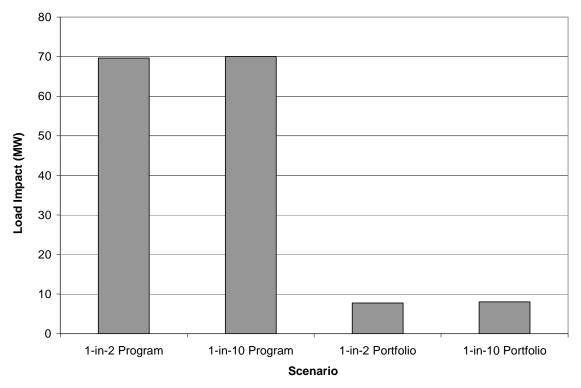


Figure ES.4: Average 1-in-2 Weather Year Load Impacts by Year and Scenario, SCE





ES.6 Summary

In 2010, PG&E called one four-hour DBP test event and SCE called 9 events. PG&E's test event resulted in a 68 MW load reduction, of which 60 MW came from customers dually enrolled in DBP and the Base Interruptible Program (BIP). The remaining DBP customers provided 8 MW of load reduction, or just 1 percent of their reference load.

Ex post load impacts for SCE's nine events averaged 61.5 MW, or 5.9 percent of the reference load.

In the ex ante evaluation, SCE forecasts that DBP customer enrollment to increase substantially in 2013, decline slightly in 2014 and remain at that level through 2021. During this period, SCE's average event-hour load impact is approximately 87 MW. Because PG&E has proposed to end its DBP program at the end of 2012, we have only forecast ex ante load impacts through that year. The forecast load impact for August 2011 is approximately 70 MW. For both utilities, the portfolio-level load impacts are substantially less than the program-level load impacts because of the high level of load response provided by customers dually enrolled in the Base Interruptible Program (BIP). For SCE, the portfolio-level load impact is 17.8 MW from 2014-2021. For PG&E, the 2011 portfolio-level load impact is 7.7 MW.

1. Introduction and Purpose of the Study

This report documents ex post and ex ante load impact evaluations for the statewide Demand Bidding Program ("DBP") in place at Pacific Gas and Electric Company ("PG&E") and Southern California Edison ("SCE") in 2010. (San Diego Gas and Electric Company discontinued its program in 2009.) The report first provides estimates of ex post load impacts that occurred during events called in 2010. The report then documents an ex ante forecast of load impacts for 2011 through 2021 (2011 only for PG&E) that is based on utility enrollment forecasts and the ex post load impacts estimated for 2010.

The primary research questions addressed by this evaluation are:

- 1. What were the DBP load impacts in 2010?
- 2. How were the load impacts distributed across industry groups?
- 3. How were the load impacts distributed across CAISO local capacity areas?
- 4. What were the effects of TA/TI and AutoDR on customer-level load impacts?
- 5. What are the ex ante load impacts for 2011 through 2021?

The report is organized as follows. Section 2 contains a description of the DBP programs, the enrolled customers, and the events called; Section 3 describes the methods used in the study; Section 4 contains the detailed ex post load impact results, including estimates of the incremental effect of TA/TI and AutoDR on load impacts; Section 5 describes the ex ante load impact forecast; Section 6 contains an assessment of the validity of the study; and Section 7 provides recommendations.

2. Description of Resources Covered in the Study

This section provides details on the Demand Bidding Programs, including the credits paid, the characteristics of the participants enrolled in the programs, and the events called in 2010.

2.1 Program Descriptions

DBP is a voluntary bidding program that offers qualified participants the opportunity to receive bill credits for reducing usage when a DBP event is triggered on a day-ahead basis. First approved in CPUC D.01-07-025, modifications have been made to the program, including changes made for the 2006-2008 program cycle at the direction of the CPUC in D.05-01-056. In that decision, the Joint Utilities were directed to continue their DBP programs. The utility's DPB programs are designed for non-residential customers, both bundled service and direct access customers. Customers must have internet access and communicating interval metering systems approved by each of the Joint Utilities. A DBP event may occur any weekday (excluding holidays) between the hours of noon and 8:00 pm and are triggered on a day-ahead basis. These events may occur at any time throughout the year. Restrictions exist for customers enrolled in multiple DR programs to avoid multiple payments for reduction during the same event period.

PG&E's DBP Program

At PG&E, DBP is available to time-of-use customers with billed maximum demands of 200 kW or higher (less for aggregated customer service accounts) who commit to reduce load by a minimum of 50 kW in each hour for two consecutive hours during a DBP event. Eligible customers must have an interval meter which is paid for by PG&E, except for direct access customers. For aggregated customer service accounts, there must be at least one service agreement with a maximum demand of 200kW or greater for at least one or more of the past 12 billing months within each aggregated group that will be designated as the primary service agreement for the aggregated group.

The DBP program operates year-round and can be called from 12:00 p.m. to 8:00 p.m. on weekdays, excluding holidays. There is no limit to the number of days on which DBP events may be called. Notification of an event day is provided on a day-ahead basis.² Day-ahead events are triggered with a California ISO Alert Notice for the following day when the California ISO's day-ahead peak demand forecast is 43,000 MW or greater, or when PG&E, in its own opinion, forecasts that resources may not be adequate. Day-of events are triggered when the California ISO issues an energy warning. PG&E may also activate up to two DBP Day-Ahead test events per year in order to simulate an emergency event. When an event day is called, enrolled customers may choose to bid a load reduction for the event or not to participate for that event.

For events called a day ahead, the incentive payment is \$0.50 per kWh reduced below a baseline level. Customers must reduce load by a minimum of 50 percent of their bid amount to qualify for a credit, and they are paid for load reductions up to 150 percent of their bid amount. The hourly baseline for load reductions is calculated as the average usage from the previous ten qualifying days (non-holiday, non-event weekdays), with the customer having the option to include a day-of adjustment based on their usage in pre-event hours. There is no penalty for failing to comply with the terms of the submitted bid. Each bid must be a minimum of two consecutive hours during the event. Bids must meet the threshold of 50 kW for each hour and customers may submit only one bid for each event notification.

Although PG&E customers enrolled in DBP may participate in other DR programs (Dayof notice in AMP, CBP, BIP, and OBMC), they do not receive a day-ahead DBP incentive payment for those hours in which a day-of event from another DR program in which the customer is enrolled occur simultaneously.

SCE's DBP Program

SCE's DBP program design is similar to PG&E's, with two exceptions: enrolled customers are required to commit to a minimum load reduction of 30 kW (versus 50 kW at PG&E); and bidding customers are paid for load reductions up to twice their bid amount. DBP participants may also participate in CPP, BIP, Day-of CBP, or OBMC.

² On June 24, 2010, PG&E filed Advice Letter 3560-E-B with the CPUC requesting the elimination of the DBP day-of program option. The Commission approved the advice letter on July 27, 2010 with a May 1, 2010 effective date.

However, the customer will not receive DBP incentive payments during overlapping event hours.

SDG&E's DBP Program

SDG&E discontinued its DBP in 2009.

2.2 Participant Characteristics

2.2.1 Development of Customer Groups

In order to assess differences in load impacts across customer types, the program participants were categorized according to eight industry types. The industry groups are defined according to their applicable two-digit North American Industry Classification System (NAICS) codes:³

- 1. Agriculture, Mining and Oil and Gas, Construction: 11, 21, 23
- 2. Manufacturing: 31-33
- 3. Wholesale, Transport, other Utilities: 22, 42, 48-49
- 4. Retail stores: 44-45
- 5. Offices, Hotels, Finance, Services: 51-56, 62, 72
- 6. Schools: 61
- 7. Entertainment, Other services and Government: 71, 81, 92
- 8. Other or unknown.

In addition, each utility provided information regarding the CAISO Local Capacity Area (LCA) in which the customer resides (if any).⁴

2.2.2 Program Participants by Type

The following sets of tables summarize the characteristics of the participating customer accounts, including size, industry type, and LCA. Table 2.1 shows DBP enrollment by industry group for PG&E. Enrollment in PG&E's DBP declined slightly from 1,127 in 2009 to 1,052 in 2010. Enrollments in previous years were 866 accounts in 2006; 1,063 in 2007; and 1,165 in 2008. Total DBP load, represented by the sum of enrolled customers' individual maximum demands⁵, amounted to 1,168 MW, or 1.1 MW per service account. Average hourly usage for enrolled customers was 729 MW, or 693 kW

³ SCE provided Standard Industrial Classification (SIC) codes in place of NAICS codes. The industry groups were therefore defined according the following SIC codes: 1 = under 2000; 2 = 2000 to 3999; 3 = 4000 to 5199; 4 = 5200 to 5999; 5 = 6000 to 8199; 6 = 8200 to 8299; 7 = 8300 and higher.

⁴ Local Capacity Area (or LCA) refers to a CAISO-designated load pocket or transmission constrained geographic area for which a utility is required to meet a Local Resource Adequacy capacity requirement. There are currently seven LCAs within PG&E's service area, 3 in SCE's service territory, and 1 representing SDG&E's entire service territory. In addition, PG&E has many accounts that are not located within any specific LCA.

⁵ Customer-level demand is calculated as the average of the monthly maximum demands during the program months.

per service account.⁶ The manufacturing; and offices, hotels, health care and services industry groups made up the majority of PG&E's DBP enrollment.

Industry Type	Count	Sum of Max kW	Sum of Mean kWh	% of Max kW	Ave. Size (kW)
1.Ag., Mining, Constr.	113	71,506	33,244	6.1%	633
2.Manufacturing	251	456,667	307,675	39.1%	1,819
3.Whole., Trans., Util.	165	167,312	81,813	14.3%	1,014
4.Retail	84	20,009	11,379	1.7%	238
5.Offices, Hotels, Health,					
Services	281	304,519	206,300	26.1%	1,084
6.Schools	42	27,455	12,628	2.3%	654
7.Ent, Other svcs, Govt.	115	120,569	75,809	10.3%	1,048
8.Other	1	283	121	0.0%	283
TOTAL	1,052	1,168,319	728,970		1,111

 Table 2.1: DBP Enrollees by Industry group – PG&E

Table 2.2 shows comparable information on DBP enrollment for SCE. SCE's enrollment in DBP has expanded slightly from 1,369 service accounts in 2009 to 1,421 in 2010. This is a continuation of a trend from recent years, which has seen enrollments increase from 1,079 customer service accounts in 2006 to 1,222 in 2007 and 1,244 in 2008. These accounted for a total of 1,461 MW of maximum demand, or 1 MW per service account. Manufacturers continued to make up more than half of the enrolled load.

Industry Type	Count	Sum of Max kW	Sum of Mean kWh	% of Max kW	Ave. Size (kW)
1.Ag., Mining, Constr.	36	43,507	23,957	3%	1,209
2.Manufacturing	348	744,044	486,614	51%	2,138
3.Whole., Trans., Util.	186	113,706	67,655	8%	611
4.Retail	184	81,405	49,757	6%	442
5.Offices, Hotels, Health,					
Services	255	189,298	110,423	13%	742
6.Schools	294	92,759	25,027	6%	316
7.Ent, Other svcs, Govt.	118	196,415	122,281	13%	1,665
TOTAL	1,421	1,461,133	885,714		1,028

Table 2.2: DBP Enrollees by Industry group – SCE

Tables 2.3 and 2.4 show DBP enrollment by local capacity area for PG&E and SCE respectively.

⁶ Average hourly usage is calculated as the sum of usage during the program months divided by the number of hours during the program months.

Local Capacity Area	Count	Sum of Max kW	Sum of Mean kWh	% of Max kW	Ave. Size (kW)
Greater Bay Area	486	497,333	337,871	42.6%	1,023
Greater Fresno	57	53,111	31,856	4.5%	932
Humboldt	12	3,783	2,240	0.3%	315
Kern	57	41,764	21,869	3.6%	733
Northern Coast	74	47,264	25,091	4.0%	639
Not in any LCA	292	496,503	296,783	42.5%	1,700
Sierra	49	18,816	8,496	1.6%	384
Stockton	25	9,744	4,764	0.8%	390
TOTAL	1,052	1,168,319	728,970		1,111

 Table 2.4: DBP Enrollees by Local Capacity Area – SCE

Local Capacity Area	Count	Sum of Max kW	Sum of Mean kWh	% of Max kW	Ave. Size (kW)
LA Basin	1,122	1,014,097	595,359	69%	913
Outside LA Basin	68	188,743	124,104	13%	2,839
Ventura	231	258,293	166,251	18%	1,116
TOTAL	1,421	1,461,133	885,714		1,038

Tables 2.5 and 2.6 summarize the characteristics of customer accounts that submitted a bid for at least one 2010 event for PG&E and SCE respectively. For both utilities, the manufacturing industry group had the highest share of enrolled load that submitted a bid.

Table 2.5: DBP Bidding Behavior – PG&E
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Industry Type	# Bidders	Sum of Max kW	% of Enrolled Max kW	Avg. Hourly Bid kW
1.Ag., Mining, Constr.	10	11,291	15.8%	2,750
2.Manufacturing	42	150,641	33.0%	52,128
3.Whole., Trans., Util.	26	57,736	34.5%	6,772
4.Retail	27	7,547	37.7%	2,350
5.Offices, Hotels, Health,				4,050
Services	35	55,796	18.3%	
6.Schools	0	0	0.0%	0
7. Ent, Other svcs, Govt.	57	64,940	53.9%	2,133
TOTAL	197	347,952	29.8%	70,183

Industry Type	# Bidders	Sum of Max kW	% of Enrolled Max kW	Avg. Hourly Bid kW
1.Ag., Mining, Constr.	21	22,377	51%	6,797
2.Manufacturing	174	350,439	47%	99,083
3.Whole., Trans., Util.	78	63,681	56%	12,389
4.Retail	34	37,721	46%	5,574
5.Offices, Hotels, Health,				
Services	97	83,538	44%	9,313
6.Schools	37	16,543	18%	2,808
7. Ent, Other svcs, Govt.	29	95,919	49%	4,814
TOTAL	470	670,218	46%	140,778

Table 2.6: DBP Bidding Behavior – SCE

2.3 Event Days

Table 2.7 lists DBP event days for the two utilities in 2010. PG&E called only one event, a four-hour test event on August 25^{th} that covered hours-ending 15 - 18. SCE called 9 events, all of which were eight-hour events from hours-ending 13 to 18.

Date	Day of Week	SCE	PG&E
7/16/2010	Friday	1	
8/24/2010	Tuesday	2	
8/25/2010	Wednesday	3	1 (Test)
8/26/2010	Thursday	4	
9/2/2010	Thursday	5	
9/27/2010	Monday	6	
9/28/2010	Tuesday	7	
9/30/2010	Thursday	8	
10/1/2010	Friday	9	

Table 2.7: DBP Events - 2010

3. Study Methodology

3.1 Overview

We estimated ex post hourly load impacts using regression equations applied to customer-level hourly load data. The regression equation models hourly load as a function of a set of variables designed to control for factors affecting consumers' hourly demand levels, such as:

- Seasonal and hourly time patterns (*e.g.*, year, month, day-of-week, and hour, plus various hour/day-type interactions);
- Weather (*e.g.*, cooling degree hours, including hour-specific weather coefficients);
- Event variables. A series of dummy variables was included to account for each hour of each event day, allowing us to estimate the load impacts for all hours across the event days.

The models use the level of hourly demand (kW) as the dependent variable and a separate equation is estimated for each enrolled customer. As a result, the coefficients on the event day/hour variables are direct estimates of the ex post load impacts. For example, a DBP hour 14 event coefficient of -100 would mean that the customer reduced load by 100 kWh during hour 14 of that event day relative to its normal usage in that hour. Weekends and holidays were excluded from the estimation database.⁷

3.2 Description of methods

3.2.1 Regression Model

The model shown below was separately estimated for each enrolled customer.

$$\begin{split} Q_{t} &= a + \sum_{Evt=1}^{E} \sum_{i=1}^{24} (b_{i,Evt}^{DBP} \times h_{i,t} \times DBP_{t}) + b^{MornLoad} \times MornLoad_{t} + \sum_{i=1}^{24} (b_{i}^{OTH} \times h_{i,t} \times OtherEvt_{i,t}) \\ &+ \sum_{i=1}^{24} (b_{i}^{CDH} \times h_{i,t} \times CDH_{t}) + \sum_{i=2}^{24} (b_{i}^{MON} \times h_{i,t} \times MON_{t}) + \sum_{i=2}^{24} (b_{i}^{FRI} \times h_{i,t} \times FRI_{t}) + \sum_{i=2}^{24} (b_{i}^{h} \times h_{i,t}) \\ &+ \sum_{i=2}^{5} (b_{i}^{DTYPE} \times DTYPE_{i,t}) + \sum_{i=6}^{10} (b_{i}^{MONTH} \times MONTH_{i,t}) + b_{t}^{Summer} \times Summer_{t} \\ &+ \sum_{i=1}^{24} (b_{i}^{CDH,S} \times h_{i,t} \times Summer_{t} \times CDH_{t}) + \sum_{i=2}^{24} (b_{i}^{MON,S} \times h_{i,t} \times Summer_{t} \times MON_{t}) \\ &+ \sum_{i=2}^{24} (b_{i}^{FRI,S} \times h_{i,t} \times Summer_{t} \times FRI_{t}) + \sum_{i=2}^{24} (b_{i}^{h,S} \times h_{i,t} \times Summer_{t} \times FRI_{t}) + e_{t} \end{split}$$

In this equation, Q_t represents the demand in hour *t* for a customer enrolled in DBP prior to the last event date; the *b*'s are estimated parameters; $h_{i,t}$ is a dummy variable for hour *i*; *DBP_t* is an indicator variable for program event days; *CDH_t* is cooling degree hours;⁸ *E* is the number of event days that occurred during the program year; *MornLoad_t* is a variable equal to the average of the day's load in hours 1 through 10; *OtherEvt_t* is equal to one in the event hours of other demand response programs in which the customer is enrolled; *MON_t* is a dummy variable for Monday; *FRI_t* is a dummy variable for Friday; *DTYPE_{i,t}* is a series of dummy variables for each day of the week; *MONTH_{i,t}* is a series of dummy variables for each month; *Summer_t* is a variable indicating summer months (defined as mid-June through mid-August)⁹, which is interacted with the weather and

⁷ Including weekends and holidays would require the addition of variables to capture the fact that load levels and patterns on weekends and holidays can differ greatly from those of non-holiday weekdays. Because event days do not occur on weekends or holidays, the exclusion of these data does not affect the model's ability to estimate ex post load impacts.

 $^{^{8}}$ Cooling degree hours (CDH) was defined as MAX[0, Temperature – 50], where Temperature is the hourly temperature in degrees Fahrenheit. Customer-specific CDH values are calculated using data from the most appropriate weather station.

⁹ This variable was initially designed to reflect the load changes that occur when schools are out of session. We have found the variables to a useful part of the base specification, as they do not appear to harm load impact estimates even in cases in which the customer does not change its usage level or profile during the summer months.

hourly profile variables; and e_t is the error term. The "morning load" variable was used in lieu of a more formal autoregressive structure in order to adjust the model to account for the level of load on a particular day. Because of the autoregressive nature of the morning load variable, no further correction for serial correlation was performed in these models.

Separate models were estimated for each customer. The load impacts were aggregated across customer accounts as appropriate to arrive at program-level load impacts, as well as load impacts by industry group and local capacity area (LCA). We add load impacts across only customers who submitted bids for a given event.

3.2.2 Development of Uncertainty-Adjusted Load Impacts

The Load Impact Protocols require the estimation of uncertainty-adjusted load impacts. In the case of ex post load impacts, the parameters that constitute the load impact estimates are not estimated with certainty. We base the uncertainty-adjusted load impacts on the variances associated with the estimated load impact coefficients.

Specifically, we added the variances of the estimated load impacts across the customers who submit a bid for the event in question. These aggregations were performed at either the program level, by industry group, or by LCA, as appropriate. The uncertainty-adjusted scenarios were then simulated under the assumption that each hour's load impact is normally distributed with the mean equal to the sum of the estimated load impacts and the standard deviation equal to the square root of the sum of the variances of the errors around the estimates of the load impacts. Results for the 10th, 30th, 70th, and 90th percentile scenarios are generated from these distributions.

4. Detailed Study Findings

The primary objective of the ex post evaluation is to estimate the aggregate and percustomer DBP event-day load impacts for each utility. In this section we first summarize the estimated DBP load impacts for both utilities' using a metric of estimated *average hourly load impacts* by event and for the average event. We also report average hourly load impacts for the average event by industry type and local capacity area. We then present tables of *hourly* load impacts for an *average event* (also referred to as a "typical event day") in the format required by the Load Impact Protocols adopted by the California Public Utilities Commission (CPUC) in Decision (D.) 08-04-050 ("the Protocols"), including risk-adjusted load impacts at different probability levels, and figures that illustrate the reference loads, observed loads and estimated load impacts. The section concludes with an assessment of the effects of TA/TI and AutoDR.

On a summary level, the average event-hour load impact per enrolled customer was 65 kW for PG&E's program and 44 kW for SCE's program.

4.1 PG&E Load Impacts

4.1.1 Average Hourly Load Impacts by Industry Group and LCA

Table 4.1 summarizes average hourly DBP load impacts at the program level and by industry group for PG&E's test event, which occurred on August 25, 2010. While DBP load impacts were estimated from the individual customer regressions of only those enrolled customers who submitted a bid for the test event, the reference loads and observed loads shown in the table reflect all customers enrolled in DBP. Across the four event hours, the average hourly load impact was 68 MW, or 7.5 percent of enrolled load. The Manufacturing industry group accounted for the largest share of the load impacts.

Table 4.2 summarizes load impacts by local capacity area (LCA), showing that the highest share of the load impacts came from outside of the seven LCAs.

Industry Group	Count	Estimated Reference Load (MW)	Observed Load (MW)	Estimated Load Impact (MW)	% LI
Agriculture, Mining, & Construction	113	39.8	37.2	2.6	6.6%
Manufacturing	251	351.4	301.5	49.9	14.2%
Wholesale, Transportation, & Other Utilities	165	83.9	77.5	6.4	7.6%
Retail Stores	84	15.9	14.9	1.0	6.6%
Offices, Hotels, Health, Services	280	288.1	283.5	4.6	1.6%
Schools	42	23.3	23.3	0.0	0.0%
Entertainment, Other Services, Government	115	101.7	98.1	3.6	3.6%
Other or Unknown	1	0.2	0.2	0.0	0.0%
Total	1,051	904.3	836.1	68.2	7.5%

 Table 4.1: 2010 Average Hourly Load Impacts – PG&E DBP, by Industry Group

Local Capacity Area	Count	Estimated Reference Load (MW)	Observed Load (MW)	Estimated Load Impact (MW)	% LI
Greater Bay Area	486	450.5	444.2	6.3	1.4%
Greater Fresno	57	43.4	43.1	0.3	0.7%
Humboldt	12	2.2	1.9	0.2	10.5%
Kern	57	23.5	20.1	3.4	14.5%
Northern Coast	74	35.5	34.6	0.9	2.5%
Sierra	49	10.7	10.6	0.1	1.3%
Stockton	25	6.2	6.1	0.1	1.2%
Not in any LCA	291	332.3	275.4	56.9	17.1%
Total	1,051	904.3	836.1	68.2	7.5%

Table 4.2: 2010 Average Hourly Load Impacts – PG&E DBP, by LCA

4.1.2 Hourly Load Impacts

Table 4.3 presents hourly PG&E DBP load impacts at the program level in the manner required by the Protocols. DBP load impacts were estimated from the individual customer regressions of only those enrolled customers who submitted a bid for the test event. However, the reference loads and observed loads in the table reflect all customers enrolled in DBP. Hourly load impacts average 68 MW, which represents approximately 7.5 percent of the total DBP reference load for enrolled customers.

PG&E has two very different types of customers in DBP: those who are dually enrolled in Base Interruptible Program (BIP) and those who are not. The customers who are enrolled in both DBP and BIP tend to be larger and much more demand responsive than the customers who are only enrolled in DBP. For example, 60 MW of the total 68 MW load impact comes from the DBP/BIP-overlap customers, which is a 31 percent load reduction for these dually enrolled customers. In contrast, the DBP-only customers account for only 8 MW of the total load impact and average a 1 percent load reduction during event hours.

Hour	Estimated Reference Load	Observed Event Day Load	Estimated Load Impact	Weighted Average	Unce	rtainty Adjust	ed Impact (MW	h/hr)- Percent	iles
Ending	(MWh/hour)	(MWh/hour)	(MWh/hour)	Temperature (°F)	10th%ile	30th%ile	50th%ile	70th%ile	90th%ile
1	750	746	3.9	77	-4	1	4	7	12
2	733	731	1.6	75	-7	-2	2	5	10
3	722	723	-0.6	74	-9	-4	-1	3	8
4	720	724	-3.5	73	-12	-7	-3	0	5
5	739	740	-1.5	72	-10	-5	-1	2	7
6	777	781	-3.6	70	-12	-7	-4	0	5
7	826	827	-1.2	70	-9	-5	-1	2	7
8	860	864	-3.9	72	-12	-7	-4	0	4
9	897	901	-4.3	76	-13	-8	-4	-1	4
10	924	930	-5.6	80	-14	-9	-6	-2	3
11	945	951	-5.9	84	-14	-9	-6	-3	2
12	945	951	-5.1	88	-13	-8	-5	-2	3
13	947	940	6.5	91	-2	3	7	10	15
14	953	923	29.2	93	21	26	29	33	37
15	940	871	68.7	92	62	66	69	72	76
16	918	851	67.1	92	60	64	67	70	74
17	898	828	69.6	91	63	67	70	73	77
18	862	794	67.4	89	60	64	67	70	74
19	836	817	18.9	87	11	16	19	22	27
20	820	814	5.9	82	-2	3	6	9	14
21	809	809	0.0	78	-8	-3	0	3	8
22	795	793	2.3	75	-6	-1	2	6	10
23	777	771	5.2	72	-3	2	5	8	13
24	761	754	7.0	71	-1	4	7	10	15
	Reference Energy Use (MWh)	Estimated Event Day Energy Use (MWh)	Change in Energy Use (MWh)	Cooling Degree Hours (Base 75 oF)	Uncertainty Adjusted Impact (MWh/hour) - Percentiles 10th 30th 50th 70th 90th				n tiles 90th
Daily	20,152	19,834	318	148.9	n/a	n/a	n/a	n/a	n/a

Table 4.3: DBP Hourly Load Impacts for August 25, 2010 Event Day – PG&E

The top portion of Figure 4.1 illustrates the reference load (net of the BIP load reduction) and observed load for the DBP test event. The lower portion of the figure displays the estimated DBP load impacts (which are labeled on the right y-axis).

The full set of tables required by the Protocols, including tables for each local capacity area, are in the Excel file attached as an Appendix to this report.

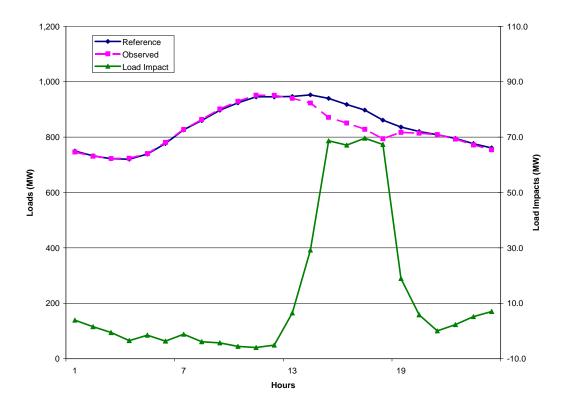


Figure 4.1: 2010 DBP Load Impacts – PG&E

4.1.3 Comparison of PGE's Load Impacts to the 2009 Program Year

PGE's 2010 average hourly load reduction of 68.2 MW is 26 percent larger than the 54.1 MW reduction reported for 2009. The difference is due to a two-hour overlap of BIP and DBP events in 2009. For customers dually enrolled in BIP, measured load reductions were allocated to the BIP during the overlapping event hours. In 2009, customer responses appear to have extended through the two remaining DBP event hours after the end of the BIP event, with load reductions exceeding 100 MW in each hour (10 percent of program load).

In 2010, there was no overlap between DBP and BIP events. This helps address a question we had in the 2009 program year evaluation: how would the DBP/BIP customers respond to a stand-alone DBP event? The 2010 load impact is quite large (68.2 MW) compared to the load impact from the overlapping hours in 2009 (~5 MW), but lower than the load impact in the non-overlapping hours in 2009 (~100 MW). Thus it appears that customers dually enrolled in BIP provide more demand response to BIP events than DBP events.

4.2 SCE Load Impacts

4.2.1 Average Hourly Load Impacts by Industry Group and LCA

Table 4.4 summarizes average hourly reference loads and load impacts at the program level for each of SCE's nine DBP events.¹⁰ Across all events, the average hourly load impact was approximately 62 MW. The load impacts showed some variation across event days, with a low of 41 MW, a high of 99 MW, and a standard deviation of 21 MW. On average, the load impacts were 5.9 percent of the total reference load.

Table 4.5 compares the bid quantities to the estimated load impacts for each event. Across all events, the bid amount averaged approximately 110 MW, while the estimated average hourly load impact was 62 MW. The average bid realization rate (estimated load impacts as a percentage of bid amounts) across all event hours was 56 percent.

Event	Date	Day of Week	Estimated Reference Load (MW)	Observed Load (MW)	Estimated Load Impact (MW)	% LI
1	7/16/2010	Friday	1,028	928	99	9.6%
2	8/24/2010	Tuesday	1,054	973	83	7.9%
3	8/25/2010	Wednesday	1,062	1,007	60	5.7%
4	8/26/2010	Thursday	1,046	973	80	7.6%
5	9/2/2010	Thursday	1,005	948	57	5.6%
6	9/27/2010	Monday	1,056	1,006	46	4.4%
7	9/28/2010	Tuesday	1,049	1,004	46	4.4%
8	9/30/2010	Thursday	1,028	990	41	4.0%
9	10/1/2010	Friday	982	940	42	4.3%
		Average	1,034	974	62	5.9%
		Std. Dev.	27	30	21	2.0%

Table 4.4: 2010 Average Hourly Load Impacts by Event, SCE

¹⁰ As for PG&E, the reference loads and observed loads represent all enrolled DBP customer accounts, while the estimated load reductions were estimated only for the accounts that submitted bids for a given event.

Event	Date	Day of Week	Average Bid Quantity (MW)	Estimated Load Impact (MW)	LI as % of Bid Amount
1	7/16/2010	Friday	122	99	81%
2	8/24/2010	Tuesday	112	83	74%
3	8/25/2010	Wednesday	103	60	58%
4	8/26/2010	Thursday	106	80	76%
5	9/2/2010	Thursday	113	57	51%
6	9/27/2010	Monday	105	46	44%
7	9/28/2010	Tuesday	103	46	45%
8	9/30/2010	Thursday	110	41	37%
9	10/1/2010	Friday	119	42	35%
		Average	110	62	56%

Tables 4.6 and 4.7 summarize average hourly load impacts for the average event by industry group and LCA. Manufacturing service accounts accounted for the largest shares of the load impacts. By region, the highest share of the average load impact came from the LA Basin.

Industry Group	Count	Estimated Reference Load (MW)	Observed Load (MW)	Estimated Load Impact (MW)	% LI	
Agriculture, Mining, & Construction	35	26.0	25.1	0.9	3.3%	
Manufacturing	341	522.9	475.0	49.3	9.4%	
Wholesale, Transportation, & Other Utilities	185	72.4	66.8	5.6	7.7%	
Retail Stores	169	55.9	54.2	1.8	3.2%	
Offices, Hotels, Health, Services	254	146.1	144.0	2.1	1.5%	
Schools	289	51.4	51.8	-0.4	-0.7%	
Entertainment, Other Services, Government	110	159.6	157.4	2.2	1.4%	
Total	1,383	1,034.3	974.2	61.5	5.9%	

 Table 4.6: 2010 Average Hourly Load Impacts – SCE DBP, by Industry Group

Table 4.7: 2010 Average Hourly Load Impacts – SCE DBP, by LCA

Local Capacity Area	Count	Estimated Reference Load (MW)	Observed Load (MW)	Estimated Load Impact (MW)	% LI
LA Basin	1,086	703.9	659.6	45.7	6.5%
Outside LA Basin	67	125.6	115.9	9.7	7.7%
Ventura	230	204.8	198.7	6.1	3.0%
Total	1,383	1,034.3	974.2	61.5	5.9%

4.2.2 Hourly Load Impacts

Table 4.8 presents hourly load impacts at the program level for the average DBP event in the manner required by the Protocols. The reference loads and observed loads in the table reflect all customers enrolled in DBP. Load impacts reflect only customers that submitted bids. Hourly load impacts for the average event range from 54.4 MW to 66.0 MW. These load impacts represent 5.9 percent of the total enrolled DBP reference load.

Hour	Estimated Reference Load	Observed Event Day Load	Estimated Load Impact	Weighted Average	Unce	rtainty Adjust	ed Impact (MW	h/hr)- Percent	
Ending	(MWh/hour)	(MWh/hour)	(MWh/hour)	Temperature (°F)	10th%ile	30th%ile	50th%ile	70th%ile	90th%ile
1	842	834	11.3	75	3	8	11	15	20
2	829	823	8.6	74	0	5	9	12	17
3	817	814	6.2	73	-3	3	6	10	15
4	817	814	4.9	72	-4	1	5	9	14
5	840	840	3.3	71	-5	0	3	7	12
6	882	883	1.3	70	-7	-2	1	5	10
7	929	932	-1.3	70	-10	-5	-1	2	8
8	980	984	-1.5	69	-10	-5	-2	2	7
9	1,021	1,028	-4.0	71	-13	-8	-4	0	5
10	1,050	1,051	0.1	75	-9	-4	0	4	9
11	1,080	1,077	5.0	79	-4	1	5	9	14
12	1,089	1,070	21.2	83	13	18	21	25	30
13	1,089	1,036	54.7	86	46	51	55	58	63
14	1,095	1,042	54.4	88	46	51	54	58	63
15	1,090	1,033	58.7	89	50	55	59	62	67
16	1,066	1,002	65.4	90	57	62	65	69	74
17	1,034	969	66.0	89	57	63	66	70	75
18	997	934	64.6	88	56	61	65	68	73
19	960	895	65.7	86	57	62	66	69	74
20	943	882	62.4	84	54	59	62	66	71
21	928	883	45.9	81	37	42	46	49	55
22	908	874	34.8	78	26	31	35	38	43
23	878	851	27.9	76	19	24	28	31	37
24	865	844	21.2	75	12	18	21	25	30
	Reference Energy	Estimated Event Day Energy Use	Change in Energy Use	Cooling Degree Hours (Base 75	Uncertainty Adjusted Impact (MWh/hour) - Percentiles				
	Use (MWh)	(MWh)	(MWh)	oF)	10th	30th	50th	70th	90th
Daily	23,030	22,395	677	122.1	n/a	n/a	n/a	n/a	n/a

 Table 4.8: 2010 DBP Hourly Load Impacts for Average Event Day, SCE

The top portion of Figure 4.2 illustrates the hourly reference load and observed load for the average DBP event. The bottom portion of Figure 4.2 displays the estimated hourly load impacts (scale is presented on the right y-axis) for the average DBP event. Figure 4.3 shows the variability of estimated load impacts across events.

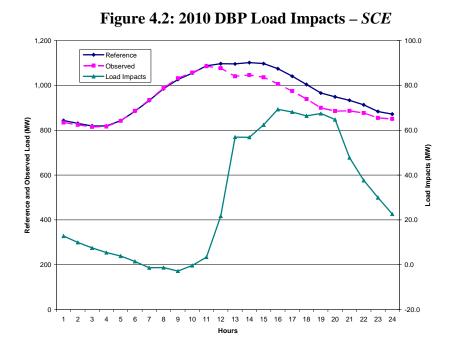
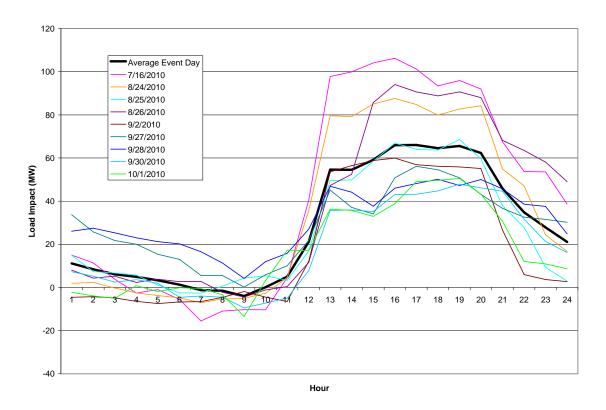


Figure 4.3: 2010 Hourly Load Impacts by Event – SCE DBP



4.2.3 Comparison of SCE's Load Impacts to the 2009 Program Year

SCE's 2010 average hourly load reduction of 61.5 MW is 51 percent larger than the average of 40.7 MW reported for 2009. For the nine events in 2010, percentage load

impacts ranged from 4.0 percent to 9.6 percent, with an average of 5.9 percent. For the fifteen events during 2009, percentage load impacts ranged from 2.5 percent to 5.9 percent, with an average of 4.1 percent.

One reason for the increase in load impacts is that 2009 estimates do not include the response of all "aggregated load" customers. Aggregated load refers to groups of SAIDs that coordinate demand response. Aggregated load SAIDs are represented in bidding records by a lead SAID that submits a total bid for the entire group. In 2010, aggregated load customers provided and average of 1.5 MW of load response, representing 2.5 percent of the total average demand response. Assuming that aggregated customers would have responded similarly in 2009, their omission from the 2009 analysis would account for roughly 6 percent of the increase in measured response in 2010.

In addition, the composition of bidding customers changed between years. Some customers who bid in 2009 did not bid in 2010 because they left the program or chose not to participate. Similarly, some customers that did not participate in 2009 did participate in 2010. Entry into and exit from DBP, in addition to changes in the customers submitting bids, account for roughly 30 percent of the increase in measured response.

The remaining 64 percent of the increase in average DBP response is due to nearly 400 customers who bid at least once in both years. There are several potential explanations for the increase in response from customers who participated in events in both years: responding on a higher share of the event days; responding more consistently across event hours; or responding at a higher level during event hours.

One means of validating the estimated load impacts is to compare aggregate DBP loads on event and non-event days. Figure 4.4 shows observed aggregated loads for each day between September 27 and September 30. September 29 represents the only non-event day of that week. Temperatures on September 30 were similar to those on September 29 (averaging 83.0 and 83.9 degrees Fahrenheit during event hours, respectively). Using September 29 as a baseline would result in an average load reduction of 35 MW, or 85 percent of the 41 MW load impact measured in our ex post regression model and twice as large as the SCE program-based estimate.

While similar "day-matching"-based differences for September 27 and 28 versus September 29 are not as large, both of those event days were hotter than September 29 (with temperatures of 100.3 and 86.6 degrees Fahrenheit, respectively). These temperature differences would likely increase the implied reference load above the usage on September 29, resulting in impacts close to those estimated by the regression model.

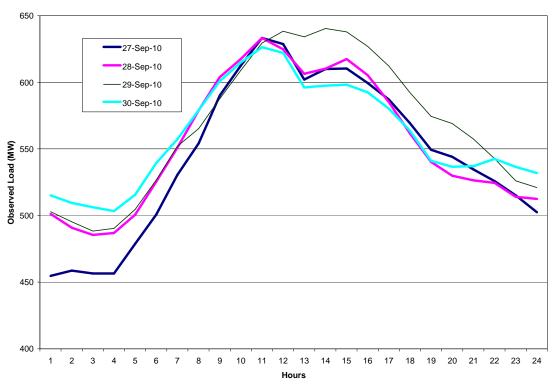


Figure 4.4: Observed Load and Temperature, Sep. 27 - Sep. 30 – SCE DBP

4.3 Effect of TA/TI and AutoDR on Load Impacts

This section describes the *ex post* load impacts achieved by DBP customer accounts that participated in two demand response incentive programs: TA/TI and AutoDR.

The Technical Assistance and Technology Incentives (TA/TI) program has two parts: technical assistance in the form of energy audits, and technology incentives. The objective of the TA portion of the program is to subsidize customer energy audits that have the objective of identifying ways in which customers can reduce load during demand response events. The TI portion of the program then provides incentive payments for the installation of equipment or control software supporting DR.

The Automated Demand Response (AutoDR) program helps customers to activate DR strategies, such as managing lighting or heating, ventilation and air conditioning (HVAC) systems, whereby electrical usage can be automatically reduced or eliminated during times of high electricity prices or electricity system emergencies.

For each utility and incentive program, we present two types of information. The first type (e.g., Table 4.9) contains the overall average hourly load impacts provided by the service accounts that participated in TA/TI or AutoDR. The second set of tables (e.g., Tables 4.10 through 4.12) describes our attempt to estimate *incremental* TA/TI or AutoDR load impacts, or the load impacts achieved by these customers less the amount of the load impact one would expect in the absence of TA/TI or AutoDR. To do this, we develop comparison groups according to industry classifications (SIC codes for SCE and

NAICS codes for PG&E). Where possible, we conduct comparisons within a 6-digit NAICS code or 4-digit SIC code. Where a comparison at this level of disaggregation was not possible, we compared at a higher level of industry aggregation, such as 2-digit SIC codes or 3-digit NAICS codes.

We note that the above comparisons do not constitute a formal evaluation of the incremental effect of AutoDR or TA/TI on customers' demand response load impacts. This is the case largely due to lack of complete information. For example, we rarely observe "before and after" load responses for the same service account, because the TA/TI and AutoDR audits and installations typically took place prior to any events in 2009. In addition, enabling technology may be used by some SA IDs that did not participate in AutoDR or TA/TI. Therefore, we cannot be certain that when we compare TA/TI and non-TA/TI accounts we are actually measuring a "with and without" technology difference. However, given the available data, we believe that the comparisons made in this section are informative and the most relevant ones to provide.

The sub-sections below present the results for each of the utilities.

PG&E

TA/TI

According to data provided by PG&E, 3 DBP service accounts participating in the TA/TI program submitted a bid for the August 25, 2010 event.

Table 4.9 shows the event-specific load impact for the TA/TI participants. TA/TI customers provided an average hourly load reduction of 383 kW, or 8.3 percent of their reference load.

Event Date	Number of SAIDs	Estimated Reference Load (kW)	Observed Load (kW)	Estimated Load Impact (kW)	% Load Impact
8/25/2010	3	4,638	4,255	383	8.3%

All three TA/TI participants were in one 6-digit NAICS industry code. As shown in Table 4.10, the TA/TI SA IDs in this industry group had reference loads that were approximately twice the size of the non-TA/TI SA IDs.

			Number of SAIDs		Average Reference Load (kW) / SAID	
NAICS Code	NAICS Description	Basis of Comparison	No TA/TI	TA/TI	No TA/TI	TA/TI
334419	Other Electronic Component Manufacturing	3-digit NAICS	3	3	789	1,546

Table 4.11 shows that the TA/TI service accounts were more demand responsive, with an 8 percent average load impact versus the 3 percent load impact estimated for the non-

TA/TI service accounts. Table 4.12 uses this information to summarize the total incremental load impact, which is 229 kW.

NAICS		Basis of	Average Load Impact (kW) / SAID		Average Percentage LI	
Code	NAICS Description	Comparison	No TA/TI	TA/TI	No TA/TI	TA/TI
334419	Other Electronic Component Manufacturing	3-digit NAICS	26	128	3%	8%

 Table 4.11: Average Load Impacts in Levels and Percentages, PG&E TA/TI

		Average % LI				
NAICS Code	NAICS Description	No TA/TI	TA/TI	Reference Load (kW)	Incremental LI (kW)	
334419	Other Electronic Component Manufacturing	3%	8%	4,638	229	

AutoDR

According to data provided by PG&E, 71 DBP service accounts participating in the AutoDR program submitted a bid for the August 25th test event. (However, not all of these service accounts appeared to reduce load during event hours.) Table 4.13 shows the average hourly load impact for the AutoDR participants, which was 1,658 kW, or 3.1 percent of their reference load.

Table 4.13: Average Hourly Load Impacts by Event, PG&E AutoDR

Event Date	Number of SAIDs	Estimated Reference Load (kW)	Observed Load (kW)	Estimated Load Impact (kW)	% Load Impact
8/25/2010	71	53,002	51,344	1,658	3.1%

AutoDR participants were spread across 25 6-digit NAICS industry codes. In nine of these industry groups, non-AutoDR bidders are present to serve as a comparison group. For the remaining 16 industry groups with Auto-DR customers, comparisons are made at a more aggregated level. "Basis of Comparison" identifies the industry level used for the comparison group.

Tables 4.14 and 4.15 show the characteristics of the treatment and comparison groups. Notice that the average size (represented by the average reference loads shown in the two rightmost columns) can be quite different between the comparison group and the AutoDR DBP participants. AutoDR DBP customers are larger than the comparison group customers in 10 of the 25 comparisons.

Table 4.15 shows the load impacts in kW and percentage terms. A positive sign indicates load reductions during event hours. Notice that there are some wrong-signed results (indicating load increases during event hours) and a large share of counter-intuitive differences between the Auto-DR load impacts and those of the comparison group. (That

is, we expect that Auto-DR customers will have a higher percentage load impact than the comparison group customers, but this is true in only 8 of the 25 comparisons.)

Table 4.16 combines the percentage load impact estimates with the reference loads to calculate the incremental load impacts. In this case, the incremental load impact is -336 kW, indicating that the industry-group level calculations do not produce positive incremental Auto-DR load impacts.

			Number of SAIDs		Average Reference Load (kW) / SAID	
NAICS Code	NAICS Description	Basis of Comparison	No	AutoDR	No	AutoDR
115114	Postharvest Crop Activities (except Cotton Ginning)	Program	153	3	938	989
221112	Fossil Fuel Electric Power Generation	Program	153	1	938	584
334112	Computer Storage Device Manufacturing	3-digit NAICS	3	6	789	1246
424410	General Line Grocery Merchant Wholesalers	3-digit NAICS	1	1	198	863
442110	Furniture Stores	Program	153	1	938	900
452111	Department Stores (except Discount Department Stores)	Program	153	23	938	114
452112	Discount Department Stores	Program	153	1	938	473
518210	Data Processing, Hosting, and Related Services	6-digit NAICS	2	2	3000	1943
531123	Lessors of Nonresidential Buildings (except Miniwarehouses)	6-digit NAICS	5	1	775	264
541710	Research and Development in the Physical, Engineering, and Life Sciences	6-digit NAICS	1	3	4,874	618
551114	Corporate, Subsidiary, and Regional Managing Offices	6-digit NAICS	4	3	2,125	2,329
621400	Outpatient Care Centers	3-digit NAICS	1	1	155	462
621491	HMO Medical Centers	3-digit NAICS	1	2	155	1,337
622112	General Medical and Surgical Hospitals	Program	153	1	938	1,063
624000	Social Assistance	3-digit NAICS	1	1	196	136
624190	Other Individual and Family Services	3-digit NAICS	1	1	196	184
624310	Vocational Rehabilitation Services	6-digit NAICS	1	1	196	2,196
713940	Fitness and Recreational Sports Centers	6-digit NAICS	20	4	101	175
812910	Pet Care (except Veterinary) Services	Program	153	1	938	228
921190	Other General Government Support	6-digit NAICS	2	7	314	1,326
922120	Police Protection	3-digit NAICS	11	1	3,405	2,386
922130	Legal Counsel and Prosecution	3-digit NAICS	11	1	3,405	706
922140	Correctional Institutions	6-digit NAICS	10	3	3,713	1,139
922160	Fire Protection	3-digit NAICS	11	1	3,405	538
923130	Administration of Human Resource Programs (except Education, Public Health, and Veterans' Affairs Programs)	6-digit NAICS	1	1	262	143

 Table 4.14: Number of Service Accounts and Average Reference Load, PG&E

 AutoDR

			Average Impact (k)		Average Percentage LI	
NAICS Code	NAICS Description	Basis of Comparison	No AutoDR	AutoDR	No AutoDR	AutoDR
115114	Postharvest Crop Activities (except Cotton Ginning)	Program	54	-80	6%	-8%
221112	Fossil Fuel Electric Power Generation	Program	54	-48	6%	-8%
334112	Manufacturing	3-digit NAICS	26	28	3%	2%
424410	General Line Grocery Merchant Wholesalers	3-digit NAICS	11	-8	6%	-1%
442110	Furniture Stores	Program	54	-100	6%	-11%
452111	Department Stores (except Discount Department Stores)	Program	54	39	6%	34%
452112	Discount Department Stores	Program	54	-9	6%	-2%
518210	Data Processing, Hosting, and Related Services	6-digit NAICS	-82	102	-3%	5%
531123	(except Miniwarenouses)	6-digit NAICS	40	37	5%	14%
541710	Research and Development in the Physical, Engineering, and Life Sciences	6-digit NAICS	94	9	2%	1%
551114	Corporate, Subsidiary, and Regional Managing Offices	6-digit NAICS	175	28	8%	1%
621400	Outpatient Care Centers	3-digit NAICS	-12	-27	-7%	-6%
621491	HMO Medical Centers	3-digit NAICS	-12	92	-7%	7%
622112	General Medical and Surgical Hospitals	Program	54	126	6%	12%
624000	Social Assistance	3-digit NAICS	13	-6	7%	-5%
624190	Other Individual and Family Services	3-digit NAICS	13	-16	7%	-9%
624310	Vocational Rehabilitation Services	6-digit NAICS	13	101	7%	5%
713940	Fitness and Recreational Sports Centers	6-digit NAICS	4	19	4%	11%
	Pet Care (except Veterinary) Services	Program	54	4	6%	2%
921190	Other General Government Support	6-digit NAICS	-2	43	0%	3%
922120	Police Protection	3-digit NAICS	271	60	8%	2%
922130	Legal Counsel and Prosecution	3-digit NAICS	271	1	8%	0%
922140	Correctional Institutions	6-digit NAICS	301	32	8%	3%
922160	Fire Protection	3-digit NAICS	271	-267	8%	-50%
923130	Administration of Human Resource Programs (except Education, Public Health, and Veterans' Affairs Programs)	6-digit NAICS	28	14	11%	10%

Table 4.15: Average Load Impacts in Levels and Percentages, PG&E AutoDR

		Avera	ge % Ll					
NAICS Code	NAICS Description	No AutoDR	AutoDR	Reference Load (kW)	Incremental LI (kW)			
115114	Postharvest Crop Activities (except Cotton Ginning)	8%	-8%	2,966	-468			
221112	Fossil Fuel Electric Power Generation	8%	-8%	584	-92			
334112	Computer Storage Device Manufacturing	3%	2%	7,479	-78			
424410	General Line Grocery Merchant Wholesalers	6%	-1%	863	-56			
442110	Furniture Stores	8%	-11%	900	-169			
452111	Department Stores (except Discount Department Stores)	8%	34%	2,630	696			
452112	Discount Department Stores	8%	-2%	473	-45			
518210	Data Processing, Hosting, and Related Services	-3%	5%	3,885	309			
531123	Lessors of Nonresidential Buildings (except Miniwarehouses)	5%	14%	264	23			
541710	Research and Development in the Physical, Engineering, and Life Sciences	2%	1%	1,853	-9			
551114	Corporate, Subsidiary, and Regional Managing Offices	8%	1%	6,986	-491			
621400	Outpatient Care Centers	-7%	-6%	462	7			
621491	HMO Medical Centers	-7%	7%	2,674	386			
622112	General Medical and Surgical Hospitals	8%	12%	1,063	45			
624000	Social Assistance	7%	-5%	136	-15			
624190	Other Individual and Family Services	7%	-9%	184	-28			
624310	Vocational Rehabilitation Services	7%	5%	2,196	-47			
713940	Fitness and Recreational Sports Centers	4%	11%	701	44			
812910	Pet Care (except Veterinary) Services	8%	2%	228	-13			
921190	Other General Government Support	0%	3%	9,285	346			
922120	Police Protection	8%	2%	2,386	-131			
922130	Legal Counsel and Prosecution	8%	0%	706	-55			
922140	Correctional Institutions	8%	3%	3,416	-182			
922160	Fire Protection	8%	-50%	538	-310			
923130	Administration of Human Resource Programs (except Education, Public Health, and Veterans' Affairs Programs)	11%	10%	143	-2			
Total								

Table 4.16: Incremental Load Impact Calculation, PG&E AutoDR

SCE

TA/TI

Table 4.17 shows the DBP load impacts provided by SCE's TA/TI service accounts for each event. An average of 55 of SCE's DBP service accounts participated in TA/TI. The load impacts vary dramatically across events. The variability is largely due to one service account that sometimes provides essentially zero load impacts, but for other events provides 15 to 19 MW of load response. The load impacts in the absence of this customer average 1.9 MW, or 12.7 percent of the remaining reference load.

Event Date	Number of SAIDs	Estimated Reference Load (kW)	Observed Load (kW)	Estimated Load Impact (kW)	% Load Impact
7/16/2010	56	48,277	27,145	21,132	43.8%
8/24/2010	53	42,975	22,295	20,680	48.1%
8/25/2010	53	44,571	42,819	1,752	3.9%
8/26/2010	53	43,925	42,996	929	2.1%
9/2/2010	53	41,949	39,921	2,028	4.8%
9/27/2010	56	48,764	46,828	1,936	4.0%
9/28/2010	56	47,625	46,022	1,603	3.4%
9/30/2010	56	46,896	46,199	696	1.5%
Average	55	45,623	39,278	6,345	13.9%

Table 4.18 shows load impact comparisons by industry group. The load impact differences between TA/TI participants and non-participants vary dramatically across industry groups. TA/TI load impacts are higher than non-TA/TI impacts in only 7 of 16 industries (the seven instances are shown in bold). The most remarkable difference is for Industrial Gases SIC (2813), where the percentage load impacts for TA/TI accounts are 66 percentage points *lower* than those of non-TA/TI service accounts. In this case, there is one TA/TI service account that can provide a comparable percentage demand response to the non-TA/TI service accounts, but it does so during only two events (but the customer submitted a bid for all of the events). Therefore, the average percentage load impact across all events is quite low compared to the non-TA/TI service accounts, which provided much more consistent demand response. Due to the large average reference load in this industry, this large percentage difference results in a negative incremental load impact for SCE's TA/TI customers. In the absence of this customer, the total incremental TA/TI load impact is substantially closer to zero (-690 kW).

		Average Percentage LI				
SIC Code	SIC Description	No TA/TI	TA/TI	Reference Load (kW)	Incremental LI (kW)	
2026	Fluid Milk	2.5%	0.4%	954	-20	
2041	Flour and Other Grain Mill Products	1.0%	-7.1%	1,746	-140	
2813	Industrial Gases	89.3%	23.5%	20,539	-13,522	
2834	Pharmaceutical Preparations	4.8%	2.5%	2,135	-51	
4941	Water Supply	29.3%	22.5%	17	-1	
5072	Hardware	0.9%	21.9%	1,174	246	
5311	Department Stores	2.5%	0.9%	2,009	-33	
5318	Retail stores	1.2%	-0.3%	5,197	-80	
5411	Grocery Stores	5.8%	6.7%	3,517	32	
5651	Family Clothing Stores	7.8%	7.4%	1,021	-4	
5912	Drug Stores and Proprietary Stores	-3.5%	0.2%	1,448	54	
6512	Operators of Nonresidential Buildings	1.4%	7.7%	10,871	682	
6514	Operators of Dwellings Other Than Apartment Buildings	20.8%	10.6%	533	-54	
8011	Kidney dialysis centers	0.01%	10.6%	507	54	
9111	Executive Offices	0.1%	4.8%	104	5	
9229	9229 Public Order and Safety, Not Elsewhere Classified 3.1% 25.2% 1					
	ΤΟΤΑ	L			-12,832	
	TOTAL Excludir	ng SIC 281	3		-690	

 Table 4.18: Incremental TA/TI Load Impacts by Industry Group, SCE TA/TI

AutoDR

Table 4.19 shows the total DBP load impacts for SCE's AutoDR participants. The percentage load impacts are uniformly high across events, averaging 49 percent, or around 14.5 MW of load impact. This result is driven by the participation of one SAID from the Industrial Gases SIC (2813), who consistently reduced load by 13 MW.

Event Date	Number of SAIDs	Estimated Reference Load (kW)	Observed Load (kW)	Estimated Load Impact (kW)	% Load Impact
7/16/2010	58	36,471	19,136	17,336	47.5%
8/24/2010	65	27,724	12,586	15,138	54.6%
8/25/2010	65	27,658	14,725	12,933	46.8%
8/26/2010	65	27,312	14,197	13,115	48.0%
9/2/2010	65	26,878	12,372	14,506	54.0%
9/27/2010	66	34,403	18,568	15,835	46.0%
9/28/2010	65	28,605	14,629	13,976	48.9%
9/30/2010	65	28,131	15,142	12,989	46.2%
Average	64	29,648	15,169	14,478	48.8%

 Table 4.19: Average Hourly AutoDR Load Impacts by Event, SCE AutoDR
 Impact SCE AutoDR

Table 4.20 describes the comparison groups, including the number of SAIDs and average reference load for each group. Table 4.21 shows the load impact comparisons by industry group. AutoDR participants showed higher load impacts in six of the eight industry groups, with several industry groups showing much higher percentage load impact. SICs 723 (Crop Preparation Services for Market, Except Cotton Ginning) and 2653 (Corrugated and Solid Fiber Boxes) provided the opposite outcome, with AutoDR participants providing substantially lower responses than non-participants.

			Number of SAIDs		Average Reference Load (kW) / SAID		
SIC Code	SIC Description	Basis of Comparison	No AutoDR	AutoDR	No AutoDR	AutoDR	
723	Crop Preparation Services for Market, Except Cotton Ginning	4 Dig. SIC	1	2	387	296	
2026	Fluid Milk	4 Dig. SIC	5	1	1,433	5,828	
2653	Corrugated and Solid Fiber Boxes	4 Dig. SIC	4	2	913	979	
2813	Industrial Gases	4 Dig. SIC	4	1	4,731	13,291	
3691	Storage Batteries	2 Dig. SIC	24	2	3,152	1,004	
5311	Department Stores	4 Dig. SIC	1	47	158	161	
5712	Furniture Stores	4 Dig. SIC	1	3	90	834	
5941	Sporting Goods Stores and Bicycle Shops	2 Dig. SIC	25	9	621	147	

Table 4.20: Number of Service Accounts and Average Reference Load, SCE AutoDR

			Average Load Impact (kW) / SAID		Average Percentage LI	
SIC Code	SIC Description	Basis of Comparison	No AutoDR	AutoDR	No AutoDR	AutoDR
723	Crop Preparation Services for Market, Except Cotton Ginning	4 Dig. SIC	60	-5	15.5%	-1.6%
2026	Fluid Milk	4 Dig. SIC	36	516	2.5%	8.9%
2653	Corrugated and Solid Fiber Boxes	4 Dig. SIC	66	-74	7.3%	-7.5%
2813	Industrial Gases	4 Dig. SIC	4,226	13,026	89.3%	98.0%
3691	Storage Batteries	2 Dig. SIC	24	221	0.8%	22.0%
5311	Department Stores	4 Dig. SIC	4	21	2.5%	12.8%
5712	Furniture Stores	4 Dig. SIC	5	57	5.1%	6.9%
5941	Sporting Goods Stores and Bicycle Shops	2 Dig. SIC	5	12	0.8%	8.1%

 Table 4.21: Average Load Impacts in Levels and Percentages, SCE AutoDR

Table 4.22 shows an incremental load impact for SCE's AutoDR participants of 2.5 MW. The six industry groups that show positive incremental load impacts from AutoDR are shown in bold. Nearly half of the 2.5 MW incremental load impact comes from the customer in the Industrial Gases SIC (2813). Notably in that industry, both the AutoDR and non-AutoDR groups show high percentage responses, of 98 and 89 percent, respectively. However, even when excluding that industry, the incremental impact for AutoDR customers is approximately 1.3 MW, or 6.1 percent of remaining reference load.

			Average Percentage LI		
SIC Code	SIC Description	No AutoDR	AutoDR	Reference Load (kW)	Incremental LI (kW)
723	Crop Preparation Services for Market, Except Cotton Ginning	15.5%	-1.6%	591	-101
2026	Fluid Milk	2.5%	8.9%	5,828	370
2653	Corrugated and Solid Fiber Boxes	7.3%	-7.5%	1,959	-289
2813	Industrial Gases	89.3%	98.0%	13,291	1,152
3691	Storage Batteries	0.8%	22.0%	2,008	427
5311	Department Stores	2.5%	12.8%	7,560	772
5712	Furniture Stores	5.1%	6.9%	2,502	44
5941	Sporting Goods Stores and Bicycle Shops	0.8%	8.1%	1,325	97
	Tota	al		•	2,472

5. Ex Ante Load Impact Forecast

5.1 Ex Ante Load Impact Requirements

The DR Load Impact Evaluation Protocols require that hourly load impact forecasts for event-based DR resources must be reported at the program level and by LCA for the following scenarios:

- For a typical event day in each year; and
- For the monthly system peak load day in each month for which the resource is available;

under both:

- 1-in-2 weather-year conditions, and
- 1-in-10 weather-year conditions.

at both:

- the program level (*i.e.*, in which only the program in question is called), and
- the portfolio level (*i.e.*, in which all demand response programs are called).

5.2 Description of Methods

This section describes the methods used to develop the relevant groups of customers, to develop reference loads for the relevant customer types and event day-types, and to develop percentage load impacts for a typical event day.

5.2.1 Development of Customer Groups

For PG&E's program, customer accounts were assigned to one of three size groups and the relevant LCA. The three size groups were the following:

- Small maximum demand less than 20 kW;
- Medium maximum demand between 20 and 200 kW;
- Large maximum demand greater than 200 kW.

The specific definition of "maximum demand" was based on the tariff on which the customer is served. For example, a tariff may require that a customer's monthly peak demand exceeds 20kW for three out of the previous twelve months. The total number of customer "cells" developed is therefore equal to 24 (= 3 size groups x 8 LCAs).

For SCE, the analysis was simplified because the enrollment assumes a continuation of the status quo with respect to shares of customers by size group and LCA. Therefore, we only simulated sets of reference loads for each of the three local capacity areas.

5.2.2 Development of Reference Loads and Load Impacts

Reference loads and load impacts for all of the above factors were developed in the following series of steps:

- 1. Define data sources
- 2. Estimate ex ante regressions and simulate reference loads by cell and scenario
- 3. Calculate percentage load impacts by cell
- 4. Apply percentage load impacts to the reference loads
- 5. Scale the reference loads using enrollment forecasts

Each of these steps is described below.

Define data sources

For both PG&E and SCE, the reference loads are developed using data for customers enrolled in DBP during the 2010 program year. In addition, the percentage load impacts that are applied to the reference loads to create hourly load impacts are based upon the ex post load impacts from the 2010 program year.

For PG&E, we divided the DBP customers into two groups according to whether they are dually enrolled in the Base Interruptible Program (BIP). BIP customers tend to be larger and more demand responsive (even during DBP events) than other DBP customers. Therefore, separating the dually enrolled customers helped ensure that The Brattle Group was able to properly match enrollments to load impacts.

Simulate reference loads

In order to develop reference loads, we first re-estimated regression equations for each enrolled customer account, using data for 2010. These equations were then used to simulate reference loads by customer type under the various scenarios required by the Protocols (*e.g.*, the typical event day in a 1-in-2 weather year).

For the summer months, the re-estimated regression equations were similar in design to the ex post load impact equations described in Section 3.2, differing in four ways. First, the ex ante models excluded the morning-usage variable. While this variable is useful for improving accuracy in estimating ex post load impacts for particular events, it complicates the use of the equations in ex ante simulation. That is, it would require a separate simulation of the level of the morning load. Second, the ex ante models excluded the summer variables (e.g., the summer variable interacted with the hourly profile). Third, for SCE the event variables were modified from the version that produces estimates of 24 hourly load impact values for *each* event, to a version that produces estimates of *average hourly event-period* load impacts across all events. (PG&E only had one test event, so this modification was not required.) The fourth difference between the ex post and ex ante models is that the ex ante model uses cooling degree days instead of cooling degree hours.¹¹

Because DBP events may be called in any month of the year, we estimated separate regression models to allow us to simulate non-summer reference loads. The non-summer model is shown below.

¹¹ Cooling degree days (CDD) was defined as MAX[0, (MaxT + MinT) / 2 - 50], where MaxT is the daily maximum temperature and MinT is the daily minimum temperature, both expressed in degrees Fahrenheit. Customer-specific CDD values are calculated using data from the most appropriate weather station.

$$Q_{t} = a + \sum_{i=1}^{24} (b_{i}^{DBP} \times h_{i,t} \times DBP_{t}) + \sum_{i=1}^{24} (b_{i}^{OTH} \times h_{i,t} \times OtherEvt_{i,t}) + \sum_{i=1}^{24} (b_{i}^{CDD} \times h_{i,t} \times CDD_{t}) + \sum_{i=2}^{24} (b_{i}^{HDD} \times h_{i,t} \times HDD_{t}) + \sum_{i=2}^{24} (b_{i}^{MON} \times h_{i,t} \times MON_{t}) + \sum_{i=2}^{24} (b_{i}^{FRI} \times h_{i,t} \times FRI_{t}) + \sum_{i=2}^{24} (b_{i}^{h} \times h_{i,t}) + \sum_{i=2}^{24} (b_{i}^{MON} \times h_{i,t} \times MON_{t}) + \sum_{i=2}^{24} (b_{i}^{FRI} \times h_{i,t} \times FRI_{t}) + \sum_{i=2}^{24} (b_{i}^{h} \times h_{i,t}) + \sum_{i=$$

In this equation, Q_t represents the demand in hour *t* for a customer enrolled in DBP prior to the last event date; the *b*'s are estimated parameters; $h_{i,t}$ is a dummy variable for hour *i*; *DBP*_t is an indicator variable for program event days; *CDD*_t is cooling degree days; *HDD*_t is heating degree days;¹² OtherEvt_t is equal to one in the event hours of other demand response programs in which the customer is enrolled; *MON*_t is a dummy variable for Monday; *FRI*_t is a dummy variable for Friday; *DTYPE*_{i,t} is a series of dummy variables for each day of the week; *MONTH*_{i,t} is a series of dummy variables for each month; and e_t is the error term.

Once these models were estimated, we simulated 24-hour load profiles for each required scenario. Each of the profiles was simulated as an average of Tuesday, Wednesday, and Thursday profiles. The typical event day was assumed to occur in August. Much of the differences across scenarios can be attributed to varying weather conditions. The definitions of the 1-in-2 and 1-in-10 weather years are the same as those used to develop ex ante load forecasts in the previous study (following the 2009 program year).

Calculate forecast percentage load impacts

For PG&E, hourly percentage load impacts were developed by LCA and whether the customer was dually enrolled with BIP. Because the forecast event window (1:00 to 6:00 p.m. in summer months; and 4:00 to 9:00 p.m. in non-summer months) differs from the historical event window (2:00 to 6:00 p.m.), we needed to adjust the historical percentage load impacts for use in the ex ante study. Specifically, in summer months, we replaced the 12:00 to 2:00 p.m. percentage load impacts with the values from 1:00 to 3:00 p.m. This ensured that the additional ex ante event hour included event-based load impacts and also ensured that the hour preceding the event included any historical effects observed in that hour (e.g., pre-event increases in load).

For the non-summer months, we replaced the values in 2:00 to 11:00 p.m. (including the non-summer event window and the two surrounding hours on each side) with the historical values from 12:00 to 8:00 p.m. In addition, the values in the hours from 12:00 to 2:00 p.m. were replaced with the values from 11:00 a.m. to 12:00 p.m.

¹² Heating degree days (HDD) was defined as MAX[0, 50 - (MaxT + MinT) / 2], where MaxT is the daily maximum temperature and MinT is the daily minimum temperature, both expressed in degrees Fahrenheit. Customer-specific HDD values are calculated using data from the most appropriate weather station.

For the customers dually enrolled in BIP, we combined the load impacts across the Greater Fresno, Northern Coast, Sierra, and Stockton LCAs because these LCAs had relatively few customers (who were also not very demand responsive).

The uncertainty-adjusted load impacts (i.e., the 10th, 30th, 50th, 70th, and 90th percentile scenarios of load impacts) were calculated under the assumption that the load impacts are normally distributed with a mean equal to the total estimated load impact and a variance equal to the sum of the variances (the squares of the standard errors) associated with the load impact estimates.

Tables 5.1 through 5.4 show the resulting hourly load impacts by LCA, according to season and whether the customers are dually enrolled in BIP.

Hour	Greater Bay Area	Greater Fresno	Humboldt	Kern	Northern Coast	Not in Any LCA	Sierra	Stockton
1	-0.1%	0.3%	0.0%	0.1%	-0.2%	0.7%	0.1%	-0.3%
2	-0.1%	0.6%	0.0%	-0.6%	-0.2%	0.7%	0.1%	-0.3%
3	-0.1%	0.0%	0.0%	-0.3%	-0.9%	0.6%	0.1%	0.0%
4	-0.2%	-0.5%	0.0%	0.5%	-1.0%	0.3%	0.1%	0.1%
5	-0.1%	-0.2%	0.0%	0.1%	-0.9%	0.3%	0.1%	0.2%
6	-0.2%	-0.1%	0.0%	0.1%	0.0%	-0.1%	-0.3%	0.3%
7	-0.4%	-0.1%	0.0%	-0.3%	1.0%	-0.4%	-0.1%	-0.1%
8	-0.3%	0.5%	0.0%	0.0%	0.0%	-0.9%	-0.1%	0.2%
9	-0.2%	0.7%	0.0%	-0.7%	-0.6%	-0.5%	-0.3%	-1.5%
10	0.2%	-0.5%	0.0%	-1.2%	0.3%	-0.3%	-0.1%	-0.3%
11	0.3%	-0.2%	0.0%	-1.4%	0.6%	0.1%	0.0%	0.5%
12	0.4%	-0.2%	0.0%	-1.6%	0.5%	0.3%	0.2%	1.3%
13	0.3%	0.0%	0.0%	2.9%	1.5%	0.5%	0.1%	0.6%
14	0.5%	-0.8%	0.0%	2.6%	1.9%	3.2%	-0.9%	0.5%
15	0.5%	-0.8%	0.0%	2.6%	1.9%	3.2%	-0.9%	0.5%
16	0.8%	-0.3%	0.0%	2.7%	3.0%	1.4%	-0.9%	-0.2%
17	0.9%	1.8%	0.0%	3.4%	2.5%	1.4%	-0.1%	1.7%
18	0.8%	2.7%	0.0%	1.3%	2.8%	1.6%	1.0%	5.2%
19	0.4%	1.7%	0.0%	-0.9%	1.4%	0.8%	-0.2%	-0.2%
20	0.7%	0.9%	0.0%	0.0%	1.3%	1.1%	-0.4%	-1.1%
21	0.8%	0.7%	0.0%	-0.9%	1.5%	0.9%	-0.5%	-0.3%
22	0.9%	0.7%	0.0%	-0.3%	2.5%	1.4%	-0.4%	0.7%
23	1.1%	0.8%	0.0%	0.3%	3.1%	1.6%	0.1%	1.0%
24	1.0%	0.8%	0.0%	-1.7%	3.1%	1.6%	-0.5%	-0.8%

Table 5.1: Hourly Percentage Load Impacts, PG&E Customers not dually enrolled in BIP, Summer Months

Hour	Greater Bay	Greater Fresno	Humboldt	Kern	Northern Coast	Not in Any	Sierra	Stockton
	Area					LCA		
1	-0.1%	0.3%	0.0%	0.1%	-0.2%	0.7%	0.1%	-0.3%
2	-0.1%	0.6%	0.0%	-0.6%	-0.2%	0.7%	0.1%	-0.3%
3	-0.1%	0.0%	0.0%	-0.3%	-0.9%	0.6%	0.1%	0.0%
4	-0.2%	-0.5%	0.0%	0.5%	-1.0%	0.3%	0.1%	0.1%
5	-0.1%	-0.2%	0.0%	0.1%	-0.9%	0.3%	0.1%	0.2%
6	-0.2%	-0.1%	0.0%	0.1%	0.0%	-0.1%	-0.3%	0.3%
7	-0.4%	-0.1%	0.0%	-0.3%	1.0%	-0.4%	-0.1%	-0.1%
8	-0.3%	0.5%	0.0%	0.0%	0.0%	-0.9%	-0.1%	0.2%
9	-0.2%	0.7%	0.0%	-0.7%	-0.6%	-0.5%	-0.3%	-1.5%
10	0.2%	-0.5%	0.0%	-1.2%	0.3%	-0.3%	-0.1%	-0.3%
11	0.3%	-0.2%	0.0%	-1.4%	0.6%	0.1%	0.0%	0.5%
12	0.4%	-0.2%	0.0%	-1.6%	0.5%	0.3%	0.2%	1.3%
13	0.4%	-0.2%	0.0%	-1.6%	0.5%	0.3%	0.2%	1.3%
14	0.4%	-0.2%	0.0%	-1.6%	0.5%	0.3%	0.2%	1.3%
15	0.3%	-0.1%	0.0%	-0.7%	1.6%	0.7%	0.2%	1.1%
16	0.3%	0.0%	0.0%	2.9%	1.5%	0.5%	0.1%	0.6%
17	0.5%	-0.8%	0.0%	2.6%	1.9%	3.2%	-0.9%	0.5%
18	0.8%	-0.3%	0.0%	2.7%	3.0%	1.4%	-0.9%	-0.2%
19	0.9%	1.8%	0.0%	3.4%	2.5%	1.4%	-0.1%	1.7%
20	0.8%	2.7%	0.0%	1.3%	2.8%	1.6%	1.0%	5.2%
21	0.4%	1.7%	0.0%	-0.9%	1.4%	0.8%	-0.2%	-0.2%
22	0.7%	0.9%	0.0%	0.0%	1.3%	1.1%	-0.4%	-1.1%
23	1.1%	0.8%	0.0%	0.3%	3.1%	1.6%	0.1%	1.0%
24	1.0%	0.8%	0.0%	-1.7%	3.1%	1.6%	-0.5%	-0.8%

 Table 5.2: Hourly Percentage Load Impacts, PG&E Customers not dually enrolled in BIP, Non-summer Months

		/			
Hour	Greater Bay Area	Humboldt	Kern	All Others	Not in Any LCA
1	-5.5%	-0.1%	1.1%	-0.5%	3.5%
2	-3.9%	4.1%	3.5%	1.7%	1.1%
3	-4.6%	3.3%	2.0%	1.2%	-0.4%
4	0.1%	4.6%	7.3%	0.9%	0.4%
5	1.5%	3.5%	14.9%	0.7%	1.3%
6	0.1%	4.0%	13.8%	1.7%	0.5%
7	0.7%	-1.1%	-7.3%	1.4%	3.9%
8	0.2%	-2.2%	-0.8%	-0.8%	1.6%
9	-1.2%	-1.1%	-1.1%	-1.9%	1.1%
10	-2.2%	-0.8%	0.9%	-0.1%	-0.8%
11	-3.1%	-0.7%	-1.6%	0.2%	-2.3%
12	-4.7%	-0.9%	-2.3%	5.5%	-3.0%
13	0.6%	5.1%	-0.3%	5.8%	15.4%
14	11.0%	11.4%	19.1%	3.7%	39.1%
15	11.0%	11.4%	19.1%	3.7%	39.1%
16	11.8%	11.8%	29.4%	1.8%	39.3%
17	11.1%	9.7%	29.4%	1.1%	40.8%
18	11.3%	10.7%	27.4%	2.0%	39.6%
19	1.3%	1.7%	13.4%	0.0%	14.8%
20	-2.7%	-0.6%	-0.5%	-2.1%	8.0%
21	8.5%	-0.4%	-4.5%	-3.7%	3.0%
22	3.8%	-1.7%	-0.1%	-3.4%	3.8%
23	3.1%	-2.0%	-1.2%	-1.6%	5.0%
24	2.7%	-2.9%	-6.5%	0.4%	6.4%

Table 5.3: Hourly Percentage Load Impacts, PG&E Customers dually enrolled in BIP, Summer Months

		·			
	Greater				Not in
Hour	Bay	Humboldt	Kern	All Other	Any
	Area				LCA
1	-5.5%	-0.1%	1.1%	-0.5%	3.5%
2	-3.9%	4.1%	3.5%	1.7%	1.1%
3	-4.6%	3.3%	2.0%	1.2%	-0.4%
4	0.1%	4.6%	7.3%	0.9%	0.4%
5	1.5%	3.5%	14.9%	0.7%	1.3%
6	0.1%	4.0%	13.8%	1.7%	0.5%
7	0.7%	-1.1%	-7.3%	1.4%	3.9%
8	0.2%	-2.2%	-0.8%	-0.8%	1.6%
9	-1.2%	-1.1%	-1.1%	-1.9%	1.1%
10	-2.2%	-0.8%	0.9%	-0.1%	-0.8%
11	-3.1%	-0.7%	-1.6%	0.2%	-2.3%
12	-4.7%	-0.9%	-2.3%	5.5%	-3.0%
13	-4.7%	-0.9%	-2.3%	5.5%	-3.0%
14	-4.7%	-0.9%	-2.3%	5.5%	-3.0%
15	-1.6%	-2.5%	-1.7%	6.6%	0.0%
16	0.6%	5.1%	-0.3%	5.8%	15.4%
17	11.0%	11.4%	19.1%	3.7%	39.1%
18	11.8%	11.8%	29.4%	1.8%	39.3%
19	11.1%	9.7%	29.4%	1.1%	40.8%
20	11.3%	10.7%	27.4%	2.0%	39.6%
21	1.3%	1.7%	13.4%	0.0%	14.8%
22	-2.7%	-0.6%	-0.5%	-2.1%	8.0%
23	3.1%	-2.0%	-1.2%	-1.6%	5.0%
24	2.7%	-2.9%	-6.5%	0.4%	6.4%

 Table 5.4: Hourly Percentage Load Impacts, PG&E Customers dually enrolled in BIP, Non-summer Months

The process was somewhat different for SCE, for two reasons. First, SCE had eight DBP events (to PG&E's one). Therefore, we based the uncertainty-adjusted load impacts on the variation in load impacts across events (as opposed to the standard error of the estimates, as was done for PG&E). Second, SCE's events lasted from 12:00 to 8:00 p.m., so in transitioning from ex post to ex ante event windows, we needed to reduce the size of the event window (as opposed to expanding it for PG&E).

We collapsed the event hour percentage load impacts from eight hours to five hours as follows: the first and last hours of the ex post window were applied in the ex ante window. The second ex ante hour was set to the average of the second and third ex post hours; the third ex ante hour was set to the average of the fourth and fifth ex post hours; and the fourth ex ante hour was set to the average of the sixth and seventh ex post hours. We then adjusted the non-event hours load impacts to fit around the newly formed event windows.

Tables 5.5 through 5.8 show the hourly percentage load impacts by LCA for each season, with the first two tables containing results for the entire program (used in the programlevel scenarios) and the final two tables containing results only for customers not dually enrolled in BIP (used in the portfolio-level scenarios).

		Ventura
Basin	LA Basin	
1.5%	2.3%	1.6%
1.5%	2.3%	1.6%
1.3%	1.4%	0.9%
1.1%	0.8%	0.6%
0.9%	0.0%	0.4%
0.7%	-0.6%	0.4%
0.5%	-1.7%	0.1%
0.5%	-2.2%	-1.0%
0.6%	-2.3%	-1.6%
0.3%	-2.0%	-1.4%
0.4%	-1.2%	-1.0%
0.8%	-1.2%	-0.5%
2.5%	1.0%	0.6%
6.3%	4.0%	2.1%
6.1%	5.8%	2.8%
7.0%	8.3%	3.3%
7.4%	8.9%	3.3%
7.5%	8.3%	3.2%
5.7%	5.7%	2.5%
4.6%	4.5%	2.0%
4.0%	2.6%	1.9%
3.2%	2.1%	1.0%
1.5%	2.3%	1.6%
1.3%	1.4%	0.9%
	1.5% $1.3%$ $1.1%$ $0.9%$ $0.7%$ $0.5%$ $0.6%$ $0.3%$ $0.4%$ $0.8%$ $2.5%$ $6.3%$ $6.1%$ $7.0%$ $7.4%$ $7.5%$ $5.7%$ $4.6%$ $4.0%$ $3.2%$ $1.5%$	BasinLA Basin1.5%2.3%1.5%2.3%1.3%1.4%1.1%0.8%0.9%0.0%0.7%-0.6%0.5%-1.7%0.5%-2.2%0.6%-2.3%0.3%-2.0%0.4%-1.2%2.5%1.0%6.3%4.0%6.1%5.8%7.0%8.3%7.4%8.9%7.5%8.3%5.7%5.7%4.6%4.5%4.0%2.6%3.2%2.1%1.5%2.3%

Table 5.5: Hourly Percentage Load Impacts, All SCE DBP Customers, Summer Months

	LA	Outside	
Hour	Basin	LA Basin	Ventura
1	1.5%	2.3%	1.6%
2	1.5%	2.3%	1.6%
3	1.5%	2.3%	1.6%
4	1.5%	2.3%	1.6%
5	1.5%	2.3%	1.6%
6	1.3%	1.4%	0.9%
7	1.1%	0.8%	0.6%
8	0.9%	0.0%	0.4%
9	0.7%	-0.6%	0.4%
10	0.5%	-1.7%	0.1%
11	0.5%	-2.2%	-1.0%
12	0.6%	-2.3%	-1.6%
13	0.3%	-2.0%	-1.4%
14	0.4%	-1.2%	-1.0%
15	0.8%	-1.2%	-0.5%
16	2.5%	1.0%	0.6%
17	6.3%	4.0%	2.1%
18	6.1%	5.8%	2.8%
19	7.0%	8.3%	3.3%
20	7.4%	8.9%	3.3%
21	7.5%	8.3%	3.2%
22	5.7%	5.7%	2.5%
23	4.6%	4.5%	2.0%
24	4.0%	2.6%	1.9%

Table 5.6: Hourly Percentage Load Impacts, All SCE DBP Customers, Non-summer Months

Hour	LA Basin	Outside LA Basin	Ventura
1	0.7%	1.7%	1.0%
2	0.7%	1.7%	1.0%
3	0.7%	1.6%	1.0%
4	0.5%	1.1%	0.8%
5	0.3%	0.6%	0.9%
6	0.1%	0.0%	0.9%
7	0.1%	-1.0%	0.5%
8	-0.1%	-1.5%	-0.2%
9	0.0%	-0.7%	-0.5%
10	-0.5%	-1.0%	-1.1%
11	-0.6%	-0.7%	-1.2%
12	-0.3%	-0.5%	-1.2%
13	0.1%	-0.1%	-1.2%
14	1.4%	1.3%	-0.5%
15	1.3%	2.6%	0.0%
16	1.9%	4.1%	0.8%
17	2.0%	4.6%	0.5%
18	1.9%	3.8%	0.3%
19	1.0%	3.0%	0.1%
20	0.8%	2.8%	0.1%
21	1.2%	3.0%	0.4%
22	1.0%	2.4%	0.3%
23	0.7%	1.7%	1.0%
24	0.7%	1.6%	1.0%

Table 5.7: Hourly Percentage Load Impacts, SCE DBP Customers not in BIP, Summer Months

		Ventura
0.7%	1.7%	1.0%
	1.7%	1.0%
	1.7%	1.0%
0.7%	1.7%	1.0%
0.7%		1.0%
0.7%	1.6%	1.0%
0.5%	1.1%	0.8%
0.3%	0.6%	0.9%
0.1%	0.0%	0.9%
0.1%	-1.0%	0.5%
-0.1%	-1.5%	-0.2%
0.0%	-0.7%	-0.5%
-0.5%	-1.0%	-1.1%
-0.6%	-0.7%	-1.2%
-0.3%	-0.5%	-1.2%
0.1%	-0.1%	-1.2%
1.4%	1.3%	-0.5%
1.3%	2.6%	0.0%
1.9%	4.1%	0.8%
2.0%	4.6%	0.5%
1.9%	3.8%	0.3%
1.0%	3.0%	0.1%
0.8%	2.8%	0.1%
1.2%	3.0%	0.4%
	0.7% 0.5% 0.3% 0.1% 0.1% -0.1% 0.0% -0.5% -0.6% -0.3% 0.1% 1.4% 1.3% 1.9% 2.0% 1.9% 1.0% 0.8%	Basin LA Basin 0.7% 1.7% 0.7% 1.7% 0.7% 1.7% 0.7% 1.7% 0.7% 1.7% 0.7% 1.7% 0.7% 1.7% 0.7% 1.7% 0.7% 1.7% 0.7% 1.6% 0.5% 1.1% 0.3% 0.6% 0.1% 0.0% 0.1% -1.0% -0.1% -1.5% 0.0% -0.7% -0.5% -1.0% -0.6% -0.7% -0.3% -0.5% 0.1% -0.1% 1.4% 1.3% 1.3% 2.6% 1.9% 3.8% 1.0% 3.0% 0.8% 2.8%

Table 5.8: Hourly Percentage Load Impacts, SCE DBP Customers not in BIP, Nonsummer Months

Apply percentage load impacts to reference loads for each event scenario. In this step, the percentage load impacts were applied to the reference loads for each scenario to produce all of the required reference loads, estimated event-day loads, and scenarios of load impacts.

Apply forecast enrollments to produce program-level load impacts. For PG&E, The Brattle Group produced load impacts at the program level, portfolio level, and by LCA by applying the database of per-customer load impacts created in the previous step to their enrollment forecasts. The per-customer reference loads and load impacts were first scaled to match the expected *size* of customers (measured as annual average usage) in the enrollment forecast and then multiplied by the number of enrolled customers to obtain cell-level results. Program-level results were obtained by aggregating results across cells. SCE provided with its own enrollment forecast, which is summarized in the next section.

5.3 Enrollment Forecasts

This section summarizes the enrollment forecasts, and resulting reference loads and ex ante load impact forecasts. Detailed tables of all results required by the Protocols are provided in associated appendices.

Because PG&E is proposing to close its DBP program at the end of 2012, enrollments are forecast through the end of that year. The Brattle Group forecasts enrollments to be 1,066 customers in 2011 and 1,162 in 2012.

SCE anticipates enrollment in DBP of 1,456 customers in 2011 and 1,529 customers in 2012. SCE forecasts DBP enrollments to increase substantially to 4,069 customers in 2013 and then decline to 3,200 customers in 2014, where enrollment remains for the duration of the forecast period. Two major changes in SCE's DBP enrollment occur in 2013. First, DBP is extended to include smaller customers (under 200 kW), which leads to the addition of 2,463 service accounts in 2013 and 2,586 service accounts in 2014. The reference loads and percentage load impacts for these customers are developed using information from the over 200 kW customers who are not dually enrolled in BIP, scaled to the appropriate load level. The DBP/BIP customers are excluded because they tend to be large and very demand responsive, which is a type of customer we do not expect to be present in the smaller customer groups.

The second change that occurs in 2013 is that service accounts will be removed from the program at the end of the program year if they did not receive a credit during any of the events. As a result, 912 service accounts are removed from the program at the end of the 2013 program year. The 2014 program year therefore includes 614 large service accounts, which includes the "participants" (i.e., service accounts who received a credit in the previous program year) and 80 new service accounts (5 percent of the previous year's total), which are assumed to have the same characteristics as the participants.

Enrollments for the portfolio-level analyses removed a fixed number of customers dually enrolled in BIP each year (because BIP enrollments are not forecast to change in the 2011-2021 period). The number of customers we removed from the DBP enrollment forecast was equal to the number of overlapping customers in the 2010 program year (i.e., we did not remove all of the forecast BIP customers because they are not all dually enrolled in DBP, and dual enrollments were not explicitly forecast).

5.4 Reference Loads and Load Impacts

For each utility and program type, we provide the following summary information regarding the load impact forecasts, including the hourly profile of reference loads and load impacts for typical event days; the level of load impacts across years; and the distribution of load impacts by local capacity area.

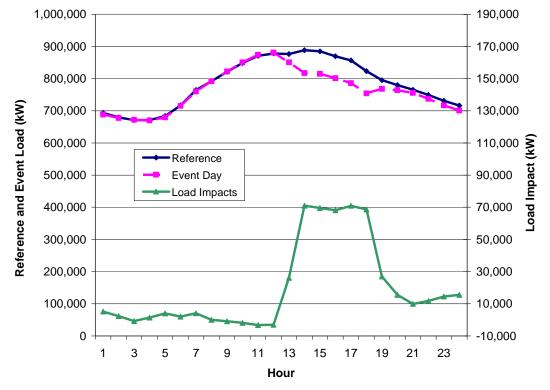
Together, these figures provide a useful indication of the anticipated changes in the forecast load impacts across the various scenarios represented in the Protocol tables. All of the tables required by the Protocols are provided in an Appendix.

5.4.1 PG&E

Figure 5.1 shows the program-level August 2011 forecast load impacts for a typical event day in a 1-in-2 weather year. Event-hour (1:00 to 6:00 p.m.) load impacts average 70 MW, which represents approximately 8.1 percent of the enrolled reference load. Figure 5.2 shows the same load impacts at the portfolio (i.e., when all DR programs are

simultaneously called). On average, the load impacts are reduced by 62 MW (relative to the program-level load impact) to 7.7 MW. The percentage load impact goes down to 1.2 percent. The large difference between program and portfolio load impacts is due to the contribution of customers dually enrolled in DBP and BIP. In the portfolio analysis (when a BIP event is assumed to be called at the same time as the DBP event), the load impacts for the dually enrolled customers are removed from DBP, dramatically reducing the load impact.





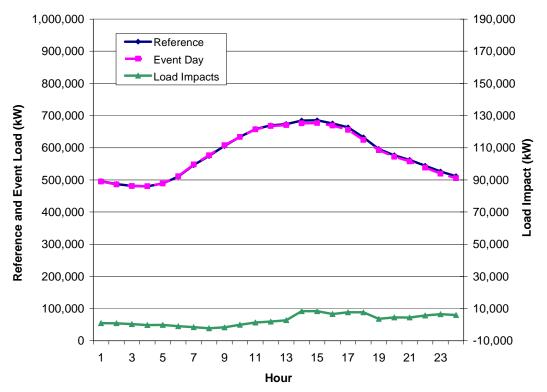


Figure 5.2: PG&E Hourly Event Day Load Impacts for the Typical Event Day in a 1-in-2 Weather Year for August 2011, Portfolio Level

Figure 5.3 shows the share of load impacts by local capacity area, assuming a typical event day in an August 2011 1-in-2 weather year. Customers not in any LCA account for the largest share, with 86 percent of the load impacts.

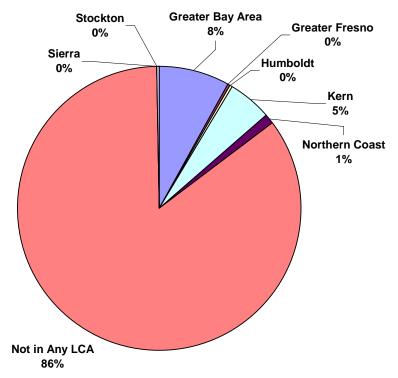


Figure 5.3: Share of Load Impacts by LCA for the August 2012 Typical Event Day in a 1-in-2 Weather Year

Figure 5.4 illustrates level of load impacts across the four key scenarios, differentiated by 1-in-2 versus 1-in-10 weather conditions, and portfolio- versus program-level load impacts. There is a very small difference in load impacts across weather scenarios, but the portfolio-level load impacts are much lower than the program-level load impacts (due to the removal of the customers dually enrolled in BIP).

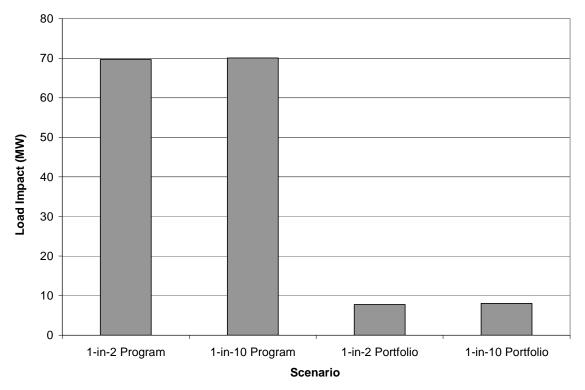


Figure 5.4: Average PG&E 2011 DBP Hourly Load Impacts by Scenario

5.4.2 SCE

Figures 5.5 and 5.6 show the program-level forecast reference load and load impacts for a typical event day in a 1-in-2 and 1-in-10 weather years from 2014 through 2021 (the enrollment forecast is assumed to remain constant during this period of time).

The 1-in-2 typical event day load impacts average 86.9 MW across the event hours, or 8.7 percent of the reference load. The figures show only small differences across the two weather years, with load impacts increasing to an average of 89.2 MW in the 1-in-10 weather year.

Figure 5.7 shows the portfolio-level forecast for a typical event day in a 1-in-2 weather year from 2014 through 2021. This forecast differs from the program-level forecast by excluding customers who are dually enrolled in DBP and BIP. Because the dually enrolled customers are much more demand responsive than the non-BIP customers, the load impacts are much lower in the portfolio-based scenario. Event-hour load impacts average 17.8 MW (down from 86.9 MW in the corresponding program-level scenario), or 2.4 percent of reference load.

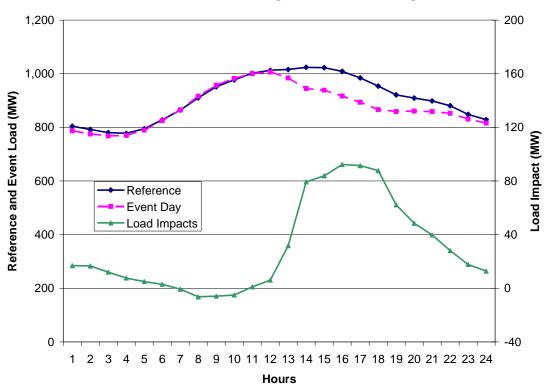
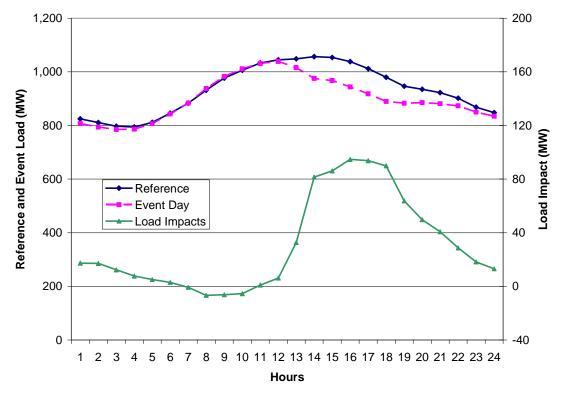


Figure 5.5: SCE Hourly Event Day Load Impacts for the Typical Event Day in a 1-in-2 Weather Year for August 2014-2021, Program Level

Figure 5.6: SCE Hourly Event Day Load Impacts for the Typical Event Day in a 1-in-10 Weather Year for August 2014-2021, Program Level



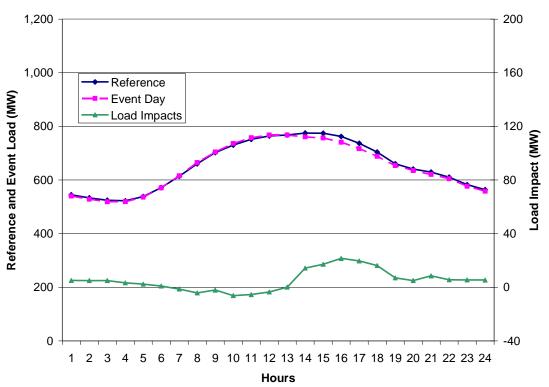


Figure 5.7: SCE Hourly Event Day Load Impacts for the Typical Event Day in a 1-in-2 Weather Year for August 2014-2021, Portfolio Level

Figure 5.8: Share of SCE DBP Load Impacts by Local Capacity Area

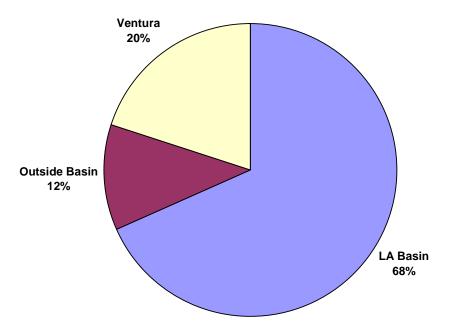
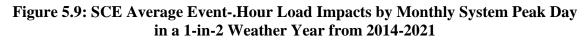
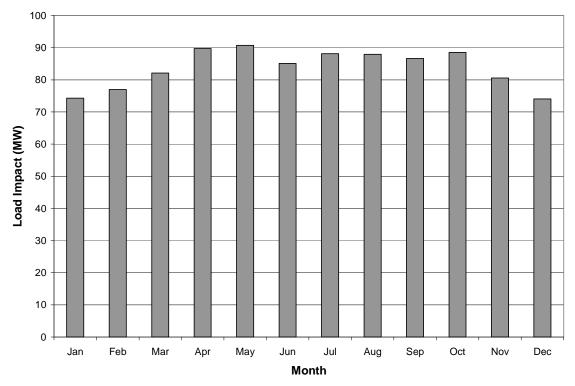


Figure 5.8 shows the distribution of program-level load impacts across local capacity areas. The LA Basin accounts for the largest share, with 68 percent of the total load impacts.

Figure 5.9 illustrates the average hourly program-level load impact across monthly system peak days of a 1-in-2 weather year, 2014-2021. Because we have not observed DBP event days in non-summer months, the percentage load impacts are constant across months. The level of the load impacts varies with the size of the reference loads.





6. Validity Assessment

We estimated load impacts using service account-specific regression models. This method has some advantages relative to the aggregated models (*e.g.*, properly accounting for when each SAID submitted bids, and allowing the results to be summarized according to any observed customer characteristic without requiring the estimation of a new model). However, it does require estimation of many models and it is important to use a uniform model structure across all of the service accounts in a program.

Our primary concern with respect to the validity of the findings is regarding the appropriateness of the model specification that is used. We believe that the most significant issue in an ex post analysis of load impacts is the risk of omitted variable bias. That is, loads levels may change for reasons that cannot be easily known to the analyst, and consequentially those reasons cannot be captured in the econometric models. For example, it is not uncommon for manufacturing customers to shut down operations for one to two weeks. Such activity can bias the estimates for the other included variables if variables are not included to explicitly account for such a "shut down".

In order to minimize the potential for omitted variable bias, we screen the SAID-level models to determine whether the load impacts appear to be "real". Because of time and resource constraints, we limit the screening to the models containing the largest estimated load impacts (positive and negative). For these service accounts, we extract the observed loads for each week in which an event day occurred. We then graph the daily loads for each event week. This provides an informal day-matching method for confirming the estimated customer load impacts. For cases in which this visual examination provides a clear confirmation that the estimation model does not properly capture the SAID's regular usage patterns and that the customer does not appear to change its behavior because of DBP event days, we zero out the estimated load impact. In a couple of cases, we found that load impacts using PG&E's 10-in-10 program baseline values better reflected the load impacts we observe from the day-matching method, so we used those values. Otherwise, we retain the estimates for the higher level summaries of load impacts.

7. Recommendations

In its 2012-2014 DR Portfolio Application, PG&E proposes to transition DBP customers to the Best Efforts, Day Ahead portion of its PeakChoice Program beginning in 2012, and close DBP by December 31, 2012. As the ex post load impacts in this study have shown, the percentage load impacts from PG&E's DBP customers are high (~30 percent) for those dually enrolled in the Base Interruptible Program (BIP) and low (~1 percent) for those who are not. PG&E plans to modify its PeakChoice program to allow for dual enrollment in the Best Efforts program and BIP. We recommend that PG&E remain aware that future load impacts on PeakChoice may substantially increase in size and variability depending upon which DBP customers choose to migrate.

Appendices

The following Appendices accompany this report. Each is an Excel file that can produce the ex post and ex ante tables required by the Protocols.

DBP Study Appendix A PG&E DBP Study Appendix B SCE DBP Study Appendix C PG&E DBP Study Appendix D SCE Ex-Post Load Impact Tables Ex-Post Load Impact Tables Ex-Ante Load Impact Tables Ex-Ante Load Impact Tables