

**PUBLIC VERSION**

# SDG&E 2020 Electric Emergency Load Curtailment (ELC) Plan

June 30, 2020

San Diego Gas & Electric

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking into the operation of interruptible load programs offered by Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company and the effect of these programs on energy prices, other demand responsiveness programs, and the reliability of the electric system. (U 902-E)

Rulemaking 00-10-002  
(Filed October 5, 2000)

SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902-E)  
2020 ELECTRIC EMERGENCY  
LOAD CURTAILMENT (ELC) PLAN

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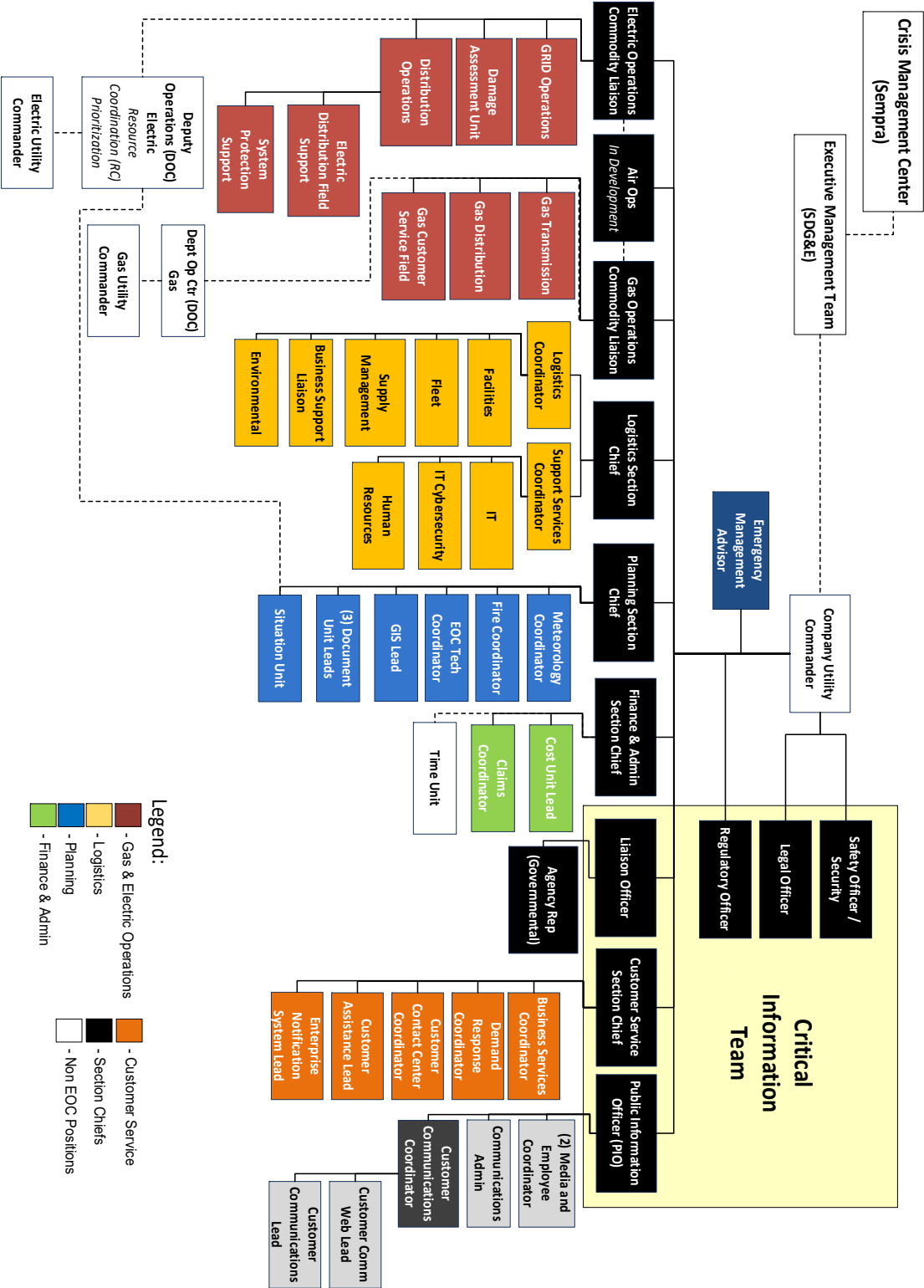
June 30, 2020

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# I. General

## **Purpose**

The Emergency Load Curtailment Plan (the ELC Plan) describes the processes undertaken by San Diego Gas & Electric (SDG&E) to attempt to prevent potential infrastructure failure from jeopardizing its own system and/or to assist the California Independent System Operator (CAISO) in correcting a statewide or regional imbalance between available system resources and system demand during periods when an operating reserve shortage is imminent or exists. It also describes the appropriate notifications during implementation of the ELC Plan. The ELC Plan is designed to be implemented by SDG&E on its own or after the CAISO notifies the Participating Transmission Owners' (PTOs) Control Centers, who in turn will notify the Utility Distribution Companies (UDCs) within their operational areas to implement their respective ELC plans.

An operating capacity deficiency exists when the operating capacity resources are inadequate to meet the load demand plus operating reserves. Operating Reserve is the margin of operating capacity above what is required to meet the demand. This margin is necessary to maintain reliability and as protection against the sudden loss of capacity. An operating reserve deficiency is oftentimes foreseeable in the day-ahead or real-time markets. Therefore, this ELC Plan assumes that there will be sufficient time to enact the ELC Plan's curtailing and reducing aspects in the event of an emergency. Finally, it assumes that the Company will have made, or will be in the process of making, all practical reductions and/or curtailments of its facility energy use during the ELC Plan's first step. This Plan also supports the North American Electric Reliability Corporation (NERC) emergency load curtailment reliability standards to help ensure the reliability of the Western Interconnection.

The ELC Plan has six progressive steps; each triggered by a specific set of circumstances and designed to minimize the need to enact succeeding, more stringent steps. The action specified in each step is based on the nature of the emergency and is designed to minimize the adverse impact on our customers.

## **Responsibility**

SDG&E will initiate an annual review of the ELC Plan in March of each year. To the extent necessary or appropriate, Regulatory Affairs, Emergency Services, Business Services, Customer Contact Center, Transmission and Distribution Asset Management, Electric Grid Operations, Electric Distribution Operations, Regional Public Affairs, Marketing and Communications, Business Analysis, Call Center, and Legal departments will participate in the review. The ELC Plan will generally be revised on or before June 1 of each year, or whenever the CAISO updates its procedures, as necessary. Each department will be responsible for updating their individual department procedures to implement the ELC Plan.

## **Plan Design**

The ELC Plan is designed to:

- 1) Minimize adverse impacts of an electric capacity shortage by curtailing load on the basis of need.
- 2) Specify the necessary action that must be taken during a capacity shortage.
- 3) Notify appropriate SDG&E company personnel of a capacity shortage situation and the enactment of the ELC Plan.
- 4) Notify designated regulatory agencies of the situation and the actions being taken to relieve the problem.
- 5) Communicate with the media and on social media platforms to bring awareness of the situation, amplify messaging for conservation, and the curtailment notifications to be made of our customers.
- 6) Alert law enforcement in anticipation of a Stage emergency and provide curtailment information as appropriate.

### **California Public Utilities Commission (CPUC) Decision**

This procedure is intended to meet the requirements of all applicable laws and regulations. To the extent applicable, SDG&E representatives will comply with the Guidelines for Notification of the CPUC Energy Division for Problems in Utility Systems. When appropriate, a representative of SDG&E will call the identified CPUC contact to report the applicable information.

### **List of Definitions**

The following acronyms are used in this ELC Plan and have the following meaning:

<b>BIP</b>	Base Interruptible Program
<b>CAISO</b>	California Independent System Operator
<b>CBP</b>	Capacity Bidding Program
<b>CCC</b>	Customer Contact Center
<b>CPP-D</b>	Default Critical Peak Pricing Program
<b>CPUC</b>	California Public Utilities Commission
<b>CSR</b>	Customer Service Representative
<b>DCC</b>	Distribution Control Center
<b>DRP</b>	Demand Response Program

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<b>DWR</b>	California Department of Water Resources
<b>EDOT</b>	Electric Distribution Operations Technology
<b>EDO</b>	Electric Distribution Operations
<b>ELCG</b>	Electric Load Curtailment Group
<b>ELC Plan</b>	SDG&E's Electric Load Curtailment Plan
<b>EOC</b>	Emergency Operation Center
<b>EOD</b>	Emergency On-Duty Representative
<b>ESD</b>	Emergency Services Department
<b>ESO</b>	Electric Switching Order
<b>FERC</b>	Federal Energy Regulatory Commission
<b>IVR</b>	Interactive Voice Response
<b>MORC</b>	Minimum Operating Reliability Criteria
<b>NERC</b>	North American Electric Reliability Corporation
<b>NMS</b>	Network Management System
<b>OCOEP</b>	County of Orange Office of Emergency Planning
<b>OES</b>	California Office of Emergency Services Warning Center
<b>PGP</b>	Peak Generation Program
<b>PI</b>	Plant Information
<b>PTO</b>	Participating Transmission Owner
<b>QF</b>	Qualified Facility
<b>SDG&amp;E</b>	San Diego Gas & Electric Company
<b>SDOES</b>	San Diego County Office of Emergency Services
<b>SIC</b>	Standard Industrial Code
<b>TOU</b>	Time of Use
<b>TST</b>	Technical Support Team
<b>UDC</b>	Utility Distribution Company
<b>WECC</b>	Western Electricity Coordinating Council



**Annual ELC Changes Comparison Table**

<b>COMPARATIVE STATISTICS – SUMMERS 2019 AND 2020</b>		
	<b>SUMMER 2019</b>	<b>SUMMER 2020</b>
<b>Adverse Summer Peak Forecast (MW)</b>	5139	5223
<b>Curtable Load (MW)</b>	3069	3052
Percent Of Peak	60	58
<b>Total Electric Customer Base</b>	1,460,440	1,477,058
<b>Curtable Customers</b>	897,473	897,280
Percent Of Total	61	61
12 kV Circuits	830	838
4 kV Circuits	59	59
12/4 kV Step-down Circuits	164	164
<b>Total Electric Circuits</b>	1053	1061
<b>Curtable Circuits (12kV and 4kV)</b>	534	534
Percent Of Total	51	50
<p>Notes:</p> <p>Changes to the curtailment list statistics for summer 2019 result primarily from the following:</p> <ul style="list-style-type: none"> <li>• Revised summer peak load forecasts for the system and individual circuits</li> <li>• Replaced 6 circuits from last year's curtailment due to changes in exempt customers or available load</li> </ul> <p>System peak load is coincident system peak and curtable load values are aggregate non-coincident circuit loads</p>		

## II. CAISO Information

### **CAISO Minimum Operating Reserve**

CAISO Minimum Operating Reserve Criteria is the sum of Regulating Reserve (sufficient spinning reserve immediately responsive to automatic generation control to meet North American Electric Reliability Corporation (NERC) Control Performance Criteria) and Contingency Reserve requirements per the WECC Standard BAL-002-WECC-2a.

### **CAISO System Emergency Steps**

The following describes the notices and stages for a CAISO emergency. The CAISO will issue an Alert notice based on forecast load and resources for the potential interruption of firm load, during which time conservation efforts are encouraged. Unless the CAISO issues specific orders during any of these stages, there are no actions required by SDG&E other than notifications to SDG&E customers.

**Note:** *The order of the actions taken may vary due to system conditions or other operational issues. It may be necessary to skip actions due to the severity of the situation. To the extent possible and prudent, action items that were skipped may be later implemented.*

**Alert:** An Alert is to be issued by the CAISO by 1500 hrs. the day before anticipated operating reserve deficiencies, along with appropriate notifications.

**Warning:** A Warning is to be issued by the CAISO when the Real-time Market - run results indicate that Contingency Reserves are anticipated to be less than Contingency Reserve requirements and further actions are necessary to maintain the Contingency Reserve requirements.

**Emergency Stage 1:** Emergency Stage 1 is declared by the CAISO when Contingency Reserve shortfalls exist or forecast to occur, and available market and non-market resources are insufficient to maintain Contingency Reserve requirements. The actions identified below will be taken as needed to restore or maintain required Contingency Reserves.

**Emergency Stage 2:** Emergency Stage 2 is declared by the CAISO when it has taken all actions listed above and cannot maintain its Contingency Reserve requirement as indicated by the EMS system. The actions identified below will be taken in an effort to restore the required Contingency Reserves.

**Emergency Stage 3:** Emergency Stage 3 is declared by the CAISO when the Contingency Reserve depletes or is anticipated to deplete below the Contingency

Reserve requirement and cannot be restored, without shedding firm load or when firm load interruptions are under way.

All CAISO Alerts, Warnings, Emergency Stages, and Operating Orders are issued by the CAISO System Operator or designated representative and received by SDG&E's Grid Control Center.

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## III. SDG&E Electric Load Curtailment (ELC) Plan

### Steps of the ELC Plan

The **six** steps of the ELC Plan are as follows:

#### 1. Alert

**When Implemented:** The CAISO issues an Alert statement.

**Procedure:**

- 1) Electric Grid Operations Shift Supervisor will receive an Alert statement from the CAISO
- 2) SDG&E will issue a web-based Energy Alert Statement indicating that the CAISO has issued an Alert statement and will update the information based upon actions of the CAISO and change the data as appropriate in concert with the CAISO. An Energy Alert Statement is an alert banner on the homepage [SDGE.com](http://SDGE.com).
- 3) If an Emergency Stage 1 is forecasted, SDG&E will quantify available Interruptible Load (Non-Firm) and report it to the CAISO.

#### 2. Warning

**When Implemented:** The CAISO issues a Warning statement.

**Procedure:**

- 1) Electric Grid Operations Shift Supervisor will receive a Warning statement from the CAISO.
- 2) SDG&E will issue an updated Energy Update on the web infocast indicating that the CAISO has issued a Warning Statement. An Energy Update is a web-based infocast found on [SDGE.com](http://SDGE.com).
- 3) SDG&E will quantify available Interruptible Load (Non-Firm) and report it to the CAISO.
- 4) SDG&E will quantify the current load reduction capabilities of the Electrical Load Curtailment Plan to prepare for implementation of the Interruptible Load programs (as applicable). SDG&E will communicate the load reduction capabilities to the CAISO.
- 5) Electric Grid Operations will notify the members of the Electric Load Curtailment Group (ELCG) of the Warning via pager and e-mail. At this time, the CAISO will dictate the quantity of interruptible load SDG&E is to shed (which shall be promptly

shed). The CAISO will attempt to provide this information with a 30-minute notice.)

- 6) SDG&E will request customers to voluntarily curtail electric energy use. These requests will outline specific measures customers should take. Customers will be told that the request for load curtailment is not intended to disrupt employment or reduce industrial production or commerce.

### **3. Warning with an Emergency Stage 1 imminent**

**When Implemented:** The CAISO issues a Warning statement and Emergency Stage 1 is imminent.

**Procedure:**

- 1) Electric Grid Operations Shift Supervisor will receive a message from the CAISO of a Warning.
- 2) Electric Grid Operations will contact the EOD and provide condition information, if the imminent Emergency Stage 1 has not been preceded by a CAISO Peak Day conference call,
  - a. The EOD will send an e-mail to ES-EOC-SD distribution list that includes EOC responders, operations personnel, and SDG&E executives. A notice will also be made to representatives of the San Diego Office of Emergency Services (SD OES), County of Orange Office of Emergency Planning (OCOEP), as well as local jurisdiction Emergency Managers. The e-mails will provide notification that CAISO has issued an Emergency Stage 1 and the reason for the declaration.
- 3) If the imminent Emergency Stage 1 Warning has been preceded by an ISO Peak Day conference call and the Emergency Stage 1 was anticipated, other than the notification to the OES no other notifications are necessary.
- 4) SDG&E will issue an updated Energy Update on the web infocast indicating that the CAISO will be issuing an Emergency Stage 1 Statement. An Energy Update is a web-based infocast found on [SDGE.com](http://SDGE.com).
- 5) When Stage 1 is imminent, Emergency Services staff will remain in monitoring mode with EOD.

**Termination:** The CAISO will issue a termination of the Warning when the operational reserves have been restored. The CAISO will notify SDG&E's Electric Grid Operations Department at the termination of the Warning. Grid Operations will then notify the members of the ELCG via pager and e-mail.

**NOTE:** *Depending on the severity of the situation, it may be necessary to bypass a CAISO declared Warning entirely and proceed immediately to CAISO declared Emergency Stage 1, 2, or 3.*

### **4. Emergency Stage 1**

**When Implemented:** An Emergency Stage 1 will be declared by the CAISO at any time it is clear that a Contingency Reserve shortfall (less than Contingency Reserve

requirements) is unavoidable or, when in real-time operations, the operating reserve is forecast to be less than minimum after utilizing available reserves.

**Procedure:** SDG&E will perform all the tasks outlined under a Warning with an imminent Emergency Stage 1; and if SDG&E has any QF generation, then it will be asked to go to full output.

- 1) When Stage 1 is issued, the EOD or the Manager of Emergency Services staff will coordinate with the Emergency Management Director.
- 2) The Emergency Management Director or designee will consult with the SDG&E Executive Team and Electric Grid Operations to decide whether and when it is appropriate to activate the EOC to a Level 3. If the SDG&E executives make the decision to activate the EOC, then SDG&E will notify its EOC responder workforce accordingly.
- 3) If the EOC is activated, the EOD, or the Emergency Services Manager, will notify the SD OES, OCOEP, as well as local jurisdiction Emergency Managers, of the Emergency Stage 1 and alert them to an Emergency Operations Center (EOC) Level 3 activation.

**Termination:** The CAISO will notify SDG&E's Electric Grid Operations at the termination of the Emergency Stage 1. Electric Grid Operations will then notify the members of the ELCG via pager and e-mail.

## 5. Emergency Stage 2

**When Implemented:** An Emergency Stage 2 is issued when the CAISO has taken all the actions listed in the Warning and Emergency Stage 1 sections and cannot maintain its Contingency Reserve requirement as identified in the CAISO EMS system. The actions identified below will be taken in an effort to restore the required Contingency Reserves.

**Procedure:** Under an Emergency Stage 2, SDG&E will perform all the tasks outlined under a Warning with an imminent Emergency Stage 1 and perform the following functions for an Emergency Stage 2.

- 1) Electric Grid Operations Shift Supervisor will receive a message from the CAISO of an Emergency Stage 2 and the potential for loss of load.
- 2) Electric Grid Operations will notify the members of the ELCG via pager and e-mail.
- 3) Upon receipt of an Emergency Stage 2 notification, the Demand Response Team will activate the appropriate Emergency Stage 2 Demand Response programs.
- 4) Grid Operations notifies AC Saver program staff via the demand response phone 858-725-1580 and e-mail that an Emergency Stage 2 has been declared and how long it is expected to last. A second notice is sent out if the emergency is terminated prior to the expected end time. SDG&E initiates a curtailment when SDG&E reaches its designated trigger or the CAISO requests load curtailment. Customer devices are cycled or smart thermostats are signaled to provide load drop. The AC Saver Program event limit is 80 hours or 20 events per year.

- Upon termination from the CAISO of an Emergency Stage 2, air conditioning units are released from control from the load control device and thermostats are returned to their original setting.
- 5) If an Emergency Stage 3 is anticipated within the next 90 minutes then the ISO will issue a "1 Hour Notice."
  - 6) Electric Grid Operations will contact the EOD and provide condition information.
  - 7) The EOD, or the Emergency Services Manager, will notify the SD OES, OCOEP, as well as local jurisdiction Emergency Managers, of the Emergency Stage 2 and alert them to an Emergency Operations Center (EOC) level 2 activation. (OES personnel have been trained and occupy seats at the EOC).
  - 8) The Emergency Management Director or designee, will consult with the SDG&E Executive Team and Electric Grid Operations to decide whether and when it is appropriate to activate the EOC. If the SDG&E executives make the decision to activate the EOC, then SDG&E will notify its EOC responder workforce accordingly.
  - 9) If an Emergency Stage 3 is imminent, the CAISO will request any additional assistance available. Electric Grid Operations will contact Demand Response Programs personnel to coordinate the activation of the electronic signal to customers participating in applicable interruptible programs. Customers will shed load in accordance with the terms of their applicable SDG&E tariff.
  - 10) Electric Distribution Operations will begin to determine the necessary field resources required to effect a curtailment and coordinate with the operating centers the extent of the expected curtailment.
  - 11) If Grid Operations determines that an Emergency Stage 3 is imminent, then Electric Distribution Operations will begin to determine, while still in the Emergency Stage 2 status, the appropriate circuit selections in order to affect a firm load curtailment under an Emergency Stage 3 CAISO order for firm load curtailment. The EOC will coordinate with Electric Grid Operations and Electric Distribution Operations the manner and order under which a firm curtailment will occur assuming an SDG&E system share of the statewide-predicted shortage or some additional amount as determined by the CAISO due to forecast versus scheduled power requirements for SDG&E (Refer to [CAISO Operating Procedure 4510A](#)). It is likely however, that due to the dynamics of the electric system that this calculation and the anticipated blocks/circuit selections will be iterative in nature.
  - 12) In addition, if an Emergency Stage 3 is imminent then SDG&E's Customer/Agency Notifications Team will initiate phone calls to customers on life support, temperature sensitive and medical baseline, traffic light centers, elevator operators, and certain commercial/industrial customers identified by SIC Code (see Appendix A).
  - 13) SDG&E will issue an updated Energy Update on the web infocast indicating that the CAISO has issued an Emergency Stage 2. An Energy Update is a web-based infocast found on [SDGE.com](#).

**Termination:** The CAISO will notify SDG&E's Electric Grid Operations at the termination of the Emergency Stage 2. Electric Grid Operations will then notify the members of the ELCG via pager and e-mail.

**NOTE:** *Depending on the severity of the situation, it may be necessary to bypass a CAISO declared Emergency Stage 2 entirely and proceed immediately to a CAISO declared Emergency Stage 3.*

Suggested telephone messages tailored for interruptible customers and for use with general customers can be found in Appendix B of the ELC Plan.

### **6. Emergency Stage 3**

**When Implemented:** An Emergency Stage 3 will be initiated by the CAISO when the Contingency Reserve depletes, or is anticipated to deplete below the Contingency Reserve requirement and cannot be restored, without shedding firm load or when firm load interruptions are under way.

**What the declaration from the CAISO means:** During a CAISO declared Emergency Stage 3, SDG&E will implement the Electric Grid Operation's Firm Load Curtailment Procedure (EOP5110), and operating personnel will commence rotating load curtailment and other emergency procedures when so directed to by the CAISO. At all times, the command to shed load will be the sole responsibility of the Electric Grid Operations Shift Supervisor in accordance with NERC/WECC/CAISO requirements for power system security and reliability.

**Procedure:** Under an Emergency Stage 3, SDG&E will perform all the tasks outlined under Emergency Stage 1 & Emergency Stage 2 above and in addition perform the following functions for an Emergency Stage 3:

- 1) Electric Distribution Operations will determine which block/circuits that SDG&E will curtail in accordance with SDG&E's Block/Circuit Curtailment Matrix (see Appendix C).
- 2) Electric Grid Operations will be in constant contact with the CAISO, Electric Distribution Operations, and the EOC in order to effect curtailments and prepare for unexpected circumstances.
- 3) Electric Distribution Operations will send out to all field leadership and all field personnel a message via the mobile data terminal, pager, radio, email and to a limited extent telephone message, that SDG&E will curtail certain circuits and the time for the curtailment.
- 4) Electric Distribution Operations will call Demand Response team to activate the Peak Generator Program (PGP); (formerly known as Rolling Blackout Reduction Program) to begin operating their generators and Electric Distribution Operations may send SDG&E personnel to the site for verification of the generator start and the associated load drop.
- 5) During a load curtailment (rotating outages), SDG&E will update the information on its website, [sdge.com](http://sdge.com) and will include information on current block/circuit outages as well as upcoming block/circuit outages as they are known.

- 6) , SDG&E will notify San Diego media outlets, including KOGO-AM (emergency broadcast station) about the Emergency Stage 3 and its potential effects, begin posting updates as appropriate on the SDG&E NewsCenter, and initiate social media communications
- 7) The EOD will notify the California Energy Commission, CalOES, SD OES, OCOEP, as well as local jurisdiction Emergency Managers of the Emergency Stage 1 declaration. They will also be informed of the amount of load (megawatts) SDG&E will be curtailing and the communities affected. The OCOEP will also be notified of the cities within Orange County that will be affected by the curtailment. SD OES will be updated by their OES representative in the EOC.
- 8) Once a curtailment has ended, the district construction and operation centers will make random calls to customers within the circuits affected to ensure the power has been restored successfully.
- 9) SDG&E will issue an updated Energy Alert Update on its website indicating that the CAISO has issued an Emergency Stage 3. An Energy Update is a web-based infocast found on [SDGE.com](http://SDGE.com). The Rotating Outage page of [SDGE.com](http://SDGE.com) shows blocks and circuits that may be included in an outage.

**Termination:** All firm load will be restored prior to restoration of any Interruptible Load when a termination of an Emergency Stage 3 occurs. Final termination of the Emergency Stage 3 will occur when all firm load has been restored.

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## IV. Communications within the ELC PLAN

### Regulatory and CAISO Communications

The CAISO will notify all PTOs' Control Centers, who in turn will notify the UDCs within their operational areas to implement their respective ELC plans.

The CAISO will notify the CPUC and other state agencies of the activation of a CAISO Alert, Warning, or Emergency Stage 1, 2, or 3. SDG&E Regulatory Affairs will notify the CPUC when SDG&E activates its EOC in response to a CAISO-directed Emergency Stage 2 or 3, which would require involuntary load curtailment. Notification to the CPUC should include: start time, anticipated duration, circuit/block number(s), amount of load curtailment, major location of load interruption, and contact number. Updates should be submitted as soon as possible each time a new circuit block is interrupted (per CPUC S. Gallagher Memo of 11/13/06). When an SDG&E-declared Emergency Stage 1 or 2 or CAISO-declared Emergency Stage 2 or 3 is confirmed, SDG&E will make required reports to the CPUC via online reporting, which is the preferred method for reporting to the Commission.



San Diego Gas & Electric

**1. CPUC Online Emergency Reporting:**

Gas or Electric Utility needs to report an incident:

<https://ia.cpuc.ca.gov/safetyevents/>

Electric Utility needs to report a Major Outage:

<https://ia.cpuc.ca.gov/electricincidents/>

Power Plant/Generation Asset Owner – Safety related incident at the plant:

<https://ia.cpuc.ca.gov/safetyevents/>

**2. CPUC Telephone Reporting (If online reporting not available):**

Gas or electric incidents: 800-235-1076

Power Plant safety-related incidents: 415-355-5503

**3. To be used ONLY if the online and hotline notification systems are NOT working:**

Leslie “Lee” Palmer	415-703-2369	<a href="mailto:Leslie.Palmer@cpuc.ca.gov">Leslie.Palmer@cpuc.ca.gov</a>
Danjel Bout	916-713-4141	<a href="mailto:danjel.bout@cpuc.ca.gov">danjel.bout@cpuc.ca.gov</a>
Nika Kjensli	415-703-1529	<a href="mailto:Nika.Kjensli@cpuc.ca.gov">Nika.Kjensli@cpuc.ca.gov</a>
Fadi Daye	213-576-7017	<a href="mailto:Fadi.Daye@cpuc.ca.gov">Fadi.Daye@cpuc.ca.gov</a>
Tony Noll	916-928-3315	<a href="mailto:Anthony.Noll@cpuc.ca.gov">Anthony.Noll@cpuc.ca.gov</a>
CPUC Alerts	800-235-1076	<a href="mailto:een@cpuc.ca.gov">een@cpuc.ca.gov</a>

The CPUC has internal protocols to ensure all appropriate CPUC personnel are notified of any reported incidents, so long as these guidelines are followed.

**Internal Communications**

Once the CAISO conveys to SDG&E Grid Operations that a significant condition exists on the electric grid, the Director of Electric Grid Operations, or his/her Designee, will contact, by phone, pager and/or email, the Vice President of Electric Transmission & System Engineering and the ELCG. This will open the lines of communication among affected SDG&E departments and will rise with any escalation in emergency stage.

Director – Electric Grid Operations:

Sohrab “Ali” Yari

Designated Alternates:

John Baranowski

Kahveh Atef

**Executive Management Group**

The Vice President of Electric Operations or their designee will notify and update the Executive Management Group on the condition of the grid and the expectations, given the known data. The Executive Management Group will then provide direction for the ELCG, as needed. The Executive Management Group is made up of the following individuals:

**President – SDG&E**

Scott Drury

**Chief Operating Officer – SDG&E**

Caroline A. Winn

**SVP – Electric Operations**

David L. Geier

**VP – Electric System Operations**

John Jenkins

**Director – Electric Grid Operations**

Sohrab “Ali” Yari

**Director – Electric Distribution Operations**

Oliva Reyes

### **Emergency Load Curtailment Group**

The ELCG will be responsible for the implementation of the ELC Plan. It will complete all operational activities and provide the primary communications for external constituencies. The representatives of the ELCG will be convened at the Emergency Operations Center (EOC) at implementation of a Stage 3 Emergency or at the discretion of the Vice President – Electric Operations or their designee for any/all levels of the emergency load curtailment plan. When convened, the ELCG will function as a primary communications center. It has direct responsibility for coordinating and implementing directions of the Executive Management Group. The ELCG is made up of the following groups, all of which respond to the EOC when activated.

#### **Communications Section**

Director – Marketing & Comms	Andrea Smith
Sr. Communications Manager	Zoraya Griffin
Sr. Communications Manager	Helen Gao
Communications Manager	Robert Iezza
Communications Manager	Denice Menard
Communications Manager	Jessica Packard
Communications Manager	Sara Prince

SDG&E 24-Hour Media Hotline/On-Duty PIO 877-866-2066

#### **Responsible Tasks: Media**

In coordination with the CAISO and the ELCG, Communications is responsible for developing and disseminating unpaid communications for external audiences through the news media. The Communications representatives are responsible for developing the communication strategy, ensure One Voice communications, including but not limited to developing talking points, develop and distribute appropriate media statements, news

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advisories, press releases, provide situational updates on the SDG&E NewsCenter, and manage media inquiries as appropriate.

### **Responsible Tasks: Employee Communications**

Work with the Employee Communications group to alert employees through email and intranet postings of the EOC activation and calls for energy conservation.

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### **Customer Communications, Web and Social Media**

Manager of Marketing	Amy Clay
Social Media Comms Manager	Allison Torres
Branding Manager	Rosario Sandoval-Jeffrey
Web Manager	David Lawrence
Marketing Comms Manager	Roland Mollen
Customer Analytics Manager	Dana Santana
Marketing Comms Manager	April Bernhardt
Marketing Comms Manager	Ty Tantum
Content System Mgmt Advisor	Fyrad Ali
Web Business Technologist	Donna Jose
Web Business Technologist	Steve Obedoza

**Responsible Tasks**

In coordination with the CAISO and the ELCG, Social Media, Customer Communications and the Web Group are responsible for updating SDGE.com, initiating and managing communications on SDG&E social media channels (i.e. Facebook, Twitter, Instagram), providing talking points for the Call Center, developing and launching emails for residential and business customers, and drafting outbound dialer scripts, as needed. For extended outages, communications may develop external materials such as fact sheets, FAQs or door hangers, as well as paid advertising, such as newspaper items, and radio IDs. This list is not all encompassing, there are several Section Chiefs rostered to respond to support this function.

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**Customer/Agency Notifications**

Director – Customer Care	Todd Cahill
Alternates	
Manager – Digital & Cust Exp	Brendan Blockowicz
Director – Customer Field Ops	Lisa Davidson
Director – Customer Programs	Alex Kim
Bus. Services Manager	Jeni Reynolds
Federal Accounts Manager	Joe Pierzina
Business Services Manager	Bryce Tiernan

**Responsible Tasks**

Business Services will contact major customers to gain immediate assistance in enacting Stages 1 through 3 of the ELC Plan. Federal Accounts staff will assist with these activities as necessary. This list is not all encompassing, there are several Customer representatives rostered to respond to support this function.

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**Local Governmental Affairs/Regional Public Affairs**

Director – Regional Public Affairs	Warren Ruis
Alternates	
External Relations Manager - OC	Duane Cave
Public Affairs Manager	Joe Gabaldon
Community Relations Manager	Morgan Justice-Black
Major Projects Dev Manager	Kevin O’Beirne
Public Affairs Manager	Claudia Valenzuela
Director – Community Relations	Pedro Villegas
Regional Public Affairs Manager	Todd Voorhees

**Responsible Tasks**

Local Governmental Affairs/Regional Public Affairs will provide notification of potential energy curtailments, de-energizations and emergency situations, as appropriate, to governmental agencies, such as city/county managers. Notifications will be made in advance, to the extent possible. This list is not all encompassing. There are several Section Chiefs rostered to respond to support this function

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**Regulatory Affairs**

Regulatory Case Manager	Elizabeth Beaver
Regulatory Case Manager	Elaine MacDonald
Regulatory Business Manager	Kirstie Raagas

**Responsible Tasks**

Regulatory Affairs will provide notifications of potential load curtailments, widespread outages, public safety power shutoffs and other emergency situations, as appropriate, to the CPUC. Notifications will be made in advance, when possible. This list is not all encompassing. There are several Section Chiefs rostered to respond to SDG&E's EOC to support this function.

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## FACILITY MANAGEMENT

Manager Dale Tattersall

Alternate John Ritter

### **Responsible Tasks**

Facilities Management will reduce non-essential lighting, air conditioning loads, and all other non-essential load in Company facilities.

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## **CUSTOMER CONTACT CENTER (CCC)**

Customer Care Centers Site Manager Michelle Costello

Alternate – Project Manager Deborah Booker

Customer Care Ops Manager Lucy Yribe

### **Responsible Tasks**

Customer Contact Center is responsible for distributing copies of approved news advisories/releases to all Energy Services Specialists. Customer Contact Center is also responsible for administering the outbound dialing notification campaigns for life support, medical baseline and temperature sensitive customers.

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## **EMERGENCY SERVICES**

Director August “Augie” Ghio

Program Manager Mona Freels

24/7 “Emergency On-Duty” (EOD) 858-503-5173 (24/7)  
Email: [ESEODSDGE@semprautilities.com](mailto:ESEODSDGE@semprautilities.com)

### **Responsible Tasks**

Emergency Services is responsible for the 7/24 readiness of SDG&E’s EOC and alternate site. The group communicates constantly with the CAISO at the onset of a Stage 1



Emergency, provides internal email updates as frequently as required throughout the emergency, and consults with the Executive Team on the activation of the EOC, facilitating EOC operations and providing support as required. This group also notifies SD OES, OCOEP, as well as local jurisdiction Emergency Managers, and the California Energy Commission at the on-set of a Stage 1 declaration through the determination of the Stage 3 and communicates with CalOES, SD OES, OCOEP, as well as local jurisdiction Emergency Managers during a Stage 3 emergency. This list is not all encompassing, there are several EOD's rostered to respond to support this function

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### **GRID OPERATIONS**

Director Ali Yari

Alternates John Baranowski

Kahveh Atef



#### **Responsible Tasks**

Grid Operations will be responsible for initial notifications to the ELCG and the Vice President –Electric Transmission & System Engineering. Grid Operations will be responsible for notifying the Distribution Operations Shift Managers and/or Working Foremen on the amount of load that needs to be dropped in a Stage 3 Emergency. Grid Operations is the primary point of contact with CAISO Operations during system emergencies.

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### **DISTRIBUTION OPERATIONS**

Director Oliva Reyes

Alternate Cory Mitsui

Roland Blankenship

#### **Responsible Tasks**

Distribution Operations will be responsible for implementation of SDG&E's Rotating Load Curtailment Standard Operating Procedures (EOP5110 and DOP 3007) as directed by Grid Operations and providing load block information to the ELCG Communication



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Dispatch Team:

DR Manager

Brad Mantz

**Responsible Tasks**

Demand Response Programs (DRP) is responsible for developing and maintaining demand response programs. DRP notifies customers when demand response events are needed and maintains customer participation information for interruptible and demand response programs.

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## V. Specific Outside Entity Contacting Plans

### MEDIA CONTACT PLAN

Mass media public announcements – social media, radio, television, and newspapers - will be used to augment notification to our customers of the need to make extra efforts to reduce their electric use. These announcements will begin as soon as the CAISO or SDG&E declares that a potential capacity shortage is forecast or exists and/or SDG&E's system is jeopardized. Announcements will continue through the duration of the shortage or until SDG&E's system is no longer jeopardized.

#### 1. ACTION PLAN

At the direction of the ELCG and the CAISO, Communications will enact the Media Contact Plan, a multi-stage communications plan, when the CAISO controlled service area Operating Reserve shortfall (less than MORC minimum) is unavoidable or, when in real-time operations, the Operating Reserve is forecast to be less than minimum after utilizing available resources or SDG&E declares its system in jeopardy. They will partner with local media outlets to advise SDG&E customers of the electric supply situation and recommend the actions customers should take.

During all stages of the Plan, Communications will manage and all media inquiries and conduct interviews where appropriate.

#### 2. EMERGENCY STAGES

##### Emergency Stage 1

SDG&E will direct all media inquiries to the CAISO for details. Communications will consult with the CAISO and SDG&E's Emergency Load Curtailment Group and will then launch proactive calls to the news media to urge customer conservation.

**Emergency Stage 2**

SDG&E will direct all media inquiries to the CAISO for details. Communications will consult with the CAISO and SDG&E's ELCG on whether to issue an advisory. Communication will also continue to work with local media to broadcast the conservation message to help avoid power interruptions.

**Emergency Stage 3**

Notify local media via a verbal or written urgent advisory. For Emergency Stage 3 (only) this message will advise customers that service interruptions (rotating outages) are scheduled or have begun. A sample media advisory is attached as Appendix D.

**End of Emergency**

When service interruption ceases, a News Release may be issued announcing the end of the service interruption, thanking customers for their cooperation, and advising them of what action should be taken for the next day. Communications will consult with the CAISO and SDG&E's ELCG on whether to issue an end of emergency advisory.

**BUSINESS SERVICES CUSTOMER CONTACT PLAN**

Generally, it is the responsibility of the Business Services Department to contact the larger customers within the SDG&E service territory. Phone calls, supplemented with specific pages, emails and sometimes person to person meetings will be held depending upon the circumstance and the extent of the problem on the grid. These announcements will begin as soon as the CAISO or SDG&E declares that a potential capacity shortage and/or SDG&E's system is jeopardized. Announcements will continue through the duration of the shortage or until SDG&E's system is no longer jeopardized.

**1. ACTION PLAN**

At the direction of the ELCG and the CAISO, Business Services will implement this multi-stage communications plan when the CAISO controlled service area Operating Reserve shortfall (less than MORC minimum) is unavailable or, when in real-time operations, the Operating Reserve is forecast to be less than minimum after utilizing available resources or SDG&E declares its system is in jeopardy.

**2. EMERGENCY STAGES**

**Emergency Stage 1**

During a Emergency Stage 1, all customers may be requested to voluntarily defer or reduce electric usage. If the time between the declaration of a Emergency Stage 1 by the CAISO or SDG&E and their estimated termination time is insufficient for the request to

affect any voluntary load reduction, the request may not be released. Communications will consult with the CAISO and SDG&E's ELCG on whether to release or not release the request (to defer or reduce electric usage).

If a request for voluntary load reduction is made, Customer Contact Center will ensure that all Energy Service Specialists have copies of the request as well as a scripted information message for customers. Customer Contact Center will also ensure the tape message announcing a Emergency Stage 1 is activated.

In addition, other participating customers may be notified of the CAISO's or SDG&E's declaration of a Emergency Stage 1. Demand Response Programs will consult with Grid Operations on the potential for proceeding to an Emergency Stage 2. The potential for proceeding to Emergency Stage 2 will dictate the need for notifying other participating customers.

***Upon CAISO request, an electronic signal will be sent to all Stage 1 Demand Response Participants informing them that an event for the program in which they participate has been requested.***

Business Services and Customer Service Operations may notify major customers of an Emergency Stage 1 and request they voluntarily defer or reduce the use of non-essential electric load. If the time between the declaration of an Emergency Stage 1 by the CAISO or SDG&E and their estimated termination time is insufficient for the major customers' electric load reductions to be effective, the notification may not be made. Customer Programs will consult with Grid Operations on the status of the Emergency Stage 1 before deciding whether to make or not make the notifications

### ***Emergency Stage 1 Activities:***

- A. Electric usage by SDG&E facilities will continue to be reduced to minimum essential levels.
- B. If appropriate, to aid residential customers in determining what load might be curtailed during the emergency, the following list should be offered:
  - Air conditioning
  - Clothes dryers
  - Dishwashers
  - Washing machines
  - Televisions
  - Pool filter pumps
  - Cooking applications
  - Small convenience appliances (hair dryers, vacuums, etc.)
  - All indoor and outdoor lighting
  - Water use to absolute minimum level (critical requirements)
  - Water heating (electric)

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- Electric Vehicle Charging
- C. If appropriate, commercial customers will be asked to reduce or defer non-essential electric use between 11 a.m. and 7 p.m. The following measures will be suggested:
1. Raise air-conditioning thermostat setting to 78 degrees F or higher in occupied spaces and turn off in unoccupied spaces.
  2. Reduce lighting in areas where it is not essential for safety. Consider garages, hallways and lobbies, warehouses, office, production and work areas, displays and flood lighting.
  3. Defer or reduce all other non-essential uses. These uses could include the following:
    - Advertising signs
    - Cleaning equipment
    - Reproduction equipment
    - Circulating pumps
    - Supply & exhaust fans
    - Boilers
    - Cafeteria equipment
    - Water heaters
    - Dispensing machines
    - Pool pumps
    - Escalators
    - Computers
    - Door & gate openers
    - Cranes
    - Calculators
    - Maintenance & repair equipment
    - Typewriters
    - Music systems
    - Battery chargers
    - Intercoms
    - Elevators (except emergency)
  4. Reduce or defer water-pumping load by minimizing the use of water.
  5. Reduce or defer Electric Vehicle charging until the emergency has passed.
  6. Reduce or defer other electric equipment loads where practical.
- D. Interruptible customers and demand response program participants will be curtailed in conformance with tariff schedules approved by the California Public Utilities Commission.
- E. If appropriate, Customer Contact Center will internally distribute copies of the voluntary curtailment request and scripted messages for customers. The appropriate tape message will be activated.
- F. Suggested telephone messages, for both general and interruptible customers, and a sample media advisory are included in Appendix B & D.

## **Emergency Stage 2**

During Emergency Stage 2, if appropriate, the mass media public announcements will continue. The message will announce implementation of intensified load reduction efforts and remind customers using life-support systems to check their standby power facilities. If Emergency Stage 1 has been bypassed and the time between the declaration of a Emergency Stage 2 by the CAISO or SDG&E and their estimated termination time is insufficient for the mass media public announcement to affect any voluntary load reduction, the announcement may not be released. Communications will consult with the CAISO and SDG&E's ELCG on whether to release or not release the announcement.

In addition, if appropriate, major customers will be advised for the first time or as a follow-up request, by telephone, to voluntarily curtail nonessential electric usage. If Emergency Stage 1 has been bypassed and the time between the declaration of an Emergency Stage 2 by the CAISO or SDG&E and their estimated termination time is insufficient for the major customers' electric load reductions to be effective, the notification may not be made. Customer Programs will consult with Grid Operations on the status of the Emergency Stage 2 before deciding whether to make or not make the notifications.

***Upon CAISO request, an electronic signal will be sent to all Emergency Stage 2 Demand Response Participants informing them that an event for the program in which they participate has been requested.***

Customer Contact Center will ensure the Energy Services Specialists receive the updated public announcements as well as the updated scripted message for the customers. Customer Contact Center will update the taped message announcing the activation of Emergency Stage 2.

### ***Emergency Stage 2 Activities:***

- A. Electric usage by SDG&E facilities will continue to be reduced to minimum essential levels.
- B. If appropriate, to aid residential customers in determining what load might be curtailed during the emergency, the following list should be offered:
  - Air conditioning
  - Clothes dryers
  - Dishwashers
  - Washing machines
  - Televisions
  - Pool filter pumps
  - Cooking appliances
  - Small convenience appliances (hair dryers, vacuums, etc.)
  - All indoor and outdoor lighting
  - Water use to absolute minimum level (critical requirements)

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- Water heating (electric)
- Electric Vehicle charging

If appropriate, customers should be made aware that the hours of 11 a.m. to 7 p.m. are extremely critical times during the emergency.

- C. If appropriate, to reduce energy use even further than that achieved during Emergency Stage 1, commercial, industrial, and agricultural customers (as well as SDG&E) can pursue the following actions at their facilities:
1. Turn off non-essential air conditioners (keeping in mind health and safety requirements).
  2. Curtail all non-essential lighting use - outdoor signs, decorative lighting, and display lighting as much as possible.
  3. Curtail water use to absolute minimum level (essential use only).
  4. Curtail nonessential water pumping between 11 a.m. and 7 p.m.
  5. Reduce or defer Electric Vehicle charging until the emergency has passed.
- D. Interruptible customers and demand response programs participants will be curtailed in conformance with tariff schedules approved by the California Public Utilities Commission.
- E. If appropriate, the Customer Contact Center will internally distribute updated public announcement and scripted messages for customers. The appropriate tape message will be activated.
- F. Suggested telephone messages and a sample media advisory for Emergency Stage 2 are included in Appendix B.

### **Emergency Stage 3**

If requested by the CAISO or SDG&E, Distribution Operations and Grid Operations personnel will commence emergency load curtailment procedures as outlined in the Rotating Load Curtailment Standard Operating Procedures (EOP5110).

Customers whose service has been interrupted will be requested to place manual and automatic equipment in the "off" position and to not turn on the equipment until after power has been restored.

Emergency Stage 2 curtailment instructions will continue during an Emergency Stage 3 curtailment for those customers whose circuits are not affected immediately by circuit interruptions. Emergency Stage 3 Demand Response Participants will be notified and requested to comply with program requirements.



Customer Contact Center will activate its Emergency Response Team and customer call back procedures.

### **End of the Emergency**

The Independent System Operator will coordinate return to normal status through SDG&E's Grid Operations, who will notify the ELCG and the Vice President – Electric Operations.

A sample media advisory describing this situation is included in Appendix D, as well as a sample media announcement to be used to thank customers for their cooperation.

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## **VI. Implementing Demand Response Programs**

### **General**

Demand Response has several programs that have been designed and developed to address system emergencies and constraints. Program implementation is initiated by SDG&E or the CAISO. Demand Response Program participants may be required to sign an agreement indicating the estimated amount of load their site(s) can reduce.

### **Day-Ahead/Day-Of Load Reduction**

Default Critical Peak Pricing (CPP-D) is a rate whereby events are called with day ahead notification driven by tomorrow's forecasted load of 4,000 MW and current system load or as requested by the CAISO or local utility emergency. The program operates year round. Customers will be notified electronically by 3:00 PM. SDG&E may activate the program for a local utility emergency.

The Capacity Bidding Program (CBP) is a demand response program that offers customers various product options to earn incentive payments in exchange for reducing energy consumption. The program has Day-Ahead and Day-Of options. Customers on the Day-Of 1 to 9 pm product are notified two hours prior to the start of the event. The Utility may call a CBP Day Of Event whenever the day of market price is equal to or greater than \$110/MWh, or as Utility system conditions warrant.

The AC Saver program is a demand response program that reduces participant's AC use using either a direct load control switch (AC Saver Day-Of) or a thermostat (AC Saver day-ahead). The program event season is April 1<sup>st</sup> through October 31<sup>st</sup> and events may occur between 12:00 p.m. and 9:00 p.m. The day-ahead program is usually called day-but it can be called day-of as well. Program triggers include heat rate, CAISO warning notices or alerts, imminent local emergencies and local system needs. Customers with the switch who sign up for notification receive a call from our ENS system when an event

is initiated. Customers with a smart thermostat will receive a notification on their thermostat or thermostat app when an event is initiated. Customers do not receive notification when the event ends.

### **Warning Notice**

When CAISO notifies SDG&E of a Warning Notice, that means the Base Interruptible Program (BIP) may be added to the CAISO market pool of resources and may be called. If BIP is called, SDG&E will initiate it.

SDG&E will notify BIP-participants via email and ENS communicator to curtail load. The BIP program limits the interruptible period to four (4) hours per day, ten (10) interruptions per calendar month and 120 hours per calendar year.

AC Saver day-ahead (thermostats) and day-of (switches) may both be activated in response to a CAISO warning notice. Nest thermostats on AC Saver day-ahead currently must be dispatched at least 2 hours in advance however ecobee thermostats and the AC Saver day-of switches can be activated in approximately 10-15 minutes.

The Capacity Bidding Program (CBP) Day-Of options may be called when the CAISO notifies SDG&E of an alert or warning notice. The notification time is two hours prior to the start of the Event.

### **Emergency Stage 1**

When CAISO notifies SDG&E of an Emergency Stage 1, that means BIP may be added to the CAISO market pool of resources and may be called. If BIP is called, SDG&E will initiate it.

SDG&E will notify BIP-participants via email and ENS communicator to curtail load. The BIP program limits the interruptible period to four (4) hours per day, ten (10) interruptions per calendar month and 120 hours per calendar year.

AC Saver day-ahead (thermostats) and day-of (switches) may both be activated in response to an Emergency Stage 1. Nest thermostats on AC Saver day-ahead currently must be dispatched at least 2 hours in advance however Ecobee thermostats and the AC Saver day-of switches can be activated in approximately 10-15 minutes.

The Capacity Bidding Program (CBP) Day-Of options may be called when the CAISO notifies SDG&E of an alert or warning notice and Emergency Stage 1. The notification time is two hours prior to the start of the Event.

## **Emergency Stage 2**

When CAISO notifies SDG&E of an Emergency Stage 2, that means the Base Interruptible Program (BIP) may be added to the CAISO market pool of resources and may be called. If BIP is called, SDG&E will initiate it.

SDG&E will notify BIP-participants via email and ENS communicator to curtail load. The BIP program limits the interruptible period to four (4) hours per day, ten (10) interruptions per calendar month and 120 hours per calendar year.

When the CAISO notifies SDG&E of an Emergency Stage 2 SDG&E may initiate the Peak Generation Program (PGP). Although the program trigger allows for events to be called in an Emergency Stage 3 the program trigger also allows events to be called if a transmission emergency exists or SDG&E warrants it. When triggered, SDG&E will notify (PGP) participants to shift load within fifteen (15) minutes from the SDG&E notification.

PGP participants are permitted to operate back up generation during events.

Upon termination from the CAISO of an Emergency Stage 2, PGP participants will be notified in the same manner as the curtailment notification.

The Capacity Bidding Program (CBP) Day-Of options may be called when the CAISO notifies SDG&E of an alert or warning notice and Emergency Stage 2. The notification time is two hours prior to the start of the Event.

AC Saver day-ahead (thermostats) and day-of (switches) may both be activated in an Emergency Stage 2. Nest thermostats on AC Saver day-ahead currently must be dispatched at least 2 hours in advance however Ecobee thermostats and the AC Saver day-of direct load control switches can be activated in approximately 10-15 minutes

## **Emergency Stage 3**

When CAISO notifies SDG&E of an Emergency Stage 3, that means the Base Interruptible Program (BIP) may be added to the CAISO market pool of resources and may be called. If BIP is called, SDG&E will initiate it.

SDG&E will notify BIP-participants via email and ENS communicator to curtail load. The BIP program limits the interruptible period to four (4) hours per day, ten (10) interruptions per calendar month and 120 hours per calendar year.

Upon notification from the CAISO that an Emergency Stage 3 or transmission emergency is imminent, SDG&E will notify PGP participants, via email and ENS Communicator to curtail load. PGP participants will have fifteen (15) minutes from SDG&E notification to curtail load from the statewide grid.

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PGP participants are permitted to operate back-up generation during an Emergency Stage 3 in an effort to shift load from the statewide grid.

Upon termination from the CAISO of an Emergency Stage 3, PGP participants will be notified in the same manner as the curtailment initiation.

The Capacity Bidding Program (CBP) Day-Of options may be called when the CAISO notifies SDG&E of an alert or warning notice and Emergency Stage 3. The notification time is two hours prior to the start of the Event.

AC Saver day-ahead (thermostats) and day-of (switches) may both be activated in an Emergency Stage 2. Nest thermostats on AC Saver day-ahead currently must be dispatched at least 2 hours in advance however ecobee thermostats and the AC Saver day-of switches can be activated in approximately 10-15 minutes

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## VII. Procedure for Requests from Water Utilities to Restore Power

According to CPUC decision 02-04-060, water and sewer treatment utilities are not exempt from rotating outages. Instead, they may request partial or complete rotating outage exemption from electric utilities in times of emergency identified as requiring their services, such as fire-fighting or similar conditions that pose an immediate threat to public health and safety.

To facilitate these requests the following procedures will apply. More detailed procedures are provided in [Appendix J](#).

### **Curtailment Prevention**

During ISO Declared Emergency Stage 2 or Stage 3 or during an SDG&E initiated Emergency Load Curtailment event, a water/wastewater customer may determine that there is a critical need for avoiding curtailment based upon an immediate threat to public health and public safety. The water/wastewater customer will request for an exemption from curtailment by contacting SDG&E at 877-277-0399, which is monitored at the Electric Distribution Coordinator desk at the EOC. Once the EOC Electric Distribution Coordinator receives the call and verifies the caller is an authorized representative for the requesting water/wastewater customer, he/she will request Electric Distribution Operations to exempt the requested circuit. Once the requested circuit has been exempted, Electric Distribution Operations will notify the EOC Electric Distribution Coordinator who in turn will notify the customer of the decision.

### **Best Efforts**

SDG&E provides no guarantee that advance notice can be given to any of the customers within the rotating outage block due to the dynamic nature of the electric grid and the active management of the load by the CAISO. SDG&E will attempt to accommodate the immediate and critical needs of these types of facilities on a case-by-case basis.

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## VIII. Notification of Rotating Outages

### **1. Existing Notification Procedures**

The following procedures are utilized to notify Medical Baseline, Life Support, and Temperature Sensitive customers about rotating outages. Whenever possible based on advance notification of potential rotating outages received from the CAISO these notifications are made prior to the initiation of the rotating outage. However, in those cases in which insufficient advance notice is received from the CAISO, the notifications are completed as quickly as possible thereafter.

## **2. Medical Baseline, Life Support, and Temperature Sensitive Customers**

Each summer, Customer Assistance (Customer Programs) mails out written reminders to Medical Baseline, Life Support, and Temperature Sensitive customers to remind them of their need to be prepared in the event of an electric outage.

Upon notification from the CAISO that rotating outages are likely, Medical Baseline, Life Support, and Temperature Sensitive customers in those curtailment blocks that will be affected are contacted via an automated outbound dialing system. These notifications will inform customers of the possibility of rotating outages and advise them to take appropriate steps to prepare for a temporary interruption in their service. To avoid repeated calls on a daily basis during prolonged high-risk periods, when appropriate, these customers are normally notified that rotating outages are a possibility for the next week. For those customers that are not reached by phone, an answering machine message is left when possible.

Following the completion of a rotating outage, Medical Baseline, Life Support, and Temperature Sensitive customers affected by the outage are again contacted via an automated outbound dialing system to determine whether their electric service has been successfully restored and verify the restoration. For those customers who are not reached by phone, an answering machine message is left, when possible. In cases in which no answering machine message can be left, Customer Contact Center personnel will issue a service order and field personnel are dispatched to visit the customer and leave the message in person or writing. Customers are advised to contact SDG&E should there be any problems.

As of May 13, 2020, SDG&E has 137 Temperature Sensitive Customers and 59,760 Medical Baseline participating households of whom 43,451 are considered Life Support.

## **3. Elevator Customers**

As a result of safety concerns for people who could be stuck in elevators during rotating outages, Business Services (Bus Svcs) proactively identified elevator customers in SDG&E's service territory. In addition, Bus Svcs educated elevator customers on elevator safety and will notify them in cases of rotating outages via an automated outbound dialing system.

Account identification was initially accomplished through elevator permits filed with the State of California. Secondly, Business Services sent elevator permit holders a letter requesting account identification. Customers were requested to phone or fax the Customer Contact Center with the pertinent account information so it could be loaded into the outbound dialer.

## **4. Large Commercial / Industrial Customers**

Upon notification from the CAISO that rotating outages are likely, large commercial & industrial customers are contacted with a message regarding the potential rotating outage. In cases in which rotating outages are a possibility for a number of subsequent

days, the message is adjusted accordingly. SDG&E currently communicates with approximately 600 such customers.

#### **5. Small Commercial / Industrial Customers**

Upon notification from the CAISO that rotating outages are likely, small commercial/ industrial customers with specified North American Industrial Classification Systems (NAICS) codes are contacted by an automated outbound dialing system with a message regarding the potential rotating outage. In cases in which rotating outages are a possibility for a number of subsequent days, the message is adjusted accordingly. SDG&E currently communicates with approximately 11,000 such customers. The NAICS codes listed in Appendix A are included in the customer notification step.

#### **6. Curtailment Block and Circuit**

SDG&E includes the applicable curtailment block and circuit on customer bills effective with bills mailed starting on June 1, 2009. For those customers fed by a circuit not currently included in the curtailment plan, the circuit will be provided along with a message that the customer is currently not subject to curtailment. In all cases, a message indicating that curtailment status is subject to change without notice will be included. The curtailment block and circuit information is available to customers via the Interactive Voice Response (IVR) or by speaking with a Customer Service Representative. With knowledge of their block and circuit information, customers subject to curtailment will be able to obtain current and potential curtailment information from the SDG&E web site or by speaking with a Customer Service Representative.

#### **7. Customer Notification**

SDG&E offers the option of email or pager notification of potential rotating outages to business and medical baseline customers who prefer this means of notification.

## IX. Essential Use Customer Classification and Priority System for Rotating Outages

### 1. Rotating Outage Priority System

Rotating outages are controlled power interruptions that SDG&E institutes at the direction and under the supervision of CAISO when there is an insufficient supply of electricity to meet customer demand. In 1978, the CPUC created a priority system in which certain customers who provide essential public health, safety, and security services should normally be exempt from rotating outages. In subsequent CPUC actions this priority system has been amended to include customer categories as customers that should be exempt from rotating outages. The CPUC's priority system for rotating outages is provided in Appendix E.

### 2. SDG&E Implementation of the CPUC's Priority System

To implement the CPUC's Priority System for Rotating Outages, SDG&E has exempted from rotating outages all circuits that serve identified essential use customers in accordance with CPUC directives. In the unlikely event an essential use customer is inadvertently interrupted due to a rotating outage, SDG&E's customer service toll-free number is available for the essential use customers to call to report the outage; if feasible, SDG&E will restore service to the essential use customer, and then contact the customer to verify service restoration.

For **water and sewage customers only**, SDG&E has established a toll-free **EOC** number for those customers to call **when** an emergency arises which requires exemption from curtailment for their service, such as for firefighting, or other public health and safety needs. SDG&E will take all steps necessary to restore service as quickly as possible, and then contact the customer to verify service restoration.

SDG&E takes steps to ensure its essential use customer list is up-to-date and accurate. SDG&E annually reviews its essential use customer list to verify that each customer on the essential use customer list should continue to be included. Any customer who is found to need reclassification (either essential to nonessential or nonessential to essential) receives a notification 15 days in advance of the effective date of reclassification.

Sample Advance Notice of Reclassification for customers moving to Essential, Nonexempt Essential, and Nonessential can be found in Appendices F, G, H of this document.



## X. Circuit Load Definition

SDG&E bases its load curtailment MW values for circuits (as shown in Appendix C) on its forecasted 2020 non-coincident system peak value of 5223 MW. This is a "1 in 10 year" forecasted peak, meaning that there is a 10% statistical chance of the SDG&E system reaching this peak value. The load forecast for the circuits in the curtailment plan are non-coincidental peaks. In an actual load curtailment scenario "real time" circuit load values will be used to determine total load amounts being curtailed to meet CAISO requirements.

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## XI. Curtailment Equity

Electric Distribution Planning assessed all distribution circuits, both 12kV and 4kV, SCADA and non-SCADA, in developing the curtailment plan, with the exception of those serving essential use (exempt) customers, those producing reverse power flow into the system measured at the circuit breaker due to customer generation and a few circuits not practical to use due to operational constraints. Appendix E outlines specific definition for customers considered as essential. An aggregate of Net Energy Metering customers on the circuit, resulting in reverse power flow measured at the bus were not exempt from the list. In compiling the plan, a cross section of circuits from each operating district is assembled into each load block to provide equity to customers and to avoid isolating any one area of significant size during an outage. Transmission circuits and customers were reviewed but are not considered for the curtailment plan at this time because of negative impacts on the operation of SDG&E's transmission network. Curtailment of a transmission customer would require opening a closed-loop transmission network and changing the power flow of the network. That change could disrupt the optimal flow of the network and negatively impact not only the network performance, but also the NERC reliability standards designed to ensure the integrity of the bulk power system.

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## XII. Extreme Temperature

In Decision 02-04-060, issued April 22, 2002, the CPUC adopted a proposal for the utilities to address the needs of "temperature-sensitive" customers who could be affected by rotating outages. In response to this order, Applications are available to customers with a health condition which places them at increased health risk from temperature extremes to receive advance notification of a rotating power outage (rotating outages). A customer with a person living in the customer's immediate household with a temperature sensitive health condition may also use the application. The advance notification will be made by phone call to the telephone number designated by the customer.

Persons who qualify for this advance notification are those with a health condition that places them at increased risk, compared to the average person, for poor health and illness when exposed to temperature extremes. These conditions include, but are not limited to:

cystic fibrosis, cardiac conditions, peripheral vascular disease, diuretics, seizure medications, tricyclic antidepressants, or calcium channel blockers. Customers are advised to have a backup plan for 90 minutes, with tips on options for them to use to deal with extreme temperature. Copies of these Applications are available by calling SDG&E at 1-800-411-7343.

In addition, the CPUC instructed that the utilities establish locations where a customer could go to obtain temporary relief from extreme heat during a rotating outage. These areas have been identified as "Cool Zones" by San Diego County Aging and Independent Services. A list of phone numbers for nearby libraries, movie theaters, senior centers, shopping malls or other public facilities that are air-conditioned is available to customers. Customers can look for the polar bear sign in the window, or call the county at 1-800-510-2020.

In the event rotating outages are required during a heat event when the "Cool Zones" are operating, SDG&E will exempt those circuits serving the "Cool Zones".

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### XIII. Temporary Circuit Exemptions

As stated in Decision 02-04-060 dated April 22, 2002 pages 93 - 95, and set forth herewith, SDG&E shall comply with valid orders from responsible police or fire authorities and other authorities with emergency powers to exempt a circuit from outage or order a circuit re-energized based on public health and safety.

SDG&E will coordinate such exemption or re-energization with the agreement and approval of the California Independent System Operator (CAISO) as necessary so that such action will not jeopardize a widespread system collapse.

## APPENDICES

**APPENDIX A**

**SDG&E SIC and NAICS Code List**

SDG&E is currently set to phone customers, using an outbound dialing system (MOSIAX), on the established circuits with the following SIC and NAICS codes:

SIC Range	Description	NAICS Range
'0210' to '0299'	LIVESTOCK PRODUCTS	112111 to 112990
'0740' to '0749'	VETERINARY SERVICES	541940
'0752'	ANIMAL SPECIALTY SERVICES	115210 and 812910
'1389'	OIL AND GAS FIELD SERVICES	213111 and 213112
'1440' to '1446'	SAND AND GRAVEL	212321 and 212322
'2000' to '3999'	MANUFACTURING	311111 to 339999
'3728'	AIRCRAFT PARTS AND EQUIPMENT	336411 to 336413
'4000' to '4099'	RAILROADS	482111 and 482112 488210
'4221'	FARM PRODUCT WAREHOUSING AND STORAGE	493130
'4222'	REFRIGERATED WAREHOUSING AND STORAGE	493120
'4581'	AIRPORTS FLYING FIELDS & SERVICES	488111 to 488190
'4600' to '4699'	PIPELINES EXCEPT NATURAL GAS	486110 and 486910 486990
'4800' to '4899'	COMMUNICATIONS SERVICES COMMUNICATIONS SERVICES (Additional Codes)	515111 to 515210 517510 517110 517212 517310 and 517410 517910
'4940' to '4949'	WATER SUPPLY	221310 and 221311
'4952'	SEWAGE SYSTEMS	221320
'5140' to '5154'	PERISHABLE FOODS	424410 to 424590
'5171'	PETROLEUM BULK STATIONS & TERMINALS	424710
'5172'	PETROLEUM PRODUCTS NEC	424720
'5181'	PERISHABLE BEVERAGES	424810
'5182'	PERISHABLE BEVERAGES	424820
'5193'	FLOWERS & FLORISTS' SUPPLIES	424930
'5400' to '5499'	FOOD STORES	445110 to 445299
'5511'	NEW AND USED CAR DEALERS	441110 and 441120
'5541'	GASOLINE SERVICE STATIONS	447110 and 447190
'5912'	DRUG STORES AND PROPRIETARY STORES	446110
'7216'	DRYCLEANING PLANTS EXCEPT RUG	812320
'7261'	FUNERAL SERVICE AND CREMATORIES	812210 and 812220
'7371' to '7374'	COMPUTER PROGRAMMING & PROCESSING	541511 and 541512 518210 511210 334611
'7382'	SECURITY SYSTEMS SERVICES	561621
7542'	CARWASHES	811192
'7822'	MOTION PICTURE AND TAPE DISTRIBUTION MOTION PICTURE THEATERS EXCEPT DRIVE-IN	512120
'7832'		512131
'7833'	DRIVE-IN MOTION PICTURE THEATERS	512132

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SIC Range	Description	NAICS Range
'8000' to '8099'	HEALTH SERVICES	621111 to 623311
'8200' to '8299'	SCHOOLS	611110 to 611710
'8351'	CHILD DAY CARE SERVICES	624410
'8361'	RESIDENTIAL CARE	623210 and 623220 623312 623990
'8422'	BOTANICAL AND ZOOLOGICAL GARDENS	712130 and 712190
'8711'	ENGINEERING SERVICES	541330
'8721'	ACCOUNTING SERVICE	541211 and 541214 541219
'8731'	COMMERCIAL PHYSICAL RESEARCH	541710
'8732'	COMMERCIAL NONPHYSICAL RESEARCH NONCOMMERCIAL RESEARCH	541720 and 541910
'8733'	ORGANIZATIONS	813311 to 813319
'8734'	TESTING LABORATORIES	541380
'9200' to '9299'	JUSTICE PUBLIC ORDER & SAFETY	922110 to 922190

**APPENDIX B**

**Stage 2 Emergency – Customer and Media Samples**

**STAGE 2 EMERGENCY**

**SUGGESTED TELEPHONE MESSAGES - GENERAL CUSTOMERS**

This is San Diego Gas & Electric with an important message about your electric service.

We are facing a statewide critical power shortage or a local shortage of power potentially affecting your electric service select the one that fits the situation) caused by

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To help avoid outages, we are asking SDG&E customers to voluntarily reduce nonessential electricity use. Please help current conditions (implementing the load curtailment plan that we previously discussed with you) by turning off all but your most essential electric equipment?

Thank you. We will follow up with you the emergency has passed so you are able to resume normal operation. The request for reduced power use is expected to end at

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If you have any questions, please call our Customer Contact Center, at 1-800-411-7343.

**END OF LOAD CURTAILMENT**

This is San Diego Gas & Electric with an important message about your electric service.

The statewide critical power shortage or local power supply shortage (select the one that fits the situation) has (passed) (been averted). We apologize for this inconvenience this may have caused and appreciate your cooperation during this emergency.

If you have any questions, please call our Customer Contact Center, at 1-800-411-7343.

**APPENDIX B (Continued)**

**Stage 2 Power Curtailment**

**Sample Media Advisory**

**STATE POWER CONTROL CENTER ADVISES SDG&E CUSTOMERS MUST  
CONSERVE ELECTRICITY TO AVOID POWER OUTAGES**

***MEDIA ADVISORY***

San Diego Gas & Electric (SDG&E) today is issuing an urgent appeal to its 1.4 million electric customers in San Diego and southern Orange County to sharply increase their energy-conservation efforts in order to avoid possible service interruptions.

According to the state's central control center for electricity, the California Independent System Operator (CAISO) in Folsom, Calif., has declared a "Stage 2 power emergency because the consumer demands for electric energy in California are nearing maximum capacity due to **(extremely hot weather) (coupled with) (mechanical failure of critical electric generating equipment at (name of plant) and/or problems with a major transmission power line near (area),** according to (SDG&E spokesperson).

A "Stage 2" power emergency is declared when the state's operating reserves drop below 5 percent.

If the reserves continue to fall, the CAISO could direct SDG&E to initiate rotating, one-hour service interruptions (rolling black-outs) through SDG&E's service territory.

Those who chose outside electricity service companies as their electric suppliers continue to have their power delivered by SDG&E and are subject to the necessary service interruptions.

Some large businesses in the San Diego area have already begun their conservation efforts to help prevent outages. More help is needed.

"We understand being without power is disruptive **said \_\_\_\_\_ of SDG&E.** "But increasing energy conservation efforts now will help avoid the need for service interruptions," **he/she added.**

Curtailment block and circuit numbers are included in customers' bills. With that information, customers can monitor their potential outage status by checking SDG&E's website at [www.sdge.com](http://www.sdge.com)

If health and safety are not jeopardized SDG&E suggests air conditioners be turned off during the emergency. The use of other appliances and electric equipment, such as dishwashers, clothes washers, and dryers should also be significantly reduced or avoided

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where possible. Refrigerator and freezer doors should be kept closed, and all unnecessary lighting should be switched off. In addition, water use should be cut down due to the need to use electricity for water pumping and processing. Charging of Electric Vehicles should be deferred until the emergency has passed, if possible.

**(SDG&E representative)** says all customers should keep battery-operated radios and flashlights available, and cautioned those using electric life-support systems to ensure they have backup batteries, equipment and facilities prepared for an outage.

SDG&E forecasts a demand of about \_\_\_\_\_ megawatts on its electric system today. The record for electricity usage in SDG&E's service territory was 4890 megawatts on September 16, 2014.

A megawatt is enough energy to power about 600 homes.

Utility officials said that weather forecasts indicated that further emergency cutbacks **(will) (will not) (may not)** be necessary tomorrow.

SDG&E is a regulated public utility that provides service to 3.6 million consumers through 1.4 million electric meters and more than 863,000 natural gas meters in San Diego and southern Orange counties. SDG&E's service area covers 4,100 square miles, covering two counties and 25 cities. SDG&E is a subsidiary of Sempra Energy (NYSE: SRE), a Fortune 500 energy services holding company based in San Diego.

**###**

NOTE: At the time of release, the advisory will be updated to reflect the specific nature and geographic area(s) of the problem.

### ***STAND-BY STATEMENT POWER SAVERS AVERT OUTAGES, SDG&E SAYS***

Interruptions of electric service to more than 1.4 million SDG&E customers were averted today as residents, businesses and industries responded to pleas to conserve power, SDG&E reported.



## **APPENDIX B (Continued)**

SDG&E lauded the efforts of its customers to cut back on power usage by turning off their air conditioners, unneeded lighting, irrigation pumps and other electrical equipment, and credited customer action for helping to prevent service interruptions.

### **TIPS FOR REDUCING ELECTRICITY USE**

- If health and safety are not jeopardized, SDG&E suggests air conditioners be turned off during the emergency.
- During the Stage 2 emergency limit use of clothes dryers, dishwashers, washing machines, ranges and ovens and non-essential appliances.
- Reduce lighting in areas where it is not essential for safety. Areas to consider include garages, hallways and lobbies, warehouses and displays.
- Minimize opening the freezers and refrigerators.
- Schedule or reschedule Electric Vehicle charging to occur after the emergency has passed, to the extent possible with your immediate driving needs.

For free information on how to conserve electricity, call SDG&E at 1-800-411-7343 or visit [www.SDGE.com](http://www.SDGE.com)

**APPENDIX C**

**SDG&E Block/Circuit Curtailment Matrix**

**SDG&E's Block/Circuit Curtailment Matrix**

**CONFIDENTIAL INFORMATION**

**HAS BEEN REMOVED**



**APPENDIX D**

**Stage 3 Sample Media Advisory**

**Stage 3 Power Curtailment**

**Sample Media Advisory**

**VOLUNTARY ENERGY CUTBACKS FAIL,  
STATE POWER COMMAND CENTER ORDERS  
ELECTRIC INTERRUPTIONS FOR SDG&E CUSTOMERS**

A series of rotating power interruptions lasting **(about one hour each)** will **(began today)** for some of the more than 1 million electric customers served by San Diego Gas & Electric after voluntary energy cutbacks of electric use failed to keep pace with energy demands.

The outages in San Diego and Orange County are the result of several factors. According to the state's central control center for electricity, the California Independent System Operator (CAISO) in Folsom, Calif., the consumer demands for electric energy in California are nearing maximum capacity due to **(extremely hot weather) (coupled with) (mechanical failure of critical electric generating equipment at (name of plant) and/or** problems with a major transmission power line that serves SDG&E's service territory.

The led CASIO to declare a "Stage 3" power emergency. A Stage 3 emergency occurs when there are insufficient resources to enable CASIO to maintain the contingency reserve of the Operating Reserve at or above 50%.

"We understand there is no good time to be without power, We apologize for the inconvenience and understanding as we work together to help avoid a more severe and widespread power outage that could have a more widespread affect," **said \_\_\_\_\_ of SDG&E.**

The company said electric service to selected areas **(is being) (will be)** turned off on a rotating basis.

Curtailment block and circuit numbers are included in customers' bills. With that information, customers can monitor their outage status by checking SDG&E's Web site at [www.sdge.com](http://www.sdge.com) hose who purchase their electricity from other suppliers still have their power delivered by SDG&E and are also subject to the service interruptions.

Many large businesses in the San Diego area have reduced their electric use to help prevent outages. More help is needed.

SDG&E urges customers whose service has not been interrupted to reduce or eliminate all nonessential use of electricity during the emergency to help minimize power outages.

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**(SDG&E representative)** says all customers should keep battery-operated radios and flashlights available, and cautioned those using electric life-support systems to check their standby facilities and equipment.

If health and safety are not jeopardized, SDG&E suggests air conditioners be turned off. The use of other appliances and electric equipment should be significantly limited. Refrigerator and freezer doors should be kept closed, and all unnecessary lighting should be switched off. In addition, water use should be reduced due to the need to use electricity for water pumping and processing.

“People whose homes or businesses are currently without electric service can help by turning all electrical switches and air conditioning controls to the ‘off’ position,” said \_\_\_\_\_ of SDG&E. These steps will help prevent circuits from being overloaded when electric service is restored.”

If electric service is not restored in about an hour, customers should call SDG&E at 800-411-7343.

SDG&E forecasts a demand of about \_\_\_\_\_ megawatts on its electric system today. The record for electricity usage in SDG&E’s service territory was 4,890 megawatts on September 16, 2014.

A megawatt is enough energy to power about 650 homes.

SDG&E officials said that weather forecasts indicated that further emergency cutbacks **(will) (will not) (may not)** be necessary tomorrow.

SDG&E is a regulated public utility that provides service to 3.6 million consumers through 1.4 million electric meters and more than 863,000 natural gas meters in San Diego and southern Orange counties. SDG&E’s service territory covers 4,100 square miles, covering two counties and 25 cities. SDG&E is a subsidiary of Sempra Energy (NYSE: SRE), a Fortune 500 energy services holding company based in San Diego.

NOTE: At the time of release, the advisory will be updated to reflect the specific nature and geographic area of the problem and will include a phone number for further information.

## **APPENDIX D (Continued)**

### **TIPS FOR REDUCING ELECTRICITY USE**

- If health and safety are not jeopardized, SDG&E suggests air conditioners be turned off. The use of other appliances and electric equipment should be significantly reduced.
- Refrigerator and freezer doors should be kept closed, and all unnecessary lighting should be switched off. In addition, water use should be reduced due to the need to use electricity for water pumping and processing.
- Do not use electric clothes dryers, dishwashers, washing machines, ranges and ovens and non-essential appliances between 11 a.m. and 7 p.m.
- Reduce lighting in areas where it is not essential for safety. Areas to consider include garages, hallways and lobbies, warehouses and displays.
- Minimize opening freezers and refrigerators.
- Schedule or reschedule Electric Vehicle charging to occur after the emergency has passed, to the extent possible with your immediate driving needs.
- For free information on how to conserve electricity, call SDG&E at 1-800-411-7343.

### **Stand-by Statement**

#### **SDG&E THANKS CUSTOMERS FOR THEIR UNDERSTANDING AND COOPERATION**

SDG&E would like to thank its 3.4 million electric customers for their understanding and cooperation during the power interruptions.

“The voluntary reduction in electricity during peak periods failed to avert the necessity of implementing rotating outages,” said \_\_\_\_\_ of SDG&E. “The prolonged heat wave and other factors brought about the problem but thanks to the conscientious efforts of our customers, the outages were kept to a minimum.”

**APPENDIX E**

**PRIORITY SYSTEM FOR ROTATING OUTAGE  
FROM CPUC DECISION 02-04-060**

I. Essential Customers — Normally Exempt from Rotating Outages

- A. Government and other agencies providing essential fire, police, and prison services.
- B. Government agencies essential to the national defense.
- C. Hospitals and skilled nursing facilities.
- D. Communication utilities, as they relate to public health, welfare and security, including telephones.
- E. Navigation communication, traffic control, and landing and departure facilities for commercial air and sea operations.
- F. Electric utility facilities and supporting fuel and fuel transportation services critical to continuity of electric power system operation.
- G. Radio and television broadcasting stations used for broadcasting emergency messages, instructions, and other public information related to the electric curtailment emergency.
- H. Water and sewage treatment utilities may request partial or complete rotating outage exemption from electric utilities in times of emergency identified as requiring their service, such as firefighting.
- I. Areas served by networks, at serving utility's discretion.
- J. Rail rapid transit systems as necessary to protect public safety, to the extent exempted by the Commission.
- K. Customers served at transmission voltages to the extent that (a) they supply power to the grid in excess of their load at the time of the rotating outage, or (b) their inclusion in rotating outages would jeopardize system integrity.

## **APPENDIX E (Continued)**

- L. Optional Binding Mandatory Curtailment Program (OBMC): Any customer or customers, meeting the following criteria.

The customer must file an acceptable binding energy and load curtailment plan with the utility. The customer must agree to curtail electric use on the entire circuit by the amount being achieved via rotating outages. The customer's plan must show how reduction on the entire circuit can be achieved in 5 percent increments to the 15 percent level and show how compliance can be monitored and enforced. The customer must maintain the required reduction during the entire rotating outage period. The required curtailment level is requested prior to commencement of Stage 3. Several customers on a circuit may file a joint binding plan to guarantee the required curtailment from the entire circuit. Each utility shall facilitate communication between customers on a circuit if any customer expresses interest in enrolling in OBMC program.

Note: Protection cannot be guaranteed because daily circuit switching may temporarily change a customer's outage block and priority classification.

- M. Limited other customers as necessary to protect public health and safety, to the extent exempted by the Commission.

Note: Category M is removed from the essential customer list effective September 7, 2003 per CPUC Decision D.02-04-060

- N. Petroleum refineries, vital ancillary facilities, and other customers in the critical fuels chain of production, to the extent exempted by the Commission. Petroleum refineries are facilities that separate or alter the components in crude oil, and convert the components into usable fuels or feedstock for further processing. Vital ancillary facilities are facilities that, if curtailed during a rotating outage, would cause one or more petroleum refineries to significantly curtail production, initiate a controlled shutdown, or initiate an emergency shutdown. Eligible refineries and vital ancillary facilities must be firm electricity service customers served at transmission level, or served at distribution level in an outage block exempt from rotating outages.



## APPENDIX F

### Advance Notice Of Reclassification To Essential Use Customer Status

Date: [Date]  
Customer: [Customer name]

The California Public Utilities Commission (CPUC) has directed SDG&E to provide advance notice to every customer who will be reclassified from either an essential to a nonessential use customer or from a nonessential to an essential use customer.

**PLEASE BE ADVISED THAT YOU ARE SCHEDULED TO BE RECLASSIFIED AS AN ESSENTIAL USE CUSTOMER WHO WILL NORMALLY BE EXEMPTED FROM ROTATING OUTAGES. THIS RECLASSIFICATION WILL BECOME EFFECTIVE IN 15 DAYS UNLESS DISPUTED IN WRITING AS DESCRIBED BELOW.**

- [list service account number(s) and service address(es)]

Please direct any questions or disputes regarding your reclassification to [SDG&E contact] at [address]. If based upon information that you have provided, your business meets one or more of the definitions of an essential use customer set forth by the CPUC. Attached is the CPUC approved list of essential customer categories exempt from rotating outages. We note that you have further informed us that you do not have adequate or sufficient backup generation capabilities to sustain your mission-critical functions for more than one hour. As such, SDG&E will classify the following account(s) as essential use and take will steps necessary to, under normal circumstances, prevent service interruption thereto during rotating outages:

If we do not receive a written objection within 15 days of the date of this notice, your reclassification shall be considered undisputed.

You may bring unresolved disputes to the CPUC by filing a formal complaint with the CPUC pursuant to Rules 9 through 13.2 of the CPUC's Rules of Practice and Procedure. Your complaint must allege and show that the utility has acted or failed to act in violation of law, or in violation of any order or rule of the Commission, by the utility improperly implementing, or failing to follow, the Commission's adopted priority system. These complaints will be filed and processed using the CPUC's expedited complaint procedure. The CPUC Public Advisor's Office can assist you in filing a formal complaint. You may reach the Public Advisor's Office at the following addresses: 505 Van Ness Avenue, Room 5303, San Francisco, CA 94102 (e-mail [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov) or 320 West Fourth Street, Suite 500, Los Angeles, CA 90013 (e-mail [public.advisor.la@cpuc.ca.gov](mailto:public.advisor.la@cpuc.ca.gov)).

## **APPENDIX F (Continued)**

Although SDG&E will take steps to exempt your account(s) from rotating outages under normal circumstances, extraordinary circumstances may prevent us from ensuring exemption, and may result in an interruption in your service. If you do experience service interruption during a rotating outage, you may contact us directly at 1-800-411-7343 to inquire why your service has been interrupted and whether your service can be restored. You will be asked to provide the following information:

- the SDG&E service account number serving the facility needing restoration
- the SDG&E service address of the facility or account
- the caller's name and position of authority with the company
- A follow-up telephone number.

If service restoration is feasible, we will take all necessary steps to restore your service as quickly as possible, and then contact you to verify that service has been restored. While SDG&E strives to provide the most reliable electric service possible, please be advised that SDG&E does not and cannot guarantee a continuous or sufficient supply of electricity or freedom from interruption. This proviso is contained in SDG&E's Tariff Rule 14. Even outside the rotating outage scenario, you could experience an unanticipated and unannounced interruption in your service due to numerous factors, including for example an earthquake, fire, windstorm, lightning strike, or even a car colliding with a power pole.

If you have any questions, please contact your account representative, [AR name].

Enclosure: Essential Use Customer Classification and Priority System for Rotating Outages

**APPENDIX G**

**Advance Notice Of Reclassification To Nonexempt Essential Customer Status**

Date: [Date]  
Customer: [Customer name]

The California Public Utilities Commission (CPUC) has directed SDG&E to provide advance notice to every customer who will be reclassified from either an essential to a nonessential use customer or from a nonessential to an essential use customer.

**PLEASE BE ADVISED THAT YOU ARE SCHEDULED TO BE RECLASSIFIED AS A NONEXEMPT ESSENTIAL USE CUSTOMER AND YOU WILL NO LONGER BE EXEMPTED FROM ROTATING OUTAGES. THIS RECLASSIFICATION WILL BECOME EFFECTIVE IN 15 DAYS UNLESS DISPUTED IN WRITING AS DESCRIBED BELOW.**

Based upon information that you have provided, your business meets one of more of the definitions of an essential use customer set forth by the CPUC. However, you have informed us that you have adequate and sufficient backup generation capabilities to sustain your mission-critical functions for more than one hour. Attached is the CPUC approved list of essential customer categories exempt from rotating outages, as well as a discussion of the Commission's position regarding the impact of backup generating capacity on exemption status. Specifically, the following account(s) will be classified as nonexempt essential use and consequently will no longer be exempt from rotating outages:

- [List service account number(s) and service address (es)].

## **APPENDIX G (Continued)**

Please direct any questions or disputes regarding your reclassification to [SDG&E contact] at [address]. If we do not receive a written objection within 15 days of the date of this notice, your reclassification shall be considered undisputed.

You may bring unresolved disputes to the CPUC by filing a formal complaint with the CPUC pursuant to Rules 9 through 13.2 of the CPUC's Rules of Practice and Procedure. Your complaint must allege and show that the utility has acted or failed to act in violation of law, or in violation of any order or rule of the Commission, by the utility improperly implementing, or failing to follow, the Commission's adopted priority system. These complaints will be filed and processed using the CPUC's expedited complaint procedure. The CPUC Public Advisor's Office can assist you in filing a formal complaint. You may reach the Public Advisor's Office at the following addresses: 505 Van Ness Avenue, Room 5303, San Francisco, CA 94102 (e-mail [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov)) or 320 West Fourth Street, Suite 500, Los Angeles, CA 90013 (e-mail [public.advisor.la@cpuc.ca.gov](mailto:public.advisor.la@cpuc.ca.gov)).

While SDG&E strives to provide the most reliable electric service possible, please be advised that *SDG&E does not and cannot guarantee a continuous or sufficient supply of electricity or freedom from interruption*. This proviso is contained in SDG&E's Tariff Rule 14. Even outside the rotating outage scenario, you could experience an unanticipated and unannounced interruption in your service due to numerous factors, including for example an earthquake, fire, windstorm, lightning strike, or even a car colliding with a power pole. If you believe an interruption would create a significant threat to public safety or health, we advise you to secure sufficient backup generation to guarantee electricity availability in those exigent circumstances. You may choose to seek the services of a qualified consultant who can offer guidance and advice regarding the installation and operation of appropriate equipment to enable your business to operate safely during outages of short duration, or at a minimum, to safely shut down your operations.

If you have any questions, please contact your account representative, [AR name].

Enclosure: Essential Use Customer Classification and Priority System for Rotating Outages

## APPENDIX H

### Advance Notice Of Reclassification To Nonessential Customer Status

Date: [Date]  
Customer: [Customer name]

The California Public Utilities Commission (CPUC) has directed SDG&E to provide advance notice to every customer who will be reclassified from either an essential to a nonessential use customer or from a nonessential to an essential use customer.

**PLEASE BE ADVISED THAT YOU ARE SCHEDULED TO BE RECLASSIFIED AS A NONESSENTIAL USE CUSTOMER AND YOU WILL NO LONGER BE EXEMPTED FROM ROTATING OUTAGES. THIS RECLASSIFICATION WILL BECOME EFFECTIVE IN 15 DAYS UNLESS DISPUTED IN WRITING AS DESCRIBED BELOW.**

Based upon information that you have provided, your business does not meet any of the definitions of an essential use customer set forth by the CPUC. Attached is the CPUC approved list of essential customer categories exempt from rotating outages. SDG&E is authorized to exempt from rotating outages only those customers who fit into one of the nine enumerated categories. Accordingly, we cannot grant your account(s) an exemption from rotating outages. Specifically, the following account(s) will no longer be classified as essential use and consequently will no longer be exempt from rotating outages:

- [List service account number(s) and service address (es)].

Please direct any questions or disputes regarding your reclassification to [SDG&E contact] at [address]. If we do not receive a written objection within 15 days of the date of this notice, your reclassification shall be considered undisputed.

You may bring unresolved disputes to the CPUC by filing a formal complaint with the CPUC pursuant to Rules 9 through 13.2 of the CPUC's Rules of Practice and Procedure. Your complaint must allege and show that the utility has acted or failed to act in violation of law, or in violation of any order or rule of the Commission, by the utility improperly implementing, or failing to follow, the Commission's adopted priority system. These complaints will be filed and processed using the CPUC's expedited complaint procedure. The CPUC Public Advisor's Office can assist you in filing a formal complaint. You may reach the Public Advisor's Office at the following addresses: 505 Van Ness Avenue, Room 5303, San Francisco, CA 94102 (e-mail [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov)) or 320 West Fourth Street, Suite 500, Los Angeles, CA 90013 (e-mail [public.advisor.la@cpuc.ca.gov](mailto:public.advisor.la@cpuc.ca.gov)).

## **APPENDIX H (Continued)**

While SDG&E strives to provide the most reliable electric service possible, please be advised that *SDG&E does not and cannot guarantee a continuous or sufficient supply of electricity or freedom from interruption*. This proviso is contained in SDG&E's Tariff Rule 14. Even outside the rotating outage scenario, you could experience an unanticipated and unannounced interruption in your service due to numerous factors, including for example an earthquake, fire, windstorm, lightning strike, or even a car colliding with a power pole. If you believe an interruption would create a significant threat to public safety or health, we advise you to secure sufficient backup generation to guarantee electricity availability in those exigent circumstances. You may choose to seek the services of a qualified consultant who can offer guidance and advice regarding the installation and operation of appropriate equipment to enable your business to operate safely during outages of short duration, or at a minimum, to safely shut down your operations.

If you have any questions, please contact your account representative, [AR name].

Enclosure: Essential Use Customer Classification and Priority System for Rotating outages

## APPENDIX I

### Electric Distribution Operations' Electric Load Curtailment Procedures

#### GENERAL

Implementation of Stage 1, 2 or 3 emergencies may become necessary as a result of a California or SDG&E transmission system emergency. The decision to implement Stage 1, 2 or 3 emergencies is made by the CAISO. The Stage 3 emergency is implemented to reduce the SDG&E system load by de-energizing circuits, which serve no essential customers (as defined by the CPUC).

#### PROCEDURES

##### Notifications

The notification procedures for EDO are referenced in the ELC Plan and DOP 5502, Notification of EDO On Duty Supervisor.

- GCC will send email and pager notices throughout SDG&E for all stage emergencies.

##### STAGE 1 EMERGENCY

- All EDO staff and support personnel report to EDO located at MCC as soon as possible.
- Locate the current edition of the ELC Plan, also known as "The Red Book."
- One Operational Technologist should ensure all required resources are available, i.e. EDO Director, Manager, Team Lead, Service Dispatch Manager or assigned substitutes.
- The Operational Technologist should open the PI Excel Load Curtailment Master Spreadsheet at his/her workstation.
- Bring up SCADA, Focal Point/Outage Utility Analytics (OUA) dashboard and NMS to monitor outages.
- Bring up CAISO website for system status:  
<http://www.caiso.com/outlook/SystemStatus.html>
- Go to the intranet website for up to date SDG&E System peak data:  
<http://infoweb.sdge.com/ems/>
- Provide DSO/TST a list of the non-SCADA subs that are in the first (6) Curtailment blocks.
- Call PGP contact and inform them to start the heads-up notification process:

<b>• PGP CONTACTS</b>	
<b>• Brad Mantz (DR Manager)</b>	<b>• 858-790-1502</b>

## **STAGE 2 EMERGENCY**

- Service Dispatch will inform the Districts of Stage 2 Emergency and request ETS to holdover at the non-SCADA substations if a stage 3 is imminent. The non-SCADA subs should be identified.
- EDO will request Kearny to standby in the substations (to be determined) for assistance in load curtailment.
- EDO should request Kearny to hold a breaker crew and a relay crew in the event that problems are experienced while de-energizing or restoring service.
- The Operational Technologist will set up in the Director's office or DCC Situation Room with all Load Curtailment reporting applications running and provide current system status.
- The Operational Technologist will enter the projected amount of MWs (SCADA and non-SCADA) to be curtailed in the PI excel spreadsheet, with the affected blocks of circuits in red and send this information to the Distribution Operations PI EDO-EOC Load Curtailment Display and to the public blackout status page.
- EDO management to assign 2 DSOs to handle load curtailment in the event a Stage 2 will likely progress to a Stage 3. One DSO should execute the actual ELC, while the 2<sup>nd</sup> DSO should create outage information in NMS.
- DSOs will cancel all planned switching, except emergency and/or restoration work, and start returning the system to normal in the likelihood of a Stage 3.
- Designated DSO will inform Service Dispatch to route ETS to non-SCADA substations where load curtailment may be necessary.
- DSO designated for load drop should establish an open line to the EDO Director's office or the DCC Situation Room.

## **STAGE 3 EMERGENCY**

- Upon notification of a Stage 3 Emergency, the Operational Technologist will activate the PGP, if necessary, (after the first rotation or at least 30 minutes after the first rotation) by calling the PGP contact to request generation.
- Upon notification from the CAISO to shed load, the OSS will request the DSO on the open emergency line to commence load shedding via the ELC Plan.
- If there are ETS present in the non-SCADA substations on the projected list, the DSO will include the non-SCADA substations in the first rotation of the ELC Plan, otherwise the DSOs will shed SCADA substations and inform the OSS on the load shed amount, in MWs.
- Load will be shed on a block by block basis, and not individual circuits. Blocks are defined by letter. Example: you can drop block 1A but not drop 1B, where 1A constitutes one block and 1B constitutes a separate block.
- The Operational Technologist will update the Distribution Operations PI EOC internet display with the MWs, blocks shed, start/restore time; customers affected all highlighted in black and the projection of blocks for the next hour.
- The Operational Technologist will monitor the PGP output and update the Distribution Operations PI EOC Display where necessary.
- The DSO will generate a Load Curtailment outage order in NMS.



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- If load curtailment is still necessary after one hour, the DSO will continue to shed the required amount or next blocks of circuits (rotation 2, 3 etc.) to include the non-SCADA circuits (if skipped in Rotation 1) and restore the first set of blocks that were curtailed. This procedure will be cycled every 60 minutes until the load curtailment is cancelled.
- ALL curtailments will follow the same 60 minute cycle. If a block is dropped part way into rotation 1 (for example), it will be restored at the same time as all the other blocks in the same rotation, i.e. run 1.

### **POST RESTORATION STAGE**

- After ALL blocks have been restored and the load curtailment has been cancelled, the EOC will be notified, as well as the districts and Service Dispatch, to initiate call-backs for those restored circuits via customer call-back lists.
- Service Dispatch will release all ETS standing-by for load curtailment.
- Kearny will be notified to stand down from the substations.
- The DCC will note the order (index) number the curtailment was terminated, so that the next round of curtailment begins at the next order number.
- The Operational Technologist will call the PGP contact and inform them to deactivate PGP
- The Operational Technologist should also note the order (index) number at which the curtailment was terminated, so that the next round of curtailment begins at the next order number.

## APPENDIX J

### Procedures for Water Utilities Exemption Request

The following procedure outlines how SDG&E will process water and sewer treatment customer's request for rotating outage exemptions either after or before the circuit has been de-energized. Since these requests are the result of an emergency condition, every effort will be made to restore or avoid de-energizing the circuit as quickly as possible. However, it should be clearly understood that the completion of these requests could take up to 15 minutes. In addition, there could be further delays if a non-authorized person makes the original request or the agency is unable to provide their block and circuit number.

When rotating outages affect water and/or sewer treatment facilities, the following actions shall be implemented:

1. If a water and/or sewer treatment customer identifies that a rotating outage to one of their facilities has resulted in an emergency situation that constitutes an immediate threat to public health and safety, they can call the special hotline number 877-277-0399. This number rings at the red phone on Electric Distribution Coordinator desk in the Emergency Operations Center. It is only manned during CAISO Declared Stage 2 or Stage 3 emergencies when advance notice from the CAISO is given or during an SDG&E initiated Emergency Load Curtailment event. If the customer calls prior to the desk being manned, the customer will need to call back in a few minutes.
2. The customer shall provide their name, their phone number, facility name and address, **circuit number & block**, and the nature of the emergency (example-imminent sewage spill). If the customer is not able to supply the block and circuit number, he/she should be informed that the time needed to obtain the block and circuit number serving the facility will delay completing their request.
3. Once the Electric Distribution Coordinator (EDC) receives a call on the hotline, he shall:
  - a. Match the name requesting the circuit restoration with that of an authorized person from the water district, wastewater or sewage operation. An authorized list by Agency will be updated yearly and will be available at the EDC desk. If an unauthorized person calls, the authorized name(s) for that agency may be provided to the caller.
  - b. Remind the customer that the request will be processed as quickly as possible, but that it could take up to 15 minutes to complete or longer if block and circuit information is needed.
  - c. Verify the outage is due to a curtailment; document the call in the log with the name of the person requesting the circuit restoration, phone number, facility name, facility address, circuit number and block number, and nature of the emergency. The EDC will not judge whether the emergency is legitimate. The customer request may be evaluated at a future date.

## **APPENDIX J (Continued)**

- d. The EDC will contact Distribution Operations on the Director Hot Line number at (619) 725-5180. This line is to be used for emergencies only. The EDC will provide the information and will request that the circuit be restored as soon as possible.
- e. The EDC will notify the Electric Operations Strategic Lead and the EOC Situation Room Lead of the situation.
- f. The EDC will monitor the time. If in 10 minutes Distribution Operation has not called back indicating the circuit was restored, the EDC should follow-up with Distribution Operation on the original request
4. The Situation Room Lead will make an announcement that a request has been received and the circuit will be restored and possibly another circuit curtailed.
5. Distribution Operations will:
  - a. Evaluate the load of the requested circuit and make a determination if any additional circuit may need to be curtailed.
  - b. If no action is required, Distribution Operations will restore the requested circuit.
  - c. If an additional circuit needs to be curtailed, Distribution Operations will communicate to the EDC the circuit number & the load of the circuit.
  - d. Curtail the selected circuit and record the time curtailed.
  - e. Report back to the EDC the time the requested circuit was restored.
  - f. If an additional circuit was curtailed, that circuit will be restored with the original block of circuits.
6. Once the EDC is notified by Distribution Operations that the circuit has been restored and, if applicable the other circuit curtailed, the EDC will:
  - a. Call the customer back to confirm restoration.
  - b. Inform the Electric Operations Strategic Lead and the Situation Room Lead of the actions.
  - c. Update the curtailment list and summary and distribute.
7. The Situation Room Lead will make an announcement that a request has been processed and the circuit was restored and, if applicable, another circuit curtailed.
8. If the customer calls to prevent curtailment, similar steps as listed above shall be taken, except that instead of the circuit being restored, curtailment shall be avoided.
9. If the customer outage is not due to load curtailment, the EDC will notify the customer. The EDC will work with Business Services Coordinator to provide further communications to the customer. The call will still be logged.

**APPENDIX K**

**References**

Rotating Load Standard Operating Procedures (EOP5110)  
Corporate Communications' Media Contact Plan  
Corporate Facility Management's Load Curtailment Procedures  
Sales & Marketing Operations' Load Curtailment Procedures  
Regional Governmental Affairs' Load Curtailment Procedures  
Customer Services Information's Load Curtailment Procedures  
Safety & Emergency Services' Load Curtailment Procedures  
Commercial & Industrial Program Load Curtailment Procedures  
Restoration Procedure for Water and Sewage Treatment Customers

APPENDIX L

Diagram of staffed positions within the SDG&E EOC

