

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



REVISED

December 4, 2018

**Advice Letter 3829-E-B**

Gary A. Stern  
Director, State Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
Rosemead, CA 91770

**SUBJECT: Methodology to Monitor the Frequency and Duration of Frequency Events**

Dear Mr. Stern:

Supplemental Advice Letter 3829-E-B is effective as of November 1, 2018, and Supplemental Advice Letter 3829-E-A is withdrawn as requested per Southern California Edison's letter dated October 30, 2018.

Sincerely,

A horizontal bar with a grayscale gradient, used to redact the signature of the sender.

Edward Randolph  
Director, Energy Division

October 30, 2018

Energy Division  
Attn: Tariff Unit  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

Re: Withdrawal of Southern California Edison Company's Advice 3829-E-A

Dear Energy Division Tariff Unit:

Pursuant to conversations with Energy Division staff, Southern California Edison Company (SCE) is requesting the withdrawal of Advice 3829-E-A.<sup>1</sup> SCE will be submitting supplemental Advice 3829-E-B which will replace and supercede Advice 3829-E in its entirety.

SCE submits this request for withdrawal in accordance with General Order (GO) 96-B, General Rule 5.3. SCE asks that a confirmation letter be returned regarding this withdrawal.

Should you have any questions, please contact me.

Sincerely,

/s/ Gary A. Stern  
Gary A. Stern, Ph.D.

GAS:dm:cm

Copy: Edward Randolph, Director, CPUC Energy Division  
Franz Cheng, CPUC Energy Division  
Sophie Meyer, CPUC Energy Division  
Service Lists GO 96-B and R.11-09-011

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<sup>1</sup> SCE's Advice 3829-E-A was submitted on October 19, 2018 and supplemented Advice 3829-E in part rather than in its entirety.

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October 19, 2018

**ADVICE 3829-E-A**  
**(U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Supplement to Advice 3829-E, Methodology to Monitor the  
Frequency and Duration of Frequency Events

**PURPOSE**

Southern California Edison Company (SCE) hereby submits for approval by the California Public Utilities Commission (Commission) this supplemental advice letter. At the direction of the Energy Division and in collaboration with the Public Advocates Office (CalPA),<sup>1</sup> SCE is submitting in this supplemental advice letter, attached herein as Attachment A, the mutually agreed upon template for collecting and reporting on data that informs of the number and duration of grid frequency events. This reported data will be used to estimate the impact on customers with inverter based distributed energy resources (DER) interconnected with the electrical distribution grid.

This advice letter supplements Advice 3829-E in part, and will not change the substance of the original Advice 3829-E. This advice letter addresses protest from CalPA submitted on August 14, 2018.<sup>2</sup>

**BACKGROUND**

On July 25, 2018, SCE submitted Advice 3829-E which proposed its methodology for monitoring frequency events and estimating their likely impact on DER customers with Phase 3 compliant smart inverters, including proposed methods to measure the impact on a set of DER customers and the data variables and data sources that can be reported. Advice 3829-E was protested by CalPA. This supplemental advice letter addresses CalPA's protest by providing a template SCE understands to be acceptable to CalPA that will be used initially for quarterly reporting and then annually to be

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<sup>1</sup> The Office of Ratepayer Advocates recently changed its name to the Public Advocates Office.

<sup>2</sup> Protest of the Office of Ratepayer Advocates to Southern California Edison Company's Advice Letter 3829-E, Regarding Methodology to Monitor the Frequency and Duration of Frequency Events.

submitted on dates aligning with the adopted February 22, 2019 activation date for Function 5 (as identified in the July 11, 2018 letter from Edward Randolph, Director of the Commission's Energy Division relative to Resolution E-4898). SCE believes this template is consistent with those proposed by San Diego Gas & Electric Company and Pacific Gas and Electric Company. Following the completion of the quarterly reports, SCE proposes to submit annual reports on frequency events via Tier 1 information-only advice letters, which will be combined with the February 22 4th quarter report on March 22, 2020, and each year on March 22, thereafter. After five years, SCE may submit a proposal (via Tier 2 Advice Letter) to continue or modify the reporting requirement.

No cost information is required for this advice letter.

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

### **TIER DESIGNATION**

Pursuant to Ordering Paragraph 1 of Resolution E-4898, this advice letter is submitted with a Tier 1 designation which is the same Tier designation as the original Advice 3829-E.

### **EFFECTIVE DATE**

This supplemental advice letter will become effective on July 25, 2018, which is the same date Advice 3829-E was submitted.

### **NOTICE**

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

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102  
E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

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

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

Gary A. Stern, Ph.D.  
Managing Director, State Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
Rosemead, California 91770  
Telephone (626) 302-9645  
Facsimile: (626) 302-6396  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Laura Genao  
Managing Director, State Regulatory Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2030  
San Francisco, California 94102  
Facsimile: (415) 929-5544  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

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

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and R.11-09-011 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

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

For questions, please contact Mary Brown at (626) 302-8103 or by electronic mail at [Mary.Brown@sce.com](mailto:Mary.Brown@sce.com).

**Southern California Edison Company**

/s/ Gary A. Stern, Ph.D.  
Gary A. Stern, Ph.D.

GAS:mb:jm  
Enclosure



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

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

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

## ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



## Frequency Reporting Template In Compliance With Resolution E-4898

<b>Utility Name</b>	Southern California Edison	
<b>Reporting Period</b>	<b>Start Date</b>	<b>End Date</b>

<b>Report Issued Date</b>	<b>Enter Date</b>
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Frequency Reporting Ranges					
Type Range Level	High Frequency (Hz)		Low Frequency (Hz)		Duration Time (Minutes)
	Low End	High End	Low End	High End	
Frequency Range 1	60.036	<60.136	59.864<	59.964	5 minutes
Frequency Range 2	60.136	<60.336	59.664<	59.864	1 Minute
Frequency Range 3	60.336	<60.636	59.364<	59.664	1 Minute
Frequency Range 4	60.636	No limit	0	59.364	1 Minute

Event #	Event Date	Event Start Time	Event End Time	Time (Minutes)			
				Frequency Range 1	Frequency Range 2	Frequency Range 3	Frequency Range 4
#1							
#2							
#3							
#4							
#5							
#6							
#7							
#8							
#9							
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