



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Clean Power Alliance of Southern California

Utility type:

☒ ELC ☐ GAS ☐ WATER  
☐ PLC ☐ HEAT

Contact Person: C.C. Song

Phone #: (213) 713-0363

E-mail: [csong@cleanpoweralliance.org](mailto:csong@cleanpoweralliance.org)

E-mail Disposition Notice to: [csong@cleanpoweralliance.org](mailto:csong@cleanpoweralliance.org)

### EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

July 11, 2025

Advice Letter (AL) #: 0037-E

Tier Designation: 1

Subject of AL: Clean Power Alliance of Southern California's Notice of Customer Enrollment in Southern California Edison Company's Expanded Dynamic Rate Pilot

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 #:  
Decision 24-01-032

Does AL replace a withdrawn or rejected AL?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

Summarize differences between the AL and the prior withdrawn or rejected AL: n/a

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 (%): n/a

Estimated system average rate effect (%): n/a

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: n/a

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

Pending advice letters that revise the same tariff sheets: n/a

<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: C.C. Song  
Title: Senior Director, Regulatory Affairs  
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## 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
Curtailable 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	



July 11, 2025

California Public Utilities Commission  
Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue, 4th Floor  
San Francisco, CA 94102-3298

**Advice Letter CPA 0037-E**

**SUBJECT: Clean Power Alliance of Southern California's Notice of Customer Enrollment in Southern California Edison Company's Expanded Dynamic Rate Pilot**

In accordance with California Public Utilities Commission's ("Commission") Decision ("D.") D. 24-01-032, *Decision to Expand System Reliability Pilots of Pacific Gas and Electric Company and Southern California Edison Company*, which directed Pacific Gas and Electric Company ("PG&E") and Southern California Edison Company ("SCE") to expand the demand flexibility pilots authorized in D.21-12-015 ("Expanded Pilots") to provide summer reliability, Clean Power Alliance of Southern California ("CPA") submits this advice letter ("AL")<sup>1</sup> to indicate to the Commission that it intends to begin customer enrollment in the SCE Expanded Pilot by November 15, 2025. The Decision directs SCE to expand the pilot authorized in D.21-12-015 ("Expanded Pilot") to one community choice aggregator ("CCA") in SCE's service territory and requires CCAs participating in an Expanded Pilot to submit a Tier 1 advice letter to inform the Commission their intent to participate in the Expanded Pilot.<sup>2</sup>

**PURPOSE**

CPA submits this AL to notify the Commission of its intent to participate in SCE's Expanded Pilot. The Decision requires CCAs choosing to participate in an Expanded Pilot to file a Tier 1 Advice Letter by March 1, 2025, to notify the Commission that it will begin enrollment in an Expanded Pilot by June 1, 2025.<sup>3</sup> On February 28, 2025, CPA submitted a letter requesting extension of time to comply with D.24-01-032 until November 1,<sup>4</sup> and on March 7, 2025, CPA's request was granted by the Executive Director of the Commission.<sup>5</sup> Therefore, CPA submits this Tier 1 AL to notify

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<sup>1</sup> D.24-01-032, *Decision To Expand System Reliability Pilots of Pacific Gas and Electric Company and Southern California Edison Company*, at 41, Conclusions of Law ("COL") 20 at 78-79.

<sup>2</sup> *Id.* at 41., COL 20 at 78-79.

<sup>3</sup> *Id.* at 41, COL 20 at 78-79.

<sup>4</sup> Clean Power Alliance of Southern California Request for Extension of Time to File Advice Letter to Consider Participation in Southern California Edison Company's Expanded Real Time Pilot (Decision 24-01-032).

<sup>5</sup> Letter Granting CCAs Extension to File Advice Letter per D.24-01-032, March 7, 2025.



the Commission of CPA's intent to begin customer enrollment in the Expanded Pilot by November 15, 2025.

## **BACKGROUND**

D.24-01-032 expanded the demand flexibility pilots authorized in D.21-12-015, which adopted several supply- and demand-side requirements to ensure that there is adequate electric power in the event of extreme weather during times of greatest need in summers 2022 and 2023.<sup>6</sup> D.21-12-015 was issued in response to Governor Newsom's issuance of an Emergency Proclamation urging all state energy agencies to ensure there is adequate electricity to meet the needs of Californians in 2022. D.21-12-015 adopted demand flexibility pilots, including an SCE pilot program ("SCE's Dynamic Rate Pilot"), to test dynamic rates' effectiveness in response to grid emergencies. SCE's Dynamic Rate Pilot facilitated load shift for customers using electric vehicles, behind the meter energy storage, and similar flexible technologies.<sup>7</sup> SCE's Dynamic Rate Pilot was scheduled to conclude on June 1, 2024.

On August 15, 2023, the Commission's Energy Division issued a Staff Proposal to expand the demand flexibility pilots, including SCE's Dynamic Rate Pilot.<sup>8</sup> The Staff Proposal proposed to extend SCE's Dynamic Rate Pilot from June 2024 to December 2027.<sup>9</sup> The Staff Proposal also recommended expanding the SCE Dynamic Rate Pilot to enable CCA customers to participate.<sup>10</sup>

On January 26, 2024, the Commission adopted D.24-01-032 which directed SCE to administer the Expanded Pilot to one CCA in its service territory by June 1, 2024, for the first 12 months of the Expanded Pilot.<sup>11</sup> Subsequently, any CCA could participate in the Expanded Pilot beginning on June 1, 2025, provided that such CCA files a Tier 1 Advice Letter by March 1, 2025.<sup>12</sup> D.24-01-032 also directed SCE to propose which CCA customers will initially be permitted to enroll in the Expanded Pilot in a Tier 2 pilot implementation advice letter.<sup>13</sup> On March 25, 2024, SCE filed an advice letter for its implementation plan for the Expanded Pilot.<sup>14</sup> In this plan, SCE explained that it had held discussions with CPA regarding participation in the Expanded Pilot, and that CPA had shown interest in joining the Expanded Pilot when practicable.<sup>15</sup>

Subsequently, SCE withdrew its implementation plan for the Expanded Pilot and resubmitted its implementation plan as two separate advice letters; one covered dual participation and another

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<sup>6</sup> D.21-12-015 Phase 2 Decision Directing Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric To Take Actions To Prepare For Potential Extreme Weather In The Summers of 2022 and 2023, at 2.

<sup>7</sup> *Id.* at 85.

<sup>8</sup> Rulemaking ("R.") 22-07-005, Administrative Law Judge's Ruling on Track Staff Proposal To Expand Existing Pilots ("Staff Proposal"), August 15, 2023.

<sup>9</sup> *Id.* attachment A at 8.

<sup>10</sup> *Id.* attachment A at 9.

<sup>11</sup> D.24-01-032, Decision To Expand System Reliability Pilots of Pacific Gas And Electric Company And Southern California Edison Company, at 41, COL 20 at 78-79.

<sup>12</sup> *Id.* 41, COL 20 at 78-79.

<sup>13</sup> *Id.* at 41, COL 20 at 78-79.

<sup>14</sup> Advice 5259-E, Implementation Plan for the Southern California Edison Expanded Dynamic Rate Pilot

<sup>15</sup> *Id.* at 12.

covered all remaining issues, including CPA's interest in participating in the Expanded Pilot.<sup>16</sup> SCE's implementation plan was then modified by SCE Advice Letter 5442-E.<sup>17</sup> The modified implementation plan explained that SCE's contracting process with a new dynamic pricing and shadow billing provider was longer than anticipated. SCE also explained that significant incremental costs and administrative efforts were required for its existing vendor to continue to provide dynamic pricing and shadow billing during the gap between the end of the contract of its existing vendor and when the new vendor would be operational for the Expanded Pilot. Therefore, SCE paused the Expanded Pilot implementation as of January 1, 2025, until the new vendor became operational.<sup>18</sup> This implementation delay impacted SCE's ability to provide operational details needed by CPA to assess the feasibility of participating in the Expanded Pilot and to receive approval from its Board of Directors. In light of these delays, on February 28, 2025, CPA filed a request for extension to comply with D.24-01-032, and on March 7, 2025, CPA was granted an extension of time to comply with D.24-01-032. The letter granting CPA's request for extension allows CPA to file a Tier 1 Advice Letter to notify the Commission of its intent to participate by November 1, 2025.<sup>19</sup>

SCE selected GridX as the shadow billing vendor in November 2024<sup>20</sup>, and enrollment of bundled customers in the Expanded Pilot began on July 1, 2025. In May 2025, SCE and CPA tentatively agreed on a customer proposal, where CPA's customers could participate in the Expanded Pilot by remaining on their Otherwise Applicable Tariffs ("OATs") while enrolling in the Expanded Pilot's shadow billing through SCE's Expanded Pilot dynamic rate. This tentative agreement allowed CPA to assess the feasibility of participating in the Expanded Pilot, and to receive approval from its Board of Directors to participate in the Expanded Pilot on July 10, 2025.

## **DISCUSSION**

In accordance with D.24-01-032<sup>21</sup>, CPA submits this AL to notify the Commission of CPA's intent to begin customer enrollment in the Expanded Pilot as soon as SCE reaches operational and technological readiness, including when SCE's customer portal for the Expanded Pilot becomes operational, which CPA and SCE estimate will be by November 15, 2025. As stated in SCE's advice letter, SCE held discussions with CPA regarding participation in the Expanded Pilot, and CPA had shown interest in joining the Expanded Pilot when practicable.<sup>22</sup> CPA is the first CCA to participate in the Expanded Pilot as of the filing of this AL. CPA will cap enrollment of CPA customers in SCE's Expanded Pilot at 15% of SCE's 50 megawatt ("MW") enrollment target (7.5 MWs), in proportion to CPA's load share ratio within SCE territory.

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<sup>16</sup> Withdrawal of Southern California Edison Company's Advice 5259-E, April 8, 2024; the resubmitted implementation plan advice letters are Advice 5273-E and Advice 5285-E.

<sup>17</sup> Advice 5442-E, Modification to the Implementation Plan for the Southern California Edison Expanded Dynamic Rate Pilot, December 13, 2024.

<sup>18</sup> *Id.* at 3.

<sup>19</sup> Letter Granting CCAs Extension to File Advice Letter per D.24-01-032, March 7, 2025.

<sup>20</sup> Advice 5442-E, Modification to the Implementation Plan for the Southern California Edison Expanded Dynamic Rate Pilot, December 13, 2024. at 2.

<sup>21</sup> D.24-01-032, Decision To Expand System Reliability Pilots of Pacific Gas and Electric Company and Southern California Edison Company, at 41, COL 20 at 78-79.

<sup>22</sup> Advice 5273-E Implementation Plan for the Southern California Edison Expanded Dynamic Rate Pilot. at 12.

## **TIER DESIGNATION**

Pursuant to General Order (“GO”) 96-B, Energy Industry Rule 5.1 and D.24-01-032, this AL is submitted with a Tier 1 designation.

## **EFFECTIVE DATE**

Pursuant to GO 96-B, General Rules 7.3.3, this AL will become effective pending disposition as of the date of its submittal.

## **NOTICE**

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

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

C.C. Song  
Senior Director, Regulatory Affairs  
Clean Power Alliance of Southern California  
801 S. Grand Ave., Suite 400  
Los Angeles, CA 90017  
Email: [csong@cleanpoweralliance.org](mailto:csong@cleanpoweralliance.org)

Alexis Rizo  
Analyst II, Regulatory Affairs  
Clean Power Alliance of Southern California  
801 S. Grand Ave., Suite 400  
Los Angeles, CA 90017  
Email: [arizo@cleanpoweralliance.org](mailto:arizo@cleanpoweralliance.org)

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

Pursuant to Resolution E-5174, this document will be submitted in electronic form only to [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov). In accordance with General Rule 4 of GO 96-B, CPA is serving copies of this AL to the interested parties shown on the R.22-07-005 service list. For changes to these 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).