

**COMMONWEALTH OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

NEPR
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IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO.: NEPR-MI-2022-0001

SUBJECT: Submittal of January 2025 Report on
the Development of the Backup Generators Emergency
Demand Response Program

**MOTION TO SUBMIT JANUARY 2025 REPORT ON THE DEVELOPMENT OF THE
BACKUP GENERATORS EMERGENCY DEMAND RESPONSE PROGRAM**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

I. Introduction

As the Transmission and Distribution system operator, LUMA is responsible for facilitating the implementation of Puerto Rico’s public energy policy, including key customer initiatives such as Energy Efficiency (“EE”) and Demand Response (“DR”) Programs, which are required by law and mandated by the Puerto Rico Energy Bureau (“Energy Bureau”). Accordingly, LUMA has been implementing a Transition Period Plan (“TPP”) containing various quick-start or pilot EE and DR programs, which will be setting the stage for the design and implementation of larger scale, more permanent programs that would form part of a Three-Year Plan submitted by LUMA and approved by the Energy Bureau.

Among the DR Programs proposed in the TPP are two Emergency DR Programs. The first is a Battery DR Program, which provides incentives to residential customers for sharing stored energy from their batteries during DR events, contributing to grid stability and supporting energy demand during peak times or emergencies. The second is a Backup Generators DR Program, also referred to as the Emergency Load Reduction Pilot Program in LUMA's Proposed TPP submitted on September 1, 2022. The program's aim was to provide incentives for industrial and commercial customers to voluntarily reduce load and/or shift load to back up generators during DR events, triggered by reliability/emergency conditions on the grid.

The TPP was approved by the Energy Bureau (with modifications) by Resolution and Order issued on February 16, 2023. With respect to the DR Programs, the Energy Bureau directed LUMA to develop and launch in FY2023 the Battery DR Program (now referred to as "Customer Battery Energy Sharing" ("CBES")), as part of or paired with the Backup Generator DR Program and established specific milestones for the CBES.

In December 2022, LUMA commenced efforts to implement the Emergency Load Reduction Pilot Program by approaching potential industrial client participants, followed by similar additional efforts in May 2023. These efforts did not yield any interest from potential participants, with potential participants raising concerns about the limitations in their air emissions permits governing their emergency backup generators and noise and air quality impacts, among others. As a result, and given budget/resource limitations, LUMA focused its resources on the development and launch of the CBES, which LUMA successfully launched in November 2023 and has seen steady growth since.

More recently, in a Resolution and Order issued on October 23, 2024, the Energy Bureau directed LUMA to develop the Backup Generator DR Program pilot before the summer of 2025

and submit monthly reports commencing on January 15, 2025. In compliance with the Energy Bureau’s order of October 23, 2024, LUMA is submitting, as Exhibit 1 to this Motion, its first report on the development of the Backup Generator DR Program, in which it describes its prior efforts to launch this program and the mentioned concerns from potential participants, as well as the proposals to move the program forward. As explained in more detail in this Motion and Exhibit 1, with respect to the permit limitations, LUMA does not expect formal enrollment in the program to occur without a waiver from the relevant agencies in relation to the Backup Generators DR Program. LUMA will continue the dialogue with industry stakeholders to understand whether concerns raised during initial outreach or new concerns, present significant obstacles to enrollment in the program.

II. Relevant Background and Procedural History

1. On June 21, 2022, LUMA filed with the Energy Bureau, in Case No. NEPR-MI-2021-0006, *In Re: Demand Response Plan Review, Implementation and Monitoring*, LUMA’s proposed Energy Efficiency and Demand Response Transition Period Plan (“Proposed TPP”) containing the description and associated budgets of various quick-start EE and DR Programs to be implemented by LUMA during a two (2)-year Transition Period, which included, among the DR programs, an Economic DR Program, an Emergency DR Program, and a Battery DR Program. *See Motion Submitting Proposed EE/DR Transition Period Plan* in Case No. NEPR-MI-2021-0006, *In Re: Demand Response Plan Review, Implementation and Monitoring* and its *Exhibit 1*.

2. The Battery DR Program was described in the Proposed TPP as a program targeting residential customers with behind the meter (BTM) batteries and providing incentives to these customers for load shifting to batteries during DR event periods. *See id.* Exhibit 1, Section 4.3.2. The Emergency DR Program was described in the Proposed TPP as one in which “customers

voluntarily reduce load and/or shift load to back up generators during DR events, triggered by reliability/emergency conditions on the grid” and which would “target the largest 100 customers with backup generators and [...] subsequently expand to a broader segment of C&I customers”. *See id.* Exhibit 1, Section 4.4.2. It was also explained that “[t]he curtailment method and the type of end-uses curtailed during DR events depend on the facility type; customers could shift load to backup generators if emissions regulations allow such operation. Customers could also shift load to any other storage device on site (e.g., thermal energy storage or batteries)”. *See id.* The program participants would receive a financial incentive for participating in the program. *See id.*

3. On February 16, 2023, the Energy Bureau issued a Resolution and Order (“February 16th Order”) considering, amending, and approving the Proposed TPP (the Proposed TPP, as approved by the Energy Bureau, the “TPP”). In the February 16th Resolution and Order, the Energy Bureau established deadlines for quarterly and annual reports, program milestones and other filings, including the filing by December 2, 2023, of a draft EE and DR Three-Year Plan for fiscal years (“FY”) 2025 to 2027.

4. Regarding the TPP’s DR Programs, the Energy Bureau indicated that “LUMA’s top priority shall be to work with third-party battery aggregators to develop and launch an emergency battery DR Program in FY2023, as part of or paired with its proposed emergency DR program that utilizes backup generators and other load flexibility”. *See* February 16th Order, p. 15. The specific milestones for DR programs in the February 16th Order focused on the Battery DR Program. *See id.*, pp. 21-23, 29.

5. On May 19, 2023, LUMA submitted to the Energy Bureau, among others and in compliance with a bench order issued by the Energy Bureau on May 5, 2023¹, a revised description

¹ This order was issued during a Technical Conference in this proceeding held on that date.

of the DR programs, in which it combined the Emergency DR and Battery DR programs into one program and clarified that the Economic DR Program does not include backup generators. *See Motion to Submit Revised Exhibit 1 to EE Rider Petition and Translation Thereof, in Compliance with Bench Order of May 5, 2023, and its Exhibit 1.*

6. On August 29, 2023, LUMA submitted the quarterly report on the TPP for the fourth quarter (“Q4”) of Fiscal Year 2022-2023 in which it informed, among others, regarding the various TPP programs, including the Battery DR Program (as mentioned, now called “Customer Battery Energy Sharing” (“CBES”)) and the emergency DR Program utilizing backup generators (“Backup Generators DR Program”). *See Motion to Submit FY2023 Q4 TPP Report and its Exhibit 1 (“August 29th Motion”).* Regarding the CBES, LUMA informed that it had finalized the design and development of this program, and the program would be launched in late fall 2023. *See id.* Exhibit 1, pp. 4 and 8. As for the Backup Generators DR Program, LUMA informed that in December 2022, LUMA had held workshops with three large industrial customers regarding the Emergency Load Reduction Pilot Program, and in May 2023, LUMA had sent a presentation on it to 26 potential industrial participants. *See id.*, p. 20. LUMA also informed that, “based on feedback from participants, challenges to broad enrollment include[d]: “[...] Questions and concerns about the hours available under existing air permits. [...] Noise Pollution. [...] Very limited number of hours to run per year. [...] “Additional specific costs to modify the generators for permits and compliance.” *Id.*

7. On October 30, 2023, LUMA submitted the first report on the TPP for Fiscal Year 2023 in which informed, among others, regarding the various TPP programs, including the CBES and the Emergency Load Reduction pilot program. Regarding the CBES, LUMA informed that it had launched the program’s website, published the guidelines for the program, and executed three

Master Aggregation Agreements. *See Motion to Submit TPP FY2023 Annual Report*, Exhibit 1, p.

5. As for the Backup Generators DR Program, LUMA provided the same information submitted with the August 29th Motion. *See id.* Exhibit 1, p. 21.

8. Also on October 30, 2023, LUMA filed a motion requesting the Energy Bureau to extend for an additional fiscal year the TPP and postponing the deadlines for filing of the Three-Year plan accordingly. *See Request to Extend by One Additional Year the Deadline to File the Three-Year Plan, Concomitant Deadlines and Extend the Term of the Transition Period Plan for An Additional Fiscal Year.*

9. On November 29, 2023, the Energy Bureau issued a Resolution and Order (“November 29th Order”) granting LUMA’s request to extend the TPP by one year, until June 30, 2025, and to delay the filing of the EE and DR Three-Year Plan by one year and ordered LUMA to file a revised TPP. *See id.*

10. On December 4, 2023, LUMA informed the Energy Bureau that as of that date it had executed additional Master Aggregation Agreements for the CBES, and that in November 2023, the first enrollments in the CBES had occurred and LUMA had successfully conducted a test of the capability to call emergency DR events for the CBES. *See Motion to File Proof of Customer Enrollment and Additional Executed Master Aggregation Agreements and Evidence of Capability to Call Emergency DR Events and Request for Confidentiality*, pp. 4-5.

11. On December 20, 2023, LUMA submitted to the Energy Bureau the revised version of the TPP, extending the TPP until June 2025. *See Motion to Submit Revised TPP and Other Information Requested Under the Resolution and Order of November 29, 2023, filed on December 20, 2023*, and its Exhibit 1.

12. On August 13, 2024, LUMA submitted its FY2024 Q4 TPP report, in which, among other things, it described the progress of the TPP programs, including the CBES. *See Motion to Submit FY2024 Q4 Consolidated Transition Period Plan and Demand Response Administrative Cost Quarterly Report and Request for Approval of Template for these Quarterly Reports* and its Exhibit 1. In it, LUMA described the significant progress made in expanding customer participation and enhancing the capacity of the CBES Program, informing, among other things, that it had 5,726 customers enrolled for FY1014 and an enrolled capacity of 38 MW and had dispatched 53 events in the Fiscal Year. *See id.* Exhibit 1, pp. 36 and 38.

13. On September 16, 2024, LUMA submitted a motion requesting clarification on the timeline for completion of the Market Baseline and Potential Studies² and an extension of the deadline to submit the Draft Three-Year Plan (then scheduled for December 2, 2024 as per the November 29th Order) given the delay in the completion of these studies which are to be used to develop the Three-Year Plan, and a concomitant extension of the TPP. *See Informative Motion, Request for Clarification Regarding Delayed Timeline for Completion of Market Baseline and Potential Studies, And Request for Extension to Submit Draft Three-Year Plan and Associated Tasks and Deadlines.*

14. On October 23, 2024, the Energy Bureau issued a Resolution and Order (“October 23rd Order”) in which, among other determinations, it determined to: (a) extend the TPP by six

² The Energy Bureau’s EE Regulation mandates two key studies to assess and guide energy efficiency efforts on the island: the Market Baseline Study and the Potential Study. *See* Regulation for Energy Efficiency, Regulation 9367 (“EE Regulation”), Sections 1.09(B)(29) and (38) and 3.02(A) and (B). Among others, the EE Regulation provides that, prior to the end of the TPP, and informed by the first Potential Study, the Energy Bureau shall estimate the energy efficiency savings achieved during that period for certain specified actions and that the Energy Bureau “shall use the results of the initial Market Baseline Study and the Potential Study, along with the estimated impacts of actions during the Transition Period Plan, to develop, in collaboration with the [the Public Energy Policy Program], estimated annual savings expected to be achieved by PREPA’s efficiency programs”, among others, “for each Program Year through 2040”. *See id.* Section 3.02(D) and (E).

months until December 31, 2025, while ordering LUMA to submit a revised TPP by December 2, 2024 and (2) defer the requirement to submit the draft EE and DR Three-Year Plan in December 2024, while ordering LUMA to begin stakeholder engagement on this draft plan on or before April 15, 2025. *See* October 23rd Order, pp. 4-6. In addition, the Energy Bureau issued directives regarding the CBES and the Backup Generators DR Program. *See id.* pp. 3-4.

15. Regarding the CBES, the Energy Bureau indicated it was pleased to see the continued growth and success of the program and recognized that it had almost 6,000 participants, while noting that the capacity could be improved if more customers participated, or existing customers made more capacity available. *See id.*, p. 3. The Energy Bureau then determined that LUMA should “transition this program from a pilot to a permanent program” and the Energy Bureau was interested in “enabling LUMA to further grow and scale this resource before summer 2025”, as well as ordered LUMA to propose the form of its permanent CBES Program no later than December 2, 2024. *See id.*, pp. 3-4.

16. As for the Backup Generators DR Program, the Energy Bureau ordered LUMA to develop and implement a program for the use of backup generators as a DR resource in emergency situations before the summer of 2025 and to file monthly reports on the 15th of each month, beginning on January 15, 2025, detailing its efforts to design and implement the program. *See id.*, p. 4. The Energy Bureau indicated that the DR Regulation allows this type of program but LUMA, to date, had not deployed such a program which is “to be used in rare dire situations only, or one with backup generator participation”. *See id.*

17. On November 25, 2024, LUMA submitted a Motion in which, among others, it requested the Energy Bureau to revise the frequency of the monthly reports on the development and implementation of the Backup Generators DR Program to quarterly reports and extend the

deadlines to submit the revised TPP and proposed CBES permanent program form. *See Motion for Extension of Deadlines and Modification of a Reporting Requirement in Resolution and Order of October 23, 2024.*

18. On December 5, 2024, the Energy Bureau issued a Resolution and Order granting the extensions to the filing of the revised TPP and CBES permanent program form until January 31, 2023, but maintaining the reporting requirements for the Backup Generators DR Program as set forth in the October 23rd Order.

III. Submittal of Report on Development of Backup Generators DR Program

19. In compliance with the October 23rd Order, LUMA submits with this Motion its first report on the re-launch of the Emergency Load Reduction pilot program (or Program). *See Exhibit 1* (the “Report”).

20. As described above, LUMA commenced development of the Emergency Load Reduction Pilot Program in FY2023, in parallel with the CBES. The attached Report provides details of these initial activities in FY2023 in which the proposed program was presented to top energy-using industrial customers and feedback was received by some. As indicated in the Report, at the time, LUMA received no interest from these customers in joining the pilot program and, therefore, focus was shifted to the CBES program. A key concern raised by the industrial customers was the air permit limitations on the use of backup generators. Generally, backup generators are subject to a limitation on the number of hours of operation for emergency backup purposes, as their function is to provide back-up power when electric power from the utility is interrupted. These limitations constrained the industrial customers’ ability to participate in the program.

21. As described in the attached report, LUMA plans to build upon these initial efforts and proposes to update the program design and conduct new outreach to industrial customers to

revisit program participation. However, LUMA does not expect formal enrollment in the program without a waiver of the mentioned air permitting restrictions from the federal Environmental Protection Agency and the Puerto Rico Department of Natural and Environmental Resources for permit holders with emergency backup generators participating in the program. LUMA will continue the dialogue with industry stakeholders in order to assess if concerns raised during the initial outreach remain or if any new issues present significant obstacles to enrollment in the program.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the report included in *Exhibit 1* in compliance with the October 23rd Order with respect to the submittal of the January 2025 report on the development of the Backup Generators DR Program.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of January 2025.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Motion the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; PREPA at arivera@gmlex.net; and mvalle@gmlex.net; and agraitfe@agraitlawpr.com, info@sesapr.org, bfrench@veic.org, shanson@veic.org, evand@sunrun.com, jordgraham@tesla.com, forest@cleanenergy.org, customerservice@sunnova.com, javrua@sesapr.org, pjcleanenergy@gmail.com, and mrios@arroyorioslaw.com.



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Exhibit 1

January 2025 Report on Emergency Load Reduction Pilot Program



**Demand Response:
Emergency Load Reduction Pilot Program Monthly
Report**

NEPR-MI-2022-0001

January 15, 2024

Emergency Load Reduction Pilot Program Monthly Report

B On target
 Y Caution
 O Off plan
 G Complete

Key Activity Summary

- Emergency Load Reduction Pilot Program design is being re-evaluated in collaboration with key internal departments and stakeholders to ensure alignment and incorporate necessary revisions based on identified opportunities and challenges.
- Review FY2023 Emergency Load Reduction Pilot Program documents to improve messaging, while addressing known challenges that limit customer participation.
- Re-identification of key industry stakeholders to engage with on pragmatic solutions for temporary waivers of certain regulatory requirements.

Key Milestones	Date	Status
Align internal departments for the re-launch of the Emergency Load Reduction pilot program	2/1/2025	B
Refine and revise Emergency Load Reduction pilot program terms and materials as necessary	Ongoing	B
Work with stakeholder to discuss limitations of EPA regulations for Backup Generators (BUGS)	3/1/2025	Y
Conduct outreach to target industrial customers to recruit and gather additional input	Ongoing	Y
Program ready for events	6/1/2025	Y

Risk / Issues:

- Environmental Protection Agency (EPA) air emissions permit limitations on the use of backup generators was a concern that prevented industry enrollment in FY2023. LUMA does not expect formal enrollment in the Emergency Load Reduction pilot program without certainty regarding the EPA waiver for permit holders.
- Puerto Rico Department of Natural and Environmental Resources will also likely need to issue a waiver via administrative order for its BUGS permit holders-to allow for the use of BUGS for the Emergency Load Reduction Program and exceeding run time limitations in case of emergencies for purposes of the Emergency Load Reduction Program.
- Industrial customers expressed concern about the impact of noise and air quality on the surrounding community.





People First.
Safety Always.



Emergency Load Reduction Pilot Program

January 15, 2025

NEPR-MI-2022-0001



Emergency Load Reduction Pilot Program

Executive Summary

LUMA is committed to building a comprehensive demand response portfolio to bolster Puerto Rico's grid resilience and enhance emergency power resource availability to align with supply demand. Through research and stakeholder engagement, LUMA identifies promising new demand response approaches, designs innovative programs tailored for the local context, and proposes programs and pilots that will provide essential data and insights to inform robust growth of the demand response program portfolio.

LUMA has sought to design quick-start emergency demand response programs to address the anticipated increase in grid constraints during the summer months of 2025. In the October 23rd Resolution and Order, the Energy Bureau ordered LUMA to design and launch an emergency demand response program utilizing customer's large backup generators (BUGS). In response, LUMA's efforts will build upon LUMA's Emergency Load Reduction Pilot Program efforts for industrial customers which began development in FY2023, in parallel to the Customer Battery Energy Sharing (CBES) pilot. This overview outlines the Emergency Load Reduction Pilot Program and the current recommendations for advancing the program in compliance with the Energy Bureau's orders and in close coordination with stakeholders.

LUMA will continue to pursue and report monthly on continued development of the Emergency Load Reduction Program and other potential quick start demand response programs that aim at helping the island prepare for FY2025 potential summer generation shortfalls.

Emergency Load Reduction Pilot Program

LUMA's Backup Generation Demand Response Pilot Program

1. Pilot Program Structure

The initial *Emergency Load Reduction Pilot Program* was designed in FY2023 to incentivize industrial customers to shift load to their BUGS in response to generation shortfall or grid emergency. The program flyer can be found in Appendix A.

The program design outlined that participants would receive an "Emergency Generation Stabilization Incentive." Specifically, the pilot would provide participants with the following:

- \$5,000/MW monthly capacity reserve payment (even if no events were called)
- Plus \$0.38/kWh during emergency events

Participants would receive advanced notice of a potential event from LUMA. Once the initial notice is issued, participants will also receive a final notice at least 30 minutes prior to the event. During the event, participants would operate on BUGS. When the event ends, normal grid energy use settings are restored.

Industrial customers eligible to participate would need to have at least 1MW of demand during the hours of 5 p.m. to 11 p.m. on weekdays with a 1 MW minimum generation capacity commitment. In addition, load reduction must be available during the hours of 5 p.m. to 11 p.m. on weekdays.

The initial pilot design anticipated 10 to 15 events during peak season, with 1 to 5 events per month in non-peak season.

2. Initial Customer Recruitment and Feedback

In December 2022, LUMA conducted one-on-one virtual presentations with three industrial customers representing the largest energy-using industrial sectors that include the pharmaceutical, biotechnology and chemical sectors.

During these sessions, the LUMA team provided a detailed overview of the program, outlining its operational framework, event procedures, terms and conditions, benefits, proposed compensation, and next steps. Participants were also given an opportunity to provide feedback and raise questions and concerns.

Among the feedback was the need for flexible, voluntary participation; special considerations for facilities with cogeneration systems; and noise pollution. All three industrial customers expressed the same main barrier to enrollment: compliance with the Environmental Protection Agency (EPA) Clean Air regulations. Each indicated that per the air emissions permits, they are subject to a limited number of hours per year to operate their generators. This raised concerns over joining the program and how this could cause them to exceed those limits, potentially leading to agency fines or unavailability of their generation resource for other needs.

Citing these concerns, all three industrial customers declined to join the pilot program.

Emergency Load Reduction Pilot Program

During the second phase of recruitment in May 2023, a presentation of the Emergency Load Reduction Program was sent to other top energy-using industrial customers. Twenty-six other industrial customers received emails which introduced them to the program and invited participants to engage with LUMA to learn more about how to join the program and to share any questions or concerns. None of the industrial customers engaged communicated interest in joining the pilot.

As a consequence, LUMA shifted focus from the Emergency Load Reduction Pilot Program to the October 2023 launch of the CBES Pilot program.

LUMA provided the Energy Bureau with updates on pilot program recruitment in its Motion to Submit FY 2023 Q4 TPP Report, filed on August 29, 2023 and in the TPP FY2023 Annual Report.

3. Recommendations for Launching the Emergency Load Reduction Pilot Program

In addition to reviewing and updating program design, LUMA plans a new outreach approach for industrial customers to revisit pilot program participation.

Central to those conversations will be addressing the key concern shared by industrial customers during initial outreach: Air permit limitations on the use of BUGS. Generally, BUGS are subject to a limitation on the number of hours of operation for emergency backup purposes and their function is to provide back-up power when electric power from the utility is interrupted. LUMA does not expect formal enrollment in the Emergency Load Reduction Pilot Program without a waiver of these restrictions from the federal Environmental Protection Agency (EPA) and the Puerto Rico Department of Natural and Environmental Protection Resources (DNER) EPA.

LUMA will continue the dialogue with industry stakeholders to understand whether initial concerns raised during initial outreach (such as the need for flexible, voluntary participation; special considerations for facilities with cogeneration systems; and noise pollution) or new concerns present additional significant obstacles to enrollment in the program.

Emergency Load Reduction Pilot Program

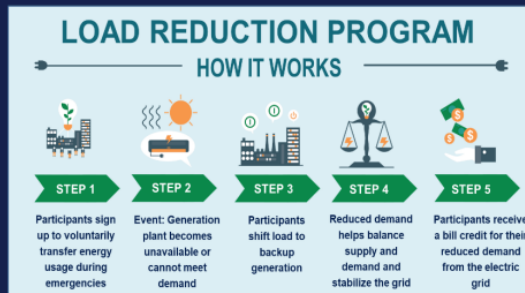
Appendix A



EMERGENCY LOAD REDUCTION PILOT PROGRAM OVERVIEW

What does the Emergency Load Reduction Program consist of?

The Emergency Load Reduction Program (ELRP) is a pilot program where eligible customers are compensated for temporarily reducing load in response to generation shortfall or grid emergency. ELRP helps stabilize the grid during emergencies by balancing load to match generation supply, to avoid load shedding. Load reduction emergency "events" are triggered when LUMA expects demand will exceed generation supply.



What happens during an Event?

Participants may receive advanced notice of a potential event (day-ahead or day-of). Then they receive a final notice at least 30 minutes prior the event. During the event, participants operate on back-up generation. When event ends, normal grid energy use settings are restored.

Key ELRP Terms and Conditions

- 1 MW minimum capacity commitment
- Load reduction must be available during the hours of 5-11 PM weekdays

What are the benefits?

- Contribute to a more reliable electricity grid. Every 1 MW you contribute during an emergency event can help keep the lights on for over 2,000 customers.
- Participants earn a bill credit by allowing flexible energy use.
- Participation in the pilot program may help to protect your operations from sudden disruptions.
- Demand response participants are notified of grid instability in advance, enabling them to prepare proactively against potential outages.

How are you compensated?

For participating, you will receive a bill credit for:

- \$5,000/MW monthly capacity reserve credit (even if no events called)
- Plus \$0.38/kWh reduced during emergency event.

Example based on 3MW load reduction for 15 events.

Description	Estimate
Capacity Credit (\$5,000/MW)	\$15,000
Energy Credit (\$0.38/kWh)	\$85,500
Monthly Bill Credit (\$)	\$100,500
Monthly Bill Savings (%)	18%

Next Steps