

Integrated Resource Planning (R.20-05-003)

Filing Requirements Overview for June 1, 2026, IRP Procurement Compliance Filing & Data Request

1. Purpose

IRP staff provides Filing requirement Overview Document to assist LSEs in preparing the Semi-Annual IRP-MTR Compliance Filing. The purpose of this document is to explain what information LSEs must submit in order to enable IRP staff to assess their compliance with the Commission's Mid-Term Reliability (MTR) Decisions (D.21-06-035, D.23-02-040, and D.25-09-007).

This document provides guidance to LSEs and provides an overview of this data request and the compliance obligations, as well as instructs LSEs on how to file their RDT and supporting documents with the CPUC. This document also intends to provide an overview of the filing requirements for D.21-06-035, D.23-02-040 and D.25-09-007 to assist LSEs with preparing their filings. This document is not intended to review all requirements. LSEs have an obligation to review this document in concert with all relevant Decisions, staff's responses to FAQ, and any other relevant Commission materials.

2. Background

In accordance with D.21-06-035 Ordering Paragraph (OP) 3:

"All load-serving entities named in Table 6 of this order, plus the individual electric service providers who will receive their individual allocations confidentially from Commission staff, shall procure the September net qualifying capacity amounts given in Table 6, and shall file and serve on the service list of this proceeding or any successor proceeding compliance filings according to the schedule given in Table 7 of this order."

Additionally, in accordance with D.23-02-040, Ordering Paragraph (OP) 5:

"Beginning after the August 1, 2023, procurement information compliance filings, all load serving entities subject to our integrated resource planning oversight shall continue making procurement data filings on December 1 and June 1 of each year to be assessed for compliance unless and until the Commission sets different requirements. The need for backstop procurement as discussed in Decisions 20-12-044 and 21-06-035 shall continue to be evaluated each year after receipt and analysis of the procurement data filed on December 1."

LSEs are required to include and provide information in the Resource Data template (RDT) for any projects intended to meet D.21-06-035 and D.23-02-040-LSEs should include information

for all applicable columns in RDT. Information on these resources should be filed in the same RDT, and LSEs should follow below instructions regarding milestone reporting, and the table of contents cover pages. The following constitutes *additional* instructions to follow for D.21-06-035 and D.23-02-040 resources. Additionally for purposes of keeping CPUC's project status information up-to-date, LSEs that are not required to make a D.21-06-035 or D.23-02-040 compliance filing may still be required to submit a completed RDT due to the following request:

- LSEs should include any projects planned, in review, or in development as of 5/1/2024, or online after 11/1/2023, in the LA Basin local capacity area, even if not pursuant to either IRP procurement order.

The RDT template is posted on the CPUC IRP Procurement Track website along with instruction documents including RDT User Guide. Each LSE should fully and accurately complete the RDT in a way that adheres to the compliance requirements explained in this document and RDT User Guide. LSEs should use the latest version of the RDT posted to the CPUC's IRP Procurement Website.

The June 1, 2026, IRP Procurement Compliance Filing & Data Request (and associated RDT template) does not replace the similar Summer Reliability Procurement Status Data Request, issued most recently via email to LSEs on October 10, 2022 (and correction guidance issued 12/7/2023). The IRP Procurement Compliance Filing & Data Request, and not the Procurement Status Data Request, will serve as the compliance check on individual LSE's compliance with IRP orders. While the templates involved are similar, they must each be submitted using their own instructions. The instructions for fields that do appear on both templates should be the same and can be found in the RDT User Guide. Further, Commission staff has posted responses to Frequently Asked Questions (FAQ) about D.21-06-035 on the CPUC IRP website (IRP Procurement Track page), that are referred to in this Filing Requirements Overview. At the time of publication of this document, the latest D.21-06-035 FAQ document is version released after the 11/14/2025 office hours. Please note that many of these FAQs are also applicable to D.23-02-040 procurement.

3. General Instructions

- A. All LSEs that have fulfilled their D.19-11-016 compliance obligations by December 1, 2024, with fully online projects do not need to report on D.19-11-016 compliance in the June 1, 2026, filing.
- B. All LSEs who fall within the Commission's authority for the IRP proceeding and were given a procurement obligation for D.21-06-035 or D.23-02-040 are also required to file procurement data and supplemental documentation pursuant to the requirements set in D.21-06-035 and D.23-02-040. Please see the detailed instructions in sections 4 and 5.
- C. Staff notes, Resolution E-5426 authorizes Commission Staff to fine LSEs for noncompliance with any mandatory filing deadlines and reporting requirements in IRP Proceedings, including any mandatory filing deadlines and reporting requirements in the procurement and planning tracks. E-5426 replaces the citation program that was established by Resolution E-5080.
- D. Additionally, LSEs should also include any projects planned, in review, or in development as of

12/1/2025, or online after 11/1/2023, in the LA Basin local capacity area, even if not pursuant to either IRP procurement order. Please see the detailed instructions in section 6.

- E. For purposes of determining contract status for D.21-06-035 and D.23-02-040 projects, use June 1, 2026, as the cutoff date. The Decision D.21-06-03 requires Diablo Canyon to be replaced with at least 2,500 MW from zero-emitting generation, generation paired with storage, or demand response resources by 2025. This filing also requires LSEs to be in compliance with their Diablo Canyon Replacement Procurement Requirement.
- F. LSEs should review “RDT User Guide” as Commission staff-provided comprehensive instructions
 - a. Similar to previous rounds, comprehensive error checking will be conducted, after submissions are received, based on the rules and relationships spelled out in the User Guide using RDT Error Checking, Aggregation and Reallocation Tool (RECART) version 3 (RECARTv3).
 - b. Staff developed an error checking macro as part of RDT, based on the rules and relationships spelled out in the user guide. LSEs need to trace the errors identified by the macro and correct them before submitting. Macro runs are required for submittal. If an LSE has not run the macro, their submittal may not be accepted. LSEs are required to correct errors wherever possible, but an error-free report sheet may not be possible under certain conditions. LSEs may advise staff when making their filings if any errors cannot be corrected.
- G. LSEs must fill out the new NQC Validation Tool and the MTR NQC Summary sheets in the RDT. Instructions are included in the RDT User Guide.
- H. LSEs do not need to fill out the following for this filing:
 - a. Unique_contract sheet columns: “csp_resource_category”; “csp_annual_2028”; “csp_annual_2030”; “csp_annual_2035”; “csp_annual_2040”; “csp_annual_2045”.
 - b. Sheets: ‘Calcs’, ‘Reliability- Planning’, ‘Reliability RCPPP-Option I’, ‘Reliability RCPPP-Option II’ and ‘CSPReportSheet’
- I. Please provide compliance filing documents at each filing as soon as they are available (I.e. even if it is for a future year).
 - a. Providing the documents before the compliance deadline will allow IRP Staff to be able to review the document in advance and notify LSEs of issues that need to be resolved.

4. Detailed Instructions on IRP D.20-12-044, D.21-06-035 and D.23-02-040 requirements:

Per OP 1 in D. 20-12-044, all LSEs with procurement obligations in D.19-11-016 who did not opt out of providing capacity for customers must submit compliance filings for backstop procurement on February 1 and August 1 of 2021, 2022, and 2023, in a format developed and disseminated by the CPUC for the publicly-available portion, containing information about progress toward achieving the electric capacity procurement requirements for 2021, 2022, and 2023. This same backstop process

was adopted on D.21- 06-035 and D.23-02-040. LSEs should follow all applicable instructions here for reporting their D.21-06- 035 and D.23-02-040 resources as well. Section 5 below details additional instructions that are only applicable to D.21-06-035 and D.23-02-040. LSEs are not required to re-submit supplemental documentation already provided to the CPUC in a previous compliance report, unless those materials have been amended or modified.

Crosswalk Table of Context Requirements

LSEs must include a table of contents cover page with their submittal (as shown below) that covers the following: document name, applicable resource, milestone requirement this document meets (e.g., site control or online status), applicable tranche or tranches, location of document in filing. LSEs submitting a remediation plan should include it in their table of contents. The crosswalk table is required to include the document location for all past MTR project milestones filed in prior filings. Below is a table LSEs may use for this cover page. The LSE Unique Contract ID column must match the RDT. Please submit all supplemental documentation in a searchable format.

Please provide supporting documents in separate folders by project. Please keep the document and folder names succinctly to prevent file path length issues. LSE Name IRP June 2, 2025, Procurement Report Crosswalk Table Format Requirements (sample format and information below).

Table of Content

Document Name	LSE Unique Contract ID	Milestone Requirement Met and/or NP Contract Validation	Decision & Tranche(s)	Compliance Filing Date	Location
<i>LSEname_developer_ABCstorage_PPA</i>	<i>ABCstorage</i>	<i>Milestone ABC Requirement(such as Notice to Proceed)</i>	<i>D.21-06-035, 2023</i>	<i>August 1, 2023</i>	<i>Folder Name, 3rd PDF in zipfile labeled: "ABCStorage_NTP"</i>
<i>LSEname_developer_DEFstorage_PPA</i>	<i>DEFstorage</i>	<i>NP Contract Validation – Nameplate value</i>	<i>D.21-06-035, 2023</i>	<i>December 1, 2023</i>	<i>Folder Name, 3rd PDF in zipfile labeled: "ABCStorage_NTP", page 4,</i>

- For compliance with Milestone 1, self-providing LSEs must provide:
 - executed contracts for new construction,
 - Executed contracts should state the nameplate value of the resource (with pg # this value can be found included in the table above). If nameplate values are not included in the contract, LSEs may submit a

- signed attestation that includes the nameplate value of the resource.
 - Executed contracts should also include a project timeline. LSEs should note if the project timeline is instead included with other documentation.
 - signed interconnection agreements,
 - and provide evidence of site control with signed land leases or title deeds (either accepted).
 - Location file path should not exceed 105 characters
- For compliance with Milestone 2, LSEs must provide a "Notice to Proceed" or similar contractual evidence of construction commencement. Additionally, LSEs meeting part of their obligation with imports, demand response or sale of excess generation must submit executed contracts for these resources.
 - If the LSE does not have the "Notice to Proceed" documentation, they may submit what similar evidence they are able to provide that serves a similar purpose (i.e., updates on construction milestones).
 - Imports may not be more than 20% of LSE's total obligation for D.19-11-016.
 - LSEs procuring demand response resources must provide load impact protocols when available. If applicable, the LSE should also submit progress on rule 21 permits for DR contracts involving BTM storage. LSEs must provide NQC via Load Impact Protocols, contracted NQC, or an estimated NQC. LSEs should be sure to indicate via the "NQC_reporting_source," column if the provided NQC is an estimate.
- For Milestone 3, LSEs must provide evidence of online status and commercial operation. Please provide a copy of the commercial operations date (COD) notice you received. If that is not available (i.e., in the case of an existing resource), LSEs should provide where to find the resource on the CAISO Master Generating Capability list.
- LSEs must either have a contract that states their contracted nameplate capacity (MW), per contract, or include a signed attestation that confirms the contracted nameplate capacity.
 - This information must be included in the crosswalk table as shown in example "DEFstorage".
 - In column "Milestone Requirement Met and/or NP Contract Validation" please specify if the NQC or Nameplate value is what is shown in the contract.
- At the time of this filing, all milestones should be met for all D.19-11-016 procurement and for the 2023, 2024, and 2025 requirements of D.21-06-035. In the event when an LSE is notified of delay or contract failure, please include a remediation plan that describes the source of the delay, possible remediation that will be taken by the LSE, whether the LSE has notified the CPUC previously of the delay, and what substitute

resources the LSE may be able to procure.

- Any instructions included in this Filing Requirements Overview, the RDT User Guide, or the RDT, supersede previous instructions and should be followed. Some previous staff instructions and responses to FAQs are no longer applicable.

Please note that staff previously instructed LSEs to create multiple lines in the unique contracts sheet in the data template if a project met multiple tranches. This is no longer necessary due to the drop-down list for the tranche column containing all possible combinations. Please only include one line for each project in the unique contracts tab. If the contract has an NQC value that changes from year to year, please include additional information in a note. When something fundamental about the contract changes (e.g., the resource's nameplate is expanded), please enter them as separate contracts (in separate rows). For more details, please read section 8 of the RDT_UserGuide. For the NQC validation tool, LSEs should follow the guidance that instructs LSEs to have separate rows for each instance where a single contract is being used for a distinct MTR "tranche."

5. Additional Instructions for D.21-06-035, D.23-02-040:

As mentioned above, LSEs are also required to include and provide information in the RDT for any projects intended to meet D.21-06-035 and D.23-02-040, LSEs should include information for all applicable columns in RDT. Information on these resources should be filed in the same RDT, and LSEs should follow all instructions above regarding milestone reporting and the table of contents cover pages. The following constitutes *additional* instructions to follow for D.21-06-035 and D.23-02-040 resources.

Please note:

- Projects pursuant to multiple orders should include a note indicating how much capacity the LSE intends to apply toward each order.
- LSEs must also fill out the NQC Validation Tool sheet for D.21-06-035 and D.23-02-040 resources. No other resources should be reported in this worksheet. Please see the RDT User Guide for instructions on how to fill out this tab. New columns have been added to this workbook to collect the NQC of resources pursuant to D.23-02-040.
- The NQC Validation Tool has been further modified to capture Zero emissions generation, generation paired with storage, or demand response requirement aka "Diablo Canyon Replacement" resources. Please see the RDT User Guide for instructions on how to enter these resources. These resources are now required to be entered into the NQC Validation Tool. Additionally, Decision D.21-06-035 requires Diablo Canyon be replaced with at least 2,500 MW from zero-emitting generation, generation paired with storage, or demand response resources by 2025. Long-Lead

Procurement NQC should be reported in the column pertaining to its applicable tranche ELCC. Please indicate this resource is meeting your LLT requirements by selecting “firm_ZE” or “long_duration_energy_storage” in the “d2106035_procurement_cat” column. Please note that this is a change from some previous RDT versions.

- Please note that the “d2106035_procurement_cat” column option “ZE_gen_paired_dr” refers to the Zero emissions generation, generation paired with storage, or demand response aka “Diablo Canyon Replacement” requirement. The “ZE_gen_paired_dr” option should not be used for any resources that are not pursuant to that requirement. If an LSE is showing a zero-emission resource being used toward their general requirement, they can select general, and they should not select “ZE_gen_paired_dr” unless it is intended to specifically count towards the “Zero emissions generation, generation paired with storage, or demand response” requirement.

6. Instructions by Resource Procurement Category:

Zero emissions generation, generation paired with storage, or demand response requirement:

Per D.21- 06-035 OP 6, LSEs are collectively required to procure 2,500 MW of zero emissions generation, generation paired with storage, or demand response resources that meet certain requirements by 2025.

- OP 6 states:

“This zero-emitting capacity shall have the following characteristics: (a) Be from a generation resource, a generation resource paired with storage (physically or contractually), or a demand response resource; (b) Be available every day from 5 p.m. to 10 p.m. (the beginning of hour ending 1800 through the end of hour ending 2200), Pacific Time, at a minimum; and (c) Be able to deliver at least 5 megawatt-hours of energy during each of these daily periods for every megawatt of incremental capacity claimed.”
- LSEs must attach an engineering assessment to their supplemental documentation to address these requirements. Staff will not provide or require a precise format for these assessments but instead outline the minimum qualifications of these assessments. Staff reserve the right to ask LSEs for additional information if insufficient detail is provided in the attached assessment. These assessments and additional documentation, if required, as well as the compliance table provided below, must be submitted via one filing prior to the required online date for this procurement category. As this procurement category is required online by June 2, 2025, these materials should be provided as soon as they are available.

- It is understandable that different portions of an LSE’s portfolio for this procurement category will have different online dates and can be used toward an LSE’s annual requirements prior to the ability to show an engineering assessment for a paired resource. However, procurement will not count toward the Zero emissions generation, generation paired with storage, or demand response requirement until the LSE is able to submit the required engineering assessment and demonstrate how the resources will be paired.

“Engineering assessments must meet the annual P50 standard set in FAQ 1.4.13 which states: “Staff expects that the resource (or combination of paired generation and storage resources) should have on an annual basis, at least 50% probability of being “able to deliver at least 5 MWh during each of these daily periods for every MW of incremental capacity claimed” (OP 6) D.21-06-035. If the probability is lower than 50%, then the resource does not comply with the decision and is ineligible. Staff expresses this standard as: the resource's annual P50 during the 5-hour period from 5 p.m. to 10 p.m. Pacific Time must be at least 1,825 MWh (5 x 365) for every MW of incremental net qualifying capacity claimed by the LSE to meet this procurement requirement.”

Engineering assessments should be in accordance with standard industry practice, per FAQ 1.4.13, which states: “Staff expects that the assessment should use standard practices in renewables and storage project financing (for example, taking into account battery charging restrictions, round trip losses, and with the probabilistic assessment considering standard sources of uncertainty including interannual resource variability). Staff expects that the only atypical aspect of this is the daily 5-hour window focus of this category of the procurement order.”

The engineering assessment must clearly state how the storage resource will be paired with the generating resource, if using paired resources. If only a portion of one or both resources is being used toward this requirement, that must be specified.

- The LSE should include the location of the engineering assessment in the table of contents cover page.
- The LSE may provide additional information if it is necessary for Staff to assess compliance of their resource or paired resources with OP6 and all of D.21-06-035.
- If an energy-only resource is being paired with a storage resource, the LSE must meet the P50 assessment *within the CAISO footprint*. This is the staff’s expectation of how an LSE would need to manage the use of a resource that is not deliverable in this situation. The LSE would need to show via the engineering assessment that sufficient energy will be provided specifically in CAISO to charge the battery prior to 5pm for 5 hours of discharge. The energy- only Solar’s capacity would not count directly at all towards the LSE’s procurement requirement, since FAQ 1.1.2

resources must be deliverable. (Staff notes that even if the solar was deliverable, it follows from the P50 standard set in FAQ 1.4.13 that is highly unlikely to contribute materially to reliability between 5p.m. and 10 p.m. other than by charging the storage earlier in the day; so it is likely that just the ELCC of the storage that is able to be counted towards an LSE’s procurement requirement for this category anyway).

- LSEs must review all requirements in D.21-06-035 and D.23-02-040, as well as staff’s responses to FAQ (particularly FAQ 1.4.13) to ensure they are complying with all requirements.
- To streamline review of compliance with these requirements, LSEs should complete the following table for each paired resource being shown towards their required procurement for this category. The engineering assessment/s should be source document/s for item D. Name of Paired Resource Being Shown for Compliance with D.21-06-035 OP6: ABC solar and storage

Item	Value	Source Documents (including relevant page numbers)
A. Generator nameplate capacity (MW)		
B. Storage nameplate capacity (MW)		
C. Storage duration (MWh)		
D. Annual P50 of combined resource during the 5-hour period from 5 p.m. to 10 p.m. Pacific Time (MWh)		
E. Reliability capacity being shown for counting towards the LSE’s required procurement for this category (NQC MW)		
F. Eligibility test: Is $D / E \geq 1,825$? (Yes/No) (If No, then the paired resource is ineligible)		Not applicable

Long Lead-Time Resources:

- Long Duration Energy Storage – Contracts for long duration energy storage must note that the storage resource is able to discharge for at least eight hours at full nameplate value, per D.21-06-035, OP 2(a). Hybrid or paired resources can be used for this requirement as long as the storage portion of resource meets the above requirement, per FAQ 1.3.1. Additionally, per FAQ 1.3.1, if a hybrid resource is used,

an engineering assessment must be submitted that demonstrates compliance with this requirement. The LSE should include the page number that an assessment of the resource's discharge capabilities can be found in the table of contents cover page. An engineering assessment is not required if the resource is not hybrid.

- Firm Zero Emission – Resources meeting the 1,000 MW NQC firm zero emission requirement must have an 80% capacity factor, per D.21-06-035, OP 2 (b). This will be based on forecasted capacity factor based on the latest available design. LSEs should provide an engineering assessment to demonstrate that their resource meets the capacity factor requirement. Per instruction in section 4, LSEs must re-submit materials that have been modified or amended. LSEs should re-submit this assessment if substantive changes are made to the resource design that lower the capacity factor below the requirements for firm zero emission resource procurement. The LSE should include the page number that an assessment of the resource's capacity factor can be found in the table of contents cover page.
- Bridge Resources: Please be sure to review D.21-06-035, D.22-02-004, D.23-02-040, and staff's responses to FAQ for all requirements regarding bridge resources. Bridge Resources should be explained and described in the LSE's remediation plan document. Bridge resources must also follow all the same requirements as other MTR compliant resources including instructions for entering into the RDT and backstop / milestone documentation submission. Staff also recommend LSE to review the CPUC Decision D.25-09-007, adopted on September 18, 2025, which modified the option for LSEs to use "bridge contracts" as an alternative compliance mechanism for specific mid-term reliability (MTR) procurement requirements.
- Additionally, Per OP 11 of D.25-09-007, "During any assessment of LSEs' compliance with the procurement requirements in D.21-06-035 and D.23-02-040, as modified by D.24-02-047, an LSE will be deemed in compliance with those procurement requirements if: (1) the LSE has sufficient executed long-term contracts (active contracts that meet the applicable requirements of D.21-06-035, D.23-02-040, and/or D.24-02-047, including the required length of ten years or more) to meet the applicable procurement requirements; and (2) the LSE has met their month-ahead system resource adequacy requirements for each month the procurement is delayed by the final deadline for curing any resource adequacy deficiency. LSEs may be deemed compliant by using this compliance pathway for a period of not more than three years from the required online date of the applicable procurement requirement. This pathway applies to all procurement categories in D.21-06-035, D.23-02-040, and D.24-02-047."

Substituting Delayed D.19-11-016 Capacity for D.21-06-035 Procurement: If an LSE submitted a resource for D.19-11-016 that was put in the baseline for D.21-06-035 and that resource has not yet come online, the LSE may follow the instructions provided in the "Instructions and Template for LSEs Substituting Delayed Excess D.19-11-016 Procurement Capacity for D.21-06-035 Mid-

Term Reliability (MTR) Procurement” document to count their resource toward D.21-06-035 instead. This requires that: (1) the resource will come online during the D.21-06-035 compliance period and that (2) The LSE has met their D.19-11-016 obligations with other resources. All requirements put forth in the referenced documentation must be met before or at the time of the filing. Additional information is also provided in FAQs.

Emergency/ Summer Reliability Resources: In some circumstances, IOUs have submitted advice letters and received approval for resource procurement to meet summer reliability requirements. If the IOU seeks to change the use of the resource that it now will be used to meet some of their MTR obligations, Staff expect the IOU may need to make a filing identifying the change in the designation of the resource from being a summer reliability resource to being an MTR resource, and the resulting change in CAM treatment.

7. Detailed Instruction on Project Progress Tracking Requests:

For the purposes of keeping our project status information up-to-date, LSEs are also required to provide information on the following project types:

- LSEs should include any projects with contract statuses planned, development, or review as of 12/1/2025, as well as any projects that came online after 11/1/2023 in the LA Basin local capacity area, even if not pursuant to either IRP procurement order.
 - LSEs should use the sub-area column
 - LSEs should complete all applicable columns in the RDT for these projects.
 - LSEs should not include any supplemental documentation for these projects, unless they are also pursuant to a procurement order.

8. Submission Date:

Each LSE must submit a completed RDT along with supporting materials to the CPUC by 5 PM PT on Monday, June 1, 2026.

9. Submission Instructions:

- a. **Informal Provision:** Please submit all materials to irpdatarequest@cpuc.ca.gov through the CPUC FTP website. The LSE should file the RDT utilizing the instructions in this document and “RDT User Guide”. LSEs may consider some contractual information confidential and wish to file accordingly. In that case, LSEs need to submit two versions of their RDTs (confidential and public). Filers who do not already have a CPUC secure FTP account should follow the instructions on the [secure FTP site](#). From within the secure FTP application, users can send secure emails to CPUC staff with large attachments. This mechanism allows filers to transmit complete filing to CPUC staff including any portions deemed confidential.

Staff notes that it is important for LSE, to use correct naming convention when filing the RDT file name using the following naming convention. The file name must

contain the 5 elements below, in the order provided. Use an underscore to separate each element. All letters should be in lower case.

1. The LSE's abbreviation, provided in the Resource Data Template's workbook in the "lse_names" tab
 2. "RDT"
 3. "38mmt"
 4. Confidential vs. Public: written as "confidential" or "public"
 5. Version number, written as the letter "v", followed by a number. If you have to re-submit a file for any reason, increase this number by 1.
- b. Formal Filing:** Parties should also read carefully and follow Rule 1.5 through 1.14 of the Commission's Rules of Practice and Procedure when preparing and submitting their filings, available here:
<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K618/209618807.PDF>

Below is a summary of the basic steps, in anticipation of the likely needs of many LSEs in this proceeding. This guidance is not intended to modify, in any way, the requirements set forth in the Commission's Rules of Practice and Procedure, which are considered authoritative.

10. E-filing

- When making the formal filing, LSEs are encouraged to utilize the Commission's electronic e-filing system and select the document type "compliance filing."
- When e-filed, documents must be PDF/A compliant (see Rule 1.13).
- All materials should be e-filed, including PDF/A compliant versions of public spreadsheet materials, EIA forms, etc.
- Filers should include the verification required by Rule 1.11.
- Filers should also include a certificate of service (service requirements are discussed further below).
- If a document is larger than 50 pages or 3.5 megabytes, the filer should instead file and serve a "notice of availability" with a link to the materials housed on its own web site in a publicly accessible format (see Rule 1.9(d)).
- The filing deadline is June 1, 2026, before 5 p.m. PT.

11. Confidential Materials

- The LSE should file the RDT utilizing the instructions in this document and "RDT User Guide". LSEs will likely consider certain contractual information confidential and wish to file accordingly.
- Along with the confidential version of its materials, the LSE will need to separately file a "motion to file under seal" detailing the justification for keeping the material confidential, following the guidance in the Commission's decision D.06-06-066 for these purposes (see Rule 11.4; there is also detailed guidance contained on the following page on the Commission's Practitioner Page web site:

<https://www.cpuc.ca.gov/about-cpuc/divisions/administrative-law-judges/practitioners-page>, look for link titled: “Filing Confidential Documents Under Seal (Rev. Nov 2013)).

- The confidential version of the LSE’s materials may be submitted under seal in hard copy form, or if the material exceeds 3.5 megabytes, may be submitted on an archival DVD directly to the Docket Office. For more detailed guidance on this issue, also see the Practitioner’s Page at <https://www.cpuc.ca.gov/about-cpuc/divisions/administrative-law-judges/practitioners-page>, look for link titled: “Mixed Media Filings: Cutting Edge Filing Techniques to Accommodate Multiple & Voluminous Media Formats.”
- LSEs should also ensure that confidential materials are delivered to Commission staff electronically immediately, regardless of the formal filing status, so that staff can begin analysis (see further details below).

12. Service of Materials

- All public versions of filed materials should be served on all members of the “service list” of this proceeding (See Rule 1.13).
- The service list can be downloaded from the docket card for this proceeding or from the Commission’s service list webpage, by clicking on “download comma-delimited file.”
- Email service is generally preferred, but has some limitations:
- Some email servers will not accept or deliver messages to groups of more than 100 addresses. Thus, serving the whole service list may require dividing up distribution into smaller groups of recipients.
- Document size is also limited if serving by email, and thus a notice of availability with a public web site link is preferred for large documents and underlying materials. Such an approach will also make spreadsheet materials more accessible and useful.
- Service should be performed on the same day as filing (June 1, 2026), before 5 p.m.

If you have specific technical questions about this general formal filing guidance, you may contact the Commission’s Docket Office at efile-help@cpuc.ca.gov or call (415) 703-2121.