

RDT Office Hours Notes & Transcript; May 6, 2025

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The meeting addressed IRP procurement updates, emphasizing compliance requirements, resource data changes, and the importance of accurate filings for upcoming deadlines.

- Christine Root led the meeting, focusing on IRP procurement updates.
- The agenda included compliance review schedule, filing requirements, and resource data template changes.
- Each LSE should know their individual procurement requirements for the upcoming June 2025 filings.
- Key updates included changes to the unique contracts tab and error checking macros in RDT.
- ELCC guidance documents are referenced for calculating NQC values based on recent studies.
- Discussed the breakdown of resources in hybrid contracts into storage and solar components.
- Clarified how to fill out contract details, including technology types and capacity values.
- Emphasized the importance of accurately entering NQC values in the MTR NQC validation tool.
- Addressed how to handle resource delays and their impact on tranche obligations.
- Highlighted that LSCs must fulfill all procurement obligations regardless of resource delays.
- Confirmed that ELCCs must align with the selected tranche, regardless of the resource's COD.
- Emphasized a holistic approach is needed for evaluating procurement gaps and resource availability.
- Clarified that December filings remain as submitted; focus should shift to upcoming June filings.

Action items

- Remind LSEs to submit both public and confidential versions of the RDT, along with supporting documentation by June filing dates. [0:04:12](#)
- Encourage LSEs to run error checking macros after filling out the unique contracts tab before using the MTR NQC validation tool. [0:09:08](#)
- Provide guidance on filling out the certification form accurately and ensuring relevant personnel are nominated for verification. [0:10:41](#)
- Release a draft of version 3_4_9 of the RDT later this week, incorporating feedback received from LSEs. [0:19:54](#)
- The team will compile a general response to address the questions related to ELCCs and tranches for all participants. [0:41:29](#)
- Follow up with a more detailed explanation and example regarding how to input contracts that are used in multiple tranches. [0:53:36](#)
- Ensure guidance is updated to reflect that bridge resources only need to be entered in the unique contract tab and not the MTR EQC validation tool tab. [1:04:35](#)

- Clarify the method for entering bridge contracts, particularly when they are bridging to multiple resources. [1:05:45](#)
- Review and potentially revise guidance on how to handle spillover of generic resources between tranches. [1:07:27](#)
- Participants with specific scenarios regarding ELCCs and tranches are encouraged to send separate emails for clarification. [1:18:46](#)
- Follow-up communications regarding individual penalties will be sent out in the near future. [1:21:22](#)

WEBVTT (Transcript)
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"SF - Courtyard Conference Room"

Hi, good morning, everyone. My name is Christine Root and I'm the supervisor of the Integrated Resource Plan Procurement Group. Before we start, I have a couple of housekeeping items. We that everybody please mute your audio until you're called upon. For those of you in the room, we do have sensitive microphones, so be careful with that. And then also our office hours today are from 11:00 a.m. to 12:30 p.m.

We ask everybody hold questions until the end; following today's presentation, we will be posting a final version of the resource data template for your use. Today's presentation in addition to a recording of today's session. And with that we'll go ahead and get into the agenda.

Today we're going over the IRP procurement orders and compliance review schedule, the filing requirements overview. We'll also be talking about core concepts and key features, the resource data template. And then we'll go over the summaries of the changes that we're making to the RDT in this cycle, and we'll do that in more detail. And then we'll also talk about the best practices for you for filling out your RDT prior to those June second filings and related effective load carrying capacity guidance for where to get those for your specific resources. Lastly, we'll be talking about next steps and timing for future updates to the RDT. And then of course the most important part is doing the question-and-answer session.

I think everyone's probably familiar with the procurement requirements. Each LSE should know what your individual requirements are, but just as a reminder, we're here in 2025 for those June filing dates, and everyone should have a cumulative of 12,800 MW coming in about this time, but each LSE will know their individual requirements. Just a reminder, when your filings come in, you're going to submit both a public and confidential version of the RDT, version 3_4_9, and then of course all your supporting documentation: your contracts, milestone documents engineering assessments, if you are required to have them and of course a remediation plan if you need one. What's not required in this cycle, are the narrative templates or the clean system power tool, and then of course the associated tab for that on the RDT. Our expectation for this cycle is that all your 2023 2024 and 2020 5D21 procurement bridge resources should be online and particularly those related to the Diablo Canyon placement requirements. And then of course we're looking for

significant progress towards the remainder of your D 23 procurement obligations too. And with that, I will turn it over to Anamika to introduce herself and do our next slide.

Thank you Christine. So good morning, everyone, and my name Anamika and I'm also an analyst in the IRP procurement team. In the next few slides, we are going to look at the broader guidance and updates for the upcoming version of RDT.

We would like to highlight the four concepts and key features of RDT. I'm going to start with the RDT 3_4_8 version, which has already updated on the CPUC IRP procurement track website. And there is a new version 3_4_9 coming up soon. The current version has 14 sheets, and it starts with a certification form, but not all sheets are required to be filled for June 2020 June 2025 filing, as the IRP staff uses the RDT for broader planning purposes and other compliance, not every sheet will be required to be filled. The 1st sheet that is probably the most important is the unique contract staff. Within the RDT version 3_4_8, which is used to report the LSE's existing and plan energy and capacity contracts. A few things that needs to be highlighted here is as the name suggests, this sheet requires LSEs to report their contract with each specific contract IDs as well as resource IDs. Whenever you have a contract that include two resources, please make sure you report it in two separate rows. Similarly for the hybrid contracts, with two resources needs to be listed in separate rows. Contracts used to meet multiple compliance obligations, different tranches. They are also required to be listed in separate rows.

We have received a lot of questions about bridge contracts both short term and long term, and I want to make a note that these also should be recorded in separate roles. In case of any bridge contracts, where it is bridging two resources that needs to be entered into separate rows with a clear indication of which resources it is used to bridge.

Every time the IRP releases a new version, it comes with updates and changes and there are additional few sheets as well as columns. And in the events of transferring the information from a previous RDT version to the newer version. We have noticed that the overriding of the data takes place, and it removes all the data validation rows or columns in the RDT. I wanted to highlight that please be extra cautious when you are pasting information from one version of the RDT to the newer version and whenever necessary, please use the paste values only.

I also want to make a note that each contract in the unique contracts tab needs to be reported in a separate row. The other major update is we have also updated the error checking macros, and we highly recommend that LSE run the macros after filling the unique contracts tab, but before going into the MTR NQC validation tool as the errors can be transferred from the unique contracts tab to the MTR NQC validation tool if not they are not corrected beforehand.

We made changes to the unique contract sheet, the MTR NQC validation tool and the MTR NQC summary tab. In addition, there is a new functionality we have added in the RDT, which is called certification form, and you will see it as the 1st sheet included in the current version of the RDT. The newer version that is going to be released soon is going to include all the feedback from the LSEs that we have received so far.

I'm going to touch base a little bit here on the certification form and then Travis will explain the next summary of changes. Certification form, it is a new functionality, like I said that we have added in the current RDT, and the purpose of this form is to ensure accuracy and reduce the data errors in the RDT. The IRP staff want to minimize the inconsistency in the data as well as the procurement volumes that has been reported by the LSEs through MTR compliance. Please make sure that you read carefully and include all the information that is asked for. We also want to make a note that LSEs must nominate a person or a number of people verifying this information and certifying it and make sure that the information is included in the certificate is relevant and current so that in the events of errors or data inconsistencies, we can follow up with the relevant staff. I will now have Travis introduce himself and cover the next updates on the RDT. Thank you.

Hi everybody, and thanks Anamika. I am Travis. I work on the Integrated Resource Planning's Planning Track team, and you probably have seen me talk about the RDT before. I'm going to give you some details about changes that we've made to the unique contracts tab as of the version that was already released. I'm going to discuss changes that have been made. Starting off, we added a new contract called unique contracts that's a dropdown with a YES or NO field. It's used for LSEs to indicate when anything materially has changed with an LSE submission between its most recent submissions, LSE's contracts. Changes in terms of the expected COD, that would be an event where I would want to include a YES marker saying that something's changed from one contract to the other. Just as an example.

You'll also see that we updated our CSP annual year columns. Those aren't required to be filled out through the submission. We've updated them in anticipation of what might be required for the next planning track submission, just trying to get ahead of it a little and you can see we're already sort of thinking ahead to that release of the RDT, but that won't have any impact on this submission, just additional columns that we will eventually need and hopefully seeing them will make it a little bit more familiar when that submission comes around. But there was no impact on this one. Those are the major changes that happen in the unique contracts sheet this time around.

Moving on to the MTR NQC validation tool, we've made some fair changes to this one. Each row will be filled out in the MTR and NQC validation tool. Each row needs to be made for each contract, for each tranche, and for each procurement obligation that the LSE is targeting. It is no longer the case that a contract row meant for DCR will automatically be counted for general. That was the case in previous RDT versions, that's a change that's been made this time around. So be aware of that.

Also worth noting is that although this we did include in version 3_4_8 the new column MTR compliance target, that's not something that's going to be included in version 3_4_9 because I realized that that's something we can steal from the unit contract sheet. It won't be something you'll have to fill out in the version that's upcoming. In addition to that, with some other modest changes that we made for the version 3_4_8, including removing the ELCC hybrid storage resource column. The type was always storage, so it was entirely redundant, so there was no reason to continue keeping it on. And finally, there's the MTR and NQC summary sheet, which we've made some changes to. Originally it was a table made up of a formula and several index match functions.

That resulted in errors, there were cases occasionally where we would have the formulas returning contracts wrong sometimes double counting numbers. The new pivot table works better and will be the major change that you'll need. It must be refreshed each time you make changes to unique contracts or to the MTR NQC validation tool for it to show up in this table. You'll see in the version that we will release later this week will include some additional column headers that will prevent double counting or doubling up of some values. That's corrected. Oh ok, back to Anamika. Thank you so much.

Thank you, Travis. Now we are going to look at the major MTR ELCC guidance documents. As many of you might have noticed that the NQC validation tool kind of compares the LSE's reported NQC values to the ones that are calculated by two. We're going to be brief in this section that how these values are calculated and what guidance documents we have referred to.

For tranche one and tranche two, the staff included a 2021 study of midterm or midterm reliability procurement by E3 and that study is available on the CPUC website. This study, as a fundamental document, creates the way NQC validation tool calculates the NQCs for the resources entered in the unique contracts tab.

For tranche three and four, for any contract signed before 30 November of 2022, this tab used the 2021 study for the tool to calculate the NQC and the contracts. Post November 30, 2022, the new incremental ELCC study for midterm reliability came in 2023 was considered. If LSEs have any questions about the ELCC methodology, please refer to these two important studies that was released by the staff. In addition, we have some FAQ documents which list a lot of questions around the ELCC methodologies and how to calculate the NQCs for the resources that are coming online in tranche four or five. For any other additional resource, the NQC validation tool will use the RA NQC counting rules at the time of the contract for the new resource or the capacity added to an existing resource when it is executed. Over to Travis.

If all goes well, you should be seeing my Excel sheet right now. This is just the version that we have as Anamika mentioned, RDT version 3_4_9. It includes many of the revisions that are, you know, noted by LSEs to be able to show stuff correctly. And I have some example contracts that I've made up to walk you through here. These are just things that in case some cases won't make any sense in terms of real contracts, but in terms of data being entered.

refer to recorded presentation to see examples

To sort of start off with, we're going to run through one example of a contract for a resource that's already online being used for general procurement. This example is an online solar resource. In the example, every single row, LSE unique contracts ID must be unique for every row. Every single row should have one and only one resource attributable to it. We've entered the alternative resource name—reminder on this, that there's a list of names you can choose from, but if it's not presented here, you can go ahead and overwrite it, with your given name that you might want to use for it. Let's call this *solar_two*. You'll get a pop up saying it's not in the list of available things, and then you'll go ahead and press YES. You really should try and find the name available in the dropdown from there.

Next up, there's alternative resource name. Contract status. There's several dropdowns. The definition of all of these is in the RDT user guide, and I cannot emphasize enough, please read it read through it. I think you will find it fairly helpful for answering a lot of the questions as to how you would fill out contract status.

You'll note here, this resource is already online and has the resource ID, so we do not need to enter a total nameplate capacity because that's already provided in our resource list that we have on the resource tab. If you want to, you still can if it makes you feel better, it doesn't hurt anything.

Because this submission is obviously pursuant to the MTR procurement obligations, the September NQC value we see here, well it's good for us to have and useful for us to have. It's not what's being evaluated directly; if you can provide this information and if it exists, please do so.

If it does not have this, e.g., a bridge contact contract that doesn't extend to September, please feel free to leave this as zero. That would be ok. However, if it does, please provide it. These are of course the RA NQC values.

Contracted gigawatt annual might be relevant in this sometimes this is for the purposes of this submission, not super-duper important. It depends on what it's pursuit to. Even planning this is required sometimes, but not for this.

The hybrids, of course, what is and isn't in a hybrid, are always important basically to if you're doing anything that's storage many of these fields that are in blue that are related to hybrids will be used. In our 1st example here though, this is just a standalone storage contract, so we say it's not a hybrid. But we do know it's solar, so if we want to include some of the solar type we should. It's not storage, so we can remove all that.

The other important part to pay attention to is of course the contract dates, the CODs, the contract start date, and contract end date. In this example, I've got a resource here that this is the actual COD for the given resource ID that I grabbed. We can see it came online in the year 2024 before June 20 it was on 23 May. And in our example contract, we're going to say that the contract started at the date of COD and the contract execution date also just for simplicity happened on that same day. We're going to say that this contract is pursuant to the general category and based on what we know about the contract, we're expecting it to be 76 MW of NQC. Once I'm done filling all that out and entering that stuff and anything else that is relevant here.

The next step I would do is to back over to the readme. I would run the error check macro. Now you can do this per line, or you can do it once you've entered all your lines, whatever you prefer. I would then go and figure out anything that needs to be corrected in the report sheet that it pulls up. This is row number three, and we're going to pretend that it didn't like that I ignored viability. That is something that's required. We're going to ignore it because for the purposes here, it doesn't stop us. It's not necessary. Anyway, now we would move on assuming that this is all good, we've removed all our errors from the unique contracts, and we've run it through the macro. We can then move on to the MTR NQC validation tool.

So once again, example one is our 1st row you see here. It is for tranche one. We've assigned 100 % of the nameplate. This is just as simple as we could do it. And then we're going to go ahead and grab a solar ELCC that we think would be applicable to it. So, solar came online in 2024, so let's grab the let's say I think. We go all the way to the right, we've updated the conditional formatting to show it gray properly now, so you know what cells to fill out and not fill out. We should come over here and we should see a value for the general amount of NQC that it can provide. Now, it isn't right now because somewhere along here I messed something up. Oh, it's because of the ID that I used here, this is for solar it's not actually a storage resource. Pretend that this was for a storage resource here to make our lives a little easier so we can see that it does calculate it right. But yeah, as of right now, the errors preventing it from calculating in general previously have been corrected, so it should get proper calculations of general. I don't know what I did just now that made it stop, but let's go ahead and erase anything that I did. Anyway, that's example one of NQC.

The other two examples that I'm going to show depending on how long it takes me to get through these will be one for a firm Z contract, and then we're going to do a hybrid contract as an example. A firm Z contract here, once again, all the same information, we're going to say that this is a solar contract. I've given an arbitrarily chosen resource name. We're going to say it's in development. This is the actual nameplate capacity for that resource, which because we're going to pretend that this is in development, we're going to say it's generic, so we, this would be for a resource e.g. that doesn't have a resource ID in CAISO's list yet or in our resource list yet that's in the resources tab, so it doesn't appear here. And this is how you would go about filling that out. It does require a total nameplate capacity to be entered and contract nameplate capacity to be entered. It does require to have September and NQC. The hybrid fields in this case, we would probably want to know the solar storage technology type or solar storage type. And once again, I've just copied over the same COD information, contract start date information and contract execution information to allow us to easily kind of get through this. But essentially it's the same idea as we had before.

So here in example two, we're seeing in the MTR NQC validation tool. Before we move on to this, again, we will want to run the macro once again to check if we have any errors or if we entered all our contracts and you need contracts 1st. We would have already done that. So just saying, before you get to this stage, before we start messing with the MTR and NQC validation tools stuff, remember to run the macro. It'll make your life easier, it'll show you where errors occur.

Remember this is an LLT contract, so we're just saying that it comes online in tranche two, it's not due until later, but just for the sake of reflecting it, we want to show, hey, this has come online early for LLT. Again, it doesn't make sense that it's a solar contract being used for LLT, but you know we're pretending here, ok? Selected an ELCC for it and we should see over here as with other stuff that it has successfully produced value in our column for LLT. So, it would have produced 1.2 MW of NQC for this LLT contract. Then, let's go ahead and take it one step further and look at how it shows up in our MTR NQC summary sheet.

Each time we've entered something or changed something in the MTR NQC validation tool or any of the contracts and run the macro and we feel good about the values that we entered. We need to

refresh our pivot table here. It doesn't take too long. We see that it has the correct procurement category selected. See it's not a hybrid, we see it's not grid charging, we see the nameplate allocation we've given to. The given tranche, and we see the NQC for LLT. So, this table essentially compresses everything that we have on our other sheet into an easier to read version and then will reflect it in the above table, as you see the 1 MW of LLT right here.

There's your example of an LLT contract, very similar to the general. The only real major difference you see here is that the LLT contract is summarized differently on the MTR and NQC summary and that we've selected different categories on the unique contract sheet. So, what you select in unique contracts will be how it is determined. It determines what these obligations are counted towards.

The next example to walk through is a hybrid example where we've got a solar and a battery. This is `three_example_gen_hybrid`. For `example_storage_hybrid`, I've chosen just cause it's a fun name and we're going to pretend that there it's in development as well and I'm going to show you how I would fill out this hybrid in order to reflect it. First and foremost, you should notice that there is although it is a hybrid, do we have enough information to know how much of each one of these given resources, of the two part of the resource that is included in this hybrid contract? The storage portion versus the solar portion, we've broken it down into two rows where we can explore and show each of those in these two different rows. We're going to pretend that the resource has a contracted nameplate capacity about a hundred megawatts of NQC, and because it's in development remember, we need to include a total nameplate capacity for it. We're going to pretend that it's new solar and new storage. We're going to pretend that it can charge from the grid. And then we're going to fill it out according to what each row has attributable to that portion of the contract. Remember for the sake of referencing back to our first row is for generation, our second row is for storage. Our 1st row, you see the generator has a hundred megawatts of assigned of contract capacity. And when we go over to storage, it's got 0 MW of assigned contract capacity. Our second row inverts that, it's got 0 MW of storage of generator attributable to it and it's got a hundred megawatts of contracted storage associated with it. However, the total amounts, this is the total amount relative to the projects remain a hundred on each row.

On each of our given rows, we'll specify the technology types, including the solar technology type and storage technology type. We would include our storage depth, especially on the row that is relative to storage because the 1st row doesn't. It is the generator portion of it, so we're saying it's zero, saying it's 400 on the storage portion. And then once again, just to make our lives easier, I've copied down the COD information, the contract start date information and execution information to this row below. These we're going to say they're going to be used for general, to make our lives a little easier, and I'm going to just make up some numbers here on the spot. We're going to pretend that it's going to give us a hundred megawatts of NQC for each, we know that's going to be way too high for the solar, so well let's see it happen.

What do we do next? We go over to our macro. We run the macro. We would then presumably come over here into our report sheet, fix all the errors that it calls up, which considering how little information I entered would be probably a lot. Once we're done with that and we correct those errors, whatever they maybe, we're going to go over and begin entry into the MTR and NQC

validation tool. We're going to include two rows just like we did before. We're going to say it's in tranche two. We're going to attribute a hundred percent, so this is the generator. Because it's 0 % on the unique contracts, we could do it for the generator portion of the contracts, we could make this a hundred or zero. It doesn't really matter. Because it's zero on the other one and multiplication, whatever you want to do, we've already reflected how much is contracted for each one of these contracts on the unique contracts, so keep that in mind. Keep in mind that what's on unique contracts always flows down to this. For ease though I've left these at a hundred. We then fill out the ELCCs applicable to this example. In this case I'm going to say it's solar, it's come online, it's applicable to the MTR incremental ELCC's 1st study that was released in 2024. And we should keep in mind these are general, go all the way over here to the right. See some general values, and here they are. We actually get six for the 6.6 MW of NQC for the solar portion and 90.7 for the storage portion, and when we go over and we refresh what's shown in the MTR NQC summary table. For contract three, we see 96.6. That's good. That's what we want. We see that the reported NQC was a hundred.

You can see the large amount of differences between the calculated versus total reported NQC is about a hundred because I've got that other contract in there it's a little off from a hundred. But that shows that the solar has been significantly over entered. The amount of solar that we assumed would be provided in in NQC in these columns over here, specifically the one example for the generator, this is way too much. That's why we see the difference. We can sort of close the loop here and say, I've overestimated something, or I've done something that's drastically different between how the MTR NQC validation tool is estimating. Would look like and I've entered into these MTR tranche columns here. Yeah, there you go.

An example walking through Diablo Canyon Replacement's a little bit more in depth and I would be happy to walk through if it's as value, it's going to follow exactly the same sort of formula as what we've previously talked about. In fact, I'll go ahead and just change one contract a little bit so we can see how that works out. Let's change the example two here from being LLT to being Diablo Canyon Replacement. We change the procurement category here, ZE gen paired DR. It's going to be about 1 MW of NQC that's probably overestimating it because remember, this is solar. We see the charging value that the contract these are the additional fields that need to be filled out to give us our Diablo Canyon Replacement NQC. I'm just going to make up numbers. Let's say that this total megawatts of megawatt hours prior to an including hour ending 17. Let's say that's a hundred thousand. And let's say after our ending 17, this solar still gets a little bit of, a little bit of sunlight, let's say 10,000. Let's say this doesn't have a battery, so it's a hundred percent. And let's pretend that the engineering assessment was completed, we go over here to the right. You should see a tiny bit of NQC from generation showing up and there it is. There you go. Not too bad, right? Okay, I'm done.

We're in our question-and-answer session now and so I ask that people in the Webex, please raise your hand so we can call on you. We'd also like to try to keep questions focused on the RDT, I know there's a lot of questions regarding contracts and you can email us through the IRP procurement inbox. We are trying to focus today's session on just RDT questions.

QUESTION:

"Shayna Levia - PCE"

Three questions, I believe they're all RDT related, so I'll just go through three of them if that's ok. I understand that if you're splitting like generic, e.g., like a resource between two generic tranches on the unique contracts tab, should that be two separate lines or can you, because there's two different columns, you can split the generic.

I'm using some for one tranche. The resource is large enough that I can use some NQC for tranche one and some NQC for tranche two. So, using it for two different tranches, I am splitting it the NQC.

ANSWER:

Between the two tranches. So if you can keep it to a single row and it's used in two different tranches, if it's got overflow into a proceeding tranche, then rather than this is one of those rare cases where rather than splitting it into a separate row, you would add it to the column, let's say you filled up tranche one and you're moving it to tranche two. Instead, you would fill out column, you would go from column B, which is MTR NQC tranche one over to MTR NQC tranche two to show the difference.

Let me show you that as an example on the Webex here really quick. Yeah, so here we go. An example like this where we would see that let's say, however ignore everything up to column BA if we had a contract, our obligation was, let's say 50 and the contract we had somehow is worth a hundred and 50 MW of NQC. Our tranche one obligation was 50, then we could carry 50 and then have the remaining hundred show up in tranche two here. So yeah, you would split those.

QUESTION:

"Shayna Levia - PCE"

Perfect. Thank you. The RDT filing instructions mentioned a column planned project retention priority. I didn't see that in the version eight. Is that going to be included in version nine?

ANSWER:

Thank you for asking about it. I was talking with the larger planning team and that was planned to be implemented later this year, but then it was decided not to put it out. We're going to remove reference to it until planning decides on how they want to go about asking for that piece of information.

QUESTION:

"Shayna Levia - PCE"

Okay, great. Final question. On slide 16 of the presentation today, 2nd bullet point, I think it said the LSEs have access to all the ELCCs, I'm just not sure what that was intended to mean.

ANSWER:

LSEs are obligated to fill each tranche of their procurement obligation regardless of resource delays. In this way LSEs have equal access to each tranche ELCCs. So that's to say if I have a delay and I'm an LSE, I've got a very delayed contract for something coming online until I have met the

requirement. For a given tranche, I am filling things out using the ELCCs for that tranche until it's satisfied. So, basically, I like the bucket analogy for tranches, until I fill up my 1st bucket, I'm going to be using the ELCCs applicable to the 1st bucket. Those ELCCs tend to be more favorable, so the ELCCs you'll use for early stuff are better than enough. Hopefully my analogy is better than anything else.

QUESTION:

This question is from Steven Byers with Constellation. Thank you for the walkthrough to clarify the change in direction regarding how to represent a single contract. If an LSE has a contract that is used in multiple general types where does the contracted capacity. And all details should now be shown on two separate lines of the contracts.

ANSWER:

That's a good question and to make sure that there's no confusion about it, let me share my screen so I can show you. This is another case like the previous question actually, where if we can represent the contract using a single row, let's say a contract does need to or exceeds the amount of MTR NQC for a given tranche, it can spill over into additional columns to the right. If something differs, the only time we'll use other an additional row to represent a contract like what I believe he's or she or they are describing, is if it is pursuant to a different procurement obligation. If I have a contract here, let's say this 1st row, that it meets my 1st tranche one NQC and then has little extra and instead of putting that little extra towards the tranche one or tranche two NQC, instead I wanted to apply that to Diablo Canyon replacement, and let's say the contract is capable of doing that, I could do that. But in order to represent the differing obligations that I'm pursuing, I have to add a new row in those cases. Otherwise, spilling over to the right is ok. When you spill over contracts to the right, what I'm saying contracts that exceed the MTR NQC to the right. Remember that these are incremental values to the total NQC, so if my contract comes online, like I'm showing in the 1st row right here with 76, it's assumed that for all remaining tranches, it will continue to apply 76 MW of NQC throughout the remainder of the MTR obligation and I believe they have to be at least ten years, so and then some hopefully that answers it. If not please let me know.

QUESTION:

"Mary Neal (DCE)"

Could I have a quick follow up on that point for LLT resources. If you're using an LLT resource for a general tranche like tranche two in your example, would that have to be also represented.

ANSWER:

Yep. Two rows, one for general, one for LLT. And the LLT breaks out in unique contracts to either long duration storage or firm ZE, both in the MTR and NQC validation tool are counted as LLT to make life a little bit easier, but you're correct. It would need to be at least two rows, it could be additional rows depending on what else is.

As a general rule of thumb, I would suggest when in doubt add a new row for it, just make sure that each row represents only what is being attributed towards that obligation by that given resource, better to add too many rows than too few. That's granularity's good.

QUESTION:

This question is also from Steven at Constellation.

Is this also a case for placement plus general? If the contract is named contract one, is the request to now separate it as contract one A and contract one B? My understanding had been that these circumstances were addressed with the nameplate tranche column BF of the validation. Those columns would now seem to be a hundred percent in all cases now.

ANSWER:

So, the answer to his question would be yes, in that you will need a separate row for unique contracts for contracts that are pursuant to Diablo and to pursuant to general obligations. And the same is true of the unique MTR NQC validation tool. You'll need a unique row for each one of them. And each one to the top of it, I like the naming convention suggested one example one A and one B that helps us understand better that they're sort of one contract being used for the two different purposes.

QUESTION:

We have a question from Gregg Klatt. It says where a PPA for a renewable resource output will be paired with more than one storage resource to account for the LSE DCR requirement. How should the production values be in that case? I feel like we would need to fill out a whole contract row to illustrate it.

ANSWER:

I'll sort of give a high-level answer, then should follow up with a more detailed explanation of an example later. An example would be like the one I entered. This is where we have, if I remember correctly, yeah, this is a Diablo Canyon replacement. This is a contract that is solar and it's primarily providing charging for a presumable resource that would then be paired with it as Diablo Canyon replacement. These megawatt hours of energy you see here, they end up showing up over here. You can see the net portfolio energy for charging resources. So, yeah, I would say high level, follow what we did on the 2nd example, this is an example of how that would be. Providing not the discharge capacity of a storage resource used in those later hours, but the charging capacity for it. And even if these hour endings were zero, after our ending 17, you would still see that the net energy available for charging remains a hundred thousand here. So hopefully that answers that question.

QUESTION:

"Gregg Klatt"

This is Greg, so there would be two, just one, just one row for that, even though it's paired with two different resources.

ANSWER:

If they are in two different tranches, I would then add additional rows for each of those that are being charged. This is just the chart, the charging portion of it. I would then add two additional rows showing those.

QUESTION:

"Gregg Klatt"

Okay cool. Thank you. And my next question is actually tied to the previous issue we're discussing. Where a resource was contracted for tranche two that did not come online until 2025, the LSE should use the 2024 ELCC value for the purpose of calculating the MTR NQC for tranche two.

ANSWER:

Our slide would indicate yes, but, that's because the ELCCs are applicable to the given tranche where a resource comes online to if an LSE hasn't met it yet, but I'll put a caveat on that and say, I don't know if there's agreement on that here. Let me get back to you on that one.

QUESTION:

Erin has a question similar to that. She says, so if a project doesn't come online until 2025, we would put it in tranche 2024 until we have satisfied all of Tranche two. That is the same question and I'm going to let Gwen quickly clarify and introduce herself.

ANSWER:

Hello everyone, I'm Gwen. Yeah, I posted a response to those questions in the chat, just so everyone's really clear on it. It is up to all the LSEs to fulfill all the obligations to meet all the ELCC, to meet all the ELCC values. I refer everyone to the response in the chat, which I will read aloud as well, just to make sure it is clear:

"We assess compliance by evaluating the entire stack of resources, the duration of the resource delays and whether bridge resources were available to address those compliance gaps. LSEs are required to fulfill every tranche of their procurement obligation regardless of the delays of procurement gaps. Delayed resources can be counted towards the tranche the resource was originally intended for if the delay occurs. If the resource was intended for tranche 2025, you should apply the 2025 values. However, enforcement actions can still take place. You are not required though to reassign any type of a delayed resource through a later tranche if the prior tranche has not been filled. Ultimately, LSEs do have the choice for tranche selection. So that is ultimately up to you, but at the end of the day, you're required to fulfill every single tranche."

QUESTION:

"Erin Pennell (SDCP)"

Thank you Gwen, that was my question, and I think Greg and Samantha all had the same question. If we procured bridge, for like using that same example, we had a resource that was supposed to come online 2024. We procured bridge and it didn't come online till 2025, then do we report the bridge and the final NQC in 2024?

ANSWER:

If the resource is not online until 2025—if your resource was intended for 2024 and it's delayed to 2025, yes. I would say, yes. If the resource wasn't originally intended for 2024, you would use 2024 values because it would be put into the category of a resource delay and it had an original online date of 2024, correct?

QUESTION:

"Erin Pennell (SDCP)"

If the original online date was for 2025, you would not be able to do that. I'm talking about if there's a delay, so wherever the original contract COD was, we can keep it in that.

ANSWER:

But then, there might be enforcement actions, but correct. Resource delays are subject to enforcement actions, and that can be determined across so many factors, which includes us looking at your entire resource stack, the time of the delay, and any potential gaps. We're trying to take a holistic approach to any type of enforcement.

QUESTION:

Justin Chau (CPSF) has a question. If a bridge was procured to be a bridge for two separate resources coming online in different tranches, how do LSEs determine which resource the bridge bridging to in the unique contract.

ANSWER:

The new way to have LSEs enter that information for the new release of the RDT, that's a new one. Let me see, I'll need to come up with some way to do it. I suppose you could enter multiple rows to reflect that for the given bridge contract. That sounds like the best way to do it. Somewhere in our guidance, we should probably note down that that's the method that we'd suggest you approach. Go ahead and enter two different rows with different MTR bridge twos. Again, each row should reflect which stuff only attributable to that resource that the bridge resource. If it's an even split of what it's bridging for, 50/50, then, that's easy enough. But if it is bridging, let's say for a contract that represents, 30 % that it's bridging of the total bridge, 30 % represents bridging for one versus 70 % of another, that bridge contract row, each one should represent those respective quantities. Hopefully that makes sense.

QUESTION:

There are two more questions from Justin Chau (CPSF).

The second question is: How should LSEs input short term bridge contracts if each has varying contract lengths that overlap?

ANSWER:

If I'm going to take a wild to guess I think our answer probably is multiple rows. I believe we're going to get back to you via email on that one.

QUESTION:

Okay. This is Justin Chau from CPSF. Thank you for answering the first two questions. In particular, I am concerned that it would look very misleading if we entered multiple rows for the NQC values; it would look abnormally high. If we have to put multiple rows for the different bridges, for multiple resources. Is it possible to confirm that bridge resources only need to be entered in the unique contract and not the MTR NQC validation tool tab?

ANSWER:

NQC summary tool. Yeah, and the summary where it's showing the claimed NQC amount, it'll look a little funky. With that said though at the end of the day, really what we're looking at the summary is a tool more for showing what we're thinking and the tool, same thing, but we will look at those numbers and interpret them knowing what you mean. So yeah, I think that's just sort of unfortunately a failure of the tool at the moment that we'll need to address in a future release. I don't think we'll be able to fix that or come up with a way of doing that for this release.

Include in your notes that that's what's going on here and make sure that your contract start and end dates reflect exactly where the bridges are beginning and ending and know that we'll have, we'll know what you're talking about. And if you feel like there's any lack of clarity on what you're trying to input into the RDT, go wild on that notes column, let us know what you're thinking.

QUESTION:

CB Hall here. Just a couple follow-ups, just to be clear: We do not enter bridge contracts.

ANSWER:

In the validation tool.

QUESTION:

"CB Hall"

And then one other follow up, I think it was one of the first questions asked talking about spillover of generic from one tranche to another tranche. I think the way Travis explained it was to enter in the unique contracts tab in those red columns. You would enter the volume in one tranche and then the spillover volume into the next, but I guess that confuse me because I thought that those red columns were supposed to be calculated by the validation tool tab. And that we were supposed to enter numbers into those columns after we derived the validated figures.

ANSWER:

Nope, objective of the tool is to show our best estimate of how it ought to be calculated and it's going to be wrong occasionally because MTR is complicated, like very complicated at this point. So what we want in columns BB through BG at this point are what you think the MTR and NQC tranche is for the contract in that tranche that it's supplying. And if you have no idea what NQC the contract will actually show, it's probably a reasonable way of trying to figure it out. But if you feel like it is wrong or different or something else, that's where you should enter the value you think it is in BB through BG. And if there are differences, you can ground truth why there's differences in the MTR NQC validation tool to see where your assumptions are or our assumptions are right.

I guess to clarify high level, the intent of the MTR NQC validation tool is to show you our best thinking of what the contract will be worth in terms of megawatts of NQC.

QUESTION:

"Mary Neal (DCE)"

I just want to follow up on the earlier discussion about the ELCCs and which ELCC to use. I think it's been very clear in previous versions of the RDT that the ELCCs all apply by tranche. If you're using a resource to apply to tranche two, you have to use the ELCC for tranche two. It doesn't matter what the COD is. That's the way it's always been set up. So, could you just confirm. Say you know what LSE tries and tries and tries to find contracts that'll meet the 2024 tranche deadline and gives up and just starts signing stuff for 2025. You could still use the ELCC, you count it as the tranche, but you're just going to have to pay the penalty. It doesn't meet the COD requirement, but it's going to be counted as the tranche two. And then you use the ELCCs for tranche two. You might still get the penalty, but you won't be backstopped and you'll have completed the requirement.

ANSWER:

Your tranche selection should be based on the COD. If you're selecting it for a 2024 tranche, it should be online for 2024. You might have a penalty assessed, but the ELCC use needs to be for the tranche. If you select 2024 tranche, you should use the 2024 for ELCC. Using the scenario you provide, at least then you don't get backstopped. Correct. I'm going to emphasize the holistic approach. If you are using a resource to fulfill a procurement gap, we would want to see that and naturally you would probably assume to apply that tranche ELCC for that gap portion, but then you wouldn't be able to use it.

I see what you're saying. It's a holistic approach, so we'd have to go and look at the entire stack of resources, how long the procurement gap is that you're talking about, and what is the availability, availability of resources for that tranche. So, it's hard for us to answer whether that's in our meets the compliance or not and whether you would be ok to use. We have to see the whole package. If you have that scenario, that would be best to probably email so that we could look at this that situation specifically. I would also ask for you to follow our FAQ guidance that if there is, it should be online when there's a gap and it comes on later, if it's originally attended for 2024, you would use the 2024 ELCC still, but if the resource comes online 2025, use the 2025 ELCC and then in the 3rd scenario in which it sounds like you're referring to is if you're trying to use a 2025 COD resource to fill a procurement gap for 2024, that's extremely situational, and we'd have to take a holistic approach and I'd you'd have to shoot an email to us.

I think this question might be veering more into compliance enforcement and what contracts count for rather than a specific RDT question. So, Mary, if you email this one to us, we can get you a clear answer, if you still feel we're not answering your question. I see where you're coming from, and I just want to note that I think Greg has a similar question. Let us talk internally and make sure we're all on the same page and then we'll get back to you just to make sure we give you a concise, complete answer that's makes sense.

QUESTION:

"Justin Chau (CPSF)"

Another scenario I'm not sure if you already covered it, but if a resource was meant for 2024 and then it's delayed, we could still use the 2024 ELCC, but does the MTR selected tranche stay in tranche, too? Or does it have to be moved to tranche three.

ANSWER:

If it was originally intended for 2024 and therefore you would want to use the 2024 ELCC value, please select the 2024 tranche for it.

QUESTION:

"Samantha Mead"

This was to follow on to what Mary was saying because it seems as though what you said confirms my understanding, so I don't have a question, but I am interested in an answer to the backfill, so should I write a separate email so that I receive an answer on that, too?

ANSWER:

If you have a very specific scenario that you want to see specifically, please send us a separate email. Otherwise, we are happy to put something together to send out so that everyone has access to the same information.

I don't want to leave any LSEs out on this conversation, but yeah, if you have like a response in relation to a specific resource, send a separate email.

If you're happy with seeing it in a general response, we will make sure you're part of that. This is of general interest, and we'll make sure we send something out to everyone.

QUESTION:

"Gregg Klatt"

I had a question to do with the December filings. Since there are so many changes and actually there's in my case there have been in some cases have been underlying changes to the procurement between when that submission was done and the one that's due in June, should we still try to go back and fix the December submissions, or can we just set those aside and just focus on the June filings?

ANSWER:

No. December is what it is. We're getting a staffed thumbs up, so don't rework December filings. We're not really going back and looking at old RDTs too much. We're really relying on the current RDT that should have like a holistic picture of your current status.

"SF - Courtyard Conference Room"

If there's no other questions, we thank everyone for calling in and participating. Thanks to everyone who participated. Your questions really do help us improve our tools, and I want to encourage open dialogue between you and us to make sure that your filings are accurate.

I want to highlight that we are trying to do these Office Hours as hybrid. So, we will be in San Francisco or another one of our offices, so I encourage you to come in person.