

July 14, 2026

Via Electronic Mail Only

Energy Division Staff
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
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Re: Response of Environmental Defense Fund to Selected Questions for
Workshop on the Procurement Compliance Staff Proposal

Dear Energy Division Staff:

Environmental Defense Fund (EDF) respectfully submits the following response to selected questions in advance of the Workshop on the Procurement Compliance Staff Proposal. EDF recommends that staff seriously consider how the IRP, RA, and RPS can be aligned, responding to the following questions:

7.1 Given that IRP, RA, and RPS have different goals and mandates, are there opportunities to align the three programs? Please explain.

7.2 What burdens need to be overcome to align IRP, RA, and RPS?

7.3 Are their stakeholder time constraints inherent in an effort to align IRP, RA, and RPS? Please explain.

EDF would like to bring staff's attention to Assembly Bill 2266.¹ AB 2266 would help align the IRP, RA, and RPS in two key ways. First, it would require the Commission to "initiate a process to consolidate compliance reporting" across the three programs. This would include integrating plans submitted by load-serving entities (LSEs) into a single procurement plan, and when feasible, would consolidate certain compliance reporting for reliability requirements. Second, AB 2266 would require the Commission to

¹ Assembly Bill 2266 (Shultz, 2025-2026).

“use the same capacity valuation method ... to assess the reliability contribution of each resource type” when “setting resource adequacy and resource procurement obligations for load-serving entities.” Currently, the IRP, RA, and RPS measure the same physical resources differently, leading to uncertainty in how a resource can be valued by the load serving entity and ensuring that maximum ratepayer value can be gained from a resource. For example, a wind farm can be assigned one value for RA reliability accounting, contribute differently to the IRP’s long-term reliability modeling, and be measured on another basis for RPS. A single capacity valuation method would remove inconsistencies across programs. EDF supports AB 2266 and recommends the Commission consider how to best integrate its proposals—even if the Legislature ultimately does not pass the bill.

The forthcoming Reliable and Clean Power Procurement Program (RCPPP) also presents an opportunity to align the IRP, RA, and RPS, to promote cost-effective new resource development and reduce the administrative burden currently borne by both the Commission and load-serving entities (LSEs). The RCPMP is intended to be a comprehensive procurement program that replaces the ad-hoc approach currently used in the IRP with a defined, regular cadence for procurement. Numerous parties, including EDF, have explained that the RA program, to date, has not been successful in incentivizing the development of new resources—contrary to the IRP, which has driven significant development of new clean and zero-emissions generation resources. Staff’s proposals for the RCPMP contemplate varying levels of interaction between the RA program and the longer-term procurement requirements in the IRP—including a potential design that would significantly merge the two programs.² Moreover, throughout the RCPMP design process, many parties have advocated for the streamlining of compliance filings. EDF argues that the RCPMP thus could operate as a vehicle to align the IRP, RA, and RPS, which would lower duplicative procurement and reduce unnecessary ratepayer expenditures.

EDF acknowledges the burdens that need to be overcome to align the RA program and the IRP. Currently, the RA program relies on the “Slice of Day” metric to value resources’ reliability contribution and determine individual LSE requirements, whereas the IRP relies on marginal Effective Load Carrying Capacity (ELCC). While the core goal of these frameworks is the same—identification of the precise amount of generation resources necessary to maintain system reliability—their implementation can lead to

² R.20-05-003, ALJ Ruling Seeking Comments on Reliable and Clean Power Procurement Program Staff Proposal, Attachment A: Staff Proposal at 22 (describing Option II for RCPMP design, which includes an expanded multi-year RA program and procurement requirements for new resources).

differing results. Serious consideration of the benefits and drawbacks of these two frameworks is ongoing in the RCPDP design process. EDF encourages the Commission to continue seeking, and evaluating, stakeholder feedback on these issues.

EDF recognizes that there are stakeholder time constraints inherent in an effort to align IRP, RA, and RPS. However, EDF notes that stakeholders have already committed significant time to the development of the RCPDP, and the ongoing RCPDP design process is an ideal mechanism for further consideration of how to align the IRP, RA, and RPS.

Very truly yours,

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