



July 14, 2026

Via Electronic Mail

California Public Utilities Commission
Energy Division
IRPdatarequest@cpuc.ca.gov

Re: CEJA's Informal Comments on the Procurement Compliance Staff Proposal Workshop Questions

Dear Energy Division:

The California Environmental Justice Alliance ("CEJA") submits these informal comments on the Procurement Compliance Staff Proposal Workshop Questions, which were sent to parties on June 17, 2026. CEJA appreciates the time and effort that Energy Division has devoted to continuing to develop methods to ensure compliance with procurement requirements. CEJA also appreciates that Energy Division continues to gather information related to ongoing compliance with procurement requirements and that it continues to publish summaries of this information.

CEJA's informal comments narrowly address an ongoing concern of CEJA's related to coordination of procurement obligations between the Integrated Resource Planning ("IRP") and the Resource Adequacy ("RA") proceedings. CEJA reserves the right to comment on the other aspects of the workshop at a later date.

Discussion

Question 7.1: *Given that IRP, RA, and RPS have different goals and mandates, are there opportunities to align the three programs?*

Response 7.1: Initially, it is important to consider that IRP, RA, and RPS have overarching mandates that should not be artificially siloed or separated. All three programs are designed to balance reliability, environmental and equity requirements, and affordability. This balance forms the fundamental structure of these overlapping programs, and this balance between reliability, environmental and equity requirements, and affordability can and must guide the integration of these programs. IRP's, RA's, and RPS's overlapping structure is emphasized in the Public

Utilities Code. For example, section 380 of the Public Utilities Code requires that the RA program achieve reliability while “advancing, to the extent possible, the state’s goals for clean energy, reducing air pollution, and reducing emissions of greenhouse gases.” Section 380 also provides that the RA program must “[f]acilitate the development of...capacity...that is economical and needed for reliability and to achieve the state policy specified in Section 454.53 [RPS and SB 100 requirements].” The Code also requires the Commission to ensure that IRP planning meets “local reliability on a short-term, midterm, and long-term basis.”¹ The Code further requires that the Commission ensure that IRP planning meets the RPS requirements.² In other words, the Code requires a direct connection between the RA, IRP, and RPS mandates. Therefore, as required by the Code, these programs must be aligned to achieve the fundamental balance between affordability, reliability, and environmental and equity requirements.

CEJA is primarily concerned about the current misalignment between the RA and the IRP programs. There are several initial steps that could be taken to better align these two programs. First, as discussed in our comments on the RCPMP, it is important to align reliability requirements in the IRP with RA’s Slice of Day requirements. It is confusing and inefficient to base the procurement requirements on metrics that are not aligned with the RA program’s requirements. LSEs may be required to procure IRP resources that ultimately will not be helpful to meet RA requirements. Alignment of these programs is an important step for meeting the program integration that the Legislature intended.

Second, and critically, CEJA recommends that the Commission formally coordinate and align local procurement requirements. Right now, IRP procurement is not targeted to any specific local areas, and that procurement has started to lead to potential issues in local areas. In particular, the high volume of storage procured has started to lead to charging capability limitations in local areas. CAISO has recently found that some local areas have reached their charging limits, like the Eastern LA Basin, and other sub-areas will reach their charging limits in the near future. For example, CAISO found that the Western LA Basin will reach its charging limit in 2027.³

The vast majority of procurement currently occurs to meet the IRP requirements, not RA requirements,⁴ and therefore, coordination between IRP procurement and local RA requirements is critical. A failure to coordinate the IRP and the RA program’s local requirements could result in the need for additional procurement, likely for significant costs. As CAISO describes:

The CAISO expects that the overall RA portfolio provided by all LSEs to account for the uplift, beyond the minimum LCR need, in MWs required from other type of resources for all areas and sub-areas where LSEs have procured battery storage beyond the charging capability or with incorrect characteristics (MW, MWh and duration). If uplift is not

¹ See Public Utilities Code § 454.52; Public Utilities Code § 380 (applying requirements of 454.52 to RA).

² See Public Utilities Code § 454.52.

³ CAISO 2027 Final LCR Report, pp. 118, 121.

⁴ CPE Framework Report, pp. 48-49, <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/useful-resources/final-report-on-the-2021-2023-cpe-framework.pdf>.

provided the CAISO may use its back stop authority to assure that reliability standards are met throughout the day, including off-peak hours.⁵

With thousands more MW of energy storage coming online, there is a very real possibility that local areas will be required to “uplift” capacity or be subject to CAISO’s back stop authority. And problematically, this very real possibility is not being even discussed in coordination with the IRP or tracked in an accessible way. As a starting point, CEJA requests that the Commission track where procurement is happening and start to develop methods to incentive procurement to the right places.

In addition to affordability concerns created by not targeting local procurement, failure to address this issue could lead to increased gas reliance in local areas, which is inconsistent with SB 887 (2022). SB 887 requires resource projections combined with transmission “are expected to substantially reduce, no later than 2035, the need to rely on nonpreferred resources in local capacity areas.”⁶ Coordination of local procurement between the IRP and RA proceedings is necessary to meet this requirement. Otherwise, the IRP’s untargeted procurement could very well lead to increases in gas reliance. The Commission should also consider evaluating the environmental justice implications of local capacity requirements, including identifying whether procurement decisions contribute to continued operation of gas plants located in disadvantaged communities. This would answer questions like which gas plants are being retained because of local reliability needs, what communities are affected, and whether procuring alternative clean resources could avoid those outcomes. This assessment would help ensure that local procurement planning coordinated between IRP and RA is consistent with both SB 887 and the Commission's Environmental and Social Justice Action Plan.

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

Response 7.2: As described above, CEJA recommends that the Commission take steps to align the IRP’s and RA’s reliability and local procurement requirements. With relation to reliability requirements, because the Commission is currently considering what reliability requirements to implement in relation to the RCPMP, alignment could be included in the initial design of the program.

Alignment of local procurement will require new coordination between the two proceedings. This can be accomplished through mechanisms such as joint workshop and briefing as well as increased notice for both proceedings. While there is not complete alignment between parties in the RA and the IRP proceedings, there is considerable overlap especially related to parties interested in this issue. In addition, coordination of this issue should also reduce the administrative burden of the Commission trying to deliberate on similar issues in two different proceedings.

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

⁵ CAISO 2027 Final LCR Report, p. 26.

⁶ Public Utilities Code § 454.57.

Response 7.3: Yes, aligning local procurement requirements between the RA and the IRP proceeding would help cut down on the need for stakeholders, such as CEJA, to continue to comment in both proceedings on related issues. There is clear jurisdictional overlap between the two proceedings on this issue, and there is not a clear delineation of how the Commission intends to address this issue in the two proceedings given this overlap.

One of the first steps to assisting with the alignment is to increase transparency related to local procurement that has occurred and what gaps exist. One consistent problem plaguing the local procurement process is the lack of clarity of where new local procurement is most needed. To this end, CEJA requests a transparent tracker to best identify the needs related to local procurement and to start aligning IRP and RA with relation to this issue.

Conclusion

We appreciate the time and effort that Energy Division has put into these issues, and we look forward to evaluating and commenting further later in the process. Thank you for consideration of these brief comments.

Sincerely,

/s/ Deborah Behles

Deborah Behles
Representing CEJA

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Service List, R.25-06-019