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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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R2401017

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.

Rulemaking 24-01-017

**ASSIGNED COMMISSIONER AND ASSIGNED ADMINISTRATIVE
LAW JUDGE'S RULING IDENTIFYING ISSUES AND SCHEDULE OF
REVIEW FOR 2025 RENEWABLES PORTFOLIO STANDARD
PROCUREMENT PLANS**

Summary

Pursuant to the authority provided in Public Utilities (Pub. Util.) Code §399.13(a)(1),¹ this Ruling identifies the 2025 Renewables Portfolio Standard (RPS) Procurement Plan filing requirements for all retail sellers of electricity and sets a schedule for the Commission's review of the 2025 RPS Procurement Plans (RPS Plans). Retail sellers should take careful note that significant revisions to the required RPS Plan format have been made in the form of clarifications to RPS Plan requirements and reorganization of some RPS Plan sections. The definition of "retail seller" in Pub. Util. Code §399.12(j) includes the

¹ Pub. Util. Code §399.13(a)(1) orders the Commission to "direct each electrical corporation to annually prepare a renewable energy procurement plan... to satisfy its obligations under the renewables portfolio standard" as well as "require each electrical corporation to review and update its renewable energy procurement plan... The commission shall require all other retail sellers to prepare and submit renewable energy procurement plans..." All subsequent code section references are to the Public Utilities Code unless otherwise indicated.

electrical corporations, as defined in Pub. Util. Code §218, community choice aggregators (CCAs),² and electric service providers (ESPs).³

Senate Bill (SB) 100 (De León, Stats. 2018, ch. 312) (SB 100) increased the RPS to 60 percent by 2030 and established a goal for 100 percent of the State's retail electricity to come from renewable and zero carbon resources by 2045. The RPS Plans should demonstrate that each retail seller's efforts align with the State's RPS goals. Additionally, pursuant to Decision (D.)17-06-026, new RPS compliance rules commenced in the 2021-2024 compliance period.⁴ Thus, the 2025 RPS Plan filings should inform the Commission of the retail seller's activities and plans to procure 65 percent of RPS resources from long-term contracts of 10 or more years for all compliance periods beginning with the current compliance period.

For procedural efficiency, all 2025 RPS Plans must follow the consistent numbering convention, as outlined in Table 1 of this Ruling. Additionally, at the time of filing, the 2025 RPS Plan must be accompanied by an officer verified checklist using the uniform template specified in Attachment B.

The electrical corporations subject to this Ruling are the six investor-owned utilities (IOUs): Pacific Gas and Electric Company (PG&E), Southern

² Pub. Util. Code §399.12(j)(2) states that "A community choice aggregator shall participate in the renewables portfolio standard program subject to the same terms and conditions applicable to an electrical corporation."

³ Pub. Util. Code §399.12(j)(3) states that "The electric service provider shall be subject to the same terms and conditions applicable to an electrical corporation pursuant to this article."

⁴ D.17-11-037 modified D.17-06-26 to adopt an exclusion for PacifiCorp and Liberty Utilities, which do not operate in a California Balancing Authority (Non-CBA Utilities). Non-CBA utilities are authorized to follow the framework adopted in D.12-06-038 regarding excess procurement, regardless of their ability to procure portfolio content category 1 renewable energy credits.

California Electric Company (SCE), San Diego Gas & Electric Company (SDG&E), PacifiCorp, Bear Valley Electric Service, Inc., and Liberty Utilities (CalPeco) LLC. The ESPs subject to this Ruling are identified in Attachment C. All current CCAs and any CCA that intends to serve customers in 2025 and beyond are subject to this Ruling and are identified in Attachment D. CCAs that have submitted Implementation Plans to serve load after 2025 are also required to file a 2025 RPS Plan.

Although this Ruling mostly follows the format of past Rulings initiating the annual RPS procurement process, significant revisions to the required RPS Plan format have been made in the form of clarifications to RPS Plan requirements and reorganization of some RPS Plan sections in order to streamline the preparation and review of the plans while improving the quality of RPS Plans. These revisions were made based on lessons learned from previous RPS Plan submissions and changes to current market and regulatory conditions. Consistent with Pub. Util. Code §§399.13(a), 399.13(b) and 399.13(c) and the requirements in SB 350 (De León, Stats. 2015, ch. 547) (SB 350) and SB 100, which extend, increase, and modify RPS procurement rules, the Commission will issue a decision on the proposed RPS Plans by the end of the year.⁵ For CCAs and ESPs, the Commission's decision will determine if the RPS Plans comply with this Ruling and the requirements of Pub. Util. Code §399.13.

⁵ Pub. Util. Code §399.13(c) states that "The commission shall review and accept, modify, or reject each electrical corporation's renewable energy resource procurement plan prior to the commencement of renewable energy procurement pursuant to this article by an electrical corporation. The commission shall assess adherence to the approved renewable energy resource procurement plans in determining compliance with the obligations of this article."

1. General Requirements for 2025 RPS Plans

In D.12-11-016, the Commission refined the RPS procurement process as part of its implementation of SB 2 (1X) (Simitian, Stats. 2011, ch.1). In 2015, SB 350 increased the RPS procurement requirement and modified the RPS procurement rules. The Commission issued D.17-06-026 implementing SB 350's requirement that, beginning January 1, 2021, at least 65 percent of the procurement a retail seller counts toward the RPS requirement of each compliance period must be from its contracts of 10 years or more in duration or ownership or ownership agreements for eligible renewable energy resources.⁶ Further, SB 100 accelerated California's RPS requirements to 60 percent retail sales from eligible renewable resources by 2030 and a planning goal of having 100 percent of the State's electricity served by zero carbon resources by 2045.

Consistent with statutory requirements and the Commission's decisions, the IOUs, CCAs, and ESPs must comply with the requirements outlined in Section 5 of this Ruling. Small and multi-jurisdictional utilities (SMJUs) are subject to a subset of the requirements, as described in Sections 2 and 3 of this Ruling.

Attachment A sets the procedural schedule for the Commission's review of the 2025 RPS Plans. Updates to the filed 2025 RPS Plans may be provided consistent with the schedule at Attachment A. Table 1 is the revised template to be used for 2025 RPS Plans. All RPS Plans must be filed using a completed checklist, as shown in Attachment B.

⁶ D.17-06-026, Ordering Paragraph (OP) 2.

2. Multi-Jurisdictional Utilities with 60,000 or Fewer Customers (Subject to Pub. Util. Code §399.17)

RPS procurement requirements for SMJUs and their successors allow these utilities to meet their RPS procurement obligations without regard to portfolio content category limitations in Pub. Util. Code §399.16.⁷

PacifiCorp is permitted to use an Integrated Resource Plan (IRP) prepared for regulatory agencies in other states to satisfy its annual California RPS Plan requirement so long as the IRP complies with the requirements specified in Pub. Util. Code §399.17(d). PacifiCorp prepares its IRP on a biennial schedule, filing its plan with the Commission in odd-numbered years.

D.08-05-029 requires PacifiCorp to file and serve its IRP in Rulemaking (R.)06-05-027 or its successor proceeding at the same time it files with the jurisdiction requiring the IRP and to file a supplement with the Commission 30-days later. This on-year supplemental filing includes an analysis of how the IRP and on-year supplement comply with the requirements in Pub. Util. Code §399.17(d). Pursuant to D.11-04-030, in years that PacifiCorp does not file an IRP, it files a comprehensive RPS supplement to its IRP on July 15th. The comprehensive supplemental filing includes an analysis of how the IRP and comprehensive supplement comply with the requirements in Pub. Util. Code §399.17. PacifiCorp filed its IRP on April 1, 2025. PacifiCorp's on-year RPS supplement must provide the aforementioned analysis and the information required in Sections 6.1-6.12 and 6.14-6.15 of this Ruling.

Liberty Utilities (CalPeco) LLC will prepare a 2025 RPS Plan subject to the same requirements as a small utility under Pub. Util. Code §399.17.

⁷ Pub. Util. Code §399.17(b) defines PacifiCorp as a multi-jurisdictional utility for RPS purposes. Liberty Utilities (CalPeco) LLC is a successor entity under Pub. Util. Code §399.17 and not a multi-jurisdictional utility because it has customers only in California.

3. Small Investor-Owned Utilities with Fewer than 30,000 Customers (Subject to Pub. Util. Code §399.18)

Pub. Util. Code §399.18(b) addresses small IOUs with less than 30,000 customers and allows compliance with the RPS procurement obligations without regard to the portfolio content category limitations in Pub. Util. Code §399.16.

A small utility must file an RPS Plan according to Pub. Util. Code §399.13(a)(6), tailored to account for its RPS procurement requirement and the limited resources of a small utility.

Bear Valley Electric Service (BVES) is the only small IOU with less than 30,000 customers. Accordingly, BVES shall include the information required in Sections 6.1-6.12 and 6.14-6.15 of this Ruling in its 2025 RPS Plan.

4. ESPs and CCAs

SB 350 modified the RPS Plan filing requirements for ESPs and CCAs to be consistent with Pub. Util. Code §399.13(a)(6).⁸ Accordingly, each ESP and CCA must file a proposed RPS Plan that complies with all Sections of this Ruling.

The CCAs play an increasingly significant role in meeting state Greenhouse Gas (GHG) reduction goals. In 2024, CCAs and ESPs served approximately 37 percent of California's retail load.⁹ Therefore, it is essential for planning purposes that the Commission is fully informed of all procurement across the State, including those carried out by CCAs and ESPs.

Consistent with D.19-02-007, Ordering Paragraph (OP) 2, this Ruling directs the CCAs and ESPs to include RPS information in their 2025 RPS Plans in

⁸ See Pub. Util. Code §399.13(a).

⁹ Data is derived from retail sellers' annual 2024 RPS Compliance Reports.

response to Pub. Util. Code §399.13(a)(6)¹⁰ and previous Commission decisions.¹¹ Reporting this information will provide the Commission, the Legislature, and the public with a complete picture of the State's RPS program to support electric reliability as the state heads toward 100 percent zero-carbon energy. For the State to fully understand the impact of procuring zero-carbon resources, CCAs and ESPs should also include cost information in their RPS Plans, in the same manner as covered by the IOUs, and as described in Section 6.14.¹²

All new CCAs and ESPs must file RPS Plans when they register with the Commission or 90 days before their commercial operation date, whichever is first.¹³ Accordingly, all new registering CCAs and ESPs should file their RPS Plans with the Commission at the time of registration and serve their RPS Plan to the RPS proceeding Service List (R.24-01-017).

In D.13-11-024, the Commission gave guidance on the applicability of a motion for provisional waiver from filing future RPS Plans. For retail sellers that stop serving load, we want to streamline the process when they decertify or deregister during an RPS Plan filing cycle.¹⁴ The CCAs and ESPs, listed in Appendix C and D, shall file a motion for exemption from filing Final RPS Plans and future Plans in the proceeding if they intend to decertify or deregister at the Commission before the Commission issues a proposed decision. The exemption

¹⁰ Pub. Util. Code §399.13(a)(6) requires information on renewable supply and demand, compliance delays, solicitations to procure renewable energy, project development status updates, price adjustment mechanisms, and project failure risk.

¹¹ RPS Decisions can be accessed at: www.cpuc.ca.gov/rps_decisions_proceedings

¹² And *see*, Pub. Util. Code §913.3 requiring the Commission to report "the costs of all electricity procurement contracts for eligible renewable resources"

¹³ D.17-12-007 at OP 4.

¹⁴ To "decertify" or "deregister" is when a retail seller is not registered with the Commission to serve retail load.

motion must inform the Commission of the retail seller's future status. If the motion is granted, it does not exempt the CCA or ESP from the required filing of a Final RPS Compliance report for any compliance period that the decertified or deregistered CCA or ESP served load for which RPS compliance has not been determined.¹⁵ Proper notification in the RPS proceeding will allow the Commission to consider whether a Final RPS Plan is required or not and decide whether a CCA or ESP is subject to future RPS requirements and actions.

The Commission will reject RPS Plans from any retail sellers that do not provide adequate details on the required information.¹⁶ A retail seller that does not comply with RPS Plan requirements may be subject to fines pursuant to the citation program adopted by the Commission or existing statutory provisions.¹⁷

5. Specific Requirements for 2025 RPS Plans

The 2025 RPS Plans should comply with the requirements set out in this section of the Ruling. Table 1 summarizes the revised RPS Plan sections that each retail seller must comply with within its filing.

An officer must verify the 2025 RPS Plan using the uniform template in Attachment B. The retail seller must complete the checklist to confirm that all sections are correctly addressed. The checklist will ensure consistency and completeness at the time of filing.

¹⁵ See D.24-04-009 for additional requirements for deregistering.

¹⁶ In D.19-12-042 (at OP 6 and OP 15) the Commission rejected several retail sellers' 2019 RPS Plans for insufficient or incomplete information.

¹⁷ See E-5143, Pub. Util. Code §§ 2101-2105, 2107, 2108 and 2114.

The RPS Plan quantitative templates are available for download on the RPS Database system.¹⁸ Energy Division Staff will hold a webinar to discuss questions from retail sellers related to the templates and 2025 RPS Plans' requirements no later than three weeks before the due date to file Draft RPS Plans.

The RPS Plans must include all information required by statute and as specified in this Ruling, including quantitative analysis supporting the retail seller's assessment of its portfolio and future procurement decisions. Narrative explanations should be provided to explain the quantitative analysis. Responses to Section 6.8 must be provided in a numerical/quantitative format to support the written responses to Sections 6.4, 6.5, 6.7 and 6.9. The RPS Plans' information should be non-confidential, to the greatest extent possible, and well supported with underlying assumptions, references, and citations.

When filed with the Commission, each proposed 2025 RPS Plan must achieve the following:

1. To ensure compliance with Table 1, all RPS Plans must be accompanied by a Checklist provided in Attachment B.
2. All RPS Plans must describe the overall plan for procuring RPS resources to satisfy the RPS program requirements while minimizing cost and maximizing value to customers, as well as demonstrating how retail sellers will comply with direction for RPS planning in SB 350, SB 100, and SB 901 (Dodd, Stats. 2018, ch. 626). This includes, but is not limited to, any plans for building retail seller-owned resources, investing in third-party owned renewable resources, and engaging in the sales of RPS eligible resources.

¹⁸ The RPS Database system can be accessed at: <https://rpsd.cpuc.ca.gov/>. Registration is required to login to the system.

3. The various aspects of the RPS Plan must be consistent. For instance, the bid solicitation protocol documents should be consistent with any statements and calculations regarding a retail seller's renewable net short position.¹⁹
4. The RPS Plans should thoroughly describe and address procurement and sales of RPS-eligible resources that demonstrate reliability and align with the State's policy goals. The RPS Plan format requires responses that provide both summaries and the detailed descriptions necessary to understand how a retail seller's planning and procurement strategies address state goals and satisfy statutory requirements. For the IOUs, the Commission may accept or reject proposed contracts based on consistency with the approved plan, including any calculation of RPS procurement net short position.²⁰
5. All retail sellers should follow the format and numbering convention directed in Table 1. Uniform format and templates will enable parties, bidders, and the Commission to easily access, review and compare the RPS Plans. All sections should be numbered in the same way, without skipping any sections, for ease of Commission review.

¹⁹ As of the date of this Ruling, the methodology can be found in *Administrative Law Judge's Ruling on Renewable Net Short*, May 21, 2024, issued in R.11-05-005.

See <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M091/K331/91331194.PDF>

²⁰ Pub. Util. Code §399.13 (d).

Table 1 Summary of Requirements for 2025 RPS Plans			
	Large IOUs	SMJUs	ESPs and CCAs
I. Summary of Major Changes to RPS Plan	X	X	X
II. Executive Summary Key Issues	X	X	X
III. Compliance with Recent Legislation and Impact of Regulatory Changes	X	X	X
IV. Assessment of RPS Portfolio Supplies and	X	X	X
IV.A Portfolio Supply and Demand	X	X	X
IV.A.1 Long-term Procurement	X	X	X
IV.B Portfolio Diversity and Reliability	X	X	X
IV.B.1 Forecasting for Increased Transportation Electrification	X	X	X
IV.B.2 Curtailment Frequency, Cost, and Forecasting	X	-	X
IV.C Portfolio Optimization	X	X	X
IV.C.1 Conformance with the IRP Proceeding	X	X	X
IV.C.2 Response to Local and Regional Policies	X	X	X
IV.D Lessons Learned – Assessment of RPS Portfolio Supplies and Demand	X	X	X
V. Project Development Status Update	X	X	X
VI. Potential Compliance Delays	X	X	X
VII. Risk Assessment	X	X	X
VII.A Compliance Risk	X	X	X
VII.B Risk Modeling and Risk Factors	X	X	X
VII.C Lessons Learned – Risk Assessment	X	X	X
VIII. Renewable Net Short Calculations	X	X	X
IX. Minimum Margin of Procurement (MMoP)	X	X	X
IX.A MMoP Level	X	X	X
IX.A.1 MMoP Methodology and Inputs	X	X	X
IX.A.2 MMoP Scenarios	X	X	X
X. Bid Solicitation Protocol	X	X	X
X.A Bid Selection Protocols	X	X	X

X.B	Solicitation Protocols for Renewables Sales	X	X	-
X.C	Least-Cost Best-Fit (LCBF) Criteria	X	X	X
XI.	Safety Considerations	X	X	X
XII.	Consideration of Price Adjustments	X	X	X
XIII.	Cost Quantification	X	X	X
XIV.	Impact of Transmission and Interconnection	X	-	-
XV.	Appendix A: Redlined Version of the Draft	X	X	X

6. Draft RPS Plans

6.1. RPS Plan Section I: Summary of Major Changes to RPS Plan

Retail sellers must provide a summary of major changes to their 2025 RPS Plans. Major changes refer to actual substantive changes between the 2024 and 2025 RPS Plans, including but not limited to new RPS-eligible procurement, updated risk mitigation strategies, and changes in Minimum Margin of Procurement (MMoP).²¹ Retail sellers must describe the significant changes and not only provide the two plans with strike-out and underlined inserts. Instead, the section should explain each significant change from 2024 to 2025 and the reason for the change.

If a new CCA did not submit an RPS Plan in 2024, it must include any differences between its previously certified CCA Implementation Plan and the proposed 2025 RPS Plan.

6.2. RPS Plan Section II: Executive Summary Key Issues

All filings should include a high-level summary of the key issues discussed in the RPS Plans. Potential key issues could consist of but are not

²¹ Retail sellers are not required to provide editorial summaries of the changes from 2024 to 2025. Instead, this table should identify the major substantive modifications that significantly differ in 2025 relative to the 2024 plans approved in D.24-12-035.

limited to service expansions, outcomes of solicitations for RPS resources, and contracts for RPS resources executed within the last calendar year. Additionally, retail sellers should itemize their specific requests for which they are seeking Commission authorization and reference the section for the detailed explanation.

6.3. RPS Plan Section III: Compliance with Recent Legislation and Impact of Regulatory Changes

This section should summarize how a retail seller's proposed RPS Plan complies with relevant legislation, such as SB 350, SB 100, and SB 255 (Bradford, Stats. 2019, ch.407) (SB 255).²² Retail sellers should not write a general summary of the legislative requirements. Instead, each retail seller should specify how its planned renewable energy procurement comports with the State's orders and guidelines and advances the retail seller's compliance with legislative mandates.

6.4. RPS Plan Section IV: Assessment of RPS Portfolio Supplies and Demand – Pub. Util. Code §§399.13(a)(6)(A), 399.13(a)(6)(B), 399.13(b), 399.15(b)(5), Compliance with D.17-06-026 Implementing SB 350's Requirement for Long-Term Procurement, Compliance with D.18-05-026 and D.14-11-042

Pub. Util. Code §399.13(a)(6)(A) provides that the renewable energy procurement plan must include an assessment of annual or multi-year portfolio supplies and demand to determine the optimal mix of eligible renewable energy resources with deliverability characteristics that may consist of peaking, dispatchable, baseload, firm, and as-available capacity.

As a forward-looking document, the RPS Plan should explain planning for current and future years, with significant focus and details for how 2025 procurement efforts will impact a retail seller's long-term procurement

²² D.22-04-035 implemented SB 255 revising General Order 156 by adding Supplier Diversity Program requirements, including those pertaining to certain to CCAs.

requirements for current and upcoming compliance periods. The Commission will carefully review how retail sellers plan to meet the 65 percent procurement requirement to be derived from long-term contracts of 10 or more years in the 2025 RPS Plans, including any potential risks of failing to meet this requirement and a retail seller's plans to apply excess procurement in one compliance period to later compliance periods.²³

Accordingly, all retail sellers must provide written assessments of their annual and multi-year portfolio supply and demand concerning RPS requirements, the RPS program, and the RPS program's overall goals in order to determine the retail seller's optimal mix of eligible renewable energy resources. This information must be presented in the following subsections:

IV.A Portfolio Supply and Demand: At a minimum, retail sellers' written assessments of their RPS portfolio supply and demand must include the following elements:

1. The written assessment must be completed for all years through 2035 and a near-term planning horizon that accounts for both portfolio supply and demand.
2. The written assessment must include the retail seller's need for RPS resources with specific deliverability characteristics (*e.g.*, peaking, dispatchable, baseload, firm, and as-available capacity) and any additional factors, such as curtailment rights and operational flexibility, in order to determine the retail seller's optimal mix of eligible renewable energy resources.
3. Experience, to date, with managing exposure to negative market prices (or lessons learned from other retail sellers in California if a new retail seller).

²³ See D.17-06-026.

4. Retail sellers must also explain how the quantitative analysis provided for RPS Plan Section VIII: Renewable Net Short Calculations supports the assessment of portfolio supply and demand.
5. The written assessment must describe how procurement, allocations, or sales planned for the period covered by the 2025 RPS Plans is consistent with the evaluation of supply and demand. *Note: retail sellers who have not yet begun to serve load must describe their planned procurement forecast for the 2025 procurement cycle. The information from retail sellers will help determine their preparedness to serve load in a manner that will reliably meet RPS goals.*

IV.A.1 Long-term Procurement: D.17-06-026 requires that 65 percent of each retail seller's procurement counted towards RPS requirements be from contracts (or ownership or ownership agreements) with term lengths of 10 years or more in duration. In addition, the Commission encourages early planning on long-term procurement to hedge against delays in project development for new renewable build and potential project performance issues.

Therefore, retail sellers are required to present a narrative description of how their current and planned RPS portfolios will comply with the long-term procurement rules. This narrative must also include the following elements:

1. The assessment of how a retail seller's current and planned procurement meets the 65 percent long-term contracting requirement must be completed for all years through 2035.
2. The narrative on long-term RPS procurement planning must include a quantitative assessment of retail sellers' long-term RPS positions that is clear enough to gauge a retail seller's long-term RPS position. It must include specific long-term procurement values in gigawatt-hours (GWh) for current and future compliance periods. Charts and graphs alone are insufficient as they lack the specificity the Commission needs to evaluate a retail seller's long-term position.

3. The assessment of current and planned long-term RPS procurement must include a short description of the long-term contracts, resources, or portfolio mix that will be used to meet the long-term procurement requirement.
4. If a retail seller has not already executed enough contracts to meet the 65 percent long-term contracting requirement, the assessment must also include a detailed timeline for how the retail seller is planning to meet the long-term procurement requirement, including how the need will be met in future compliance periods. If the retail seller received an SB 155²⁴ letter from the Commission's Energy Division, the retail seller shall include a timeline (pursuant to Pub. Util. Code §399.13(a)(4)) describing planned actions to meet the 65 percent long-term procurement requirement.

IV.B Portfolio Diversity and Reliability: Resource diversity can support reliability by ensuring that renewable procurement complements system needs. Therefore, retail sellers must describe how their portfolio diversity supports system reliability and maximizes ratepayer value.

First, all retail sellers must describe how portfolio diversity is considered, both qualitatively (*e.g.*, geography, technology, contract type, contract start/end dates, etc.) and quantitatively (*e.g.*, Least-Cost Best-Fit or Net Market Value valuations, IRP modeling, portfolio modeling, etc.), in their renewable procurement decisions and procurement processes.

²⁴ SB 155 (Bradford, Stats. 2019, ch.401) (SB 155) requires the Commission to review annual preliminary RPS Compliance reports and to notify at-risk retail sellers that, based on the Commission's review of their compliance reports, they may not be in compliance with their RPS requirements in the current and/or future compliance periods. SB 155 also requires the Commission to provide recommendations for retail sellers on how they might satisfy the requirements.

Second, all retail sellers must describe how planned RPS portfolio diversity would contribute to system reliability in a planning horizon through 2035. This written description must explain the following:

1. How the proposed renewable energy portfolio incorporates overall energy portfolio and system requirements.
2. How the proposed renewable energy portfolio aligns with expected load curves and duration.
3. How the portfolio mitigates any negative system impacts (e.g., rolling electric outages, violation of current standards for ancillary services, etc.).
4. How the portfolio addresses the issues of renewable integration and the underutilization of existing RPS-eligible generation.

Third, all retail sellers must describe how planned portfolio diversity will maximize ratepayer value while minimizing costs and risk (e.g., project development risk, technology risk, etc.).

Fourth, retail sellers must also provide an explanation of how energy storage resources and emerging technologies, such as offshore wind developments or other technologies, are addressed in their diversity and reliability planning. If retail sellers are not considering advanced emerging technologies, their diversity assessment should explain the reasons for their decision.

IV.B.1 Forecasting for Increased Transportation Electrification: Retail sellers must address local transportation electrification adoption trends while planning for portfolio diversity and renewable resource procurement to meet incremental

RPS requirements, consistent with OP 3 of D.18-05-026.²⁵ Therefore, all retail sellers must demonstrate that transportation electrification is quantitatively accounted for in their RPS procurement plans. When reporting their transportation electrification forecasts, retail sellers must provide the following information:

1. A detailed description of the data and methodology used to support the retail seller's transportation electrification forecast.
2. A comparison of the retail seller's transportation electrification forecast to the California Energy Commission's Integrated Energy Policy Report (IEPR) transportation electricity demand forecast. The retail seller must clearly identify which vintage year IEPR forecast the retail seller is referencing for its transportation electrification forecast. If the retail seller is not using the most up-to-date IEPR forecast, it must provide reasoning for its choice of vintage year for the IEPR forecast. Finally, if the retail seller is not using or considering the IEPR transportation electricity demand forecast in creating its own transportation electrification forecast, it must provide its reasoning for its decision.
3. Retail sellers must include a table and/or chart showing the annual load from transportation electrification as forecasted in their analysis. These graphics must also compare the retail seller's transportation electrification load results to the IEPR transportation electricity demand forecast results.

²⁵ D.18-05-026 at OP 3 ("... all retail sellers ... must annually demonstrate that transportation electrification is accounted for in their procurement plans by explicitly referencing forecasted transportation electrification in their Renewables Portfolio Standard procurement plans; providing a detailed description of the data and method used to support their forecast; and explaining how they considered the California Energy Commission's Integrated Energy Policy Report transportation electricity demand forecast in creating their own forecast"). *See also* D. 22-12-030 at 16-17.

4. Retail sellers that do not perform a transportation electrification forecast must provide reasoning for their decision or their RPS Plan will be rejected.

The requirement to reference transportation electrification forecasts in RPS procurement plan also applies to ESPs whose customers' demand may increase,²⁶ even though the total direct access program is capped.

IV.B.2 Curtailment Frequency, Cost, and Forecasting: In D.14-11-042, the Commission approved curtailment terms and conditions in pro forma contracts for PG&E, SCE, and SDG&E and directed reporting on curtailment frequency, forecasting, and costs. As retail sellers become more numerous and diverse, and as the State moves towards the electricity sector becoming 100 percent carbon-free, all retail sellers need to report their unique experiences and issues related to economic curtailment, as well as any actions and analysis needed to forecast curtailment events. The Commission recognizes the inherent challenge of long-term forecasting of negative pricing events. Retail sellers must, however, provide strategies tailored to their portfolios and region to show how they are managing exposure to negative pricing events, overgeneration, economic curtailment.

Given the increase in renewable development and curtailment on the system in recent years, retail sellers shall provide information in their 2025 RPS Plans on the following topics as they relate to their current and future RPS procurement:

1. Factors having the most impact on the projected increases in incidences of overgeneration and negative market price hours.

²⁶ D.19-05-043 at 13-15; D.10-03-022, Appendix 2 at 7 ("Changes in the 12-month usage of direct access (DA) accounts will be reflected in order to determine the room available under the cap. No customer taking DA service while room was available under the cap will be removed from DA service as a result of growth in DA load.")

2. Written description of a quantitative analysis of the forecast of the number of hours per year of negative market pricing for the next 10 years.
3. Experience, to date, with managing exposure to negative market prices (or lessons learned from other retail sellers in California if a new retail seller).
4. Direct costs incurred, to date, for incidences of overgeneration and associated negative market prices.
5. Overall strategy for managing the overall cost impact of increasing incidences of overgeneration and negative market prices.
6. Contract terms included in RPS contracts intended to reduce the likelihood of curtailment or protect against negative prices.

Pursuant to Pub. Util. Code §399.13 (a)(6)(b) and §399.15(b)(5), retail sellers should not simply outline general issues related to curtailment but should explain how they are actively addressing challenges related to curtailment events and include information on each of the issues detailed in 1-6 above.

IV.C Portfolio Optimization: All retail sellers should describe how they are planning to optimize portfolios. Portfolio optimization descriptions should include policies, goals, strategies, solicitations, any Request for Information (RFI), and coordination efforts across Commission program requirements and retail sellers.²⁷ For 2025 RPS Plans the IOUs shall report on the status and outcomes of previous RFIs.

IV.C.1 Conformance with the IRP Proceeding: The IRP proceeding (R.20-05-003) is the primary venue for implementing the SB 100 requirements related to resource planning for the electric sector. While the Commission is still

²⁷ E.g., IRP requirements, rate affordability, compliance risks, retail seller mission statements, climate change, joint solicitations, etc.

considering how to align the IRP process and RPS Plans, we still expect consistent information on RPS planning across the respective proceedings.

Under this section, all retail sellers must explain in the table format below (Table 2) how the information in their 2025 RPS Plans, will align with information that is to be filed in their next round of individual IRPs, due on November 1, 2025, to ensure that their RPS obligations are in compliance (*e.g.*, renewable resource valuation and target setting).²⁸ This information should also conform with the determinations made in the IRP Proceeding, including the balanced and diverse set of resources identified in the most recent preferred system plan adopted by the Commission.²⁹ The 2025 RPS Tables must provide concise narratives for the respective proceedings (IRP and RPS) to allow a direct comparison that the Commission can easily follow and determine consistency with adopted IRP optimal portfolios and planning assumptions.

Table 2
Alignment of IRP and RPS Planning

IRP Section Subsection	RPS Alignment in IRPs
III. Study Results A. Conforming and Alternative Portfolios	Retail sellers should explain how the RPS resources they plan to procure, outlined in their RPS Plan, will align with each of their Conforming Portfolios being developed in their IRP Plans for Commission approval and certification. This explanation should include: 1. Existing RPS resources that the retail seller owns or contracts.

²⁸ *Assigned Commissioner's Amended Scoping Memo and Ruling Extending Statutory Deadline*, April 18, 2024, set forth an amended scope and schedule for the IRP proceeding, R.20-05-003. This amended scoping memo directs retail sellers to file their individual IRPs on November 1, 2025.

²⁹ See D.24-02-047, which adopts the 2023 Preferred System Plan portfolio for use in planning and procurement. The 2023 Preferred System Plan will be used as the basis for the next round of individual IRPs.

	<ol style="list-style-type: none"> 2. Existing RPS resources that the retail seller plans to contract with in the future. 3. New RPS resources that the retail seller plans to invest in. 4. New and existing resources that will be used to meet Mid-Term Reliability obligations adopted in D.21-06-035³⁰ and the supplemental procurement ordered in D.23-02-040.
IV. Action Plan A. Proposed Activities	<p>Retail sellers should describe how they propose to use RPS resources to implement both Conforming Portfolios. Narratives should include:</p> <ol style="list-style-type: none"> 1. Proposed RPS procurement activities as required by Commission decision or mandated procurement. 2. Procurement plans, potential barriers, and resource viability for each new RPS resource identified.
IV. Action Plan B. Procurement Activities	<p>The retail seller should describe the solicitation strategies for the RPS resources identified in both Conforming Portfolios. This description should include:</p> <ol style="list-style-type: none"> 1. The type of solicitation. 2. The timeline for each solicitation. 3. Desired online dates. 4. Other relevant procurement planning information, such as solicitation goals and objectives.
IV. Action Plan C. Potential Barriers	<p>Retail sellers should provide a summary of the potential barriers to implementing both Conforming Portfolios as they relate to RPS resources. The section should include:</p> <ol style="list-style-type: none"> 1. Key market, regulatory, financial, or other resource viability barriers or risks associated with the RPS resources coming online in retail sellers' Preferred Portfolios. 2. Key risks associated with the potential retirement of existing RPS resources on which the retail seller intends to rely in the future.

³⁰ Load Serving Entities are required to submit procurement information twice yearly, consistent with D.20-12-044 requirements, to show progress toward the capacity procurement requirements adopted in D.21-06-035.

All retail sellers in the RPS proceeding are required to become parties to the IRP proceeding (R.20-05-003). We recommend that other RPS parties also become parties to R.20-05-003 (or any subsequent IRP proceeding) as some of the RPS/IRP coordination and alignment may be initiated in that proceeding.

IV.C.2 Responsiveness to Local and Regional Policies: All retail sellers should explain how their RPS Plan comports with their respective company or local and regional policies. For example, retail sellers should describe how local and regional policies are incorporated in their RPS procurement quantities, generation attributes, bid selection criteria, and overall RPS Planning process. For many retail sellers, this may include consideration of regional climate action plans, air quality district plans, transportation plans, and land use plans, among others. Also, retail sellers should describe whether any unique regional attributes impact RPS Plan development (*e.g.*, if a CCA has established goals that exceed State's RPS mandates, or an IOU is addressing once-through cooling retirements). Retail sellers should include information on their strategies and planning mechanisms to achieve those goals through their RPS procurement activities.

IV.D Lessons Learned – Assessment of RPS Portfolio Supplies and Demand: For all retail sellers, the assessment of supply and demand must describe and incorporate RPS lessons learned. Descriptions of lessons learned should address, at a minimum, procurement planning, approaches to long-term procurement, and RPS trends and anticipated future trends.

It is insufficient to state that a retail seller has not yet learned any lessons, as all retail sellers should be engaged in prudent and proactive risk mitigation to ensure customers receive safe, reliable, affordable, and equitable electric service. New CCAs and ESPs are not exempt from this section and should look to lessons

learned across other retail sellers' prior RPS filings to demonstrate how they will mitigate risk. For example, retail sellers can look to previous lessons learned reported by other retail sellers on RPS procurement activities such as, but not limited to, coordination on joint procurement, long-lead planning, and ratable procurement.

**6.5. RPS Plan Section V: Project Development
Status Update – Pub. Util. Code §399.13(a)(6)(D)**

Current Commission forecasts indicate a need for developing new renewable resources to meet system needs, RPS requirements, and greenhouse gas goals.³¹ Accordingly, all retail sellers must provide an update describing new RPS-eligible resources that are being developed but are not yet online, whether they are under contract or are retail seller owned.

First, retail sellers must use the Project Development Status Update template to report development status updates for all their RPS-eligible resources that are currently under contract or are retail seller-owned, but not yet delivering generation.³²

Second, retail sellers must also provide a narrative in this section that provides additional detail on the status of these projects' development, beyond the categories in the Project Development Status Update template. At a minimum, for each project in development, this narrative must include the following information:

³¹ See D.24-02-047 for more information on the Preferred System Plan (2023 PSP) portfolio adopting a 25 million metric ton (MMT) 2035 electric sector GHG planning target following the 2022-2023 IRP cycle.

³² The RPS Database system can be accessed at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

1. Project or facility name, technology type, capacity procured from project, location (city and county), length of contract, commercial online date.
2. Any significant deviations in project development updates reported in previous RPS Plans.
3. Each facility's current development phase, which should differentiate projects whether they are in the pre-construction, construction, or post-construction development phase.
4. The status of any new required transmission line construction and/or any transmission upgrades necessary for each facility.

The status updates for a retail seller's projects in development must also be reflected in the quantitative analysis in RPS Plan Section VIII: Renewable Net Short Calculations. Retail sellers should use this analysis to explain how their project development updates will impact their RPS net short and their procurement decisions for the next two years and on a planning horizon through 2035.

6.6. RPS Plan Section VI: Potential Compliance Delays – Pub. Util. Code §399.13(a)(6)(B)

In this section, retail sellers must describe in a narrative form any potential issues that could impact their RPS compliance, including any project development delays, reduced generation, and projected changes in load.

Potential issues could include, but are not limited to:

- Inadequate transmission capacity;
- Permitting delays;
- Insufficient eligible renewable energy resources supply;
- Unanticipated curtailment; and
- Unanticipated increase in retail sales.

Next, retail sellers must also describe the steps taken to both account for and minimize these potential compliance delays. Retailers shall discuss how the potential compliance delays will impact the retail seller's RPS net short, progress towards 65 percent long-term procurement, and its procurement decisions. In addition, the potential compliance delays included in the written description must be reflected in the quantitative analysis provided in RPS Plan Section VIII. If the retail seller does not anticipate any potential compliance delays, it shall justify its analysis using the information reported in RPS Plan Sections IV and VII to support the narrative provided in this section, Section VI.

**6.7. RPS Plan Section VII: Risk Assessment – Pub. Util.
Code §399.13(a)(6)(F)**

Pub. Util. Code §399.13(a)(6)(F) provides that the renewable energy procurement plan must include an assessment of the risk that an eligible renewable energy resource will not be built or that construction will be delayed, with the result that electricity will not be delivered as required by the contract. As described below, retail sellers must discuss compliance risk, risk modeling and risk factors, and lessons learned in subsections to Section VII of their 2025 RPS Plans.

VII.A Compliance Risk: Each retail seller shall provide a written assessment of the risks to their RPS portfolio that could impact their ability to achieve RPS compliance requirements.

First, retail sellers must identify potential risks to their RPS portfolios and describe how these individual risks could impact achieving the long-term procurement requirement and overall RPS requirements. Retail sellers must describe how the need to minimize compliance risks and project delays informs

their long-term procurement planning decisions. Potential risks to consider include, but are not limited to, developer delays, permitting, transmission development, supply chains, and financing.

Second, retail sellers must also describe the severity of the individual risks (*e.g.*, high, medium, low) they have identified and must include concrete steps, with timelines, for how to overcome or mitigate compliance risks.

Third, the retail seller's risk assessment results must be provided in the written narrative of RPS Plan Section VIII: Renewable Net Short Calculations and must be reflected in the quantitative analysis that is also provided in response to that section.

VII.B Risk Modeling and Risk Factors: Retail sellers must provide details of the modeling and model(s) used (*e.g.*, deterministic, stochastic) to conduct annual risk assessments of their entire RPS portfolio.³³ These details should include specific inputs and assumptions to their risk assessment model. In addition, risk modeling should evaluate a range of risk factors, such as those described above regarding compliance delays and risks. The intent here is for retail sellers to provide sound and reasonable inferences based on both qualitative and quantitative modeling criteria.

VII.C Lessons Learned – Risk Assessment: Retail sellers must include a discussion of lessons learned in assessing RPS portfolio risk, including how other retail sellers' risk assessments were used to guide the risk assessments of those with less experience serving retail load.

³³ Examples of two different approaches to risk modeling include deterministic models for expected and standard variabilities (*e.g.*, project failure rates and expected project delays) and stochastic models for uncertain variabilities (*e.g.*, retail sales fluctuations, project failure rates, curtailment, RPS generation variability).

Responses will be deemed deficient if they state the retail seller has no risks or if they only acknowledge that risk exists, without any description of proposed strategies to mitigate their portfolio's risk(s). A thorough risk assessment should include a detailed, historical understanding of lessons learned, a reflection on current trends and forecasts, and probabilistic and statistical models that project what could occur under different circumstances.

6.8. RPS Plan Section VIII: Renewable Net Short Calculations – Pub. Util. Code §399.13(a)(6)(A), (D), and (F)

For this section, retail sellers shall provide both a narrative and quantitative response demonstrating how the results of their risk assessments described in Section VII of their 2025 RPS Plans have been incorporated into their 2025 renewable net short (RNS) calculations.

The narrative response for this section must be clear regarding the quantitative progress made towards RPS requirements and the specific risks to the retail sellers' RPS Procurement Portfolios. The narrative in RPS Plan Section VII: Risk Assessment should support the analysis provided in response to this section. The narrative response in this section must also provide quantitative data, methodologies, and calculations the retail seller relied upon to assess the retail seller's RPS portfolio needs and RPS procurement net short.

The quantitative analysis provided for this section must include retail seller's long-term and short-term contracts through 2035 as well as any RPS-eligible procurement that has or will occur outside of the RPS program.^{34, 35}

³⁴ For example, RPS-eligible procurement to replace generation from the retired San Onofre Nuclear Generation Station that will be applied towards RPS requirements should be included.

³⁵ Retail sellers must distinguish RPS-eligible procurement between online generation and RPS facilities in development when calculating their RPS net short. Please refer to the *Administrative Law Judge's Ruling on Renewable Net Short*, May 21, 2014, issued in R.11-05-005.

Retail sellers must complete the quantitative response based on the most recently directed RNS methodology Ruling, following the Ruling's instructions for data input in Appendix B (Table 8).³⁶ The quantitative analysis provided must consider the relevant qualitative discussion in RPS Plan Section VII: Risk Assessment. As outlined in the RNS Ruling, retail sellers must use their internal risk analyses to make appropriate adjustments to their procurement and explain how this mitigates risk on all projects in their respective RPS portfolios. The quantitative response must be provided in the Excel spreadsheet template that is posted on the RPS Database system.³⁷

6.9. RPS Plan Section IX: Minimum Margin of Procurement (MMoP) – Pub. Util. Code §399.13(a)(5)(D)

A minimum margin of procurement (MMoP) above the minimum RPS procurement level is necessary to comply with the RPS program's requirement for retail sellers to mitigate the risk that renewable projects under contract are delayed or terminated or projects do not perform as expected.

IX.A. MMoP Level: All retail sellers shall define in their proposed 2025 RPS Plans a MMoP assumed above the minimum procurement level and report their MMoP in this subsection. The MMoP must be reflected in retail sellers' risk-adjusted RPS eligible procurement provided in the quantitative response in RPS Plan Section VIII: Renewable Net Short Calculations and should remain separate from retail sellers' voluntary margin of over-

³⁶ As of the date of this Ruling, the methodology directed in *ALJ's Ruling on Renewable Net Short*, May 21, 2014, issued in R.11-05-005, is the most recent renewable net short methodology.

³⁷ The RNS template can be download on the RPS Database system at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

procurement (VMoP).³⁸ Additional forecasted procurement beyond the identified risk associated with the MMoP, including excess procurement, should be identified as VMoP.³⁹ If the retail seller's assumed MMoP is not used in calculating a retail seller's net short provided in response to RPS Plan Section VIII, then the retail seller's RPS Plan will be rejected.

IX.A.1 MMoP Methodology and Inputs: Draft 2025 RPS Plans for all retail sellers must include both a narrative and quantitative description of their risk-adjusted portfolio methodology and inputs required to inform a retail seller's proposed MMoP.

First, the assumptions used to calculate each retail seller's MMoP should be supported with quantitative information and should explain the implementation timeline for meeting higher-than-mandated renewable energy goals. In addition, since the MMoP process is intended to mitigate the numerous risks that may lead to RPS non-compliance, arbitrary quantifiers such as expected excess procurement or policy goal targets should not be used.

Second, while retail sellers may develop their own MMoP methodology, retail sellers must provide a rationale for why their proposed minimum margin is reasonable. Retail sellers must also demonstrate that the methodology is representative of and consistent with the retail seller's inputs, assumptions, and risk assessment in RPS Plan Sections IV through VII.

³⁸ The need for additional procurement above a retail seller's risk-adjusted portfolio should be explained and supported by the VMoP reported in the quantitative analysis (Row D). Retail sellers should not have a VMoP in place of an MMoP but should only have a VMoP after establishing and quantifying an MMoP.

³⁹ See Appendix B of *ALJ's Ruling on Renewable Net Short*, May 21, 2024, issued in R.11-05-005. VMoP includes that margin of over-procurement to account for additional project/forecasting risk above a utility's projected risk-adjusted project failure rate in a given compliance year.

IX.A.2 MMoP Scenarios: Retail sellers must describe any sensitivities or scenarios used to calculate the proposed MMoP for the 2025 procurement cycle and RPS Compliance Period 5 (2025-2027).

**6.10. RPS Plan Section X: Bid Solicitation Protocol,
Including Least-Cost Best-Fit (LCBF) Methodologies
– Pub. Util. Code- §399.13(a)(6)(C), D.04-07-029,
D.11-04-030, D.12-11-016, D.14-11-042,
and D.16-12-044**

Pursuant to Pub. Util. Code §399.13(a)(6)(C), 2025 RPS Plans must include a bid solicitation protocol setting forth the need for eligible renewable energy resources of each deliverability characteristic, required online dates, and locational preferences, if any.

X.A. Bid Selection Protocols: First, all retail sellers must provide bid solicitation protocols for eligible renewable resources in their 2025 RPS plans. At minimum, the bid solicitation protocols must include the following elements:

- Overview of the solicitation process, including a solicitation schedule;
- Description of bid evaluation criteria;
- Quantity of products being requested;
- Required deliverability characteristics of the resources;
- Online dates and term lengths;
- Locational preferences, if any;
- Copy of the applicable pro forma agreement(s). Note, if an IOU plans to use a renewable auction mechanism procurement process, then the IOU shall provide a pro forma agreement for that process. Additionally, if an IOU plans other types of RPS procurement that would require a specific pro forma agreement (*e.g.*, short-term procurement), then a description of the bidding protocol for that specific pro forma agreement must also be included.

Second, retail sellers must describe in detail how their solicitation process determines whether renewable energy resources are located in disadvantaged communities, pursuant to Pub. Util. Code §399.13(a)(8), and how their procurement decisions will give preference to resources in those communities.⁴⁰

Third, retail sellers' stated bid selection criteria should align with all sections of their RPS Plan, especially regarding stated needs, goals, and preferences of the retail seller. Solicitations must be consistent with the portfolio supply and demand assessment provided in RPS Plan Section IV and the retail seller's renewable net short position in RPS Plan Section VIII.

Fourth, all retail sellers should provide descriptions of any ongoing, planned, and proposed solicitation processes, including solicitation materials. Retail sellers should provide recent, current, and future solicitation materials to the Commission, including a link, if one exists, to the public website where public materials can be found for all relevant solicitations. In addition, retail sellers should describe whether they are participating in joint solicitations with other retail sellers, and this information must be consistently reported across all relevant retail sellers' RPS Plans for efficient CPUC review.

X.B. Solicitation Protocols for Renewables Sales: If an IOU intends to sell eligible renewable energy products as part of its 2025 RPS Plan, then it must also submit a solicitation protocol setting forth its proposed sales solicitation process. At a minimum, the sales protocols must include the following elements:

⁴⁰ Pub. Util. Code §399.13(a)(8)(A) requires that in soliciting and procuring eligible renewable energy resources for California-based projects, each electrical corporation shall give preference to renewable energy projects that provide environmental and economic benefits to communities afflicted with poverty or high unemployment, or that suffer from high emission levels of toxic air contaminants, criteria air pollutants, and GHG.

- Overview of the solicitation process, including a solicitation schedule;
- Description of bid evaluation criteria;
- Product attributes for the renewable energy products being offered for sale (*e.g.*, bundled / unbundled product, technology, location, etc.);
- Delivery dates and term lengths;
- Pricing (*e.g.*, fixed price, index price, etc.);
- A framework for determining the quantity of RPS volumes to sell in each solicitation, the target price, and the price floor⁴¹;
- Copy of applicable pro forma agreements.

Each IOU should also include a section on lessons learned from its sale of excess RPS volumes authorized under its previous RPS Plans.

X.C. Least-Cost Best-Fit (LCBF) Criteria: Retail sellers must also include a detailed description of their bid evaluation methodologies and “best-fit” attributes considered, pursuant to Pub. Util. Code §399.13(a)(9).⁴² The description of retail sellers’ bid evaluation, or LCBF, methodologies, must include the following considerations and requirements:

1. Retail sellers must describe how bids will be valued and evaluated based on their evaluation methodology.
2. The LCBF methodology used must be consistent with relevant Commission decisions.⁴³

⁴¹ Bilaterally-negotiated REC sales agreements are subject to the same terms and pricing set forth in an IOUs’ Commission-approved REC sales framework and are subject to the Commission’s Tier 3 Advice Letter approval process if the terms deviate from the Commission.

⁴² Pub. Util. Code §399.13(a)(9) requires that in soliciting and procuring eligible renewable energy resources, each retail seller consider the best fit attributes of resource types that ensure a balanced resource mix to maintain the reliability of the electrical grid.

⁴³ See D.04-07-029, D.11-04-030, D.12-11-016, D.14-11-042, and D.16-12-044.

3. When evaluating bids in their solicitations, retail sellers shall consider, at a minimum, the following attributes: energy and capacity value, congestion cost, locational preference, potential for curtailment, and operational flexibility.
4. Any qualitative measures or criteria in the LCBF methodology should also be described, including how these criteria are applied.
5. If a retail seller's LCBF criteria does not include system reliability considerations then the retail seller's RPS Plan will be rejected.

6.11. RPS Plan Section XI: Safety Considerations

As stated in D.13-11-024, OP 3, all entities filing RPS Plans must identify any safety consideration related to the information set forth in the RPS Plans. The Commission directive was made pursuant to its authority under Pub. Util. Code §451, which provides, in pertinent part, as follows:

Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.

This information will help the Commission assess a retail seller's safety culture and ensure that their deliverability of the renewable electricity follows safety considerations in a manner that is safe for customers and employees as required under Pub. Util. Code §451. If a retail seller's RPS Plan states that it has no safety considerations or fails to reflect any safety considerations, then the retail seller's RPS Plan will be rejected.

Therefore, in their RPS Plans, retail sellers shall describe business practices that reflect safety considerations in RPS-eligible generation procurement through

execution and negotiation of power purchase agreements, contract management, and operation and maintenance of utility-owned generation.

For RPS compliance obligations achieved through non-utility owned generation, retail sellers should describe how they incorporate safety provisions and standards in their contracts for the RPS-eligible resources. For example, the 2025 RPS plans must include descriptions of any mandatory compliance requirements each retail seller will follow to ensure it meets all prudent electrical practices, including all safety standards, safety requirements for plant visits by its employees, and requirements to comply with regional applicable laws and regulations relating to safety.

Regarding utility-owned generation, retail sellers should describe how they comply with applicable safety codes, including but not limited to the National Electric Safety Code, the Occupational Health and Safety Act, and any relevant state health and safety act requirements at generation facilities complying with California's RPS program.

If other safety factors are considered in a retail seller's RPS procurement and planning efforts, such as future land use impacts due to climate change (*e.g.*, sea level rise), Public Safety Power Shut-off (PSPS) events, wildfire risk mitigation, or a combination of these approaches to overall system and public safety, then retail sellers are encouraged to include them as well.

**6.12. RPS Plan Section XII: Consideration of Price
Adjustment Mechanisms – Pub. Util.
Code- §399.13(a)(6)(E)**

Pub. Util. Code §399.13(a)(6)(E) requires that RPS Plans include consideration of mechanisms for price adjustments associated with the costs of key components for eligible renewable energy resource projects with online dates more than 24 months after the date of contract execution.

Pursuant to Pub. Util. Code §399.13(a)(6)(E), each retail seller shall describe how price adjustments (*e.g.*, index to key components, index to Consumer Price Index, price adjustments based on exceeding transmission or other cost caps) will be considered and potentially incorporated into contracts for RPS-eligible projects with online dates occurring more than 24 months after the contract execution date. Retail sellers should discuss how any potential price adjustments will maximize value for ratepayers and minimize potential risks to ratepayers.

6.13. RPS Plan Section XIII: Cost Quantification

Pursuant to SB 836 (Padilla, Stat. 2011, ch. 600, § 1)⁴⁴ and SB 2 (1X), the Commission provides annual reports to the California Legislature that include aggregated cost data on all procurement contracts for eligible renewable energy resources approved by the Commission.⁴⁵ To support the Commission's reporting to the Legislature under Pub. Util. Code §913.3 and §913.4, PG&E, SCE, SDG&E, BVES, Liberty Utilities LLC, and PacifiCorp are required to include the information described in Table 3, below, in their proposed 2025 RPS Plans. For the Commission to have complete information for statewide electric procurement costs, CCAs and ESPs must also include this information in their 2025 RPS Plans.

While the Commission does not set rates for the CCAs and ESPs or approve their contracts, Pub. Util. Code §399.12(j)(2) states that “[a] community choice aggregator shall participate in the renewables portfolio standard program subject to the same term and conditions applicable to an electrical corporation.” The same applies to ESPs pursuant to Pub. Util. Code §399.12(j)(3). Therefore, CCAs and ESPs shall follow the same RPS planning requirements as electrical

⁴⁴ Adding §911 to the Pub. Util. Code.

⁴⁵ The Padilla Report: Costs and Savings for the Renewables Portfolio Standard (pursuant to Public Utilities Code §913.3).

corporations, including providing the information described in Table 3 below in their 2025 RPS Plans. Further, the Commission uses cost data submitted in the RPS Plans to develop the annual RPS Costs and Cost Savings report.⁴⁶ This cost information is essential to understand the impact of retail seller procurement and renewable cost trends in California.

All retail sellers shall provide the information required in Table 3 below using the standardized Cost Quantification template that is available through the Commission's RPS Database and should indicate in the narrative if they are awaiting contract approval either by the Commission or their local governments or executive boards as instructed in the template.⁴⁷ Responses should be non-confidential to the greatest extent possible.

⁴⁶ Pub. Util. Code §913.3 requires the Commission to produce an annual RPS cost report to the legislature. The report is posted on the Commission's RPS website:
<https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/energy-reports-and-whitepapers/rps-reports-and-data>.

⁴⁷ The Cost Quantification template can be downloaded from the RPS Database system at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

Table 3
RPS Procurement and Sales Information Related to Cost Quantification

	Item	Description
1.	Actual Direct Expenditures and Revenue- per year	Total dollars expended and received for all Renewable Energy Credit (REC) transactions for every year from 2022-2024. ⁴⁸ Figures must be reported by resource and technology type and reported for each year.
2.	Actual REC Procurement (MWh) - per year	Total REC procurement for every year from 2022-2024, including any REC sales. Amounts must be reported by resource and technology types and reported for each year.
3.	Forecast Direct Expenditures and Revenue - per year	Total forecasted dollars expended and received for all REC transactions to date (and approved to date for the utilities). Forecasts Direct Expenditures must be reported by resource and technology type and reported for each year from 2025-2035.
4.	Forecast REC Procurement (MWh) - per year	Total forecasted REC procurement to date (and approved to date for the utilities), including any planned REC sales. Forecasts must be reported by resource and technology types and reported for each year from 2025-2035.
5.	Incremental Utility Rate Impact - per year	Total actual and forecasted annual utility rate impacts from RPS procurement from 2022-2035.

6.14. RPS Plan Section XIV: Impact of Transmission and Interconnection Delays – Pub. Util. Code §399.13(a)(2)(B)

Pursuant to SB 1174 (Hertzberg, Stat. 2022, ch. 229) electrical corporations that own electrical transmission facilities are required to provide information in RPS Plans on the development of transmission and interconnection facilities that enable renewable energy or energy storage resources which have executed

⁴⁸ For all information provided in response to Table 3, REC-only contracts should be listed separately.

interconnection agreements.⁴⁹ SB 1174 also requires the Commission to provide an assessment of delays to interconnection or transmission approvals for eligible renewable energy or energy storage resources.⁵⁰ As such, electrical corporations shall 1) fulfill the data request as described below, and 2) provide narrative context within RPS Plans.

Data Request

For 2025 RPS Plans, electrical corporations that own transmission facilities are required to provide information detailing the impact that delays to transmission projects have had on renewable energy and energy storage resources with executed interconnection agreements. Electrical corporations shall list each transmission project currently in development or that has come online between January 1, 2020 to March 31, 2025, whether it has experienced a delay or not. Moreover, electrical corporations are to list all renewable energy and energy storage projects currently in development, tying the renewable energy and energy storage projects to specific transmission projects and identifying any delays.

“Transmission projects” include transmission and interconnection projects, as well as network upgrades, that are CAISO-approved or utility self-approved and needed for generator interconnections. A transmission project is defined as “in development” if the project has commenced but is not yet online. A transmission project is defined as “delayed” when it’s current or actual in-service date is later than the project’s original in-service date. Electrical corporations

⁴⁹ Pub. Util. Code §399.13(a)(2)(B).

⁵⁰ Pub. Util. Code §913.4(g).

shall provide this information in the “2025 SB 1174 Data Reporting Template” that is available on the RPS Database system.⁵¹

RPS Plan Narrative

In addition to providing the data requested within the 2025 SB 1174 Data Reporting Template, electrical corporations with relevant projects must provide a narrative summary in the text of their RPS Plan. The narrative summary should include aggregated quantitative information to summarize the magnitude of transmission project delays as well as the magnitude of renewable energy and energy storage resources impacted. Information within this section should correspond with information detailed in other RPS Plan sections, such as Section VI (Potential Compliance Delays) and Section VII (Risk Assessment), as well as with the data provided within the 2025 SB 1174 Data Reporting Template. The narrative summary must include:

1. Reference to the 2025 SB 1174 Data Reporting Template, which should be attached to the RPS Plan, and corresponding Appendix letter.
2. A summary of how delays will have an impact on the electrical corporation’s current and future RPS compliance obligations. Include a discussion of the general magnitude and causes of delays, challenges to overcome them, and potential solutions. This narrative should be consistent with other RPS Plan sections that also discuss RPS compliance risks and quantify impacts (e.g. MWh and MW). The summary should include the following data:
 - a. Transmission projects:
 - i. Total number of projects in development;

⁵¹ The 2025 SB 1174 Data Reporting Template can be download on the RPS Database system at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

- ii. Total number of projects that have come online from January 1, 2020 to March 31, 2025;
 - iii. Total number of projects identified in (i) and (ii) with delayed in-service dates; and
 - iv. Total capacity (MW) of projects identified in (iii).
- b. Renewable energy and energy storage resources:
 - i. Total capacity in number of gigawatts (GW) in development in the electrical corporation's interconnection portfolio (include all renewable energy and energy storage resources with executed interconnection agreements in the CAISO, WDAT, or other interconnection queues); and
 - ii. Total number of gigawatts (GW) identified in (i) and dependent on delayed transmission projects identified in (2.a.iii).
- 3. A summary of the in-service date change reasons identified within the 2025 SB 1174 Data Reporting Template ("1. Transmission Delay Reporting" tab), including a contextualization for the delays from the electrical corporation's perspective and elaboration on the most significant delay reasons with the greatest impacts on dependent renewable energy and energy storage resources. The summary should discuss:
 - a. The top five (5) delay reasons in terms of the total number of transmission projects that have been delayed;
 - b. The top five (5) delay reasons in terms of reliant GW of renewable energy and energy storage resources; and
 - c. The top five (5) delay reasons in terms of longest median delay times (in months).
- 4. An aggregation of the in-service date change reasons identified within the 2025 SB 1174 Data Reporting Template ("1. Transmission Delay Reporting" tab). Use the table below and include the following data aggregated by delay reason:
 - a. Total number of renewable generation and storage resources impacted;

- b. Total resources in GW impacted;
- c. Total RPS-eligible resources in GW impacted; and
- d. Median delay time per project in months.

Table 4: In-service Date Change Reasons for Delayed Transmission Projects

Delay Reason	Total Number of Generation Resources Impacted	Total Resources Impacted (GW)	Total RPS-Eligible Resources Impacted (GW)	Median Delay Time Per Project (months)
Bundling Dependencies				
Clearances				
Completed Early				
Financing				
ISO Action				
Land Rights				
Material				
Outage				
Permitting (CPUC/CEQA)				
Permitting (non-CPUC/CEQA)				
Project Design				
Supply Chain Delays				
Vendor Quality/Delays				
Weather				
Workforce Availability				

- 5. List and describe the top three (3) transmission projects that have been delayed in terms of the most reliant GW of renewable energy and renewable storage resources. Make sure to include:
 - a. The name of the transmission project.
 - b. The primary delay reason identified for the project.
 - c. How much the project is delayed (in months).

- d. How many renewable energy and renewable storage resources and the total GW are reliant on the transmission project.
 - e. What mitigation efforts have been done to address the project's delay.
 - f. What mitigation efforts will be done in 2025 and 2026 to address this project's delays.
 - g. Any secondary reasons that have had a substantial impact on the project's delays.
6. Describe mitigation efforts and business process improvements that the utility took in 2024 to address the most significant reasons for delays to transmission and interconnection in-service dates, and the effects of these efforts on renewable energy and storage resource deliverability. Describe how process improvements have assisted with transmission projects being completed on time or ahead of schedule. Quantify these positive impacts (*e.g.* MWh and MW).
- a. If any projects were delayed due to Workforce Availability, identify the workforce limitations and mitigation efforts used to address the workforce shortage.
 - b. If any projects were delayed and the "Customer" was identified as the "Delay Resolver", identify how the utility has improved support efforts to mitigate delays caused by customers.
 - c. If any projects were delayed due to Permitting, please discuss the following:
 - i. Which types of Permitting delays have had the greatest impact on dependent renewable energy and storage resources (MW)?
 - ii. Which types of Permitting delays generally take the longest and/or are the most complex to resolve?
 - iii. Which permitting agencies have a significant role in reducing permitting times and associated delays?
7. Describe mitigation efforts and business process improvements the utility has taken/will in 2025 to address the most significant reasons for delays to transmission and interconnection in-service dates and the

effects of these efforts on renewable energy and storage resource deliverability.

6.15. Appendix A: Redlined Version of Draft 2024 RPS Plans Required

Each retail seller shall provide a “redlined” version of the 2025 RPS Plan to identify all changes from its Final 2024 RPS Plan to the Commission’s Energy Division Staff to facilitate review of the draft 2025 RPS Plans. The redlined version must also be made available to any party who requests a copy.

7. Resources for RPS Plans

The Commission staff has compiled a list of resources on the Commission’s website for reference in developing RPS Plans. Staff encourages retail sellers to review the resources posted on the Commission’s RPS Procurement webpages, which include this Ruling, and a Frequently Asked Questions for RPS Plan submissions.⁵² The templates required for draft 2025 RPS Plans can be downloaded from the RPS Database system.⁵³

8. Requirements for Document Filings and Data Submissions

This proceeding will follow the electronic service protocol set forth in Rule 1.10. All parties to this proceeding shall serve documents and pleadings using electronic mail, whenever possible, transmitted no later than 5:00 p.m., on the date scheduled for service to occur. Although Rule 1.10 requires service on the Administrative Law Judge (ALJ) of both an electronic and a paper copy of filed or served documents, parties are directed to only serve ALJs Atamturk and Mutialu electronically in this proceeding.

⁵² The CPUC RPS Procurement website is located here: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps/rps-procurement-plans>.

⁵³ The templates can be downloaded from the RPS Database at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

All retail sellers must submit the native file versions of the required Microsoft Excel spreadsheets for the Renewable Net Short calculations, Project Development Status Update, and Cost Quantification to Energy Division staff through the RPS Database system. This submission is in addition to including the required data in the retail sellers' RPS Plan.

The RPS Database can be accessed at: <https://rpsd.cpuc.ca.gov>. Retail sellers must register to login to the system and access the templates.

9. Submission of Information with Claim of Confidentiality

The information in the RPS Plans should be non-confidential, to the greatest extent possible. If there is a request for confidential treatment of information, the procedures outlined in D.06-06-066, as modified by D.21-11-029 are applicable.⁵⁴ It is important for retail sellers to orient their year-specific redactions based on the year filing is made. Draft and final RPS plans will be interpreted as being filed in the same year to preserve confidentiality of data for the current year and the first and second forecast years.⁵⁵

In addition to following Commission filing requirements, retail sellers are directed to use the Commission's secure FTP site to send Energy Division unredacted copies of all RPS Plan documents, excluding Microsoft Excel spreadsheets which as noted above are to be submitted to the RPS Database. To access the FTP site, retail sellers should create an account on the FTP website: <https://kwftp.cpuc.ca.gov/> to do so.

⁵⁴ D.06-06-066 was modified by D.07-05-032 and D.08-04-023. The references to D.06-06-066 here include the modifications made by D.07-05-032 and D.08-04-023.

⁵⁵ See D.24-12-035 at 68 and OP 50.

10. Schedule

Parties may file comments and reply comments on the RPS Plans per the schedule outlined in Attachment A. We are not seeking comments on the Ruling as the requirements are well established at this time.

After reviewing the record in the proceeding, the Commission will accept, modify, or reject each plan or Supplement as required by Pub. Util. Code §399.13(a)(1) and (c).

11. *Ex Parte* Communications

Ex parte communications are permitted as described in Pub. Util. Code §1701.1 and §1701.3. Parties and interested persons are advised that, to the extent that the requirements of Rule 8.1 *et seq.* deviate from Pub. Util. Code §1701.1 and §1701.3, as amended by SB 215, effective January 1, 2017, the statutory provisions govern.

In a ratesetting proceeding involving hearings, *ex parte* communications are permitted only if consistent with certain restrictions and are subject to reporting requirements. (*See* Pub. Util. Code §1701.3(c) and Rules 8.2, 8.3, and 8.5.) Parties must electronically serve all three-day notices required by Rule 8.2(c)(2) for all *ex parte* meetings with decision-makers to the assigned Commissioner, the ALJs, and the service list of this proceeding.

IT IS RULED that:

1. No later than June 30, 2025, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall each file a proposed 2025 Renewables Portfolio Standard Procurement Plan that addresses the elements stated herein.

2. No later than June 30, 2025, Bear Valley Electric Service Company and Liberty Utilities LLC shall file a proposed 2025 Renewables Portfolio Standard Procurement Plan that addresses the elements stated herein.

3. PacifiCorp may use its IRP on-year supplement to satisfy the requirement to prepare a renewable energy procurement plan that addresses the elements stated in this ruling.

4. No later than June 30, 2025, each Community Choice Aggregator shall file a proposed 2025 Renewables Portfolio Standard Procurement Plan to address the elements stated herein.

5. No later than June 30, 2025, each Electric Service Provider serving electricity to customers in California shall file a proposed 2025 Renewables Portfolio Standard Procurement Plan to address the elements stated herein.

6. The procedural schedule for the Commission's consideration of the 2025 Renewables Portfolio Standard Procurement Plans is outlined in Attachment A. This schedule may be adjusted as needed by the assigned Commissioner or Administrative Law Judge.

7. All retail sellers shall include an officer verified checklist using the uniform template in Attachment B, which is also the template that should be used to draft their 2025 Renewables Portfolio Standard Procurement Plans, responding to all sections unless otherwise noted on the template in Table 1 of this Ruling.

8. The Electric Service Providers and Community Choice Aggregators that shall comply with this ruling are identified in Appendix C and D of this ruling. Any retail sellers that decertify in 2025 before the proposed decision is published shall file a motion for exemption from filing final Renewables Portfolio Standard (RPS) Plans and future filings in the proceeding informing the Commission on their future RPS procurement plans.

Dated April 17, 2025, at San Francisco, California.

/s/ JOHN REYNOLDS
John Reynolds
Assigned Commissioner

/s/ NILGUN ATAMTURK
Nilgun Atamturk
Administrative Law Judge

Attachment A

**Procedural Schedule
2025 Renewables Portfolio Standard
Procurement Plans**

Process Details	DATE
Assigned Commissioner's Ruling setting scope and schedule for annual RPS Plans	April 2025
PacifiCorp files 2025 On-Year Supplement	May 1, 2025
IOUs, Small Utilities, ESPs and CCAs file draft annual RPS Plans	June 30, 2025
Comments on RPS Plans	July 28, 2025
Motions requesting an evidentiary hearing (note: If a motion is filed and granted, the ALJ may need to issue a revised schedule.)	July 28, 2025
Reply comments on RPS Procurement Plans	August 11, 2025
Motion to update RPS Plans [note 1 below]	August 11, 2025
Commission votes on Proposed Decision	Quarter 4, 2025
IOUs, Small Utilities, ESPs and CCAs file final annual RPS Plans	30 days from the effective date of the Decision
IOUs issue Request for Offers for Solicitations or otherwise pursue approved RPS Procurement Plan	14 days after Final RPS Plan filings, unless extended by Energy Division

Note 1: Updates are not intended to alter the form and format of the Plan but may be appropriate for limited elements based on changed circumstances or recent information (*e.g.*, new legislation, recent Commission decision, new regulation of the California Independent System Operator, harmonization of definitions within contract for specific terms).

(END OF ATTACHMENT A)

Attachment B

2025 RPS Procurement Plan Checklist and RPS Plan Template

The Checklist must be filed with the RPS Procurement Plan and include verification.

2025 RPS Procurement Plan Checklist- Task Completed

Officer Verification

Retail seller name:	YES/ NO	NOTES
I. Summary of Major Changes to RPS Plan		
II. Executive Summary Key Issues		
III. Compliance with Recent Legislation and Impact of Regulatory		
IV. Assessment of RPS Portfolio Supplies and		
IV.A Portfolio Supply and Demand		
IV.A.1 Long-term Procurement		
IV.B Portfolio Diversity and Reliability		
IV.B.1 Forecasting for Increased Transportation Electrification		
IV.B.2 Curtailment Frequency, Cost, and Forecasting		
IV.C Portfolio Optimization		
IV.C.1 Conformance with the IRP Proceeding		
IV.C.2 Response to Local and Regional Policies		
IV.D Lessons Learned		
V. Project Development Status Update		
VI. Potential Compliance Delays		

VII.	Risk Assessment		
VII.A	Compliance Risk		
VII.B	Risk Modeling and Risk Factors		
VII.C	Lessons Learned		
VIII.	Renewable Net Short Calculations		
IX.	Minimum Margin of Procurement (MMoP)		
IX.A	MMoP Level		
IX.A.1	MMoP Methodology and Inputs		
IX.A.2	MMoP Scenarios		
X.	Bid Solicitation Protocol		
X.A	Bid Selection Protocols		
X.B	Solicitation Protocols for Renewables Sales		
X.C	Least-Cost Best-Fit (LCBF) Criteria		
XI.	Safety Considerations		
XII.	Consideration of Price Adjustments		
XIII.	Cost Quantification		
XIV.	Impact of Transmission and Interconnection Delays		
Appendix A: Redlined Version of the Draft			

I am an officer of the reporting organization herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet templates used within this filing have not been altered from the version issued or approved by Energy Division.

Executed on **[insert date]** at **[insert City and State]**.

[Insert Electronic version of Signature]

[Insert Name, Title, Organization and Contact Information]

(END OF ATTACHMENT B)

Attachment C

List of Registered ESPs Required to File 2025 RPS Procurement Plans as of the Date of This Ruling

1. 3 Phases Renewables, Inc.
2. BP Energy Retail Company California LLC (formerly EDF Industrial Power Services (CA), LLC)
3. Brookfield Renewable Energy Marketing US LLC
4. Calpine Energy Solutions, LLC
5. Calpine Power America-CA, LLC (dba Champion Energy Services, LLC)
6. Commercial Energy of Montana, Inc. (dba Commercial Energy of California)
7. Constellation NewEnergy, Inc.
8. Direct Energy Business
9. Gexa Energy California, LLC*
10. Just Energy Solutions*
11. Palmco Power CA, LLC*
12. Pilot Power Group, LLC
13. Praxair Plainfield, Inc.*
14. Shell Energy Solutions (Shell Energy North America (US), L.P.)
15. Tenaska Power Services Co.*
16. The Regents of the University of California
17. Tiger Natural Gas, Inc.*

*The Commission determined in D.13-11-024, D.17-12-007, D.19-02-007, D.19-07-007, D.19-12-042, and D.21-01-005 that EnerCal USA, LLC, Liberty Power Delaware, LLC, Praxair Plainfield, Inc., Palmco Power CA, Liberty Power Holdings, LLC, Mansfield Power and Gas, Tiger Natural Gas, and Tenaska Power, Tenaska California Energy Marketing, Gexa Energy California, American Power Net, and Just Energy do not need to file RPS Procurement Plans if they continue not serving any retail customers. If any of the ESPs begins to serve retail customers in the future, it must immediately file an RPS Procurement Plan. The Commission determined in D.19-02-007 that new ESPs must file their RPS plans upon registering with the Commission or 90 days prior to delivering load, whichever event occurs first.

(END OF ATTACHMENT C)

Attachment D

List of Active CCAs Required to File 2025 Procurement Plans as of the Date of this Ruling

1. Apple Valley Choice Energy
2. Ava Community Energy
3. Central Coast Community Energy
4. City of Palmdale
5. City of Pomona
6. City of Santa Barbara
7. Clean Energy Alliance
8. Clean Power Alliance of Southern California
9. CleanPowerSF
10. Desert Community Energy
11. King City Community Power
12. Lancaster Choice Energy
13. Marin Clean Energy
14. Orange County Power Authority
15. Peninsula Clean Energy
16. Pico Rivera Innovative Municipal Energy
17. Pioneer Community Energy
18. Rancho Mirage Energy Authority
19. Redwood Coast Energy Authority
20. San Diego Community Power
21. San Jacinto Power
22. San Jose Clean Energy
23. Silicon Valley Clean Energy
24. Sonoma Clean Power Authority
25. Valley Clean Energy Alliance

* The Commission determined in D.17-12-007 that new CCAs must file their RPS Plans upon registering with the Commission or 90 days prior to delivering load, whichever event occurs first.

(END OF ATTACHMENT D)