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**Subject:** R.20-05-003: Email ruling inviting comments on natural gas issues

Parties to R.20-05-003 (integrated resources planning rulemaking):

On September 30, 2021, the California Energy Commission (CEC) adopted, at its business meeting, its final Mid-Term Reliability Analysis Staff Report that was anticipated and referred to in Commission Decision (D.) 21-06-035. This email ruling takes official notice of the CEC's action. The final CEC analysis is available at the following link:

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=239881&DocumentContentId=73322>

Parties are invited to make final comments on the record of this proceeding recommending any actions the Commission should take as a result of the CEC analysis. These actions may include, but need not be limited to, procurement actions this year as part of consideration a Preferred System Plan (PSP). In making comments on the CEC's analysis, parties may also refer to and need not repeat their comments and/or reply comments already filed in response to the August 17, 2021 Administrative Law Judge's Ruling Seeking Comments on Proposed PSP.

In addition, this ruling makes available a Commission staff paper titled "Considering Gas Capacity Upgrades to Address Reliability Risk in Integrated Resource Planning." The paper is attached to this ruling and available at the following link:

<https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energydivision/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2019-2020-irp-events-and-materials/cpuc-gas-upgrades-staff-paper-october-2021.pdf>

Parties are invited to provide comments and recommendations on the Commission staff paper on gas capacity upgrades, including, but not limited to, any procurement actions that the Commission should take as part of consideration of this PSP. In making their comments, parties are invited to provide feedback on the following specific issues:

1. The assumptions and conclusions of the RESOLVE analysis that includes gas capacity upgrades as a candidate resource.
2. Whether gas capacity upgrades at existing sites should be considered as eligible resources for the procurement requirements of D.21-06-035? If so, which of the various procurement process steps of D.21-06-035 would need to be amended, and how?
3. Whether load serving entities that wish to contract with gas capacity upgrades at existing sites, if permitted by the Commission, should be required to demonstrate that they first attempted to procure non-emitting resources. If so, what should this demonstration consist of, and on what timeframe?
4. If the Commission allows gas capacity upgrades at existing sites, whether the Commission should restrict or prohibit gas capacity upgrades in disadvantaged communities, as defined by the CalEnviroScreen tool, or impose some other/additional criteria.

Parties are required to limit their comments in response to both the CEC's analysis and the staff paper on gas capacity upgrades to no more than 15 pages. Reply comments shall not exceed 7 pages. Comments are due no later than October 21, 2021 and reply comments are due no later than October 28, 2021.

**IT IS RULED that:**

1. The Commission takes official notice of the adoption by the California Energy Commission of its Mid-Term Reliability Analysis Staff Report at its September 30, 2021 public business meeting.
2. Parties to this proceeding are invited to file and serve comments and recommendations in response to the California Energy Commission's Mid-Term Reliability Analysis Staff Report and this Commission's staff paper titled "Considering Gas Capacity Upgrades to Address Reliability Risk in Integrated Resource Planning" by no later than October 21, 2021. Comments shall not exceed 15 pages in length.
3. Parties may file and serve reply comments in response to this ruling by no later than October 28, 2021. Reply comments shall not exceed seven (7) pages in length.



**The Docket Office shall formally file this ruling.**

Due to the size of the service list, this email ruling is being distributed in batches, to avoid rejection by servers.

Best regards,

**Julie A. Fitch**

(pronouns: she/her)

Administrative Law Judge

California Public Utilities Commission

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