

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

03/28/23  
Rulemaking 21-10-002  
(Filed October 7, 2021) 12:06 PM  
R2110002

Order Instituting Rulemaking to Oversee the  
Resource Adequacy Program, Consider  
Program Reforms and Refinements, and  
Establish Forward Resource Adequacy  
Procurement Obligations.

**REPLY COMMENTS OF  
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON  
PROPOSED DECISION ON PHASE 2 OF THE RESOURCE ADEQUACY REFORM  
TRACK**

March 28, 2023

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

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The Center for Energy Efficiency and Renewable Technologies (CEERT) submits these Reply Comments on the Proposed Decision on Phase 2 of the Resource Adequacy Reform Track (Proposed Decision), mailed in this proceeding on March 3, 2023. These Reply Comments are timely filed and served pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure and the instructions accompanying the Proposed Decision.

**I.  
MULTIPLE PARTIES URGE THE COMMISSION TO INCLUDE ADDITIONAL DATA  
IN THE MASTER RESOURCE DATABASE**

In Opening Comments, CEERT recommended inclusion of “operating and environmental characteristics for each [resource adequacy (RA)] resource contained within the Master Resource Database (MRD)” which would include greenhouse gas (GHG) heat rate and Disadvantaged Community (DAC) resource information which was previously recommended by CEERT and the California Environmental Justice Alliance (CEJA).<sup>1</sup> This view is shared by other parties, including CEJA, Natural Resources Defense Council (NRDC), and Public Advocates Office (Cal Advocates).<sup>2</sup>

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<sup>1</sup> CEERT Opening Comments, at pp. 2 and 4.

<sup>2</sup> CEJA Opening Comments, at p. 2; NRDC Opening Comments, at p. 1; and Cal Advocates Opening Comments, at pp. 7-9.

The main argument against adopting these recommendations in the Proposed Decision is that it would be too burdensome for Commission Staff to add this information and that it is “unnecessary.”<sup>3</sup> However, NRDC correctly states that while this may be an additional step for Commission staff, “incorporation into the database simplifies this step for dozens of [load-serving entities (LSEs)], enabling staff and elected governing boards to more easily implement policies and priorities in the selection of capacity.”<sup>4</sup> Cal Advocates makes a similar argument that “[i]ncluding DAC and heat rate information in the MRD would facilitate LSE procurement planning, which includes use of the MRD, to meet [] Commission requirements and California’s clean energy goals.”<sup>5</sup>

Furthermore, CEJA argues that this data would only add two columns of information and that this “information is valuable because it provides the location of the most polluting sources.”<sup>6</sup> In addition, CEERT agrees with CEJA that if the Commission is, in fact, committed to equity it must add this information.<sup>7</sup> As such, the Proposed Decision must be modified to include DAC and heat rate information in the MRD.

## **II. CEERT AGREES WITH NRDC’S RECOMMENDED MODIFICATIONS TO THE PLANNING RESERVE MARGIN AND TEST YEAR**

CEERT and NRDC urge the Commission to adopt a monthly Planning Reserve Margin (PRM) for Slice-of-Day (SOD) implementation and inclusion of summer months in the submittals of LSEs during the RA Test Year.<sup>8</sup> CEERT shares NRDC’s concern that the Proposed Decision continues to rely “on a single annual PRM percentage value to be applied to

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<sup>3</sup> Proposed Decision, at p. 12.

<sup>4</sup> NRDC Opening Comments, at p. 5.

<sup>5</sup> Cal Advocates Opening Comments, at p. 8.

<sup>6</sup> CEJA Opening Comments, at p. 3.

<sup>7</sup> *Id.*, at pp. 1-2.

<sup>8</sup> CEERT Opening Comments, at pp. 2-3 and 4-5 and NRDC Opening Comments, at pp. 1-3.

all months” because “a single annual PRM would not result in consistent resource requirements across months.”<sup>9</sup> Furthermore, CEERT concurs with NRDC that the 2024 Test Year should include July and August. NRDC states that “[g]iven the unique monthly characteristics within Slice of Day, it is important for both LSEs and the Commission to attempt to surface any concerns with July and August in the test year prior to showings in 2025.”<sup>10</sup>

### **III. CONCLUSION**

CEERT appreciates the opportunity to submit these Reply Comments and the Proposed Decision on the RA Phase 2 Reform Track. CEERT urges that the Commission adopt the recommendations enumerated above and in CEERT’s Opening Comments.

Dated: March 28, 2023

Respectfully submitted,

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<sup>9</sup> NRDC Opening Comments, at p. 1.

<sup>10</sup> *Id.*, at p. 3.