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12/02/24

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R2005003

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
Electric Integrated Resource Planning and  
Related Procurement Processes.

Rulemaking 20-05-003  
(Filed May 7, 2020)

**DECEMBER 2, 2024 INTEGRATED RESOURCE PLAN PROCUREMENT UPDATE  
COMPLIANCE FILING OF DIRECT ENERGY BUSINESS, LLC**

PUBLIC VERSION  
[Attachment 1]

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December 2, 2024

*Attorneys for Direct Energy Business, LLC*

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
Electric Integrated Resource Planning and  
Related Procurement Processes.

Rulemaking 20-05-003  
(Filed May 7, 2020)

**DECEMBER 2, 2024 INTEGRATED RESOURCE PLAN PROCUREMENT UPDATE  
COMPLIANCE FILING OF DIRECT ENERGY BUSINESS, LLC**

Pursuant to the September 24, 2020 Scoping Memo, D.19-11-016 Ordering Paragraph 13, D.20-12-044 Ordering Paragraph 1, and D.21-06-035 Ordering Paragraph 3 of the California Public Utilities Commission (the “Commission”), and the Energy Division’s June 2024 IRP Procurement Compliance Filing & Data Request Filing Requirements Overview (“Filing Requirements”) and Commission Staff’s November 8, 2024 electronic correspondence, Direct Energy Business, LLC (“Direct Energy”) formally submits its December 2, 2024 Integrated Resource Plan Procurement Update Compliance Filing.

The populated Resource Data Template has been provided as Attachment 1 and a crosswalk cover page has been provided as Attachment 2. The first project that appears on line two of the Resource Data Template was operational prior to August 1, 2023, and Milestone 3 documentation was provided as part of Direct Energy’s August 1, 2023 Compliance Filing. The second project appearing on lines three and four of the Resource Data Template is now operational, and Milestone 3 documentation was provided as part of the June 3, 2024 Compliance Filing. The third project appearing on line five of the Resource Data Template is not yet operational, and Milestone 1 documentation was provided as part of the June 3, 2024 Compliance Filing. All other necessary milestone documentation for these three projects has previously been provided to the Commission in earlier compliance reports, and none of those materials have been amended or modified. Additionally,

all information required pursuant to D.21-06-035, Ordering Paragraph 6, concerning zero emissions generation, generation paired with storage, and demand response resources was provided as part of Direct Energy's August 1, 2023 Compliance Filing, including the requisite engineering assessment.

In accordance with the Filing Requirements, the crosswalk cover page references all materials that have previously been submitted in this docket to meet the Milestone requirements for each of the three projects appearing on the Resource Data Template. Additionally, a zipfile folder has been uploaded to the Energy Division File Transfer Protocol that includes two subfolders containing confidential versions of all supplemental milestone materials for each of the three projects. However, as there have been no amendments or modifications to the materials that have been submitted in previous filings, these materials are not being re-submitted for purposes of this filing, and remain subject to the Motions to File Under Seal that the Commission previously granted for Direct Energy's February 1, 2023, August 1, 2023, and June 3, 2024 Compliance Filings.

Dated: December 2, 2024

Respectfully submitted,

                  /s/                    
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***Attorneys for Direct Energy Business,  
LLC***

**ATTACHMENT 1**

**DIRECT ENERGY'S INTEGRATED RESOURCE PLAN PROCUREMENT UPDATE  
RESOURCE DATA TEMPLATE**

**(PUBLIC VERSION)**

lse_unique_contract_id	resource	alternative_resource_name	contract_status	project_interconnection_position	interconnection_substation	marginal_addition	marginal_addition_to	total_nameplate_capacity	contracted_nameplate_capacity
raonly2021IRP1 energy_Clearway_1 energy_Clearway_2 RAonly_Hecate_Chiquito	FIFTHS_2_FSSBT VICPAS_2_SLOSR1 VICPAS_2_SOCSTR3 _NEW_GENERIC_BATTERY_STORAGE	FIFTH STANDARD BATTERY ARICA SOLAR ARICA SOLAR CHIQUITO GRID	Online Online Online Development	421 1302 SCE WDT1635	NA NA NA	NA NA NA		137 49.5 20 80	

lse_unique_contract_id	resource	sep_contracted_mw_nqc	contract_gwh_annual	is_hybrid_paired	can_charge_from_grid	total_generator_mw	contracted_generator_mw	total_storage_mw
raonly2021IRP1 energy_Clearway_1 energy_Clearway_2 RAonly_Hecate_Chiquito	FIFTHS_2_FSSBT VICPAS_2_SLOSR1 VICPAS_2_SOCSR3 _NEW_GENERIC_BATTERY_STORAGE			NotHybrid NotHybrid NotHybrid NotHybrid				

lse_unique_contract_id	resource	contracted_storage_mw	solar_technology_sub_type	storage_technology_sub_type	total_storage_depth_mwh	contracted_storage_depth_mwh	viability_cod_reasonableness	viability_technical_feasibility	viability_financing_sitecontrol
raonly2021IRP1 energy_Clearway_1 energy_Clearway_2 RAonly_Hecate_Chiquito	FIFTHS_2_FSSBT VICPAS_2_SLOSR1 VICPAS_2_SOCSSR3 _NEW_GENERIC_BATTERY_STORAGE		1Axis 1Axis	Li Li	548 320		4	3	3

lse_unique_contract_id	resource	resource_mix	_d1911016_vamo_ghgfre	buy_sell_own	counterparty	generator_supplier	developer_name	capacity_area	capacity_sub_area	cpuc_approval_ref	county
raonly2021IRP1 energy_Clearway_1 energy_Clearway_2 RAonly_Hecate_Chiquito	FIFTHS_2_FSSBT VICPAS_2_SLOSR1 VICPAS_2_SOCSR3 _NEW_GENERIC_BATTERY_STORAGE						RWE Clearway Clearway Hecate Grid	GreaterFresno SCE SCE SCE	Greater Fresno Coalinga No_sub_area No_sub_area No_sub_area		FresnoCounty RiversideCounty RiversideCounty RiversideCounty



lse_unique_contract_id	resource	COD_year	COD_month	COD_day	contract_start_date_year	contract_start_date_month	contract_start_date_day	contract_end_date_year	contract_end_date_month	contract_end_date_day	contract_execution_date_year
raonly2021IRP1	FIFTHS_2_FSSBT	2023	6	2	2023	7	1	2033	7	1	2022
energy_Clearway_1	VICPAS_2_SLOSR1	2024	6	1	2024	6	1	2034	12	31	2022
energy_Clearway_2	VICPAS_2_SOCSR3	2024	6	1	2024	6	1	2034	12	31	2022
RAonly_Hecate_Chiquito	_NEW_GENERIC_BATTERY_STORAGE	2026	6	1	2026	6	1	2036	5	31	2024

lse_unique_contract_id	resource	contract_execution_date_month	contract_execution_date_day	tx_upgrades	tx_upgrade_date_year	tx_upgrade_date_month	tx_upgrade_date_day	tx_upgrade_description	d2106035_procurement_cat	mtr_tranche1_NQC	mtr_tranche2_NQC
raonly2021IRP1	FIFTHS_2_FSSBT	4	28	NA					ZE_gen_paired_dr	[REDACTED]	[REDACTED]
energy_Clearway_1	VICPAS_2_SLOSR1	12	22	NA				ZE_gen_paired_dr			
energy_Clearway_2	VICPAS_2_SOCSTR3	12	22	NA				ZE_gen_paired_dr			
RAonly_Hecate_Chiquito	_NEW_GENERIC_BATTERY_STORAGE	2	13	NO				general			

lse_unique_contract_id	resource	mtr_tranche3_NQC	mtr_tranche4_NQC	mtr_tranche5_NQC	mtr_tranche6_NQC	mtr_NQC_ZE_gen_paired_dr	mtr_bridge_to	previous_COD_year	previous_COD_month	previous_COD_day	remediation_plan
raonly2021IRP1 energy_Clearway_1 energy_Clearway_2 RAonly_Hecate_Chiquito	FIFTHS_2_FSSBT VICPAS_2_SLOSR1 VICPAS_2_SOCSSR3 _NEW_GENERIC_BATTERY_STORAGE							2023 2024 2024 2026	7 6 6 6	1 1 1 1	NO NO NO NO

lse_unique_contract_id	resource	signed_contract	notice_to_proceed	public_contract	buying_energy_capacity	NQC_reporting_source	procurement_origin	csp_resource_category	csp_annual_2024	csp_annual_2026	csp_annual_2030	csp_annual_2035
raonly2021IRP1 energy_Clearway_1 energy_Clearway_2 RAonly_Hecate_Chiquito	FIFTHS_2_FSSBT VICPAS_2_SLOS1 VICPAS_2_SOC3R3 _NEW_GENERIC_BATTERY_STORAGE	YES YES YES YES	YES YES YES NO	YES YES YES NO	CapacityOnly EnergyOnly EnergyOnly CapacityOnly	In the contract In the contract In the contract In the contract	RA, D2106035, and D2302040 RPS and D2106035 RPS and D2106035 D2302040					

lse_unique_contract_id	resource	macro_supertype	notes
raonly2021IRP1 energy_Clearway_1 energy_Clearway_2 RAonly_Hecate_Chiquito	FIFTHS_2_FSSBT VICPAS_2_SLOSR1 VICPAS_2_SOCSSR3 _NEW_GENERIC_BATTERY_STORAGE	physical physical physical newgeneric	and contractually paired with Arica contract below t et DCR procurement obligation. Separated into two iet DCR procurement obligation. Separated into tw

lse_unique_contract_id	lse_selected_mtr_tranche	%_nameplate/tranche_non_hybrid	%_nameplate/tranche_hybrid_gen	%_nameplate/tranche_hybrid_storage	elcc_non_hybrid
raonly2021IRP1	DCR_tranche_2	28%			storage_2024_mtr_2
raonly2021IRP1	tranche_1	17%			storage_2023_mtr_2
raonly2021IRP1	tranche_2	32%			storage_2024_mtr_2
raonly2021IRP1	tranche_3	17%			storage_2025_mtr_2_post_nov302022
raonly2021IRP1	tranche_4	5%			storage_2026_mtr_2_post_nov302022
RAonly_Hecate_Chiquito	tranche_4	34%			storage_2026_mtr_2_post_nov302022
RAonly_Hecate_Chiquito	tranche_5	42%			storage_2027_mtr_2

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	elcc_hybrid_gen	elcc_hybrid_storage	p50_annual_mwh_he_17	p50_annual_mwh_post_he_17	round_trip_efficiency
raonly2021IRP1	DCR_tranche_2			128,079	-	80%
raonly2021IRP1	tranche_1					
raonly2021IRP1	tranche_2					
raonly2021IRP1	tranche_3					
raonly2021IRP1	tranche_4					
RAonly_Hecate_Chiquito	tranche_4					
RAonly_Hecate_Chiquito	tranche_5					

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	engineering_assessment_confirmation	contract_in_uc	uc_is_hybrid_paired	hybrid
raonly2021IRP1	DCR_tranche_2	TRUE	TRUE	NotHybrid	FALSE
raonly2021IRP1	tranche_1		TRUE	NotHybrid	FALSE
raonly2021IRP1	tranche_2		TRUE	NotHybrid	FALSE
raonly2021IRP1	tranche_3		TRUE	NotHybrid	FALSE
raonly2021IRP1	tranche_4		TRUE	NotHybrid	FALSE
RAonly_Hecate_Chiquito	tranche_4		TRUE	NotHybrid	FALSE
RAonly_Hecate_Chiquito	tranche_5		TRUE	NotHybrid	FALSE

Public Version



lse_unique_contract_id	lse_selected_mtr_tranche	uc_resource_id	resource_lookup	uc_d2106035_procurement_cat	contracted_nameplate_cap	contracted_generator_m
raonly2021IRP1	DCR_tranche_2	FIFTHS_2_FSSBT	storage	ZE_gen_paired_dr		
raonly2021IRP1	tranche_1	FIFTHS_2_FSSBT	storage	ZE_gen_paired_dr		
raonly2021IRP1	tranche_2	FIFTHS_2_FSSBT	storage	ZE_gen_paired_dr		
raonly2021IRP1	tranche_3	FIFTHS_2_FSSBT	storage	ZE_gen_paired_dr		
raonly2021IRP1	tranche_4	FIFTHS_2_FSSBT	storage	ZE_gen_paired_dr		
RAonly_Hecate_Chiquito	tranche_4	_NEW_GENERIC_BATTERY_STORAGE	storage	general		
RAonly_Hecate_Chiquito	tranche_5	_NEW_GENERIC_BATTERY_STORAGE	storage	general		

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	uc_contracted_storage_mw	uc_contracted_storage_depth_mwh	storage_duration_hrs	storage_lookup_key
raonly2021IRP1	DCR_tranche_2				
raonly2021IRP1	tranche_1				
raonly2021IRP1	tranche_2				
raonly2021IRP1	tranche_3				
raonly2021IRP1	tranche_4				
RAonly_Hecate_Chiquito	tranche_4				
RAonly_Hecate_Chiquito	tranche_5				

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	uc_contract_start_year	contract_start_mon	uc_contract_start_day	is_non_grid_charging	is_general	is_ZE_gen_paired_dr	is_applicable_to_general
raonly2021IRP1	DCR_tranche_2	2023	7	1	FALSE	FALSE	TRUE	TRUE
raonly2021IRP1	tranche_1	2023	7	1	FALSE	FALSE	TRUE	TRUE
raonly2021IRP1	tranche_2	2023	7	1	FALSE	FALSE	TRUE	TRUE
raonly2021IRP1	tranche_3	2023	7	1	FALSE	FALSE	TRUE	TRUE
raonly2021IRP1	tranche_4	2023	7	1	FALSE	FALSE	TRUE	TRUE
RAonly_Hecate_Chiquito	tranche_4	2026	6	1	FALSE	TRUE	FALSE	TRUE
RAonly_Hecate_Chiquito	tranche_5	2026	6	1	FALSE	TRUE	FALSE	TRUE

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	is_firm_ZE	is_long_duration_storage	is_ilt	contract_date	ssumed_Tranch	decision_elcc_non_hybrid	decision_elcc_hybrid_gen
raonly2021IRP1	DCR_tranche_2	FALSE	FALSE	FALSE	7/1/2023	tranche_1	mtr	0
raonly2021IRP1	tranche_1	FALSE	FALSE	FALSE	7/1/2023	tranche_1	mtr	0
raonly2021IRP1	tranche_2	FALSE	FALSE	FALSE	7/1/2023	tranche_1	mtr	0
raonly2021IRP1	tranche_3	FALSE	FALSE	FALSE	7/1/2023	tranche_1	mtr	0
raonly2021IRP1	tranche_4	FALSE	FALSE	FALSE	7/1/2023	tranche_1	mtr	0
RAonly_Hecate_Chiquito	tranche_4	FALSE	FALSE	FALSE	6/1/2026	tranche_4	mtr	0
RAonly_Hecate_Chiquito	tranche_5	FALSE	FALSE	FALSE	6/1/2026	tranche_4	mtr	0

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	decision_elcc_hybrid_storage	valid_contract_start_date	do_tranches_match?	tranche_elcc_match_non_hybrid
raonly2021IRP1	DCR_tranche_2	0	TRUE	TRUE	TRUE
raonly2021IRP1	tranche_1	0	TRUE	TRUE	TRUE
raonly2021IRP1	tranche_2	0	TRUE	TRUE	TRUE
raonly2021IRP1	tranche_3	0	TRUE	TRUE	TRUE
raonly2021IRP1	tranche_4	0	TRUE	TRUE	TRUE
RAonly_Hecate_Chiquito	tranche_4	0	TRUE	TRUE	TRUE
RAonly_Hecate_Chiquito	tranche_5	0	TRUE	TRUE	TRUE

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	tranche_elcc_match_hybrid_gen	tranche_elcc_match_hybrid_storage	mtr_heuristic_check	elcc_non_hybrid_resource
raonly2021IRP1	DCR_tranche_2	0	0	TRUE	storage
raonly2021IRP1	tranche_1	0	0	TRUE	storage
raonly2021IRP1	tranche_2	0	0	TRUE	storage
raonly2021IRP1	tranche_3	0	0	TRUE	storage
raonly2021IRP1	tranche_4	0	0	TRUE	storage
RAonly_Hecate_Chiquito	tranche_4	0	0	TRUE	storage
RAonly_Hecate_Chiquito	tranche_5	0	0	TRUE	storage

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	elcc_hybrid_gen_resource	elcc_hybrid_storage_resource	elcc_match_resource_type_non_hybrid	elcc_match_resource_type_hybrid_gen	elcc_value_nonhybrid
raonly2021IRP1	DCR_tranche_2	0	0	TRUE	0	90.70%
raonly2021IRP1	tranche_1	0	0	TRUE	0	96.30%
raonly2021IRP1	tranche_2	0	0	TRUE	0	90.70%
raonly2021IRP1	tranche_3	0	0	TRUE	0	75.10%
raonly2021IRP1	tranche_4	0	0	TRUE	0	76.60%
RAonly_Hecate_Chiquito	tranche_4	0	0	TRUE	0	76.60%
RAonly_Hecate_Chiquito	tranche_5	0	0	TRUE	0	74.00%

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lse_unique_contract_id	lse_selected_mtr_tranche	elcc_value_hybrid_gen	elcc_value_hybrid_storage	culated_nqc_non_hyblated_nqc_hybric	calculated_nqc_hybrid_storage	alculated_nqc_hybrid_total_nq	calculated_general_nqc_total
raonly2021IRP1	DCR_tranche_2	0.00%	0.00%				
raonly2021IRP1	tranche_1	0.00%	0.00%				
raonly2021IRP1	tranche_2	0.00%	0.00%				
raonly2021IRP1	tranche_3	0.00%	0.00%				
raonly2021IRP1	tranche_4	0.00%	0.00%				
RAonly_Hecate_Chiquito	tranche_4	0.00%	0.00%				
RAonly_Hecate_Chiquito	tranche_5	0.00%	0.00%				

Public Version



lse_unique_contract_id	lse_selected_mtr_tranche	calculated_llt_nqc_total	dcr_is_storage_contract	dcr_not_energy_only	dcr_5_hr_battery_size	dcr_required_energy_battery
raonly2021IRP1	DCR_tranche_2		TRUE	TRUE		
raonly2021IRP1	tranche_1		FALSE	TRUE		
raonly2021IRP1	tranche_2		FALSE	TRUE		
raonly2021IRP1	tranche_3		FALSE	TRUE		
raonly2021IRP1	tranche_4		FALSE	TRUE		
RAonly_Hecate_Chiquito	tranche_4		FALSE	TRUE		
RAonly_Hecate_Chiquito	tranche_5		FALSE	TRUE		

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	dcr_round_trip_efficiency_loss	dcr_energy_requirement	dcr_net_energy_available	dcr_noncharging_hybrid_flag	dcr_nqc_from_gen
raonly2021IRP1	DCR_tranche_2				FALSE	
raonly2021IRP1	tranche_1				FALSE	
raonly2021IRP1	tranche_2				FALSE	
raonly2021IRP1	tranche_3				FALSE	
raonly2021IRP1	tranche_4				FALSE	
RAonly_Hecate_Chiquito	tranche_4				FALSE	
RAonly_Hecate_Chiquito	tranche_5				FALSE	

Public Version

lse_unique_contract_id	lse_selected_mtr_tranche	dcr_battery_nqc	dcr_total_nqc	dcr_eligibility_test
raonly2021IRP1	DCR_tranche_2			TRUE
raonly2021IRP1	tranche_1			-
raonly2021IRP1	tranche_2			-
raonly2021IRP1	tranche_3			-
raonly2021IRP1	tranche_4			-
RAonly_Hecate_Chiquito	tranche_4			-
RAonly_Hecate_Chiquito	tranche_5			-

Public Version

		tranche_1 2023	tranche_2 2024	tranche_3 2025	tranche_4 2026	tranche_5 2027	tranche_6 2028	MTR Total All
LSE: <b>DEB</b>								
<b>ESP</b>	Obligation (Enter data in this row or select LSE)							
	Total NQC reported (non-LLT and non-DCR)							
<b>Summary of unique_contracts</b>	Total NQC reported (LLT)							
	Total NQC Entered							
	Total NQC vs Obligation							
<b>summary of mtr_nqc_validation_top</b>	Calculated NQC (general including DCR)							
	Calculated vs Total Reported NQC							
	Calculated NQC vs Obligation							
<b>Summary with Pending D.23-02-040 Compliance trades</b>	Enter values on this row:							
	Total NQC vs Proposed Obligation							
	Calculated NQC vs Proposed Obligation							
<b>Summary of LLT</b>	Calculated LLT NQC							
	Total Reported LLT NQC							
	Calculated DCR NQC							
<b>Summary of DCR NQC</b>	Total Reported DCR NQC							
	DCR portfolio net energy							

contracts (if needed, use F9 key to refresh list of contracts)	MTR Procurement Category	contracted nameplate capacity MW	contracted generator MW	contracted storage MW	hybrid	grid charging	total reported MTR DCR nqc MW (mtr_nqc_validation_tool)	contract total calculated MTR general NQC MW (mtr_nqc_validation_tool)	total reported MTR general NQC MW (unique_contracts)
raonly2021IRP1	ZE_gen_paired_dr		0	0	FALSE				
RAonly_Hecate_Chiquito	general		0	0	FALSE				

contract total calculated MTR LLT NQC MW (mtr_nqc_validation_tool)	total reported MTR LLT NQC MW (unique_contracts)	engineering_assessment_confirmation	reported nqc <= NQC tool calculated	% nameplate/tranche non hybrid	% nameplate/tranche hybrid gen	% nameplate/tranche hybrid storage
		TRUE	TRUE			
			TRUE			

**ATTACHMENT 2**

**CROSSWALK COVER PAGE**

<b>Document Name</b>	<b>LSE Unique Contract ID</b>	<b>Milestone Requirement Met and/or NP Contract Validation</b>	<b>Decision &amp; Tranche</b>	<b>Compliance Filing Date and Location</b>	<b>Location in Zipfile Provided via Energy Division File Transfer Protocol</b>
<i>DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_Confirmation Letter.pdf</i>	<i>Raonly2021IR P1</i>	<i>Milestone 1: Executed Contract, NP Contract Validation – Nameplate Value (1 of 2)</i>	<i>D.21-06-035, D.23-02-040, 2023</i>	<i>February 1, 2023, Attachment 3(a)</i>	<i>Fifth Standard Project, 1st PDF in zipfile labeled: “Fifth_2022 Confirmation Letter”.</i>
<i>DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_Notice of Exercise.pdf</i>	<i>Raonly2021IR P1</i>	<i>Milestone 1: Site Control</i>	<i>D.21-06-035, D.23-02-040, 2023</i>	<i>February 1, 2023, Attachment 3(b)</i>	<i>Fifth Standard Project, 6th PDF in zipfile labeled: “Fifth_Notice of Exercise”.</i>
<i>DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_Notice of Exercise Map Drawing.pdf</i>	<i>Raonly2021IR P1</i>	<i>Milestone 1: Site Control</i>	<i>D.21-06-035, D.23-02-040, 2023</i>	<i>February 1, 2023, Attachment 3(c)</i>	<i>Fifth Standard Project, 5th PDF in zipfile labeled: “Fifth_Notice of Exercise Map Drawing”.</i>
<i>DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_Interconnection Agreement.pdf</i>	<i>Raonly2021IR P1</i>	<i>Milestone 1: Signed Interconnection Agreement</i>	<i>D.21-06-035, D.23-02-040, 2023</i>	<i>February 1, 2023, Attachment 3(d)</i>	<i>Fifth Standard Project, 5th PDF in zipfile labeled: “Fifth_Interconnection Agreement”.</i>
<i>DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_Development Progress Report.pdf</i>	<i>Raonly2021IR P1</i>	<i>Milestones 1 and 2: Project Timeline and Current Work Status</i>	<i>D.21-06-035, D.23-02-040, 2023</i>	<i>February 1, 2023, Attachment 3(e)</i>	<i>Fifth Standard Project, 7th PDF in zipfile labeled: “Fifth_Development Progress Report”.</i>



DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_EPC Agreement.pdf	Raonly2021IR P1	Milestone 2: Notice to Proceed	D.21-06-035, D.23-02-040, 2023	February 1, 2023, Attachment 3(f)	Fifth Standard Project, 8th PDF in zipfile labeled: "Fifth_EPC Agreement".
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_April 13, 2023 Confirmation Letter.pdf	Raonly2021IR P1	Milestone 1: Executed Contract, NP Contract Validation – Nameplate Value (2 of 2)	D.21-06-035, D.23-02-040, 2023	August 1, 2023, Attachment 3(a)	Fifth Standard Project, 3rd PDF in zipfile labeled: "Fifth_2023 Confirmation Letter", NP Contract Validation at page 14 of PDF.
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_COM Notice.pdf	Raonly2021IR P1	Milestone 3: Commercial Operation	D.21-06-035, D.23-02-040, 2023	August 1, 2023, Attachment 3(b)	Fifth Standard Project, 2nd PDF in zipfile labeled: "Fifth_COM Notice".
DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXIS_Power Purchase Agreement.pdf	energy_Clearway	Milestone 1: Executed Contract, NP Contract Validation – Nameplate Value	D.21-06-035, 2024	August 1, 2023, Attachment 3(c)	Arica Project, 3rd PDF in zipfile labeled: "Arica_PPA", NP validation on page 56 of PDF.
DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXIS_Interconnection Agreement.pdf	energy_Clearway	Milestone 1: Signed Interconnection Agreement	D.21-06-035, 2024	August 1, 2023, Attachment 3(d)	Arica Project, 5th PDF in zipfile labeled: "Arica_IA".
DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXIS	energy_Clearway	Milestone 1: Site Control	D.21-06-035, 2024	August 1, 2023, Attachment 3(e)	Arica Project, 2nd PDF in zipfile labeled: "Arica_ROW".

<i>S_Right of Way.pdf</i>					
<i>DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXI S_June Monthly Report.pdf</i>	energy_Clearway	<i>Milestones 1 and 2: Project Timeline and Current Work Status</i>	<i>D.21-06-035, 2024</i>	<i>August 1, 2023, Attachment 3(f)</i>	<i>Arica Project, 1st PDF in zipfile labeled: "Arica_Timeline".</i>
<i>DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXI S_Notice to Proceed.pdf</i>	energy_Clearway	<i>Milestone 2: Notice to Proceed</i>	<i>D.21-06-035, 2024</i>	<i>August 1, 2023, Attachment 3(g)</i>	<i>Arica Project, 4th PDF in zipfile labeled: "Arica_NTP".</i>
<i>DEB_Arica Solar, LLC_VICPAS_2_SLOSRI_C OD_Sloth.pdf</i>	energy_Clearway_1	<i>Milestone 3: Commercial Operation</i>	<i>D.21-06-035, 2024</i>	<i>June 3, 2024, Attachment 3(a)</i>	<i>Arica Project, 5th PDF in zipfile labeled: "Arica_COD".</i>
<i>DEB_Arica Solar, LLC_VICPAS_2_SOCSR3_COD_Sol Catcher.pdf</i>	energy_Clearway_2	<i>Milestone 3: Commercial Operation</i>	<i>D.21-06-035, 2024</i>	<i>June 3, 2024, Attachment 3(b)</i>	<i>Arica Project, 6th PDF in zipfile labeled: "Arica_COD2".</i>
<i>DEB_Chiquito Grid, LLC_NEW_G ENERIC_BATTERY_STORAGE_RA Purchase Agreement.pdf</i>	RAonly_Hecat e_Chiquito	<i>Milestone 1: Executed Contract, Project Timeline, NP Contract Validation – Nameplate Value</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(c)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: "Chiquito_RA Purchase Agreement".</i>
<i>DEB_Chiquito Grid, LLC_NEW_G ENERIC_BATTERY_STORAGE_Ground Lease Option Agreement.pdf</i>	RAonly_Hecat e_Chiquito	<i>Milestone 1: Site Control</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(d)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: "Chiquito_Ground Lease Option Agreement".</i>

<i>DEB_Chiquito Grid, LLC_NEW_GENERIC_BATTERY_STORAGE_Lease Option Agreement – She - Xu.pdf</i>	RAonly_Hecate_Chiquito	<i>Milestone 1: Site Control</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(e)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: “Chiquito_Lease Option Agreement”.</i>
<i>DEB_Chiquito Grid, LLC_NEW_GENERIC_BATTERY_STORAGE_Lease Option Extension.pdf</i>	RAonly_Hecate_Chiquito	<i>Milestone 1: Site Control</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(f)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: “Chiquito_Lease Option Extension”.</i>
<i>DEB_Chiquito Grid, LLC_NEW_GENERIC_BATTERY_STORAGE_Interconnection Agreement.pdf</i>	RAonly_Hecate_Chiquito	<i>Milestone 1: Signed Interconnection Agreement</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(g)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: “Chiquito_Interconnection Agreement”.</i>

## VERIFICATION

I am the attorney for Direct Energy Business, LLC (“Direct Energy”) and am authorized to make this verification on its behalf. Certain Direct Energy personnel are absent from the County of San Francisco, California, where I have my office, and I make this verification for that reason. The statements in the foregoing document are true to my own knowledge, except as to matters that are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 2, 2024 at Austin, Texas.

\_\_\_\_\_/s/\_\_\_\_\_  
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