

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



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R2005003

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

R.20-05-003

**SEMI-ANNUAL MID-TERM RELIABILITY PROCUREMENT REPORT  
OF BP ENERGY RETAIL COMPANY CALIFORNIA LLC  
(FORMERLY KNOWN AS EDF INDUSTRIAL POWER SERVICES CA, LLC)**

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December 2, 2024

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In accordance with Ordering Paragraph 5 of Decision (D.) 23-02-040, BP Energy Retail Company California LLC (BPER) (f/k/a EDF Industrial Power Services CA, LLC) hereby submits this semi-annual Mid-Term Reliability (MTR) procurement report. Per the requirements set forth in D.21-06-035 and Energy Division's instructions, BPER provides the following information about its MTR procurement<sup>1</sup> in this filing:

- Appendix A: Resource Data Template
- Appendix B; Remediation Plan

Respectfully submitted,

-----/s/-----

Deborah Merrill  
President  
BP Energy Retail Company California LLC

December 2, 2024

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<sup>1</sup> BPER opted out of the requirement to self-procure its share of the procurement requirements adopted in D.19-11-016 and does not have any procurement of new resources in the Los Angeles Basin local capacity area to report.

## **VERIFICATION**

I am an officer of BP Energy Retail Company California LLC 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.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2024, in Houston, Texas.

-----/s/-----

Deborah Merrill, President  
BP Energy Retail Company California LLC

**APPENDIX A**

**RESOURCE DATA TEMPLATE**

| 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 | sep_contracted_mw_nqc | contract_gwh_annual | is_hybrid_paired |
|--------------------------|------------------------------|---------------------------|-----------------|----------------------------------|----------------------------|-------------------|----------------------|--------------------------|-------------------------------|-----------------------|---------------------|------------------|
| BPERC_RWE_FSS            | FIFTHS_2_FSSR1               | Fifth Standard Solar      | Online          |                                  | Gates Substation 230 kV    | NO                |                      | 148.8                    | 62.576                        | 4.13                  | -                   | NotHybrid        |
| BPERC_Engie_Noosa        | _NEW_GENERIC_BATTERY_STORAGE | Noosa Energy Storage LLC  | Development     | 1557                             | Ripon Substation 115kV     | NO                |                      | 280                      | 30                            | 30                    | -                   | NotHybrid        |
| EDF50003                 | FIFTHS_2_FSSR1               | Fifth Standard Solar      | Online          |                                  | Gates Substation 230 kV    | NO                |                      | 148.8                    | 0                             | 0                     | 361                 | NotHybrid        |
| BPERC_BPEC_30MW_Import_1 | BPE6_MALINS00_I_F_RA01       | unspecified RA import     | Online          |                                  | N/A                        | NO                |                      | 30                       | 30                            | 30                    | -                   | NotHybrid        |
| BPERC_BPEC_30MW_Import_2 | BPE6_MALINS00_I_F_RA01       | unspecified RA import     | Online          |                                  | N/A                        | NO                |                      | 30                       | 30                            | 30                    | -                   | NotHybrid        |
| BPERC_BPEC_30MW_Import_3 | BPE6_MALINS00_I_F_RA01       | unspecified RA import     | Online          |                                  | N/A                        | NO                |                      | 30                       | 30                            | 30                    | -                   | NotHybrid        |
| BPERC_BPEC_15MW_Import_4 | GRIFFL_2_LSPDYN              | GRIFFITH ENERGY           | Online          |                                  | N/A                        | NO                |                      | 15                       | 15                            | 15                    | -                   | NotHybrid        |
| BPERC_BPEC_50MW_Import_5 | BPE6_MALINS00_I_F_RA01       | unspecified RA import     | Online          |                                  | N/A                        | NO                |                      | 50                       | 50                            | 50                    | -                   | NotHybrid        |

|                      |                    |                         |                  |                       |                           |                             |                         |                              |                              |                                 |                                 |              |                      |
|----------------------|--------------------|-------------------------|------------------|-----------------------|---------------------------|-----------------------------|-------------------------|------------------------------|------------------------------|---------------------------------|---------------------------------|--------------|----------------------|
| can_charge_from_grid | total_generator_mw | contracted_generator_mw | total_storage_mw | 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 | resource_mix | d1911016_vamo_ghgfre |
|                      |                    |                         |                  |                       | 1Axis                     | Li                          | 280                     | 120                          | 4                            | 3                               | 5                               |              |                      |
|                      |                    |                         |                  |                       | 1Axis                     |                             |                         |                              |                              |                                 |                                 |              |                      |

| buy_sell_own | counterparty     | generator_supplier                 | developer_name             | capacity_area | capacity_sub_area      | cpuc_approval_ref | county           | 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 |
|--------------|------------------|------------------------------------|----------------------------|---------------|------------------------|-------------------|------------------|----------|-----------|---------|--------------------------|---------------------------|-------------------------|------------------------|-------------------------|-----------------------|
| Buy          | non-LSE supplier | RWE Supply & Trading Americas, LLC | RWE Solar Development, LLC | PacGE         | Greater Fresno Reedley |                   | FresnoCounty     | 2023     | 9         | 23      | 2024                     | 8                         | 1                       | 2034                   | 7                       | 31                    |
| Buy          | non-LSE supplier | Noosa Energy Storage LLC           | BROAD REACH POWER          | PacGE         | Stockton Lockeford     |                   | SanJoaquinCounty | 2025     | 5         | 1       | 2025                     | 6                         | 1                       | 2035                   | 5                       | 31                    |
| Buy          | non-LSE supplier | EDF Trading North America, LLC     | RWE Solar Development, LLC | PacGE         | Greater Fresno Reedley |                   | FresnoCounty     | 2023     | 9         | 23      | 2023                     | 1                         | 1                       | 2032                   | 12                      | 31                    |
| Buy          | non-LSE supplier | BP Energy Company                  | N/A                        |               |                        |                   |                  | 2024     | 5         | 1       | 2024                     | 5                         | 1                       | 2024                   | 5                       | 31                    |
| Buy          | non-LSE supplier | BP Energy Company                  | N/A                        |               |                        |                   |                  | 2024     | 6         | 1       | 2024                     | 6                         | 1                       | 2024                   | 6                       | 30                    |
| Buy          | non-LSE supplier | BP Energy Company                  | N/A                        |               |                        |                   |                  | 2024     | 7         | 1       | 2024                     | 7                         | 1                       | 2025                   | 9                       | 30                    |
| Buy          | non-LSE supplier | BP Energy Company                  | N/A                        |               |                        |                   |                  | 2024     | 10        | 1       | 2024                     | 10                        | 1                       | 2024                   | 4                       | 30                    |
| Buy          | non-LSE supplier | BP Energy Company                  | N/A                        |               |                        |                   |                  | 2025     | 5         | 1       | 2025                     | 5                         | 1                       | 2025                   | 10                      | 31                    |

| contract_execution_date_year | 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 | mtr_tranche3_NQC | mtr_tranche4_NQC | mtr_tranche5_NQC | mtr_tranche6_NQC | mtr_NQC_ZE_gen_paired_dr | mtr_bridge_to     |
|------------------------------|-------------------------------|-----------------------------|-------------|----------------------|-----------------------|---------------------|------------------------|----------------------------|------------------|------------------|------------------|------------------|------------------|------------------|--------------------------|-------------------|
| 2024                         | 4                             | 19                          |             |                      |                       |                     |                        | general                    |                  | 4.13             |                  |                  |                  |                  |                          |                   |
| NA                           | NA                            | NA                          |             |                      |                       |                     |                        | general & ZE_gen_paired_dr | 5                | 9.87             | 4                | 3.36             |                  |                  | 6                        |                   |
| 2022                         | 2                             | 27                          |             |                      |                       |                     |                        | ZE_gen_paired_dr           |                  |                  |                  |                  |                  |                  |                          |                   |
| 2023                         | 11                            | 16                          |             |                      |                       |                     |                        | general                    | 5                |                  |                  |                  |                  |                  |                          | BPERC_Engie_Noosa |
| 2023                         | 11                            | 16                          |             |                      |                       |                     |                        | general                    | 5                | 9.87             |                  |                  |                  |                  |                          | BPERC_Engie_Noosa |
| 2023                         | 11                            | 14                          |             |                      |                       |                     |                        | general                    | 5                | 9.87             |                  |                  |                  |                  |                          | BPERC_Engie_Noosa |
| 2023                         | 11                            | 16                          |             |                      |                       |                     |                        | general                    | 5                | 9.87             |                  |                  |                  |                  |                          | BPERC_Engie_Noosa |
| 2024                         | 2                             | 9                           |             |                      |                       |                     |                        | general                    | 5                | 9.87             | 4                |                  |                  |                  |                          | BPERC_Engie_Noosa |



| lse_unique_contract_id | lse_selected_mtr_tranche | %_nameplate/tranche_non_hybrid | %_nameplate/tranche_hybrid_gen | %_nameplate/tranche_hybrid_storage | elcc_non_hybrid                   | elcc_hybrid_gen | elcc_hybrid_storage | p50_annual_mwh_he_17 | p50_annual_mwh_post_he_17 | round_trip_efficiency | engineering_assessment_confirmation | contract_in_uc |
|------------------------|--------------------------|--------------------------------|--------------------------------|------------------------------------|-----------------------------------|-----------------|---------------------|----------------------|---------------------------|-----------------------|-------------------------------------|----------------|
| BPERC_RWE_FSS          | tranche_2                | 100%                           |                                |                                    | solar_2024_mtr_2                  |                 |                     |                      |                           |                       |                                     | TRUE           |
| BPERC_Engie_Noosa      | tranche_1                | 22%                            |                                |                                    | storage_2025_mtr_2_post_nov302022 |                 |                     |                      |                           |                       |                                     | TRUE           |
| BPERC_Engie_Noosa      | DCR_tranche_2            | 44%                            |                                |                                    | storage_2025_mtr_2_post_nov302022 |                 |                     |                      | 80%                       |                       | FALSE                               | TRUE           |
| BPERC_Engie_Noosa      | DCR_tranche_3            | 18%                            |                                |                                    | storage_2025_mtr_2_post_nov302022 |                 |                     |                      | 80%                       |                       | FALSE                               | TRUE           |
| BPERC_Engie_Noosa      | tranche_4                | 15%                            |                                |                                    | storage_2025_mtr_2_post_nov302022 |                 |                     |                      |                           |                       |                                     | TRUE           |
| EDF50003               | dcr_tranche_2            |                                |                                |                                    |                                   |                 |                     | 431,363              | 2,987                     |                       |                                     | TRUE           |
| EDF50003               | dcr_tranche_3            |                                |                                |                                    |                                   |                 |                     | 431,363              | 2,987                     |                       |                                     | TRUE           |

| uc_is_hybrid_paired | hybrid | uc_resource_id              | resource_lookup | uc_d2106035_procurement_cat | onctracted_nameplate_capc_contracted_generator_m | uc_contracted_storage_mw | uc_contracted_storage_depth_mwh | storage_duration_hrs | storage_lookup_key                    | uc_contract_start_year | :_contract_start_mon |
|---------------------|--------|-----------------------------|-----------------|-----------------------------|--------------------------------------------------|--------------------------|---------------------------------|----------------------|---------------------------------------|------------------------|----------------------|
| NotHybrid           | FALSE  | FIFTHS_2_FSSR1              | solar           | general                     | 62.576                                           | 0                        | 0                               | 0.0                  |                                       | 2024                   | 8                    |
| NotHybrid           | FALSE  | NEW_GENERIC_BATTERY_STORAGE | storage         | general_&_ZE_gen_paired_dr  | 6.74763                                          | 0                        | 26.99052                        | 4.0                  | 4hr_storage_2025_mtr_2_post_nov302022 | 2025                   | 6                    |
| NotHybrid           | FALSE  | NEW_GENERIC_BATTERY_STORAGE | storage         | general_&_ZE_gen_paired_dr  | 13.31985                                         | 0                        | 53.2794                         | 4.0                  | 4hr_storage_2025_mtr_2_post_nov302022 | 2025                   | 6                    |
| NotHybrid           | FALSE  | NEW_GENERIC_BATTERY_STORAGE | storage         | general_&_ZE_gen_paired_dr  | 5.39811                                          | 0                        | 21.59244                        | 4.0                  | 4hr_storage_2025_mtr_2_post_nov302022 | 2025                   | 6                    |
| NotHybrid           | FALSE  | NEW_GENERIC_BATTERY_STORAGE | storage         | general_&_ZE_gen_paired_dr  | 4.53441                                          | 0                        | 18.13764                        | 4.0                  | 4hr_storage_2025_mtr_2_post_nov302022 | 2025                   | 6                    |
| NotHybrid           | FALSE  | FIFTHS_2_FSSR1              | solar           | ZE_gen_paired_dr            | 0                                                | 0                        | 0                               | 0.0                  |                                       | 2023                   | 1                    |
| NotHybrid           | FALSE  | FIFTHS_2_FSSR1              | solar           | ZE_gen_paired_dr            | 0                                                | 0                        | 0                               | 0.0                  |                                       | 2023                   | 1                    |

| uc_contract_start_day | is_non_grid_charging | is_general | is_ZE_gen_paired_dr | is_applicable_to_general | is_firm_ZE | is_long_duration_storage | is_ilt | contract_date | assumed_Tranch | decision_elcc_non_hybrid | decision_elcc_hybrid_gen | decision_elcc_hybrid_storage | valid_contract_start_date | do_tranches_match? | tranche_elcc_match_non_hybrid |
|-----------------------|----------------------|------------|---------------------|--------------------------|------------|--------------------------|--------|---------------|----------------|--------------------------|--------------------------|------------------------------|---------------------------|--------------------|-------------------------------|
| 1                     | FALSE                | TRUE       | FALSE               | TRUE                     | FALSE      | FALSE                    | FALSE  | 8/1/2024      | tranche_3      | mtr                      | 0                        | 0                            | TRUE                      | FALSE              | TRUE                          |
| 1                     | FALSE                | FALSE      | FALSE               | FALSE                    | FALSE      | FALSE                    | FALSE  | 6/1/2025      | tranche_3      | mtr                      | 0                        | 0                            | TRUE                      | FALSE              | FALSE                         |
| 1                     | FALSE                | FALSE      | FALSE               | FALSE                    | FALSE      | FALSE                    | FALSE  | 6/1/2025      | tranche_3      | mtr                      | 0                        | 0                            | TRUE                      | FALSE              | FALSE                         |
| 1                     | FALSE                | FALSE      | FALSE               | FALSE                    | FALSE      | FALSE                    | FALSE  | 6/1/2025      | tranche_3      | mtr                      | 0                        | 0                            | TRUE                      | TRUE               | TRUE                          |
| 1                     | FALSE                | FALSE      | FALSE               | FALSE                    | FALSE      | FALSE                    | FALSE  | 6/1/2025      | tranche_3      | mtr                      | 0                        | 0                            | TRUE                      | TRUE               | FALSE                         |
| 1                     | FALSE                | FALSE      | TRUE                | TRUE                     | FALSE      | FALSE                    | FALSE  | 1/1/2023      | tranche_1      | #N/A                     | 0                        | 0                            | TRUE                      | TRUE               | #N/A                          |
| 1                     | FALSE                | FALSE      | TRUE                | TRUE                     | FALSE      | FALSE                    | FALSE  | 1/1/2023      | tranche_1      | #N/A                     | 0                        | 0                            | TRUE                      | TRUE               | #N/A                          |

| tranche_elcc_match_hybrid_gen | tranche_elcc_match_hybrid_storage | mtv_heuristic_check | elcc_non_hybrid_resource | elcc_hybrid_gen_resource | elcc_hybrid_storage_resource | elcc_match_resource_type_non_hybrid | elcc_match_resource_type_hybrid_gen | elcc_value_nonhybrid | elcc_value_hybrid_gen | elcc_value_hybrid_storage | lculated_nqc_non_hyblated_nqc_hybrid | calculated_nqc_hybrid_storage |
|-------------------------------|-----------------------------------|---------------------|--------------------------|--------------------------|------------------------------|-------------------------------------|-------------------------------------|----------------------|-----------------------|---------------------------|--------------------------------------|-------------------------------|
| 0                             | 0                                 | TRUE                | solar                    | 0                        | 0                            | TRUE                                | 0                                   | 6.60%                | 0.00%                 | 0.00%                     | 4.1                                  | 0.0                           |
| 0                             | 0                                 | TRUE                | storage                  | 0                        | 0                            | TRUE                                | 0                                   | 75.10%               | 0.00%                 | 0.00%                     | 0.0                                  | 0.0                           |
| 0                             | 0                                 | TRUE                | storage                  | 0                        | 0                            | TRUE                                | 0                                   | 75.10%               | 0.00%                 | 0.00%                     | 0.0                                  | 0.0                           |
| 0                             | 0                                 | TRUE                | storage                  | 0                        | 0                            | TRUE                                | 0                                   | 75.10%               | 0.00%                 | 0.00%                     | 0.0                                  | 0.0                           |
| 0                             | 0                                 | TRUE                | storage                  | 0                        | 0                            | TRUE                                | 0                                   | 75.10%               | 0.00%                 | 0.00%                     | 0.0                                  | 0.0                           |
| 0                             | 0                                 | TRUE                | #N/A                     | 0                        | 0                            | #N/A                                | 0                                   | #N/A                 | 0.00%                 | 0.00%                     | 0.0                                  | 0.0                           |
| 0                             | 0                                 | TRUE                | #N/A                     | 0                        | 0                            | #N/A                                | 0                                   | #N/A                 | 0.00%                 | 0.00%                     | 0.0                                  | 0.0                           |

| calculated_nqc_hybrid_total_nq | calculated_general_nqc_total | calculated_lit_nqc_total | dcr_is_storage_contract | dcr_not_energy_only | dcr_5_hr_battery_size | dcr_required_energy_battery | dcr_round_trip_efficiency_loss | dcr_energy_requirement | dcr_net_energy_available | dcr_noncharging_hybrid_flag | dcr_nqc_from_gen | dcr_battery_nqc | dcr_total_nqc | dcr_eligibility_test |
|--------------------------------|------------------------------|--------------------------|-------------------------|---------------------|-----------------------|-----------------------------|--------------------------------|------------------------|--------------------------|-----------------------------|------------------|-----------------|---------------|----------------------|
| 0.0                            | 4.1                          | 0.0                      | FALSE                   | TRUE                | -                     | -                           | -                              | -                      | -                        | FALSE                       | -                | -               | -             | -                    |
| 0.0                            | 0.0                          | 0.0                      | FALSE                   | TRUE                | -                     | -                           | -                              | -                      | -                        | FALSE                       | -                | -               | -             | -                    |
| 0.0                            | 0.0                          | 0.0                      | FALSE                   | TRUE                | -                     | -                           | -                              | -                      | -                        | FALSE                       | -                | -               | -             | -                    |
| 0.0                            | 0.0                          | 0.0                      | FALSE                   | TRUE                | -                     | -                           | -                              | -                      | -                        | FALSE                       | -                | -               | -             | -                    |
| 0.0                            | 0.0                          | 0.0                      | FALSE                   | TRUE                | -                     | -                           | -                              | -                      | -                        | FALSE                       | -                | -               | -             | -                    |
| 0.0                            | 0.0                          | 0.0                      | FALSE                   | TRUE                | -                     | -                           | -                              | -                      | 431,363                  | FALSE                       | -                | -               | -             | -                    |
| 0.0                            | 0.0                          | 0.0                      | FALSE                   | TRUE                | -                     | -                           | -                              | -                      | 431,363                  | FALSE                       | -                | -               | -             | -                    |

|                                                    |                                          | tranche_1 | tranche_2 | tranche_3 | tranche_4 | tranche_5 |
|----------------------------------------------------|------------------------------------------|-----------|-----------|-----------|-----------|-----------|
|                                                    |                                          | 2023      | 2024      | 2025      | 2026      | 2027      |
| LSE:                                               |                                          |           |           |           |           |           |
|                                                    |                                          |           |           |           |           |           |
| Summary of unique_contracts                        | Total NQC reported (non-LLT and non-DCR) | 30        | 53        | 8         | 3         | -         |
|                                                    | Total NQC reported (LLT)                 | -         | -         | -         | -         | -         |
|                                                    | Total NQC Entered                        | 30        | 53        | 8         | 3         | -         |
|                                                    | Total NQC vs Obligation                  | 30        | 53        | 8         | 3         | -         |
| Summary of mtr_NQC_validation_tool                 | Calculated NQC (general including DCR)   | -         | 4         | -         | -         | -         |
|                                                    | Calculated vs Total Reported NQC         | 30        | 49        | 8         | 3         | -         |
|                                                    | Calculated NQC vs Obligation             | -         | 4         | -         | -         | -         |
|                                                    | Enter values on this row:                |           |           |           |           |           |
| Summary with Pending D.23-02-040 Compliance trades | Total NQC vs Proposed Obligation         | 30        | 53        | 8         | 3         | -         |
|                                                    | Calculated NQC vs Proposed Obligation    | -         | 4         | -         | -         | -         |
|                                                    | Calculated LLT NQC                       | -         | -         | -         | -         | -         |
|                                                    | Total Reported LLT NQC                   | -         | -         | -         | -         | -         |
| Summary of LLT                                     | Calculated DCR NQC                       | -         | -         | -         | -         | -         |
|                                                    | Total Reported DCR NQC                   |           |           | 6         |           |           |
|                                                    |                                          |           |           |           |           |           |
|                                                    | DCR portfolio net energy                 | 862,727   |           |           |           |           |

| contracts<br>(if needed, use F9 key to<br>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<br>(mtr_nqc_validation_tool) |
|----------------------------------------------------------------------|----------------------------|----------------------------------|-------------------------|-----------------------|--------|---------------|------------------------------------------------------------|
| EDF50003                                                             | ZE_gen_paired_dr           | 0                                | 0                       | 0                     | FALSE  |               |                                                            |
| BPERC_RWE_FSS                                                        | general                    | 62.576                           | 0                       | 0                     | FALSE  |               |                                                            |
| BPERC_Engie_Noosa                                                    | general_&_ZE_gen_paired_dr | 30                               | 0                       | 0                     | FALSE  |               |                                                            |

| tranche_6<br>2028 | MTR Total<br>All |
|-------------------|------------------|
|                   | -                |
| -                 | 95               |
| -                 | -                |
| -                 | 95               |
| -                 | 95               |
| -                 | 4                |
| -                 | 91               |
| -                 | 4                |
|                   |                  |
| -                 | 95               |
| -                 | 4                |
| -                 |                  |
| -                 |                  |
|                   | -                |
|                   | 6                |

| contract total calculated<br>MTR general NQC MW<br>(mtr_nqc_validation_tool) | total reported MTR general NQC MW<br>(unique_contracts) | contract total calculated MTR LLT NQC<br>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<br>gen | % nameplate/tranche<br>hybrid storage |
|------------------------------------------------------------------------------|---------------------------------------------------------|-----------------------------------------------------------------------|--------------------------------------------------|-------------------------------------|-------------------------------------|--------------------------------|-----------------------------------|---------------------------------------|
| 4.1                                                                          | 4.1                                                     |                                                                       |                                                  |                                     | TRUE                                | 100%                           |                                   |                                       |
|                                                                              | 44.5                                                    |                                                                       |                                                  |                                     | FALSE                               | 100%                           |                                   |                                       |

**APPENDIX B**

**REMEDIATION PLAN**

## BP Energy Retail Company California LLC Remediation Plan

In accordance with Energy Division's request, BP Energy Retail Company California LLC (BPERC), formerly known as EDF Industrial power Services (CA), LLC, hereby provides the following information regarding the status of BPERC's procurement efforts to meet the Mid-Term Reliability (MTR) requirements established pursuant to Decision (D.) 21-06-035.

### Overview

BPERC's MTR requirements, and the status of its procurement efforts with respect to those requirements, are as follows:

| Category    | Tranche 1 (2023)           | Tranche 2 (2024) | Tranche 3 (2025)           | Zero-Emitting              | Long Lead Time |
|-------------|----------------------------|------------------|----------------------------|----------------------------|----------------|
| Requirement | 5 MW                       | 14 MW            | 4 MW                       | 6 MW                       | 5 MW           |
| Status      | Contract pending execution | Partial          | Contract pending execution | Contract pending execution | In process     |

However, as discussed below, BPERC has executed bridging agreement that cover its Tranche 1, Tranche 2 and, if necessary, Tranche 3 requirements through October 2025 (except for ~1.5 MW of BPERC's Tranche 2 requirements, which are currently not covered for the October 2024-April 2025 period).

### Tranche 1

Although BPERC conducted a solicitation and vigorously pursued several bilateral contracting opportunities, BPERC was unable to execute a contract that would have fulfilled its Tranche 1 procurement requirements. BPERC plans to cover its Tranche 1 requirements with the Engie/Noosa contract and the bridging agreements discussed below, with the bridging agreements covering the period from May 1, 2024 through the expected commercial online date of the Noosa energy storage facility (i.e., May 1, 2025) and extending through October 31, 2025 (thereby providing additional bridging for Tranche 1 requirements, in the event that the Engie/Noosa energy storage facility does not achieve commercial operation by May 1, 2025). However, BPERC did not have any bridging arrangements for its Tranche 1 requirements in place during the period from August 1, 2023 through April 30, 2024.

### Tranche 2

On June 6, 2024, BPERC executed a contract with RWE Supply & Trading Americas, LLC (RWE), which confirms a transaction agreed on April 19, 2024, for 4.13 MW of IRP Compliance Attributes from the Fifth Standard Solar (CAISO ID: FIFTHS\_2\_FSSR1) for

the ten-year period starting on August 1, 2024 and ending on July 31, 2034.<sup>1</sup> Fifth Standard Solar achieved commercial operation on September 29, 2023.<sup>2</sup>

In addition, BPERC has successfully negotiated a contract with Broad Reach Power (which was recently acquired by Engie) for resource adequacy (RA) capacity from the Noosa Energy Storage facility.<sup>3</sup> The Noosa facility has an expected commercial online date of May 1, 2025.<sup>4</sup> The Engie/Noosa provides for delivery of 30 MW of RA capacity for the ten-year period starting on June 1, 2025 and ending on May 31, 2035,<sup>5</sup> which equates to 30 MW of nameplate capacity (as stated in the contract) and translates into 22.53 MW of MTR compliance attributes.

Execution of the Noosa contract is expected to occur within the next two weeks. Assuming the Noosa facility comes online as planned, BPERC will be able to cover its Tranche 2 requirements with the Engie/Noosa contract, with the period between June 1, 2024 and the Engie/Noosa facility's COD being covered by bridging agreements, as discussed below.

### **Tranche 3**

Assuming the aforesaid Engie/Noosa contract is executed as planned and the Noosa energy storage facility comes online by May 1, 2025, it will cover BPERC's Tranche 3 requirements. (The bridging agreement discussed below will cover BPERC's Tranche 3 requirements through October 31, 2025, in the event that the Engie/Noosa energy storage facility does not achieve commercial operation by May 1, 2025).

### **Zero-Emitting**

BPERC also plans to use the Engie/Noosa contract, paired with its long-term RPS contract with Fifth Standard Solar,<sup>6</sup> to fulfill its Diablo Canyon replacement requirements. (The Fifth Standard Solar contract provides for annual deliveries of 425,000 MWh through December 31, 2032. As previously discussed with Commission staff, BPERC will either secure an amendment to the Fifth Standard Solar contract or execute a second contract for energy deliveries from an otherwise eligible RPS-certified facility to provide the requisite energy deliveries for the final year of the Engie/Noosie contract.)

### **Long-Lead Time**

BPERC has not yet executed any contracts that would fulfill its long-lead time requirements but plans to issue another solicitation for same in 2025.

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<sup>1</sup> Contract ID: BPERC\_RWE\_FSS.

<sup>2</sup> Documentation on record.

<sup>3</sup> Contract ID: BPERC\_Engie\_Noosa.

<sup>4</sup> Documentation on record.

<sup>5</sup> Contract ID: BPERC\_BPEC\_30MW\_Import\_1.

<sup>6</sup> Contract ID: EDF50003.

## Bridging Resources

To date, BPERC has executed five bridging agreements.

The first bridge agreement, executed on November 16, 2023, is an RA contract for 30 MW of firm non-resource-specific imports for May 2024.<sup>7</sup> This bridge resource covers BPERC's Tranche 1 requirements for May 2024.

The second bridge agreement, executed on November 21, 2023, is an RA contract for 30 MW of firm non-resource-specific imports for June 2024.<sup>8</sup> This bridge resource covers BPERC's Tranche 1 and residual Tranche 2 requirements for June 2024.

The third bridge agreement, executed on November 14, 2023, is an RA contract for 30 MW of firm non-resource-specific imports for the period starting on July 1, 2024 and ending on September 30, 2024.<sup>9</sup> This bridge resource covers BPERC's Tranche 1 and Tranche 2 requirements for the July-September 2024 period.

The fourth bridge agreement, executed on November 16, 2023, is an RA contract for 15 MW of firm imports from a specified resource (GRIFFI\_2\_LSPDYN) for the period starting on October 1, 2024 and ending on April 30, 2025.<sup>10</sup> This bridge resource covers BPERC's Tranche 1 and Tranche 2 requirements for the October 2024-April 2025 period.

The fifth bridge agreement, executed on November 16, 2023, is an RA contract for 50 MW of firm non-resource specific imports for the period starting on May 1, 2025 and ending on October 31, 2025.<sup>11</sup> This bridge resource covers BPERC's Tranche 1, Tranche 2 and, if necessary, Tranche 3 requirements for the May-October 2025 period.

In summary, the aforesaid bridge resources cover BPERC's Tranche 1, Tranche 2 and, if necessary, Tranche 3 requirements for the May 2024-October 2025 period.

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<sup>7</sup> Contract ID: BPERC\_BPEC\_30MW\_Import\_1.

<sup>8</sup> Contract ID: BPERC\_BPEC\_30MW\_Import\_2.

<sup>9</sup> Contract ID: BPERC\_BPEC\_30MW\_Import\_3.

<sup>10</sup> Contract ID: BPERC\_BPEC\_15MW\_Import\_4.

<sup>11</sup> Contract ID: BPERC\_BPEC\_50MW\_Import\_5.