BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue Electric Integrated Resource Planning and Related Procurement Processes.	Rulemaking 20-05-003

JOINT PROPOSAL OF AMERICAN CLEAN POWER – CALIFORNIA, SOLAR ENERGY INDUSTRIES ASSOCIATION, LARGE-SCALE SOLAR ASSOCIATION, AND INDEPENDENT ENERGY PRODUCERS ASSOCIATION TO ESTABLISH A NEAR-TERM NEEDS TRACK TO INITIATE AN EXPEDITED NEAR-TERM PROCUREMENT ORDER

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In accordance with the April 29, 2025 *Administrative Law Judge's Ruling Seeking Comments on Reliable and Clean Power Procurement Program Staff Proposal*, the May 15, 2025 *Email Ruling Granting Request For Extension of Time*, and the June 16, 2025 *Email Ruling in Response to Motion For Clarification of Alliance For Retail Energy Markets*, all issued by Administrative Law Judge Julie A. Fitch, American Clean Power – California ("ACP-California"),[1] the Solar Energy Industries Association ("SEIA"),[2] the Large-Scale Solar Association ("LSA"), and the Independent Energy Producers Association ("IEP") (the "Joint Parties") submit the following proposal to establish a Near-Term Procurement Track within the Integrated Resource Planning ("IRP") proceeding to develop a technical assessment of resource

[1] The American Clean Power Association ("ACP") is the voice of companies from across the clean power sector that are providing cost-effective solutions to the climate crisis while creating jobs, spurring massive investment in the American economy, and driving high tech innovation across the United States. ACP's mission is to transform the U.S. power grid to a low-cost, reliable, and renewable power system. ACP-California is a state project of ACP, representing companies who develop, own, and operate utility-scale solar, storage, land-based wind, offshore wind, enhanced geothermal, conventional geothermal, and transmission assets to power a clean and renewable economy for California and the West.

[2] SEIA is the national trade association of the U.S. solar industry.

needs for the 2028-2032 timeframe and initiate commensurate procurement action in parallel with the development of the Reliable and Clean Power Procurement Program ("RCPPP").[3]

Specifically, Joint Parties ask the California Public Utilities Commission ("Commission" or "CPUC") to develop a procurement order to address resource needs in the 2028-2032 timeframe. Starting in 2028, there are no longer Mid-Term Reliability ("MTR") requirements and yet the California Energy Commission ("CEC") forecasts substantial incremental load growth beyond what has been studied in past IRP planning cycles. There are resources available in Cluster 14, outside of the California Independent System Operator ("CAISO"), and potentially prior CAISO queue-clusters, but the Commission must act quickly to ensure that these projects can proceed to interconnection in a timely manner and still retain the opportunity for many projects to qualify for Investment Tax Credits ("ITC") or Production Tax Credits ("PTC") under new federal rules.

Joint Parties propose an expedited timeline driven by the limited development window through 2028 and the need for clearer direction on load-serving entity ("LSE") procurement than what is contemplated in existing IRP scenarios, the Renewables Portfolio Standard ("RPS"), and the short-term Resource Adequacy ("RA") requirements. Specifically, Joint Parties ask the Commission to initiate a near-term needs order for 2028-2032 by September 2025, based on least-regrets needs identified by parties. While a more robust and extended timeframe would be beneficial for a needs assessment under less exigent circumstances, the urgent need to move procurement forward to address fast-approaching load growth and deliverability deadlines merits immediate action flowing from directional analyses submitted in this proceeding.

[3] Pursuant to the Commission's Rules of Practice and Procedure, Rule 1.8(d), ACP-California has been authorized to file this Joint Proposal on behalf of SEIA, LSA, and IEP.

As discussed in comments below, a low-end estimate of the reliability gap in the 2028-2032 timeframe is approximately 5 gigawatts ("GW") of effective capacity, 4 GW of which are expected to materialize by 2030, as well as the associated need for clean energy resources to support storage additions and decarbonization needs. The Commission has substantial precedent in ordering procurement based on directional assessments of need in prior IRP Procurement Track orders.[4] While future structured procurement under RCPPP should be tethered to robust probabilistic analysis, current circumstances merit prompt action to pursue least regrets procurement for upcoming needs.

The Commission should leverage existing procurement constructs in order to expedite the issuance and implementation of the proposed procurement order. Specifically, Joint Parties recommend utilization of the existing MTR procurement constructs, including the pro rata allocation methodology, milestones, contract terms, and other key features to ensure new build resources are developed in a timely and orderly fashion. However, in recognition of the evolving reliability dynamics – specifically a need for energy sufficiency and RECs – it may be necessary to incorporate specific attributes beyond generic qualifying capacity. This would be consistent with prior MTR orders, and can be analyzed using the Slice of Day accounting methodology, focused on the identified need. For clean energy needs, the Joint Parties recommend specifying the procurement of RPS-eligible energy to ensure LSEs procure new clean energy resources to meet the near-term need. Procuring incremental clean energy is necessary to remain on track to achieve the emissions reduction goals identified in prior IRP analyses.

[4] See, e.g., D.19-11-016, D.21-06-035, and D.23-02-040.

OVERVIEW OF NEED FOR NEAR-TERM PROCUREMENT ACTION

While formal analysis is ongoing, there are several clear indications that there will be substantial resource needs in the late 2020s and early 2030s which are not covered by existing procurement orders. While some voluntary procurement above and beyond existing procurement orders may be occurring, recently reported tracking data does not indicate excess procurement beyond existing procurement orders.[5] One issue is that LSEs lack clarity on future needs and some have concerns that incremental procurement may be ineligible or would be discounted by a future procurement framework. While these concerns reflect real uncertainties, they also highlight the urgent need for a binding procurement order from the Commission to drive the market to address the significant needs on the horizon.

There are several indicators of under-procurement risk. Chief among these is the 2024 Integrated Energy Policy Report ("IEPR") demand forecast, which includes approximately 5 GW of additional peak load by 2032 (4 GW by 2030) relative to the prior, 2023 IEPR forecast. See Figure A below.

[5] CPUC May 2025 Resource Tracking Data, Slide 15.

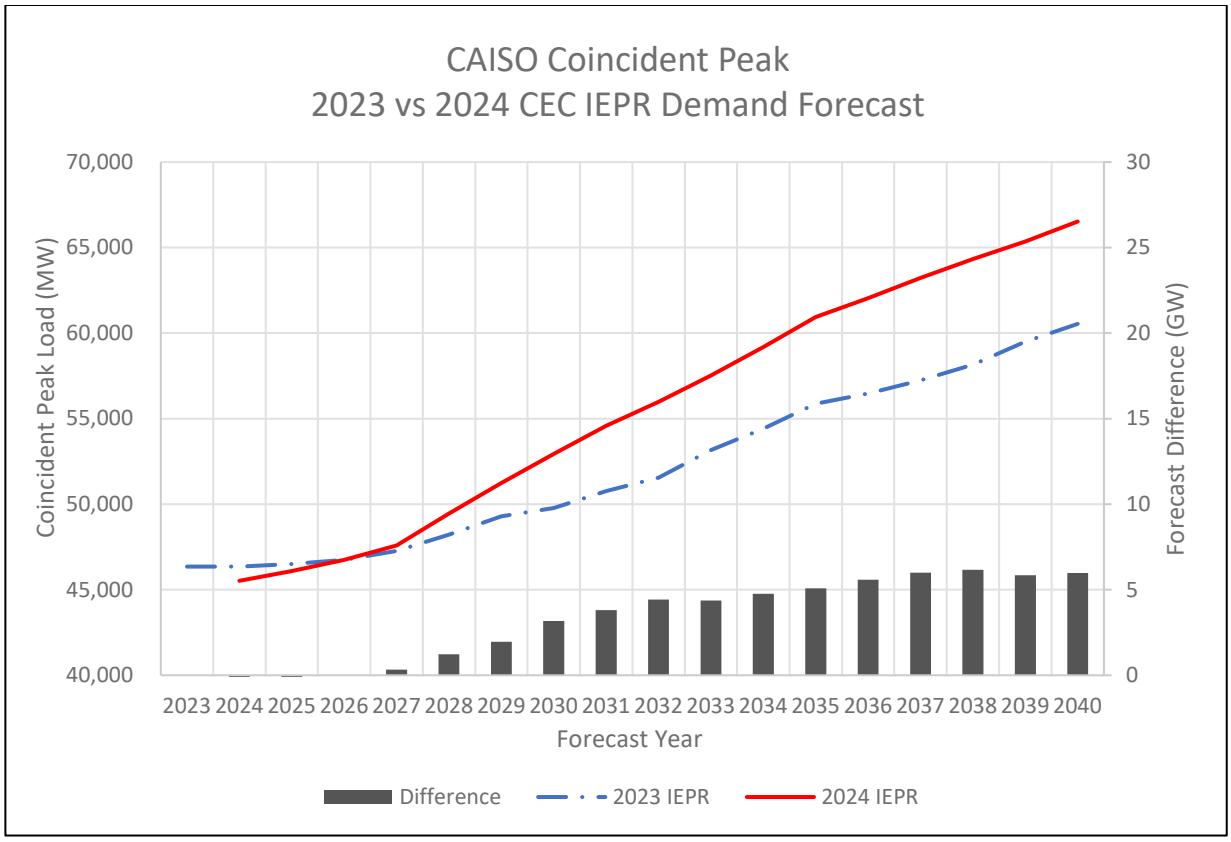

Figure A: Incremental Load Growth from 2023 to 2024 IEPR Forecast

This incremental load has not been analyzed in IRP modeling, and falls beyond the bounds of any existing procurement track order. However, this new demand may be incremental to existing procurement gaps, as recent analyses conducted on the lower 2023 and 2022 IEPR demand forecasts, such as the 2025-2026 Transmission Planning Process ("TPP") portfolios and the 2022-2023 IRP Preferred System Plan ("PSP"), each identified incremental resource needs in the late 2020s relative to LSEs' indicated procurement plans and minimum RPS percentages.

Compounding the need for near-term procurement, resource development timelines remain extended with timeline bottlenecks in the deliverability study and interconnection processes. 2028-2032 resource needs will fall largely on resources in Cluster 14 and new resources located outside of CAISO. While there is ample energy and storage capacity in Cluster 14 and outside of CAISO,

there are significant and fast-approaching development timeline concerns which risk significantly limiting resource availability for meeting near-term needs in the 2028-2030 timeframe.

The deadlines for Cluster 14 in the CAISO's Transmission Plan Deliverability ("TPD") allocation processes risk eliminating substantial capacity from obtaining deliverability, unless procurement is initiated in the very near future. Following revisions to the Cluster 14 study process through the Interconnection Process Enhancements ("IPE") stakeholder initiative, uncontracted resources face significant risk and delay if they are not able to obtain an executed power purchase agreement ("PPA") by March 2027, regardless of whether they may be necessary to meet system-level needs. In order to ensure Cluster 14 resources have a chance at securing deliverability, and providing resources to meet system needs, near-term procurement direction is required, as solicitations and PPA negotiations, even when expedited, will take a substantial portion of the remaining development window.

In parallel with the development of a procurement order, the Commission should investigate supporting policy changes with the CAISO and within adjacent proceedings, specifically the RA proceeding. Joint Parties are also actively working with CAISO, and through ongoing CAISO initiatives, to ensure that opportunities for Cluster 14 projects remain viable for a potential near-term procurement action and to evaluate whether any process or timeline adjustments may be necessary and feasible. Similarly, the Commission should act to remove barriers to the development of energy generating resources within the RA program for use to meet LSE charging sufficiency requirements, a requirement which is likely to be one of the chief constraints moving into the 2028-2032 timeframe. These parallel actions are discussed further in Section IV below.

To address near-term needs, the Commission should immediately initiate a needs assessment in preparation for a procurement order to be issued as soon as is practicable. The needs assessment should include updated minimum portfolio requirements determined through IRP analysis utilizing the RESOLVE/SERVM modeling ecosystem and updated to reflect the latest IEPR load forecast. A robust needs assessment will identify the magnitude and characteristics of potential reliability and clean energy gaps and create optionality for the Commission to implement a procurement order based on its findings. If a robust analysis is not feasible in the necessary timeframe, Energy Division should focus on existing analysis in the record or the development of a more expedient analysis identifying the magnitude and characteristics of the near-term need, using a stack analysis or similar approach.

I. Assessing Resource Need

There are several analyses and datapoints which suggest the existence of a resource gap through 2028. As noted above, these include the 2025-2026 TPP portfolio and 2022-2023 IRP Preferred System Plan, both of which identified incremental resource needs in this timeframe, as well as clean energy needs exceeding the RPS minimums. Figure B below is based on the 2025-2026 TPP portfolio and 2023 IEPR load forecast, and shows that starting in 2030 there are resource needs above what are in LSE resource plans While these analyses provide useful assessments of minimum need, the true need is likely considerably higher when considering the 2024 IEPR load forecast, which forecasts a need to serve an additional 5 gigawatts of peak load by 2032, compared to the 2023 IEPR load forecast.

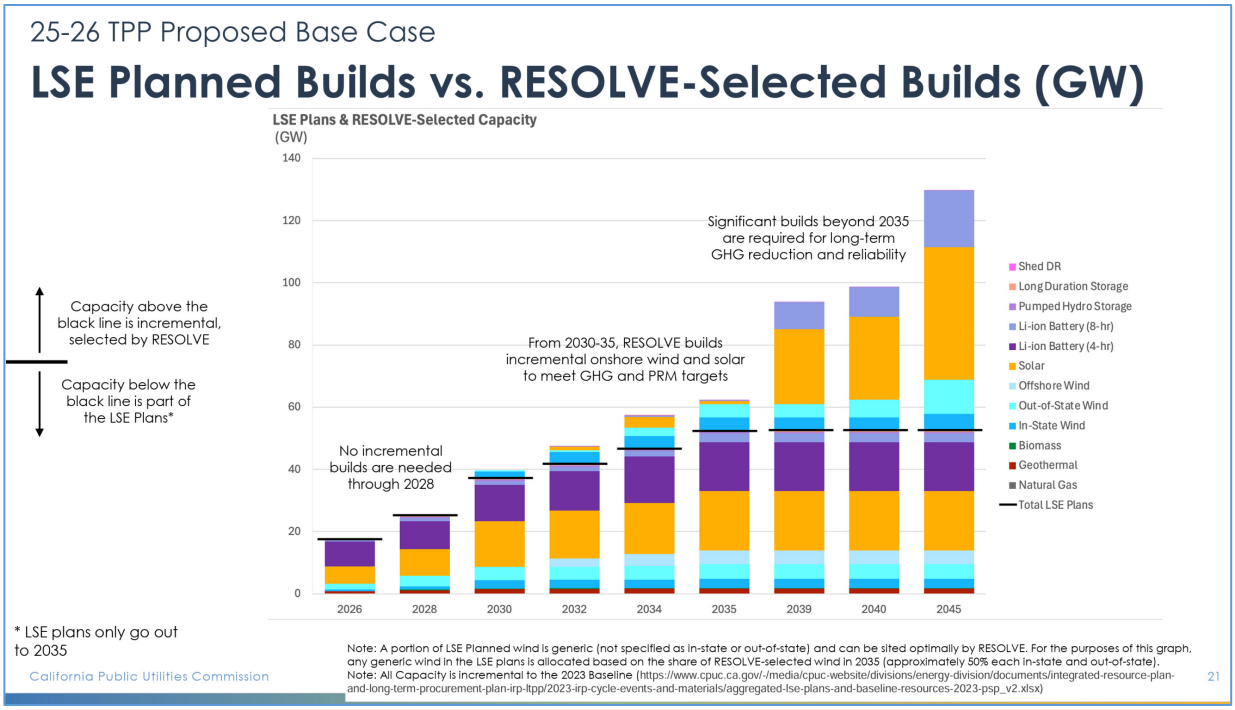

Figure B: Incremental Resource Need Identified in 2025-2026 TPP in 2030-32[6]

Thus, the 2025-2026 TPP RESOLVE analysis identifies incremental resource needs above resources filed in the 2023 Individual Integrated Resource Plan ("IIRP") submissions beginning in 2030.[7] Since IIRP filings include aspirational procurement, it is likely that some of the resources included in the 2023 IIRPs have not materialized.

Beyond these concerns, it is unclear whether the MTR portfolio will be as effective as modeled ex ante. Discussion at the June 24th RCPPP workshop suggests significant deterioration in the effective load carrying capability ("ELCC") value of storage due to lower-than-expected

[6] 2025-2026 Transmission Planning Process (TPP) Proposed Decision, January 10, 2025, Slide 21. Available at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2024-2026-irp-cycle-events-and-materials/assumptions-for-the-2025-2026-tpp/25-26-tpp-pd-resolve-and-servm-analysis-slide-deck.pdf.

[7] *Id.*

LSE investments in solar resources.[8] We are now two years on from the most recent ELCC study, and it is increasingly unclear on what facet of the ELCC surface the system actually exists, and, consequently, how reliable the portfolio may or may not be. Regardless, the Joint Parties assume that incremental storage beyond MTR requirements will play a significant role in meeting near-term needs, and that will drive further energy sufficiency and REC requirements for LSEs and the portfolio.

The 2024 IEPR load forecast results in significantly higher peak loads in the near-term, with approximately 5 GW higher peak load for CAISO than the 2023 vintage, as well as [xx] more annual energy. These load additions will drive additional reliability need and may drive shifts in the type of reliability need given the expected high capacity factors of the forecasted load growth. Similarly, these additions are expected to cause significant incremental clean energy needs in order to achieve the mass-based electric sector decarbonization targets established in the last PSP.

Load forecasting is inherently uncertain, and the rapid acceleration of load growth due to data center interconnections has reignited and amplified longstanding debates about load growth projections. The Joint Parties take no position here on the precision of the IEPR load forecast, and encourage the Commission to redirect any attempts to relitigate the forecast to the IEPR docket at the California Energy Commission. However, as a basic principle of resource planning, the Commission and the market should be planning to meet the load which is forecast through official processes.

[8] Comments from Aaron Burdick, Energy and Environmental Economics, on evolution of marginal ELCC ("mELCC") values from ex ante MTR mELCC analysis to IRP PSP mELCC analysis. Workshop Recording Day 1, 2:40-2:43.

From an emissions perspective, the 2022-2023 IRP Preferred System Plan identifies clean energy needs well above the RPS requirements,[9] a view which is further developed in the RCPPP staff proposal.[10] Moreover, the significant increase in load from the 2024 IEPR forecast will lead to far higher volumes of clean energy required. Assuming LSEs have not proactively integrated these higher clean energy percentages and elevated load forecasts, it is likely a large and growing clean energy gap exists in the near-term timeframe.

According to the Commission, the 2022-23 Preferred System Plan ("PSP") is the "blueprint endorsed by the Commission for how electricity customers will be served reliably at the lowest reasonable cost while meeting state policy objectives for GHG emissions reduction, resulting in reduced reliance on fossil fuels and the cleanest potential portfolio."[11] The 2022-2023 PSP shows an increased need for RPS eligible resources. Decision 24-02-047 states:

> This PSP portfolio achieves clean energy production well beyond the SB 100 interim targets used for PSP modeling, achieving 101 percent (compared to the SB 100 90 percent target), 105 percent (compared to the 95 percent target), and 113 percent (compared to the 100 percent target) clean generation in 2035, 2040, and 2045, respectively.[12]

In addition, when Energy Division staff presented the draft results of the Preferred System Plan, staff made clear that the PSP (25 MMT core portfolio) would exceed the minimum 60% RPS

[9] D.24-02-047 *Decision Adopting 2023 Preferred System Plan and Related Matters, and Addressing Two Petitions for Modification*, February 15, 2024, p. 75. Available at: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M525/K918/525918033.PDF.

[10] RCPPP Staff Proposal, p. 45

[11] See D.24-02-047, p. 50.

[12] *Id.*, p. 75.

requirement throughout the entire planning horizon.[13] Energy Division's October 5, 2023 presentation demonstrated this point. Figure C below was taken from that presentation.[14]

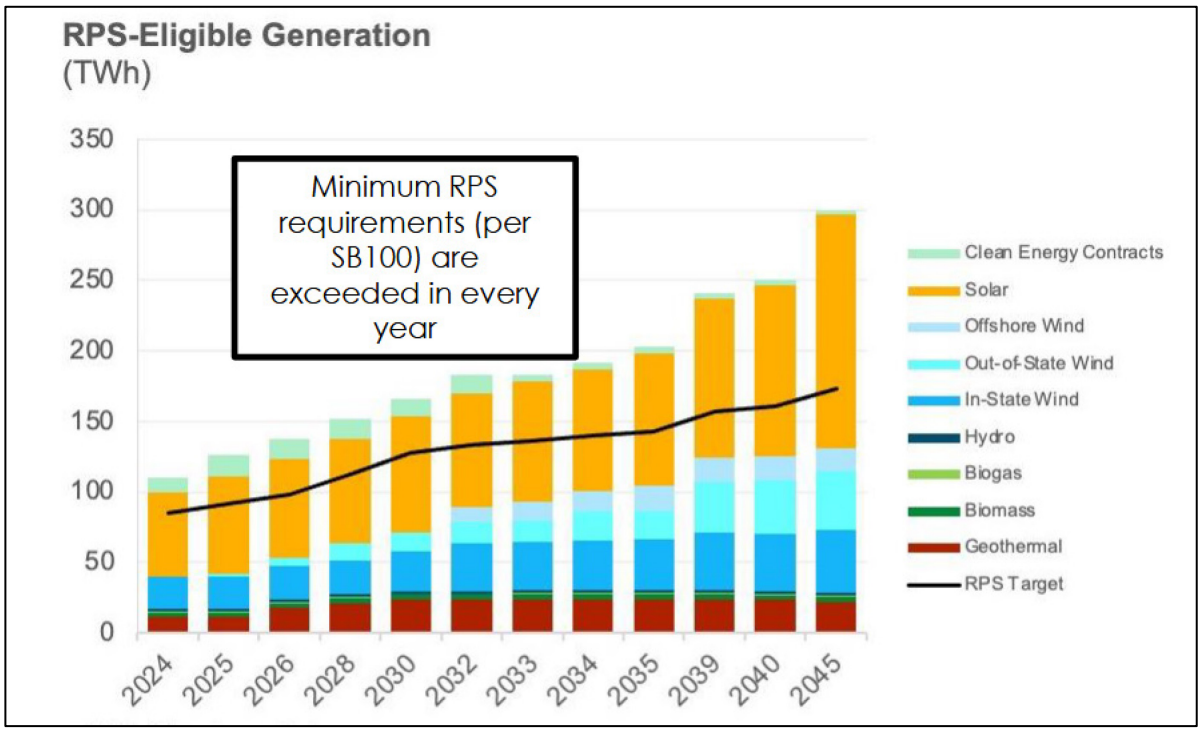

Figure C

The Senate Bill ("SB") 100 analysis, which includes GHG-free resources that are not RPS-eligible shows similar results. The RESOLVE 25 MMT Core case forecasts 80 percent GHG-free

[13] See R.20-05-003 Energy Division Staff Presentation, *2023 Proposed PSP & 2024-2025 TPP Resolve Modeling Results* (October 5, 2023), Slide 62. Available at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2023-irp-cycle-events-and-materials/2023-proposed-psp-and-2024-2025-tpp-resolve-analysis-slide-deck_20231004.pdf.

[14] *Id.*

energy serving CAISO load in 2030.[15] Assuming roughly 10 percent energy from large hydro,[16] this means that LSEs will need to achieve *both* a higher RPS and a higher clean energy target in 2030 to meet the 25 MMT Core case requirements.

II. Resource Availability

Meeting near-term reliability and clean energy needs will require thousands of megawatts of resources currently in the CAISO cluster study process. Specifically, Cluster 14 will be critical for meeting 2028-2032 resource needs (in addition to new resources available outside of CAISO). However, many of the resources currently in Cluster 14 are at risk of elimination from the queue or conversion to Energy Only ("EO") status due to their lack of contracts with LSEs, as shown in Figure D:

[15] The *2023 Proposed Preferred System Plan Reliability and Emission Analysis* performed by Commission staff shows 48,591 GWh of CAISO emitting and unspecified imports in the 25 MMT Core case for the 2030 RESOLVE analysis (Slide 49). This translates to roughly 80 percent GHG-free energy making up the remainder, per the 2022 Integrated Energy Policy Report managed energy load forecast of 239,310 GWh (Slide 11). Presentation available at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2023-irp-cycle-events-and-materials/psp-ruling-reliability-and-emissions-analysis-slides_20231004.pdf.

[16] See https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation.

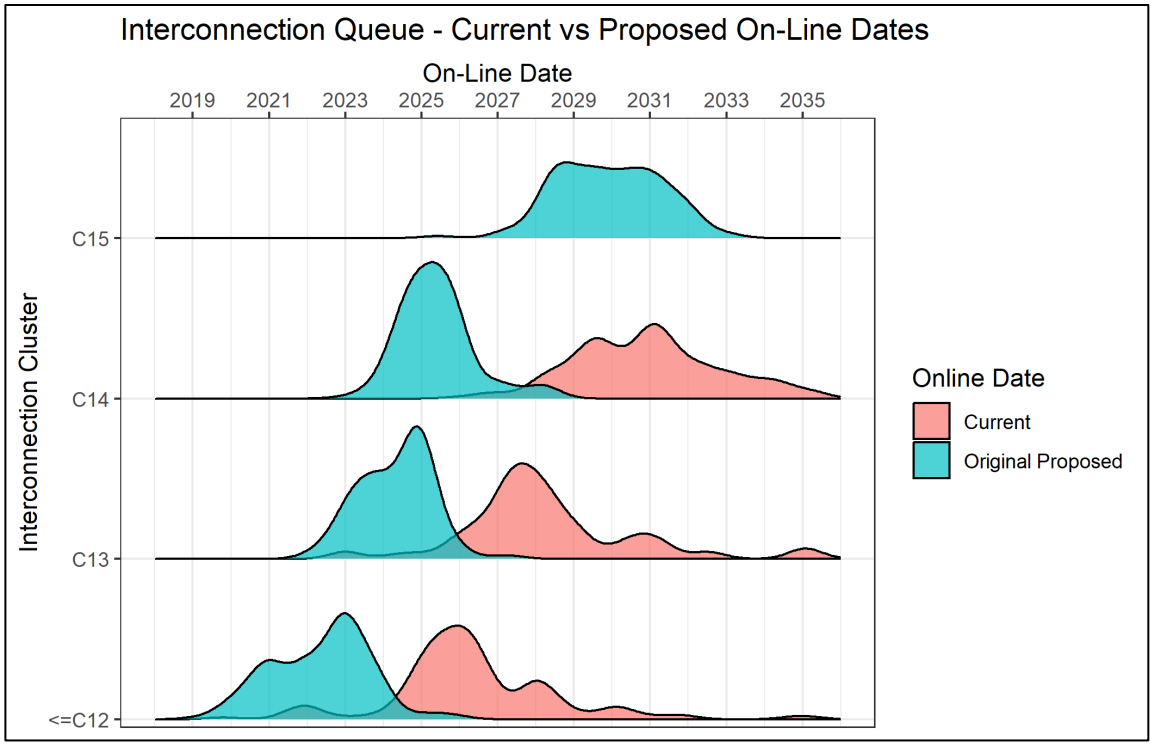

Figure D: Proposed and Current On-Line Dates for Clusters 12-15[17, 18]

This timeline pressure is a new feature of the various CAISO Interconnection Process Enhancements ("IPE") updates which have been designed to help focus the large volume of the queue on projects with commercial interest and a higher likelihood of success. But there is also timing pressure for Cluster 14 resources, as these are likely the last set of CAISO queued solar and wind projects that could be eligible for the ITC and PTC under new federal rules. Unfortunately, LSEs lack procurement orders for the 2028-2032 timeframe and do not appear to be voluntarily fulfilling post-2028 needs, many projects from Cluster 14 which may be necessary to meet system needs are at risk of losing deliverability (and the opportunity for ITC/PTC) if they cannot move quickly towards procurement and progress to an executed PPA by March 2027. Those Cluster 14

[17] Queue data for Cluster 15 from: CAISO Cluster 15 Interconnection Requests. June 9, 2025. Available at: https://www.caiso.com/documents/cluster-15-interconnection-requests.xlsx.

[18] Queue data for Cluster 14 and earlier from: The CAISO Controlled Grid Generation Queue. June 13, 2025. Available at: https://www.caiso.com/documents/publicqueuereport.xlsx.

projects that do not have an executed PPA by the 2027 CAISO TPD allocation cycle deadline will be converted to Energy Only. Since there is currently no meaningful contracting path for energy-only resources, we expect many projects to drop out of the queue in the absence of near-term procurement orders.

Specifically, the revised IPE framework establishes a grouping system with specific thresholds to retain deliverability within the study process:

- **Group A:** Have **secured PPA** & may be meeting existing MTR requirement
- **Group B**: Demonstrated **shortlist for PPA**, must convert to executed PPA by **August 29, 2025**
- **Group D**: **No PPA**, must demonstrate shortlisting or execute PPA by Aug 29, 2025 or can re-apply for a Group D allocation and must **convert to PPA by Q1 2027**

Any Cluster 14 projects that receive a Group D TPD allocation in the 2025 cycle have until Q1 of 2027 to execute a PPA.

An investigation of Cluster 14 data and contracting status indicates that there are not sufficient contracted resources in Cluster 14 to meet the scale of need expected based on the load growth and other changes discussed in Section II. While Cluster 14 includes tens of thousands of megawatts of both energy and storage resources (Figure E), a much smaller share of resources is contracted and within Group A (see Figure F).

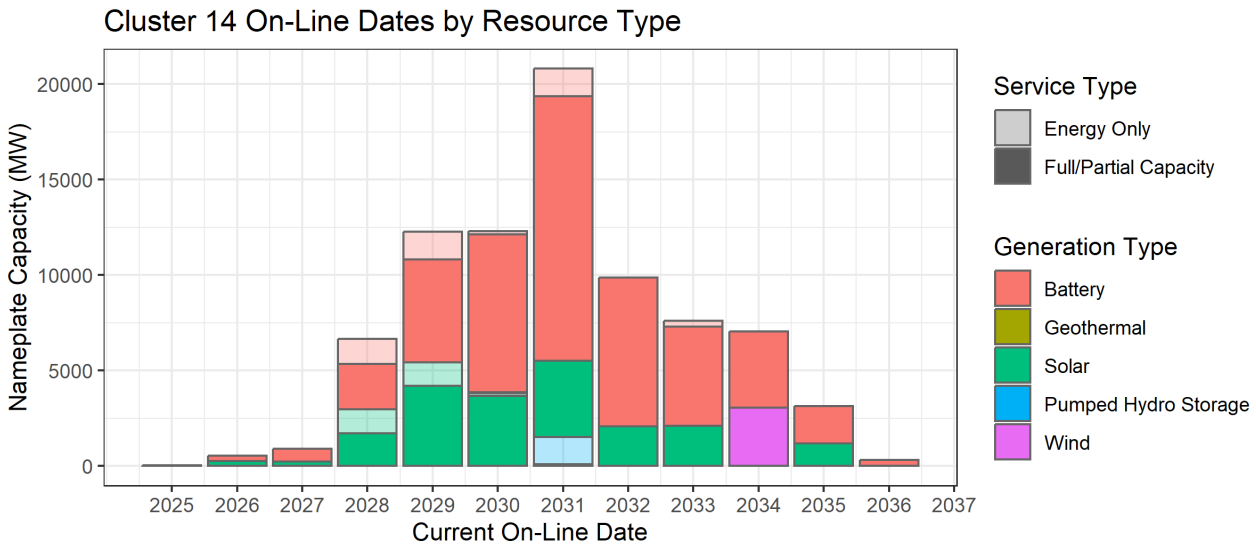

Figure E: Cluster 14 Resources by Technology and Online Date[19]

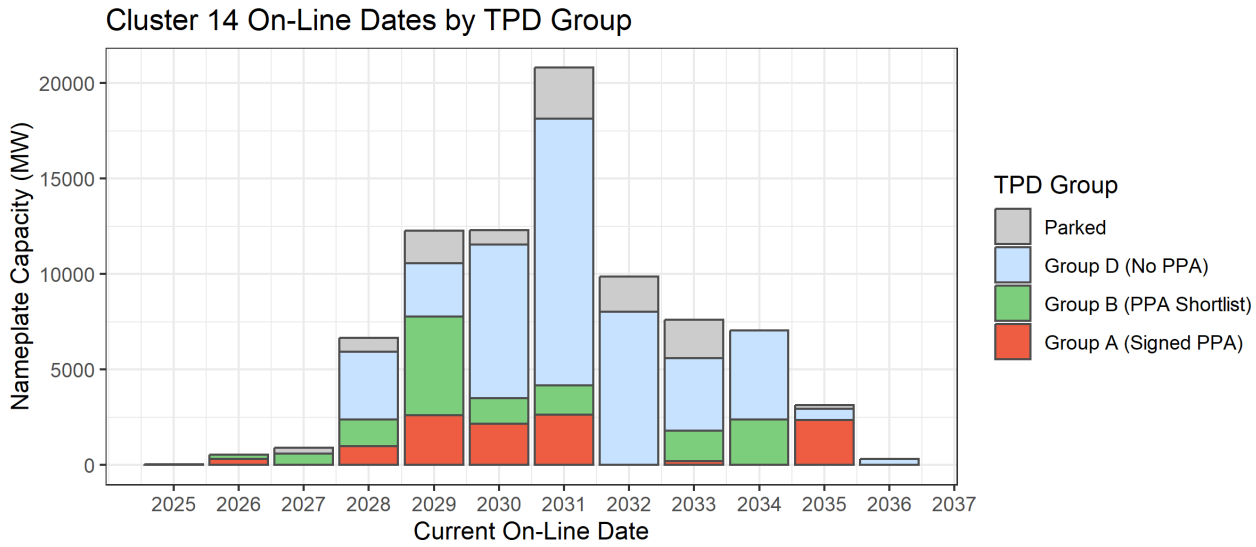

Figure F: Cluster 14 Resources by TPD Group[20]

Figure G shows the resources in Groups A and B with deliverability and an executed Large Generation Interconnection Agreement ("LGIA"). Figure H shows cumulative resources through 2032 based on development status, identifying 5.5 GW of Cluster 14 storage contracted through

[19] Ibid.

[20] Ibid.

2032 and an additional 5.4 GW which are shortlisted but at risk of withdrawal or conversion to Energy Only if not converted to an executed PPA by August 2025.

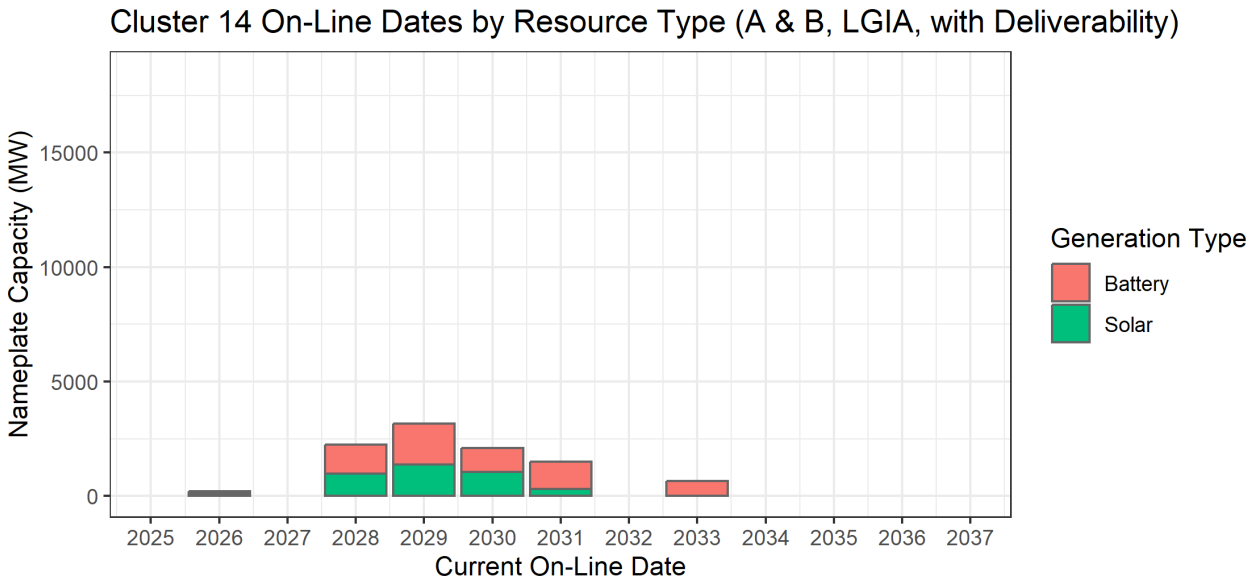

Figure G: Cluster 14 Resources at Advanced Development Stages by COD[21]

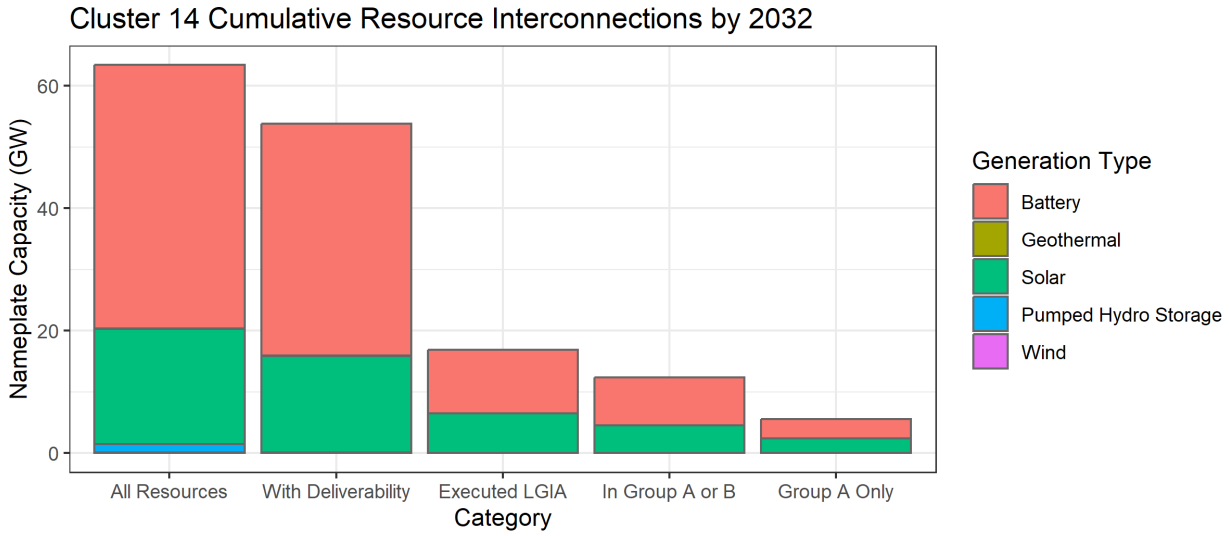

Figure H: Cluster 14 Data by Development Stage[22]

[21] Ibid.

[22] Ibid.

Joint Parties are actively coordinating with CAISO to ensure the current pathways to retain Cluster 14 resources are maintained and to evaluate whether any modifications are necessary and viable to ensure Cluster 14 resources can be maintained as an option for meeting system needs in the 2028-2032 timeframe.

III. Coordinating Actions with CAISO and Adjacent CPUC Proceedings

In addition to an expedited procurement order, the Commission should act swiftly to identify and implement potential policy solutions to improve the development ecosystem with other agencies and in adjacent proceedings. These include exploration of potential modifications to the CAISO processes to ensure Cluster 14 resources remain a viable option for cost-effectively meeting near-term system needs. The Commission should also move to address limitations to Energy Only ("EO") resources contributing to storage charging sufficiency in the RA program given the likely emphasis on energy sufficiency needs in the 2028-2032 timeframe and parallel challenges with the deliverability process.

While Joint Parties support exploration of CAISO process adjustments, any adjustments would need careful vetting to ensure there are not negative impacts to transmission development for already-contracted resources that are moving through the study process.

Similarly, the Commission should act to remove barriers to the development of energy generating resources within the RA program for use to meet LSE charging sufficiency requirements, a requirement which is likely one of the chief constraints moving into the 2028-2032 timeframe. Given the magnitude of storage in development for MTR and likely needed for 2028-2032, there will also be substantial need for energy resources to support charging sufficiency requirements. The Commission has received multiple proposals on EO resource participation which merit near-term action but have stalled due to conflicting energy sufficiency frameworks

between the Commission and CAISO, the latter of which does not assess energy sufficiency for compliance.

The Commission has the authority to modify the charging sufficiency requirement – which exists solely within the Commission's status as a Local Regulatory Authority – to allow participation of EO resources for charging sufficiency. There are various methods available to address the potential for charging contributions to be curtailed due to deliverability limitations which may be implemented unilaterally by the Commission to align with existing constructs within the IRP (which, unlike RA, includes the reliability contributions of EO resources in RESOLVE and SERVM).[23] While a long-term solution may merit a more complex technical framework developed in coordination between CAISO and the Commission, the urgency and characteristics of forthcoming needs merit implementation of a near-term solution to create a viable procurement pathway for EO resources.

IV. Proposed Actions for Near-Term Needs

While the precise magnitudes and characteristics of reliability and clean energy needs remain to be fully studied, there is sufficient insight from the prior analyses and shifting load forecasts to confirm that near-term action is needed – and requires urgent attention in light of the development timelines presented here. It is likely that the needs are, at minimum, as large as the capacity and energy growth in the revised IEPR forecast for reliability and clean energy, respectively, and may be higher. Pursuing a near-term procurement order on the best available information – even if information is limited – is both a pressing need and a least-regrets action for the Commission to undertake in coming months.

[23] For additional discussion of IRP-RA alignment issues, including treatment of Energy Only resources, see ACP-California's recently filed comments in the RA proceeding, p. 7-10. Available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M569/K592/569592855.PDF.

The Commission should immediately initiate a needs assessment for 2028-2032. Joint Parties recommend taking immediate action based on the record developed in this proceeding, and recommend the Commission issue a Proposed Decision by September 2025.

CONCLUSION

Joint Parties appreciate the opportunity to submit this proposal in support of augmenting the RCPPP Staff Proposal.

DATED: July 15, 2025

Respectfully submitted,

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