BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON THE ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON ELECTRICITY PORTFOLIOS FOR 2026-2027 TRANSMISSION PLANNING PROCESS AND NEED FOR ADDITIONAL RELIABILITY PROCUREMENT

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission's ("Commission"), the California Energy Storage Alliance ("CESA") respectfully submits these comments on the Administrative Law Judge's ("ALJ") *Ruling Seeking Comments on Electricity Portfolios for 2026-2027 Transmission Planning Process and Need for Additional Reliability Procurement* ("Ruling"), issued on September 30, 2025.

I. INTRODUCTION

CESA's comments primarily focus on the crucial matter of the proposed order for additional reliability procurement contained in Section 3 of the Ruling. CESA commends Commission staff for their timely work in determining the need for additional capacity using its standard analysis methodology, which is essential given the significant load growth forecasted in the 2024 Integrated Energy Policy Report ("IEPR") and the looming expiration of federal tax incentives. The current analysis and updated policy assessments underscore the essential contribution of energy storage to both grid reliability and the achievement of California's ambitious Greenhouse Gas ("GHG") reduction goals.

CESA supports the procurement order based on an updated reliability analysis following the Commission's standard reliability modeling approach. In R.20-05-003, CESA filed a response supporting the American Clean Power – California's ("ACP-CA") *Motion to Amend the Amended Scoping Memo to Include an Additional Track for Expedited Procurement* ("Motion"), filed July 21, 2025, but recommended the Commission base any expedited procurement requirements on a reliability needs assessment using its standard reliability modeling approach with updated inputs and assumptions or a cost-effectiveness assessment given that the Commission has acknowledged Production Tax Credits ("PTC") and Investment Tax Credits ("ITC") have a significant impact on portfolio build and portfolio costs in RESOLVE.[1] The Ruling describes the Commission staff's results from an updated reliability needs assessment using its standard modeling approach with updated inputs and assumptions.

CESA supports the Commission's direction to not disqualify energy storage resource procurement through this procurement order, as some parties have previously suggested. CESA supports the Commission in allowing the Effective Load Carrying Capability ("ELCC") values to guide appropriate procurement.

In ***Section II***, CESA provides specific responses to the Ruling's questions.[2] In those responses, CESA discusses the following:

- The Commission should seek to limit potential malinvestment in transmission by selecting a realistic scenario for the TPP base case that focuses on the resources most likely to materialize to achieve California's reliability and GHG reduction goals: solar and storage. Therefore, the Commission should recognize the

[1] D.24-02-047, pg. 52
[2] Ruling, Section 4

significant headwinds against offshore wind development and the potential that much of the Assembly Bill ("AB") 1373 Long Lead Time ("LLT") procurement may not occur by selecting either the current Limited Wind Sensitivity Case as the base case, or at a minimum, re-running the model without forcing in the AB 1373 procurement.

- It is critical that the busbar mapping results clearly identify the MW quantities of all in-front-of-the-meter distributed energy storage included at the various substations. The busbar mapping results currently only differentiate between distributed solar and non-distributed solar capacity values. This continuing reporting error has prevented distributed storage from receiving deliverability through CAISO's Distributed Generation Deliverability process, putting it at a severe competitive disadvantage relative to distributed solar.

- CESA supports the Commission's direction for the procurement requirements to not discriminate against energy storage. Any energy sufficiency concerns will be appropriately addressed through annually calculated and tranched ELCC accreditation values and existing Resource Adequacy program rules that will signal resource retention when appropriate.

- The Commission must now endeavor to ensure the procurement structure facilitates resource repowering and augmentation by transitioning to a contract status baseline method, which will exclude all uncontracted existing resources from the baseline, thereby creating a procurement need that can be met by contracts for new resource development, repowering, or augmentation.

- Recognizing the state's long-term clean energy goals, CESA supports the Commission requiring the procured resources "to be non-GHG-emitting and/or eligible for the RPS program." CESA understands that this eligibility requirement includes all forms of energy storage (stand-alone, co-located, hybrid, long-duration, and multi-day).

II. RESPONSE TO QUESTIONS

a. Response to Questions Related to the 2026-2027 TPP Recommendations

Question 3: Do you support the recommended Base Case for the 2026- 2027 TPP? Provide rationale for your recommendation. If you prefer a different Base Case portfolio, describe it as specifically as possible.

CESA does not support the Recommended 2026-2027 TPP Base Case Portfolio because it forces in LLT procurement volumes, specifically large amounts of offshore wind, which significantly increases costs and does not reflect a realistic scenario focused on the most cost-effective resources. The overall direction of the longer duration energy storage now being optimally selected supports CESA's historical comments that as the model is improved to accurately represent the value of long duration energy storage, more long duration and multi-day storage will be revealed to be in the best interest of ratepayers. Understanding that the model does not yet fully incorporate features that are necessary for the accurate reflection of long-duration and multi-day storage system reliability value, it makes sense to continue to force-in their expected procurement.

The Recommended 2026-2027 TPP Base Case Portfolio forces in approximately half of the maximum LLT volumes considered in the AB 1373 need determination, including large volumes of offshore wind. The RESOLVE modeling indicates that the model itself does not

optimally select offshore wind because of its high cost under current assumptions, even when forced into the Proposed Base Case portfolio. Forcing in these partial AB 1373 volumes increases the total system costs by approximately $1.9 billion to $2.5 billion annually starting in 2036, when compared to the Least-Cost Comparison Portfolio.

While investing in transmission to deliver offshore wind to load may have appeared to be a sound investment a year ago when it was included in the 2025-2026 TPP base case, circumstances have since significantly changed. For example, On January 20 2025, President Trump signed an executive order that halted new offshore wind lease sales in federal waters and paused approvals, permits, and loans for both on-shore and offshore wind projects.[3] In July/August 2025, the Bureau of Ocean Energy Management ("BOEM") rescinded all previously designated Wind Energy Areas ("WEAs") on the Outer Continental Shelf ("OCS") and eliminated the requirement to publish a five-year offshore wind leasing schedule.[4] Considering the regulatory landscape, this is no longer a "least-regrets" portfolio that puts ratepayers first.

The Commission should seek to limit potential malinvestment in transmission by selecting a realistic scenario for the TPP base case. The base case should focus on the resources most likely to materialize to achieve California's reliability and GHG reduction goals: solar and storage, while recognizing the significant headwinds against offshore wind development.

CESA recommends selecting an alternative scenario as the Base Case, specifically opting for a case that aligns with the Least-Cost Comparison Portfolio or, at a minimum, one that avoids forcing in the AB 1373 offshore wind procurement volumes. The preferred scenario is the one that

[3] https://www.whitehouse.gov/presidential-actions/2025/01/temporary-withdrawal-of-all-areas-on-the-outer-continental-shelf-from-offshore-wind-leasing-and-review-of-the-federal-governments-leasing-and-permitting-practices-for-wind-projects/
[4] https://content.govdelivery.com/accounts/USDOI/bulletins/3ecd13c?utm_source=chatgpt.com

allows the capacity expansion model to optimally select the least-cost resources necessary to meet state goals, reliability standards, and GHG targets, without forcing in high-cost offshore wind LLT resources. CESA believe this scenario is described as the Least-Cost Comparison Case in the analysis.

Question 5: If you have a recommendation for a lower-overall-cost sensitivity portfolio to be evaluated, please describe it in detail.

As discussed in Question 3, CESA primarily supports selection of a base case that does not force in AB 1373 LLT procurement, due to the apparent high costs of and the risks associated with offshore wind development. CESA observes that the Limited Wind Sensitivity already evaluated by staff serves as a demonstrably lower-overall-cost scenario compared to the Recommended 2026-2027 TPP Base Case Portfolio and would also support its use as a suitable least-regrets approach to transmission build if it were instead selected as the Base Case.

- Cost Comparison. Despite the limits placed on wind deployment (both in-state, out-of-state, and removing offshore wind), the Limited Wind Sensitivity case has lower total costs in 2036 and beyond than the Proposed Base Case.

- Rationale for Lower Cost. The lower costs are mostly attributed to the exclusion of the relatively expensive offshore wind volumes that were forced into the Base Case portfolio pursuant to AB 1373. Specifically, forcing in offshore wind (including associated transmission) is more expensive than limiting onshore wind.

- Resource Mix. The Limited Wind Sensitivity primarily replaces the curtailed wind resources (onshore and offshore) with additional solar and storage (specifically Li-ion 8-hr and Location-Constrained Storage), along with approximately 3 GW of

geothermal (conventional and enhanced). This combination results in a total system Net Present Value (NPV) that is approximately $14.6 billion less than the currently Proposed Base Case.

Therefore, CESA endorses the Limited Wind Sensitivity as a key scenario to evaluate because it provides insight into the transmission implications of a more solar/storage-heavy portfolio, and crucially, demonstrates that avoiding the forced procurement of high-cost offshore wind resources leads to a substantial overall system cost reduction.

Question 7: Comment on the busbar mapping methodology updates made for this round of TPP recommendations. Are there other critical updates that you recommend? Be as specific as possible about assumptions and data sources.

It is critical that the busbar mapping results clearly identify the MW quantities of all in-front-of-the-meter distributed energy storage included at the various substations. The busbar mapping results currently only differentiate between distributed solar and non-distributed solar capacity values. **This continuing reporting error has prevented distributed storage from receiving deliverability through CAISO's Distributed Generation Deliverability process, putting it at a severe competitive disadvantage relative to distributed solar.**

The representation of in-front of meter distributed storage resources in the Commission's portfolio of resources results is currently lacking. The policy-driven *portfolios* **do include** both Energy Only distributed storage and full capacity deliverability status storage, but only **reports out** full capacity deliverability storage at distribution voltages. Most distributed generation projects in the Wholesale Distribution Access Tariff ("WDAT") queues in southern California today are energy storage, with a sizeable amount of active energy-only distributed storage

projects.[5] The TPP would be better informed if both the quantity of energy-only distributed storage and the location of the energy-only distributed storage were accurately included in the policy-driven portfolio of resources results, like distributed solar.

To be clear: the last TPP did include Energy Only distributed energy storage resource MW quantities at many substations, but it did not clearly designate those quantities as coming from "energy only distributed resources." The lack of clarity regarding whether there are in fact distributed Energy Only MW quantities at certain substations disqualifies those very substations from being assessed in CAISO's Distributed Generation Deliverability process.

To ensure all relevant locations are studied in CAISO's process, the busbar mapping results must include all substations with distributed energy storage, both energy-only and full capacity deliverability status, along with the quantities of distributed energy storage at those locations clearly labeled as such.

The following designations must be included in the busbar mapping:

- The busbar mapping must designate the amounts and locations of the full capacity deliverability status distributed energy storage resources from the WDAT queues that are included in the mapping as distributed energy storage.

- The busbar mapping must include the amounts and locations of the Energy Only distributed energy storage resources from the WDAT queues and designate these locations and amounts in the mapping as distributed energy storage.

[5] For instance, most active Interconnection Requests in SDGE's WDAT queue are energy storage: https://www.sdge.com/sites/default/files/documents/SDGE%20WDAT%20Generation%20Interconnection%20Queue%203-18-2024.pdf

This would result in three energy storage categories: (1) "Distributed Energy Storage (EODS)," (2) "Distributed Energy Storage (FCDS)," and (3) Energy Storage (FCDS)." Correspondingly, the following language should be added to CPUC Step #4 in Section 7 of the Methodology for Resource-to-Busbar Mapping for the Annual TPP:

> *Distributed Energy Storage – This resource represents all in-front of the meter energy storage resources, both Energy Only and Full Capacity Deliverability Status. Resource potential is assessed based on resources identified in LSE plans and all potential projects in the interconnection queues of the lower voltage transmission systems.[fn] These resources are mapped to the nearest CAISO system level substation or the likely CAISO system interconnection point.*
>
> *[fn] CPUC staff utilizes the Wholesale Distribution Access Tariff interconnection queues for PG&E, SCE, and SDG&E.*

b. Response to Questions Related to the Procurement Need Analysis and Recommendations

Question 10: Is another procurement order needed, as recommended in this ruling? What amount of resources (in ELCC MW NQC) should be required and for which years/tranches?

Staff's analysis clearly demonstrates that another procurement order for 6 GW is needed. However, the actual need is likely higher accounting for and enablingeconomic resource repowering and augmentation to meet the state's clean energy objectives. Under the current Mid-Term Reliability ("MTR") rules, LSEs and developers have struggled to qualify economically

viable resource repowering and augmentation development that furthers the state's clean energy objectives.

The Commission must now endeavor to ensure the procurement structure facilitates resource repowering and augmentation by transitioning to a contract status baseline method, which would exclude all uncontracted existing resources from the baseline, thereby creating a procurement need that can be met by contracts for new resource development, repowering, or augmentation.

CESA proposes that the analysis supporting the procurement order transitions from a "New/Existing" baseline method to a method that also recognizes "Contract Status" for assessing LSE procurement needs.[6] This approach would exclude all uncontracted existing resources from the baseline, therefore potentially creating the additional need for new resource development, repowering, and augmentation. The contract status approach supports development of new resources to replace resources that are on retirement watch for not having an advance contract. Furthermore, it supports repowering, augmentation, or replacement of resources as they come off contract. Critically, adopting a contract status baseline avoids problematic "deadline cusp" issues and debates about repower definitions that complicate current baseline methods. This direct approach ensures collective action to drive new resource development and support repower decision-making. Importantly, under this contract status approach, only contracts for new resource development (including repowering and augmentation) are eligible to meet the procurement order's new resource requirements.

[6] "Contract Status" refers to whether a resource has an RA contract or a bundled RCPPP/RA contract.

The analysis should consider the following resources "existing uncontracted" resources and removed from the baseline:

(1) all resources that have given notice to CAISO to retire prior to the Summer of the each of the the upcoming compliance years (2029, 2030, 2031, and 2032), and

(2) all resources that do not have a contract extending over the summer of 2026 and beyond

All "existing uncontracted" resources should be removed from the baseline, thus increasing the need for new resource development (including repowering and augmentation). This timing would provide sufficient time for repowering and augmentation projects to be contracted and developed prior to the compliance year, assuming the repowering and augmentation development could take up to 3 years to complete.

Question 11: Should the Commission base a potential procurement order on an alternative study or rationale beyond that described in this ruling? If so, provide the study and explain why it should be used instead.

CESA strongly supports the Commission's use of its existing proven reliability assessment methods. The appropriate rationale for procurement orders is based on achieving the established 0.1 Loss of Load Expectation ("LOLE") planning standard and accurately measures resource contribution using the marginal ELCC. CESA strongly cautions against basing a reliability need on the novel, unproven, and incomplete Slice-of-Day ("SOD") methodology.

Given that the IRP process' core mission is to get resources built as needed to achieve California's electricity goals, it is paramount that the IRP process sends simple and clear procurement signals in the forward planning space. The Commission must seek to avoid unwarranted additional friction in the forward planning space as much as possible.

In stark contrast to SOD accreditation, marginal ELCC accreditation provides a proven, clear, and fungible accounting to support new resource development and should be used for reliability compliance. The marginal ELCC accreditation approach allows for accurate price signals and efficient investment incentives. It is crucial for sending price signals that accurately reflect resources' reliability contributions during periods of tight supply. It recognizes the diminishing returns of resources with correlated availability and the value of adding complementary resources that enhance reliability. By doing so, marginal ELCCs provide efficient incentives for investment decisions, including avoiding the over-saturation of a particular technology, encouraging the investment in diverse and complementary resources, facilitating the efficient pairing of storage with intermittent resources, guiding the efficient selection of storage project durations, and incentivizing investment in resources that provide reliability during critical periods, thus encouraging a more diverse and balanced resource mix, including storage resources to complement intermittent renewables.

The Commission recognizes the importance of accurately reflecting resource reliability value in its processes/programs. The Commission and its staff have traditionally evaluated resource reliability value by determining a resource's ELCC. The Commission has accepted the use of marginal ELCC values as a basis for establishing its Preferred System Plan ("PSP"). Further, Energy Division has recognized the benefit of using any ELCC approach is that the metric captures each resource's contribution to system reliability across a wide range of system conditions, captures saturation effects that cause declining reliability values within a resource type, captures interactive effects between different resource types, and inherently captures both capacity and energy constraints. Energy Division further recognized that if the system becomes too energy constrained to charge energy storage resources, then after Loss of Load Probability ("LOLP")

modeling is performed to update the resource counting compliance metrics, the marginal ELCC of storage will decline and the marginal ELCC of energy-providing resources (such as solar and wind) will begin to increase. Energy Division has concluded that from a technical reliability planning perspective, a separate energy-based requirement would be redundant. The Commission's IRP modeling heavily relies on use of ELCC values with a focus on resource reliability value and it previously found that "[c]alculating the system reliability benefits of specific resources will be more accurate if marginal ELCCs are used" in its MTR compliance assessments. Although the Commission has been clear that it is not necessary for both the IRP proceeding and the RA program to utilize the same methodologies, it must recognize the importance of accurately accounting a resource's reliability value in its processes.

ELCC capacity accreditation methodologies, originally introduced by L.L. Garver in 1966, are well-established and well-vetted by the U.S. electric industry and the Federal Energy Regulatory Commission ("FERC"). ELCCs or ELCC approximations are used for capacity accreditation in PJM, MISO, SPP, NYISO, and in the Western Resource Adequacy Program. Additionally, ISO-NE is exploring the use of marginal ELCC in its capacity market reform efforts. Furthermore, many utilities across the Western Interconnection use ELCC in their IRP planning efforts.

ELCC capacity values signal the relative reliability value between different resource types and constitute a clear fungible capacity product to be procured by LSEs. Under an ELCC-based procurement framework, each LSE values each MW of each resource type equal to the reliability value those resources provide the system operator. The forward procurement signal to get new resources built is clear, uniform, and aligned with system reliability value.

Slice-of-day resource accounting is incomplete, unproven, creates market friction, and is too costly to be applied in the IRP process.

- As it stands, the novel slice-of-day framework remains incomplete even in its current application to the RA program. After several years of development, there remains continued uncertainty due to the continued delay in establishing clear and uniform LDES/Multi-Day Storage charging sufficiency requirements and accreditation, putting LDES at an unfair competitive disadvantage under the framework.

- The accuracy of the novel implementation of the exceedance methodology for variable energy resources has been debated since its creation.

- Transactability issues related to the granularity of the product not equaling the granularity of the requirement also remain, costing ratepayers upwards of $180M per year. The slice-of-day framework also introduced considerable friction into the RA marketplace due to its non-fungible resource counting methodology. For instance, energy storage resources are assigned an ambiguous and non-uniform qualifying capacity value that inequitably reduces their transactability, while all non-storage resources enjoy unambiguous and uniform qualifying capacity values.

- Under the slice-of-day framework, an energy storage resource's qualifying capacity value is dependent not only on the physical attributes of the energy storage facility (e.g. round-trip efficiency, duration, etc.), *but also the make-up of an individual LSE's RA portfolio* because of the charging sufficiency test. This poorly structured charging requirement also discourages LSEs from procuring standalone storage

even though it is an ideal solution to meet reliability and clean power objectives in densely populated local capacity areas.

- Energy storage's qualifying capacity value ambiguity is further compounded by the fact that the precise calculation of the qualifying capacity value is buried in the implementation of the RA showing template and user guide.

- Finally and importantly, energy storage resources have a qualifying capacity value that is not equal to their system reliability value (as could be calculated with an ELCC), which sends inaccurate procurement signals to LSEs. Considerable market friction would follow in the new resource development space if an LSE would pass on procurement of a resource that provides system reliability value because it does not perfectly fit its individual portfolio. Such procurement signals are not clear and uniform, resulting in a non-fungible product.

If the Commission were to apply the novel slice-of-day framework into the IRP process, there will be several unforeseen design issues to resolve that have already been well-vetted under the ELCC methodology. For instance, the slice-of-day need allocation is based on each LSE's hourly load shape, which is more difficult to forecast further into the future in part due to risks around load migration and electrification progress. Extending this accounting further than 1 or 2 years at most would exacerbate these risks creating greater challenges for LSEs.

Question 14: If the Commission orders procurement in the IRP proceeding between 2028-2032, should it be for generic capacity, or should there also be an energy component (due, in part, to the declining ELCCs of battery storage)? Why or why not? Do the resource adequacy Slice of Day requirements adequately address this issue? Why or why not?

If procurement is ordered, it should be for generic capacity based on a marginal ELCC value, allowing LSEs to competitively procure as they wish and file resulting contracted capacity in compliance with their requirements each year, four years ahead of time. However, the Commission should calculate and publish tranched ELCC values for each compliance year four years ahead of time to capture any portfolio effects following from updated LSE procurement filings. Under this approach, the Commission would calculate binding[7] ELCC values for 2029-2030 compliance in early 2026, then in early 2027 calculate binding ELCC values for 2031 compliance, then in early 2028 calculate binding ELCC values for 2032 compliance. LSEs would file the results of their procurement efforts in the fall of each year, allowing the following year's ELCC study to reflect the changing portfolio.

It would also further support the mid- to long-term procurement markets if the Commission were to calculate and publish *advisory* ELCCs for the five to nine years beyond the binding ELCC year. That is, when the Commission calculates binding ELCC values for 2029-2030 in early 2026, it would also calculate and publish advisory values for 2031-2040. Then, in 2027, it would provide binding ELCCs for 2031 and advisory ELCCs for 2032-2041 and so on.

From a technical reliability planning perspective, a separate energy-based requirement would be redundant because the marginal ELCC metric inherently captures both capacity and energy constraints. The annually calculated and tranched marginal ELCC method ensures that if the system becomes too energy-constrained to charge energy storage resources, the marginal ELCC of storage will decline, while the ELCC of energy-providing resources (like solar and wind) will begin to increase, thus sending the appropriate market signal for necessary resources.

[7] "Binding" means a value that will not change after it is set.

Using annually calculated and tranched ELCCs sends a simple, uniform, and transparent market signal supporting the important task of ensuring enough resources get built. The slice-of-day counting framework should not be applied in the IRP because it is incomplete, unproven, and too costly. It fails to adequately address issues such as multi-day reliability events, creating significant market friction, and assigning ambiguous and non-uniform reliability values to energy storage resources, which severely impairs their transactability.

As CESA stated in comments on the Reliable and Clean Power Procurement Program ("RCPPP") in R.20-05-003, resource retention signals should remain contained within the Resource Adequacy program. The RA program is optimally suited to manage resource retention due to its established function in operationalizing the existing fleet of resources and ensuring their continued availability. The RA program primarily focuses on securing contracts with existing resources and subjecting them to a must offer obligation in the CAISO market, typically with a one- to three-year time horizon. This existing framework allows resource owners to typically wait for RA prospects before giving notice to retire or mothball their assets, as declining RA prospects often prompt considerations for repowering or retirement. While this procurement order is primarily focused on mid- and long-term planning and procurement of new resources, the RA program with its operational focus is an effective tool to signal contracting for and retention of existing resources. If stressed conditions materialize in a compliance year, if new resource development is delayed, or if transmission supporting deliverability is delayed, the RA program will retain existing resources as needed to meet reliability needs.

Question 17: Should a procurement order, if one is issued, specify particular characteristics for resource procurement (e.g., clean firm, long-duration storage, etc.), or should the requirement be entirely for generic capacity resources?

CESA maintains that the procurement requirement should be entirely for generic capacity resources measured using the fungible marginal ELCC metric. This approach ensures that procurement signals are clear, uniform, and aligned with system reliability value. CESA disagrees with ordering procurement limited to certain resource types, such as excluding standalone energy storage resources. An LSE procuring standalone storage and standalone solar provides a functionally equivalent outcome to procuring co-located resources, so excluding standalone storage has no reasonable basis. The Commission has historically recognized that energy storage is an integral part for ensuring the renewable resource buildouts effectively achieve California's emissions reductions goals, and therefore must be eligible for any expedited procurement ordered by the Commission.

CESA supports the Commission requiring the procured resources "to be non-GHG-emitting and/or eligible for the RPS program."[8] CESA understands that this eligibility requirement includes all forms of energy storage (stand-alone, co-located, hybrid, long-duration, and multi-day). This interim resource procurement criteria allows the Commission to work through a durable clean energy content requirement in the RCPPP design.[9] Ultimately, all procurement should be technology-neutral while meeting established objectives. This highlights the importance of a more holistic RCPPP framework that will allow LSEs to acquire generic capacity with broader, less restrictive eligibility criteria than the MTR and currently proposed criteria.

Question 22: Should capacity accreditation be based on forthcoming incremental ELCC analysis? If you prefer another method for resource accreditation (such as extension of existing

[8] Ruling, pg. 36

[9] In opening comments on the RCPPP in R.20-05-003, CESA proposed that the Commission adopt the PSDP's hourly-matched results as the primary measure for CES compliance as it would improve accuracy and effectiveness of the clean energy accounting while also aligning with Energy Division's objectives for simplicity, scalability, and ability to avoid duplication with other GHG regulations.

accreditation, straight-line decline, or less frequent updates to values), describe it in detail. Also describe how resources should be submitted and processed for compliance review.

CESA discusses how the capacity accreditation should be based on annually calculated and tranched marginal ELCC values in its answer to Question 14.

CESA proposes that LSEs contract resources for forward compliance years by the fall of each year 4 years prior to the compliance year. For instance, LSEs would show that they have contracted for 100% of the 2029 and 2030 requirements by the fall of 2026, then show that they have contracted for 100% of their 2031 requirement by the fall of 2027, then show that they have contracted for 100% of their 2032 requirement by the fall of 2028.

III. CONCLUSION

CESA appreciates the opportunity to comment on the Commission's Ruling and looks forward to further engaging on this topic in this proceeding.

Respectfully submitted,

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