



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

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

R.25-10-003

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
COMMENTS ON THE ORDER INSTITUTING RULEMAKING**

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SUMMARY OF RECOMMENDATIONS

In summary, CalCCA recommends that the Commission:

- Address RA SOD transactability issues, as scoped in the OIR, with a modified schedule to allow parties to file updated proposals following the release of the Energy Division report on transactability issues in Q1 2026;
- Include load forecasting issues within the scope to improve processes with the CEC to increase transparency, collaboration, and certainty in the demand forecast, adjustment, and allocation processes, especially considering the emergence of new data centers and other large loads in the forecast;
- Clarify how local RA CPEs are intended to use the aggregated results of LSEs' local RA data request responses in their procurement decisions;
- Consider within this proceeding updates to the Commission's requirements for showing MIC to align with the SOD framework; and
- Include DR, DER, and microgrid counting rules within the scope of this proceeding.

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The California Community Choice Association¹ (CalCCA) submits these comments pursuant to Rule 6.2 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure,² in response to the *Order Instituting Rulemaking*³ (OIR), issued October 15, 2025, and the directives therein.

I. INTRODUCTION

The Commission's Resource Adequacy (RA) program plays an important role in shaping load serving entities' (LSE) forward capacity procurement to support reliable operations of the California Independent System Operator (CAISO) balancing authority area (BAA). This new rulemaking will continue the Commission's oversight over and make refinements to the RA program. CalCCA

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

² *State of California Public Utilities Commission, Rules of Practice and Procedure, California Code of Regulations Title 20, Division 1, Chapter 1* (May 2021): <https://webprod.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/rules-of-practice-and-procedure-may-2021.pdf>.

³ *Order Instituting Rulemaking*, Rulemaking (R.) 25-10-003 (Oct. 15, 2025): <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M583/K934/583934825.PDF>.

supports the scope advanced in the OIR, which includes the following issues: (1) adoption of local capacity requirements; (2) adoption of flexible capacity requirements; (3) loss of load expectation (LOLE) study; (4) accreditation for long-duration energy storage (LDES); (5) unforced capacity ; (6) accreditation for solar and wind resources; (7) transactability issues within the slice-of-day (SOD) framework; (8) residual unit commitment for RA resources; (9) coordination with the Integrated Resource Planning proceeding; and (10) other refinements to the RA program.

The OIR asks parties to “identify no more than five (5) issues relating to refinements to the RA program that it believes should be addressed in this proceeding and list the issues in priority order.”⁴ CalCCA provides the following five priority issues, as described in detail in these comments. *First*, the Commission should address **RA SOD transactability** issues in this proceeding. CalCCA’s analysis submitted in R.23-10-011 demonstrates significant affordability benefits to increasing the transactability of the RA SOD program.⁵ CalCCA appreciates the Commission including transactability issues in the scope of this proceeding to consider Energy Division’s evaluation of the needs, benefits, and feasibility of hourly load obligation trading as authorized in Decision (D.) 25-06-048.⁶ The Commission should modify the schedule in the OIR to allow parties to file modified proposals following the release of the Energy Division report on transactability issues.

Second, the Commission should update the scope of this proceeding to include **RA load forecast** issues. The Commission’s process for working with the California Energy Commission (CEC) and LSEs to establish individual LSE RA requirements could benefit from increased transparency, collaboration, and certainty, especially considering the emergence of new data centers

⁴ OIR, at 5.

⁵ See *California Community Choice Association’s Proposals on Track 3*, R.23-10-011 (Jan. 17, 2025), at 8-11: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M553/K679/553679242.PDF>.

⁶ D.25-06-048, *Decision Adopting Local Capacity Obligations for 2026-2028, Flexible Capacity Obligations for 2026, and Program Refinements*, R.23-10-011 (June 26, 2025): <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M571/K237/571237404.PDF>.

and other large loads in the forecast. In addition, the RA program would benefit from more transparent demand allocation procedures that recognize the role each type of LSE plays in serving load and clear procedures for adjustments to individual LSE demand forecast allocations, and adjustments to the overall forecast.

Third, the Commission should clarify how local RA central procurement entities (CPE) are intended to use the aggregated results of LSEs' **local RA data request** responses in their procurement decisions. The September 19, 2025, Annual Compliance Reports from the CPEs suggest that the CPEs used the results to inform their local RA procurement in different ways.⁷ The Commission should use this proceeding to clarify how CPEs should use the results to inform reliable and cost-effective local RA procurement that does not require CPEs to over-procure local RA.

Fourth, the Commission should update the scope of this proceeding to coordinate with the CAISO on aligning the Commission's requirements for showing **maximum import capability (MIC) with the SOD framework**. The Commission has updated the requirements for showing fully or partially deliverable co-located resources located within CAISO system to align with SOD, in which either component can count for RA so long as the showing does not exceed the deliverability at the interconnection point in any hour. Similar updates should be considered for imports to ensure imports can provide their full amount of RA in each hour under the SOD program.

Fifth, the Commission should update the scope of this proceeding to include **demand response (DR), distributed energy resource (DER), and microgrid counting rules**. To the extent these issues

⁷ See Advice Letter (AL) 7704-E, *Pacific Gas and Electric Company ("PG&E") Central Procurement Entity ("CPE") 2025 Annual Compliance Report* (Sept. 19, 2025) (PG&E CPE Annual Compliance Report): https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_7704-E.pdf; see also AL 5632-E, *Southern California Edison Company's 2026 Central Procurement Entity Annual Compliance Report* (Sept. 19, 2025) (SCE CPE Annual Compliance Report): <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

are already scoped into another proceeding (*e.g.*, R.25-09-004), the Commission should coordinate the proceedings to ensure consistent rules and effective dates that align with RA showing timelines.

In summary, CalCCA recommends that the Commission:

- Address RA SOD transactability issues, as scoped in the OIR, with a modified schedule to allow parties to file updated proposals following the release of the Energy Division report on transactability issues in Q1 2026;
- Include load forecasting issues within the scope to improve processes with the CEC to increase transparency, collaboration, and certainty in the demand forecast, adjustment, and allocation process, especially considering the emergence of new data centers and other large loads in the forecast;
- Clarify how local RA CPEs are intended to use the aggregated results of LSEs' local RA data request responses in their procurement decisions;
- Consider within this proceeding updates to the Commission's requirements for showing MIC to align with the SOD framework; and
- Include DR, DER, and microgrid counting rules within the scope of this proceeding.

II. RECOMMENDED SCOPE PRIORITIZATION AND SCHEDULE MODIFICATIONS

A. The Commission Should Prioritize the RA SOD Transactability Scope Item and Modify the Schedule to Allow Parties to File Modified Proposals Following the Release of Energy Division's Report

CalCCA appreciates the Commission including RA SOD transactability issues within the scope, and recommends this issue be the highest priority in this proceeding. CalCCA's analysis of 2025 year-ahead RA filings submitted in R.23-10-011 demonstrates significant affordability benefits to increasing the transactability of the RA SOD program.⁸ Since then, CalCCA has issued a whitepaper further documenting the benefits of hourly trading by simulating competitive market trades between LSEs.⁹ CalCCA has also performed additional analysis on 2025 month-ahead RA showings from CCAs demonstrating that, averaged across five peak summer months, CCAs in aggregate

⁸ See *California Community Choice Association's Proposals on Track 3*, R.23-10-011 (Jan. 17, 2025), at 8-11: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M553/K679/553679242.PDF>.

⁹ See CalCCA, *Effective Mechanisms for Slice-of-Day RA Trading* (Apr. 24, 2025): https://cal-cca.org/wp-content/uploads/2025/04/4.24.25_Effective-Mechanisms-for-Slice-of-Day-RA-Trading.pdf.

purchased about 540 megawatts (MW) more RA capacity each month than they would have needed had a mechanism like hourly load obligation trading been available.¹⁰ At the 2025 final RA market price benchmark,¹¹ those excess purchases cost CCA consumers more than \$30 million in the summer of 2025. If the tight market conditions observed in the summer of 2024 arise again, as suggested by the Commission’s recommendation for additional procurement in R.25-060-019,¹² RA prices could rise again to the levels observed in 2024. The CCAs’ excess RA purchases valued at the 2024 RA prices described in CalCCA’s whitepaper¹³ would cost CCAs customers nearly \$51 million. Using similar assumptions about the indirect price reduction effect from lowering RA demand and the potential benefit of hourly obligation trading across all Commission-jurisdictional LSEs, CalCCA’s findings from the 2025 month-ahead RA data suggest hourly obligation trading could save all LSEs \$144-\$179 million each year. These savings could then directly improve affordability for ratepayers.

CalCCA looks forward to reviewing Energy Division’s report on the needs, benefits, and feasibility of hourly load obligation trading as authorized in D.25-06-048. The OIR does not specify a date for the issuance of the report beyond Q1 2026. Therefore, the report could come out shortly

¹⁰ To quantify the excess RA capacity that could have been avoided with hourly obligation trading, CalCCA first calculated the amount of thermal capacity each individual CCA could have sold from their final month-ahead portfolio, while still remaining compliant. To perform this calculation, CalCCA adjusted the way that an individual CCA would show its contracted storage capacity such that it maximized the amount of thermal capacity that could be removed. Next, CalCCA aggregated all CCA portfolios and requirements, and recalculated the excess thermal capacity from the aggregate showing. The aggregation is a proxy for what could be achieved through frictionless trade between LSEs, which is enabled through a policy like hourly load obligation trading. Finally, the excess RA capacity that could be avoided through hourly obligation trading was calculated as the difference between the excess of the aggregate and the excess for individual CCAs. On average across the five peak months from May to October, CalCCA observed 540 MW of excess thermal capacity that could have been avoided with hourly obligation trading.

¹¹ CPUC Energy Division. Market Price Benchmark Calculations 2025 (Oct. 1, 2025).

¹² *Administrative Law Judge’s Ruling Seeking Comments on Electricity Portfolios for 2026-2027 Transmission Planning Process and Need for Additional Reliability Procurement*, R.25-06-019 (Sept. 30, 2025): <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M582/K082/582082526.PDF>.

¹³ See CalCCA, *Effective Mechanisms for Slice-of-Day RA Trading* (Apr. 24, 2025): https://cal-cca.org/wp-content/uploads/2025/04/4.24.25_Effective-Mechanisms-for-Slice-of-Day-RA-Trading.pdf.

before proposals are due, after comments and reply comments are due, or somewhere in between. The Commission should modify the schedule to ensure parties can file updated proposals, comments, and reply comments based on the contents of Energy Division's report in the event the release of the report does not align with the rest of the schedule for proposals, comments, and reply comments established in the OIR.

B. This Proceeding Should Include Load Forecasting Issues in Scope

The Commission should coordinate with the CEC to increase transparency, collaboration, and certainty in the demand forecast, adjustment, and allocation processes used to set LSEs' RA requirements. These processes must be re-evaluated in the context of the unprecedented increased load predicted in the Demand Forecast established by the CEC's 2024 Integrated Energy Policy Report (IEPR) Update.¹⁴ This increase is driven in large part due to data centers, other large loads, and electrification. The CEC,¹⁵ other state and federal regulators,¹⁶ researchers,¹⁷ and the media have widely noted the difficulty of concluding whether these loads will materialize.

¹⁴ CEC 24-IEPR-01, adopted 2024 IEPR Update (Oct. 29, 2025): <https://www.energy.ca.gov/publications/2024/2024-integrated-energy-policy-report-update>.

¹⁵ CEC Docket No. 24-IEPR-03, Data Center Forecast presentation, Jenny Chen (Dec. 23, 2024), at 2: https://www.energy.ca.gov/sites/default/files/2024-12/Data_Center_Forecast_Update_ada.pdf; CEC staff acknowledged the uncertainties involved with their data center certainty analysis, stating during the 2024 Demand Forecast development that "[t]his has been a continually evolving process, as we learn more every day. The data center methodology will be improved next year."

¹⁶ For example, a recent letter to regional transmission organizations and independent system operators including the CAISO, from Federal Energy Regulatory Commission (FERC) Chairman Rosner highlights challenges and opens a dialogue regarding large load interconnections. *See* FERC Chairman Rosner's Letter to the RTOs/ISOs on Large Load Forecasting (Sept. 18, 2025): <https://www.ferc.gov/news-events/news/chairman-rosners-letter-rtosisos-large-load-forecasting> ("Our experience to date tells us that large loads, such as data centers, have characteristics that call for new and improved forecasting methods. Given the size and volume of new large load interconnection requests, I'm optimistic that utilities have an opportunity to apply similar criteria to those currently used to assess the commercial readiness of large projects in the generator interconnection queue. These objective criteria include observable milestones such as contracts, financial security deposits, and physical site control.").

¹⁷ *See, e.g., Fast, Flexible Solutions for Data Centers*, Rocky Mountain Institute (July 17, 2025): <https://rmi.org/fast-flexible-solutions-for-data-centers/> ("Some estimate that speculative interconnection requests could be five to ten times more than the actual number of data centers, as data centers "shop around" for the fastest interconnection opportunities and cancel data center projects in oversupply.").

These large load changes and their uncertainty can significantly affect the grid as a whole and individual LSEs. Failures in accuracy and timeliness, failure to account for the onsite generation of some data centers, or failure to account for the inherent uncertainty with these loads can result in significant consequences for specific LSEs. Large load customers changing their LSE on short notice could also significantly affect LSEs and their procurement. Too high a forecast could result in substantial procurement costs with little or no additional load to spread those costs. With too low a forecast, the LSE's RA requirements could be too low to meet reliability needs. In addition, depending on how the RA obligations are allocated, specific LSEs may be especially impacted.

The CEC's 2024 IEPR Update states:

Data centers will remain an area of focus for the 2025 IEPR forecast. Staff will continue to track new information, collaborate with utilities to monitor applications for new data centers, and ask for stakeholder feedback on inputs and assumptions. Staff will adjust inputs and assumptions for the 2025 IEPR forecast based on the most recent data.¹⁸

To this end, the Commission should coordinate with the CEC to hold a workshop(s) to ensure that the IEPR load forecast process and its use for RA purposes provides an accurate and timely load forecast. This process should aim to identify all sources of data that will enable highly accurate load forecasting, providing the maximum amount of time for all LSEs to provide input into their forecasts, and to adjust procurement to the accurate forecast.

The Commission and CEC's approach to load forecasting and RA requirement setting should also establish parameters for at what point to include data center and other loads in forecasts used to determine procurement obligations, given the potentially speculative nature of these loads. Given that data center loads are uncertain and cannot be made more certain even with very careful forecasting, the approach to forecasting and directing procurement for data center load needs to be carefully

¹⁸ 2024 IEPR Update, at 21.

crafted. The Commission should examine ways in which it can ensure a reasonable procurement program that may, in part, be based on speculative large loads such as data centers.

For example, the load forecast process should include a meaningful way for LSEs to dispute the forecast if they identify inaccurate load additions. Currently, the IEPR process is a zero-sum game. That is, to the extent one LSE changes its load forecast, the CEC adjusts other LSEs' forecasts in an equal and opposite direction. This process ensures that the total system wide load forecast remains unchanged. However, this may also not result in the best and most accurate estimates. The Commission and CEC should consider how best to address individual load forecast adjustments and their relationship to the system forecast as a whole, as noted in CalCCA's comments in the 2025 IEPR docket in which it recommends the CEC establish a focused procedural track to improve system demand forecasting and allocation.¹⁹

C. The Commission Should Clarify the Intended Use of the Local RA Data Request Responses in CPE Procurement Decisions

The Commission should clarify how CPEs should use the local RA data request responses in their procurement decisions to ensure reliable and cost-effective local procurement that does not result in over-procurement when LSE procurement meets local needs. D.24-12-003 adopted a local RA data request process to replace the non-compensated self-showing options. Energy Division provides aggregated local RA procurement information from LSEs to the CPEs so the CPEs can better assess "the state of the overall local portfolio" and "...the actual needs for short-term and long-term procurement for the three-year forward requirements and beyond."²⁰ The local RA data request process took effect in January 2025 for the 2026 RA compliance year. PG&E Annual Compliance

¹⁹ See CEC Docket No. 25-IEPR-03, *California Community Choice Association's Comments on the August 6, 2025, IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions* (Aug. 20, 2025): <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-IEPR-03>.

²⁰ D.24-12-003, *Decision on Track 2 Issues*, R.23-10-011 (Dec. 5, 2024), at 38: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M549/K295/549295013.PDF>.

Report and SCE Annual Compliance Report documented how each CPE took in to account the results of the data request in their procurement decisions.

The PG&E Annual Compliance Report states that:

Although this data does not count towards PG&E CPE's compliance needs, PG&E CPE used the data to inform its procurement decisions [REDACTED]. Without taking into account the LSE data aggregation results, following the 2025 PG&E CPE procurement efforts, the PG&E CPE has not been able to procure enough capacity to meet the needs in all months for any of the seven (7) local capacity areas within its territory and will be deferring procurement to CAISO backstop mechanisms for those areas for a majority of the months of the 2026 and 2027 compliance years.²¹

The SCE Annual Compliance Report states that:

This [Annual Compliance Report] demonstrates that SCE-CPE met the obligations set forth in D.20-06-002, D.20-12-006, D.22-03-034, and D.24-12-003. SCE-CPE did not select any offers for its 2025 SCE-CPE Local RA Request for Offers (RFO), as the CPUC Data Request File indicates sufficient local resources in the LA Basin (LAB) and Big Creek Ventura (BCV) local areas that are currently under contract. In short, the CPUC Data Request File demonstrates existing contracted capacity in excess of the Local Capacity needs identified in the CAISO technical studies for SCE-CPE's compliance obligations for years 2026-2028.²²

These statements show that the two local RA CPEs appear to use the results of the data request differently. SCE's approach appears superior, because accounting for LSE contracts for resources in local areas would limit over-procurement, therefore, offering ratepayer savings. SCE used the data request results to determine whether CPE plus LSE procurement resulted in sufficient local resources under contract. It is unclear how PG&E used the data request results, as PG&E states that the results "informed" its procurement but not its compliance needs. While not clear from the PG&E Annual Compliance Report whether accounting for LSE contracts for resources in local areas would have

²¹ PG&E CPE Annual Compliance Report, Public Attachment E, at 3-4.

²² SCE CPE Annual Compliance Report, Public Attachment 1, at 4.

covered all the PG&E CPE's deficiencies, it appears that even if they had, the PG&E CPE may have still conducted procurement because it did not account for the LSE data aggregation results. This could have resulted in excess and unnecessary procurement costs. The Commission should clarify within this proceeding how CPEs should use the local RA data request responses in their procurement decisions, so the CPEs can use the information consistently and cost-effectively.

D. The Commission Should Update its Requirements for Showing MIC to Align with the SOD Framework

The Commission should coordinate with the CAISO to consider in this proceeding how to align its requirements for showing MIC to align with the SOD framework and provide the full amount of RA in each hour. The advent of the SOD framework has made some RA accreditation rules considerably more complex. This is particularly true for interfaces between the Commission's and CAISO's processes. The CAISO has continued to evaluate RA as a single value on the peak day of the month while the Commission evaluates all hours on the "worst day" of the month. In doing so, the CAISO continues to perform a single hour evaluation, using variable resources' exceedance values in that hour because they no longer have an ELCC value, to determine if there is an RA deficiency that the CAISO must backstop.

These complications have also extended to the general concept of deliverability, which is measured by full or partial deliverability for resources interconnected to the CAISO-controlled grid and by MIC for imports to the CAISO controlled grid. Within the context of deliverability internal to the CAISO grid, the Commission has allowed co-located resources with full or partial deliverability status to count for RA where they do not exceed the deliverability at the interconnection point in any hour of shown RA.²³ This has enabled both the storage component and the co-located generating resource, typically a renewable generator, to both count for reliability. This recognizes that in an RA

²³ D.25-06-048, Ordering Paragraph 10.

showing, the storage component and the generating component are not being shown in the same hours and the deliverability can effectively serve both resources to count for reliability.

The same issue occurs for certain imports. It is possible that an LSE will contract with a renewable resource and storage outside of the CAISO and use those resources in different hours to meet their reliability needs. If done similarly to internal co-located resources as described above, both resources could meet reliability needs while being deliverable to any load on the grid.

The Commission should therefore coordinate with the CAISO to consider in this proceeding how MIC can be more efficiently used to provide the full amount of RA in each hour. This may include allowing an LSE to use the MIC for multiple resources, allowing entities to optimize the use of MIC across all hours, provided the resources are not shown in the same hours in excess of the MIC available. It could also include a mechanism to trade MIC or load obligations hourly so that entities can make the best use of MIC in all hours under SOD.

In addition, CAISO has scoped MIC allocation issues into its RA Modeling and Program Design initiative. Should the CAISO make changes in that process, this proceeding should consider the implications of any such changes on the Commission's program.

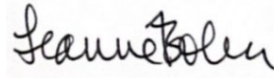
E. The Commission Should Include DR, DER, and Microgrid Counting Accreditation in the Scope of this Proceeding

The scope of this proceeding should include DR, DER, and microgrid accounting. The evolution of the RA program to SOD and the expected proliferation of these resources in the near future necessitate the revisiting or developing of accounting methodologies to ensure they align with the current RA program and provide RA value to new resources coming onto the system. To the extent these issues are already scoped into another proceeding (*e.g.*, R.25-09-004), the Commission should coordinate these proceedings to ensure consistent rules and effective dates that align with the RA showing timeline.

III. CONCLUSION

CalCCA appreciates the opportunity to submit these comments and respectfully requests adoption of the recommendations proposed herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leanne Bober", is centered below the closing text. The signature is written in a cursive, flowing style.

Leanne Bober,
Director of Regulatory Affairs and Deputy
General Counsel

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

November 4, 2025