STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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November 14, 2025

Agenda ID #23864
Ratesetting

TO PARTIES OF RECORD IN RULEMAKING 24-01-017:

This is the proposed decision of Administrative Law Judge Nilgun Atamturk. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's December 18, 2025 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure (Rules).

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4).

/s/ MICHELLE COOKE
Michelle Cooke
Chief Administrative Law Judge

MLC:nd3
Attachment

Decision **PROPOSED DECISION OF ALJ ATAMTURK (Mailed 11/14/2025)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.	Rulemaking 24-01-017

DECISION ON 2025 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLANS

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DECISION ON 2025 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLANS

Summary

Today's decision adopts, with modifications, the Draft 2025 Renewables Portfolio Standard (RPS) Procurement Plans of the following retail sellers:

1. The large Investor-Owned Utilities (IOUs) the California Public Utilities Commission (Commission) regulates: Pacific Gas and Electric Company (PG&E); Southern California Edison Company (SCE); and San Diego Gas & Electric Company (SDG&E).
2. The Small and Multi-Jurisdictional Utilities (SMJUs) under the Commission's jurisdiction: Bear Valley Electric Service, Inc. (BVES); Liberty Utilities (CalPeco Electric), LLC (Liberty); and PacifiCorp d/b/a Pacific Power (PacifiCorp).
3. Community Choice Aggregators (CCAs): Apple Valley Choice Energy; Ava Community Energy; Central Coast Community Energy; City of Palmdale; City of Pomona; City of Santa Barbara; City of San Jacinto dba San Jacinto Power; Clean Energy Alliance; Clean Power Alliance of Southern California; CleanPowerSF; Desert Community Energy; King City Community Power; Lancaster Choice Energy; Marin Clean Energy; Orange County Power Authority; Peninsula Clean Energy; Pico Rivera Innovative Municipal Energy; Pioneer Community Energy; Rancho Mirage Energy Authority; Redwood Coast Energy Authority; San Diego Community Power; San Jose Clean Energy; Silicon Valley Clean Energy; Sonoma Clean Power Authority; and Valley Clean Energy Alliance.
4. Electric Service Providers (ESPs): 3 Phases Renewables, Inc.; BP Energy Retail Company California LLC; Calpine Energy Solutions, LLC; Calpine Power America-CA, LLC; Commercial Energy of Montana, Inc.; Constellation NewEnergy, Inc.; Direct Energy Business, LLC; Pilot Power Group, LLC; Shell Energy North America (US), L.P.; and The Regents of the University of California.

Any Draft 2025 RPS Plan that does not require a correction, or clarification is deemed as final. For the Draft 2025 RPS Plans that require corrections as identified in this decision, the Final 2025 RPS Plans are due no later than 30 days following the issuance of this decision by the Commission. This decision adopts the following directives:

Large IOUs:

1. The IOUs' requests to procure long-term RPS-eligible resources are approved. Any Tier 3 Advice Letter submitted by the IOUs must clearly demonstrate that the contracts procured under this procurement authority are RPS-eligible and meet either RPS needs, portfolio goals from their Integrated Resource Planning (IRP) filings, or a formally adopted IRP portfolio, or any remaining IRP procurement needs for orders issued through the RPS Plan implementation year.
2. The IOUs are authorized to enter into short-term transactions to procure RPS resources by submitting contracts and receiving approval through the Tier 1 Advice Letter process. The IOUs must demonstrate that the contracts are RPS-eligible and that they are either needed to meet RPS needs or that the contracts are necessary for the IOUs to comply with IRP-related orders.
3. The IOUs' requests to eliminate the Tier 1 Advice Letter requirement for approval of short-term transactions are denied without prejudice as the oversight of short-term transaction filings will be addressed in the IRP proceeding.
4. PG&E is authorized to renegotiate its existing contracts.
5. PG&E's request to enter bilateral negotiations to procure long-term and short-term RPS-eligible resources and conduct short-term sales during the 2025 RPS cycle is approved.
6. PG&E's request for approval to transact bundled and unbundled RPS sales up to five years forward is approved.

7. PG&E is authorized to participate in other market participants' competitive solicitations to procure long-term and short-term RPS resources and to conduct short-term RPS sales.
8. PG&E is authorized to use brokers and exchanges to procure long-term and short-term RPS-eligible resources and to sell short-term RPS-eligible products.
9. PG&E is authorized to retire renewable energy credits (RECs) for Low Carbon Fuel Standard Credits.
10. PG&E must supplement its Final 2025 RPS Plan according to the directive provided in this decision.
11. SCE is authorized to purchase and sell portfolio content category (PCC) 1, PCC 2, and PCC 3 RECs.
12. SCE's request for approval of agreements is granted.
13. SCE's bid solicitations protocols are approved.
14. SCE is authorized to retire RECs for Low Carbon Fuel Standard Credits.
15. SDG&E is authorized to use banked RECs consistent with excess procurement rules to meet RPS requirements.
16. SDG&E is authorized to procure RECs for compliance.
17. SDG&E's request for short-term RPS sales (for five years or less) using its own solicitations and brokers and exchanges is approved.
18. SDG&E is authorized to buy and sell RECs in the same year.
19. SDG&E is authorized to participate in Request for Offers and utilize brokers and exchanges.
20. SDG&E must supplement its Final 2025 RPS Plan according to the directive provided in this decision.
21. The procuring IOUs must continue to submit either Tier 1 or Tier 3 Advice Letters seeking approval of the short-term or long-term procurement contracts, respectively.

22. The IOUs that sell RPS products must continue to submit Tier 1 Advice Letters seeking approval of the short-term sales contracts.

Small and Multi-Jurisdictional Utilities:

23. BVES' Draft 2025 RPS Plan is accepted as final with no modifications.

24. Liberty and PacifiCorp must supplement their Final 2025 RPS Plans according to the directive provided in this decision.

Community Choice Aggregators and Energy Service Providers:

25. Several CCAs and ESPs must supplement their Final 2025 RPS Plans according to the directives provided in Section 8 of this decision and its subsections.

This proceeding remains open.

1. Background

This section provides an overview of the California Renewables Portfolio Standard (RPS) program and the procedural background for the 2025 RPS planning cycle.

1.1. Renewables Portfolio Standard Program Overview

The RPS program was established by Chapter 516, Statutes of 2002 (Senate Bill (SB) 1078), and has since been modified several times by Chapter 464, Statutes of 2006 (SB 107); Chapter 685, Statutes of 2007 (SB 1036); Chapter 1, Statutes of 2011 (SB X1-2); Chapter 600, Statutes of 2011 (SB 836); Chapter 547, Statutes of 2015 (SB 350); and Chapter 312, Statutes of 2018 (SB 100). The RPS program is codified in Public Utilities (Pub. Util.) Code Sections 399.11-399.33.[1]

[1] All references are to the Public Utilities Code, unless otherwise noted.

SB 1078 established the RPS program, requiring that 20 percent of retail electricity sales come from renewable resources by 2017. SB 107 later accelerated this requirement, moving the 20 percent target to 2010. SB 1036 changed the RPS contract payment structure, while SB 836 required the California Public Utilities Commission (Commission) to report renewable energy contract costs to the Legislature.

SB X1-2 expanded the program by requiring all retail electricity sellers and publicly-owned utilities to procure at least 33 percent of electricity delivered to their retail customers from renewable resources by 2020. SB 350 added interim annual RPS targets with three-year compliance periods. It also required 65 percent of RPS procurement to come from long-term contracts lasting 10 years or more.

In 2018, SB 100 raised the target again to 60 percent by 2030 and set a broader goal for 100 percent of the state's retail electricity sales to come from renewable and zero-carbon resources by 2045. SB 1020 later established interim targets for eligible renewable energy resources and zero-carbon resources to supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, and 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040.

As part of implementing SB X1-2, the Commission refined the RPS procurement process in Decision (D.) 12-11-016. In earlier decisions, the Commission had set forth the process for filing and evaluating the RPS Procurement Plans (RPS Plans) of electrical corporations and other retail sellers. Under the statute, the term "retail seller" includes small and large electrical

corporations, Community Choice Aggregators (CCAs), and Electric Service Providers (ESPs).[2]

1.2. Procedural Background

On April 17, 2025, an assigned Commissioner and assigned Administrative Law Judge (ALJ) Ruling (2025 ACR) was issued according to the authority provided in Pub. Util. Code Section 399.13(a)(1). This 2025 ACR identified the 2025 RPS Procurement Plan filing requirements for all retail sellers of electricity and set a schedule for the Commission's review of the 2025 RPS Plans.

The following retail sellers timely filed their Draft 2025 RPS Plans: Pacific Gas and Electric Company (PG&E); Southern California Edison Company (SCE); San Diego Gas & Electric Company (SDG&E); Bear Valley Electric Service (BVES); Liberty Utilities (CalPeco Electric), LLC (Liberty); PacifiCorp d/b/a Pacific Power (PacifiCorp); Apple Valley Choice Energy; Ava Community Energy; Central Coast Community Energy; City of Palmdale; City of Pomona; City of Santa Barbara; Clean Energy Alliance; Clean Power Alliance of Southern California; CleanPowerSF; Desert Community Energy; King City Community Power; Lancaster Choice Energy; Marin Clean Energy; Orange County Power Authority; Peninsula Clean Energy; Pico Rivera Innovative Municipal Energy (Pico Rivera); Pioneer Community Energy; Rancho Mirage Energy Authority; Redwood Coast Energy Authority; San Diego Community Power; San Jacinto Power; San Jose Clean Energy; Silicon Valley Clean Energy; Sonoma Clean Power Authority; Valley Clean Energy Alliance; 3 Phases Renewables, Inc.; BP Energy Retail Company California LLC (BP Energy); Calpine Energy Solutions,

[2] Pursuant to Pub. Util. Code Section 399.12(j) retail seller means an entity engaged in the retail sale of electricity to end-use customers located within the state, including an electrical corporation, as defined in Section 218, a community choice aggregator, and an electric service provider, as defined in Section 218.3.

LLC; Calpine Power America-CA, LLC; Commercial Energy of Montana, Inc. (Commercial Energy); Constellation NewEnergy, Inc.; Direct Energy Business, LLC; Pilot Power Group, LLC (Pilot Power); Shell Energy North America (US), L.P. (Shell Energy); and The Regents of the University of California. Brookfield Renewable Energy Marketing US LLC (BREMUS) filed a motion for exemption from filing its current and future RPS plans.

Comments on the Draft 2025 RPS Plans were filed on July 28, 2025, by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). Reply comments were filed on August 11, 2025, by PG&E, SCE, and SDG&E.

On August 11, 2025, SCE filed a motion to update its Draft 2025 RPS Plan; SDG&E filed substitute sheets to update its Draft 2025 RPS Plan. Cal Advocates filed a response to these updates on August 26, 2025. SCE and SDG&E filed replies to Cal Advocates' response on September 5, 2025.

1.3. Submission Date

This matter was submitted on September 5, 2025, upon receipt of replies to Cal Advocates' response to SCE's and SDG&E's submittals to update their draft 2025 RPS Plans.

2. Issues Before the Commission

In this decision, we review the Draft 2025 RPS Plans for information required by statute and the 2025 ACR and dispose of any requests or proposals specific to each retail seller.

To help retail sellers organize the submission of comprehensive 2025 RPS Plans, the 2025 ACR listed specific issues to address and guidance on managing the information, including quantitative analysis and narratives supporting the retail seller's assessment of its portfolio's future procurement decisions.

The issues required by statute and the 2025 ACR are as follows:[3]

1. Assessment of RPS Portfolio Supplies and Demand;
2. Project Development Status Update (PDSU);
3. Potential Compliance Delays;
4. Risk Assessment;
5. Renewable Net Short (RNS) Calculations;
6. Minimum Margin of Procurement (MMoP);
7. Bid Solicitation Protocol;
8. Safety Considerations;
9. Consideration of Price Adjustments;
10. Cost Quantification; and
11. Impact of Transmission and Interconnection Delays.

We reviewed the Draft 2025 RPS Plans for completeness, accuracy, and compliance. Based on the guidance in the 2025 ACR, we also examined the Draft 2025 RPS Plans for the following:

1. Compliance with Table 1 of the 2025 ACR, which required all RPS Plans to be accompanied by a checklist.
2. Description of the retail seller's overall plan for procuring RPS resources to satisfy the RPS program requirements while minimizing cost and maximizing value to customers, as well as demonstrating how retail sellers comply with direction for RPS planning in SB 350, SB 100, and SB 901 (Dodd, Stats. 2018, ch. 626). This includes, but is not limited to, any plans for building retail seller-owned resources, investing in renewable resources, and engaging in the sales of RPS-eligible resources.
3. Consistency of information in the RPS Plan.

[3] S*ee* 2025 ACR, Table 1 Summary of Requirements for 2025 RPS Plans, for the complete list of 2025 RPS Plan requirements.

4. Thoroughly describing and addressing procurement and sales of RPS-eligible resources to demonstrate reliability and alignment with the State's policy goals. The 2025 ACR required responses that provide summaries and detailed descriptions necessary to understand how a retail seller's planning and procurement strategies address state goals and satisfy statutory requirements.
5. Compliance with the format and numbering convention in Table 1 of the 2025 ACR.

3. Organization of the Decision

The RPS statute requires that retail sellers prepare an annual RPS procurement plan for Commission review.[4] This decision reviews 41 Draft 2025 RPS Plans filed by the IOUs (3), SMJUs (3), ESPs (10), and CCAs (25). The Commission has reviewed and approved or accepted annual RPS procurement plans for over a decade. Besides reviewing the need for procurement and sale of RPS-eligible resources to balance their portfolios, reviewing the three large IOUs' procurement plans has become routine. This decision describes only the sections of the IOUs', ESPs', and CCAs' procurement plans that are key, disputed, seeking specific requests, or contain deficiencies.

4. Assessment of Renewables Portfolio Standard Long-Term Procurement Requirement

SB 350 increased the RPS long-term contracting requirement such that 65 percent of all procurement used for RPS compliance must be through contracts with terms of 10 years or longer. The 65 percent long-term requirement became effective for all retail sellers in the 2021-2024 compliance period (CP) 4, though some elected for early compliance in the 2017-2020 compliance period (CP 3). Prudent long-term contracting assessments should be used to inform a

[4] Pub. Util. Code § 399.13(a).

retail seller's RPS procurement planning and procurement decisions for current and future compliance periods.

Our current assessment of the retail sellers' compliance with the 65 percent long-term procurement requirement shows that all but two retail sellers are forecasted to meet the requirement for the 2025-2027 compliance period (CP 5).[5] This represents an improvement from last year, when the assessment showed that all but nine were forecasted to meet the requirement.[6]

The Commission continues to encourage early planning on long-term procurement to hedge for delays in project development for new renewable build and potential project performance issues. Inadequate long-term procurement planning can impact the risk profile of a retail seller's portfolio and impede the State's progress towards meeting RPS goals.

5. Summary of Party Comments on Draft 2025 Renewables Portfolio Standard Plans

Cal Advocates was the only party to file comments on the IOUs' Draft 2025 RPS Plans. In its comments, Cal Advocates recommends that the Commission deny the IOUs' requests for incremental long-term RPS procurement, reject the IOUs' request to remove the Tier 1 Advice Letter requirement for short-term RPS contracts, and reject PG&E's proposed changes to its short-term RPS transaction framework.[7]

First, Cal Advocates asserts that the IOUs' plans show that the requested IOU procurement is not needed to meet the IOUs' respective 2030 RPS targets.[8]

[5] This assessment is based on the retail sellers' most recent annual RPS compliance reports, submitted on August 1, 2025, approximately one month after Draft 2025 RPS Plans were filed.

[6] D.24-12-035 at 11.

[7] Cal Advocates Comments on the Draft 2025 RPS Plans, July 28, 2025, at 1.

[8] Cal Advocates Comments on the Draft 2025 RPS Plans, July 28, 2025, at 1-4.

Cal Advocates argues that unnecessary procurement of RPS resources could significantly increase curtailment costs, which, in Cal Advocates' view, are already a concern and place a financial burden on ratepayers.[9] Cal Advocates recommends that to reduce the risk of avoidable curtailment costs, the Commission should require the IOUs to procure RPS-eligible resources through the Integrated Resource Planning (IRP) process to avoid grid congestion charges.[10]

Second, noting that this is the third straight year that the IOUs seek to replace the Tier 1 Advice Letter approval process with their proposed pre-approval process, Cal Advocates state that the IOUs do not provide evidence that the Tier 1 Advice Letter process harms their ability to compete in the short-term RPS market, including specific contracts lost, along with cost analyses showing potential savings for ratepayers if the process were not in place.[11]

Finally, opposing PG&E's proposed revisions, Cal Advocates argues that PG&E's proposed changes would remove key safeguards that protect ratepayers from overpaying for or underselling short-term RPS resources. Noting that price floors and ceilings ensure transactions reflect fair market value and that benefits from REC sales go to ratepayers, Cal Advocates argues that allowing PG&E to bypass these protections undermines their purpose and exposes ratepayers to unreasonable risks.[12]

[9] Cal Advocates Comments on the Draft 2025 RPS Plans, July 28, 2025, at 4.

[10] Cal Advocates Comments on the Draft 2025 RPS Plans, July 28, 2025, at 5.

[11] Cal Advocates Comments on the Draft 2025 RPS Plans, July 28, 2025, at 6.

[12] Cal Advocates Comments on the Draft 2025 RPS Plans, July 28, 2025, at 12-13.

6. Investor-Owned Utilities' Draft 2025 Renewables Portfolio Standard Plans

SB 100 set a requirement for retail sellers to meet a 60 percent RPS procurement target by 2030. D.19-06-023 implemented the revised procurement quantity requirements established by SB 100 and specified that, for the 2021-2024 compliance period, retail sellers must procure at least 44 percent of their retail sales from eligible renewable energy resources by December 31, 2024. The decision also required that procurement in the intervening years follow the quantities calculated by the straight-line trend method.[13]

The three large IOUs — PG&E, SCE, and SDG&E — reported RPS progress at or above the program procurement requirements for compliance period 2021-2024 (CP 4). For 2024, the IOUs reported that 44 percent of PG&E's load,[14] 49 percent of SCE's load,[15] and 49.99 percent of SDG&E's load[16] was met by RPS-eligible resources. For the compliance period 2025-2027 retail sellers must procure no less than 52 percent of their retail sales from eligible renewable energy resources by December 31, 2027.

Figure 1 below summarizes the large IOUs' actual and forecasted progress toward meeting the 60 percent RPS mandate by 2030.

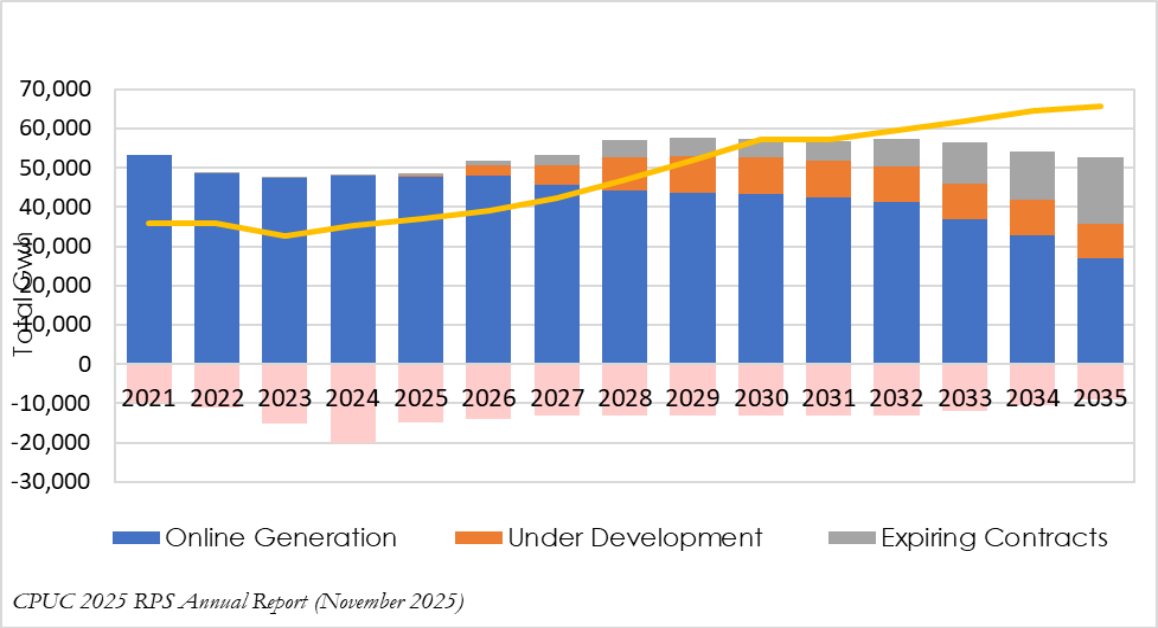
[13] D.19-06-023 at Ordering Paragraph (OP) 1.

[14] PG&E Draft 2025 RPS Plan at Appendix C.1 and C.2.

[15] SCE Draft 2025 RPS Plan at Appendix C.1 and C.2.

[16] SDG&E Draft 2025 RPS Plan at Appendix 1a and 1b.

Figure 1: Aggregated Investor-Owned Utilities' Progress Toward 60 Percent Renewables Portfolio Standard



6.1. Investor-Owned Utilities' Request to Eliminate Tier 1 Advice Letter Requirement for Approval of Short-Term Transactions

In their Draft 2025 RPS Plans, for the third time, PG&E, SCE, and SDG&E request authority to eliminate the Tier 1 Advice Letter review process for short-term RPS contract approval and replace it with a pre-approval process. In the proposed process, the IOUs could execute short-term (terms of less than three years in duration) transactions that are consistent with strategies detailed in their RPS Plans and reviewed through quarterly compliance reports. Currently, pursuant to D.14-11-042, IOUs must submit their contracts and receive approval via Tier 1 Advice Letter before deliveries can occur. In its comments on the Draft 2025 RPS Plans, Cal Advocates opposed this proposal, recommending that the Commission keep the current Tier 1 review process.

Recently, after the IOUs filed their Draft 2025 RPS Plans, the Commission issued D.25-08-009, denying the IOUs' prior request submitted in their 2024 RPS

Plans and determined that the IOUs did "not provide sufficient evidence to support their claim that the current Tier 1 AL filing requirement has significantly disadvantaged them in the short-term RPS market and the ratepayers have been harmed."[17]

Subsequently, SCE filed a motion to update its Draft 2025 RPS Plan and SDG&E submitted substitute sheets to its 2025 RPS Plan, supplementing their requests to eliminate the Tier 1 Advice Letter requirement for approval of short-term transactions. SCE provided analysis on the financial impact to bundled customers from the requirement for Tier 1 Advice Letter review of short-term REC transactions and SDG&E submitted substitute sheets to address the "Commission's concerns, including transactions that were not completed or entertained, cost savings not realized, RPS goals not met based on its recent experience, and SDG&E's purchase price methodology."[18]

Cal Advocates filed a response to the IOUs' updates, stating that "…the Commission should conclude that the additional information fails to address the evidentiary standards and program oversight determinations the Commission adopted in [D.25-08-009]." Cal Advocates recommended that the Commission uphold its finding in D.25-08-009 that the Tier 1 Advice Letter review process for short-term RPS transactions provides the Commission oversight needed to protect ratepayer interests and to preserve the integrity of the RPS program.[19] In their replies, SCE and SDG&E disagreed with Cal Advocates.

This decision will not address the merits of the IOUs' requests for eliminating the Tier 1 Advice Letter review process for short-term transactions as

[17] D.25-08-009 at 16.

[18] SDG&E's Submittal at 69.

[19] Cal Advocates Response to Motions to Update Draft 2025 RPS Plans, August 26, 2025, at 2.

included in the Draft 2025 RPS Plans and updates filed after D.25-08-009 was adopted. The Commission herein denies the IOU requests without prejudice. In D.25-08-009, the Commission noted that it may consider the oversight of short-term transactions, among other procurement transactions, in the new IRP proceeding, the RA proceeding or its successor, or another applicable proceeding.[20] Further, D.25-08-009 also emphasized the administrative difficulty of establishing a new review program at that time. The decision stated that if the Commission adopted the IOU proposal for after-the-fact review and approval of short-term RPS transactions, a new review process would have to be created, requiring time and resources to implement. The Commission today maintains that position.

The Commission initiated *Rulemaking to Continue Oversight of Electric Integrated Resource Planning and Procurement Processes* (Rulemaking (R.) 25-06-019) on June 26, 2025. In the Order, the Commission noted that the proceeding will be, to the extent necessary, the venue for considering the bundled procurement plans and procurement rules applicable to the three large electric IOUs.[21] The R.25-06-019 scoping memo and ruling issued on October 28, 2025, expressly includes within its scope the review and necessary modifications to the IOU bundled procurement plans, procurement rules and oversight, activities associated with Pub. Util. Code Section 454.5, and any other issues that materially impact procurement policies, practices, and/or procedures, including proposals for oversight processes for short-term RPS transactions.[22] Therefore,

[20] D.25-08-009 at 19.

[21] Order Initiating Rulemaking to Continue Oversight of Electric Integrated Resource Planning and Procurement Processes at 2.

[22] R.25-06-019 Assigned Commissioner's Scoping Memo and Ruling at 9.

any changes to the review processes of short-term transactions, renewable or non-renewable, will be addressed in R.25-06-019. Until that occurs, the IOUs must continue to adhere to the transaction review process requirements established in D.14-11-042. Accordingly, the IOUs must continue to file a Tier 3 Advice Letter for approval of long-term transactions and a Tier 1 Advice Letter for short-term transactions that are conducted in accordance with the transaction framework approved in their RPS Plans.

6.2. Pacific Gas and Electric Company's Draft 2025 Renewables Portfolio Standard Plan

PG&E's Draft 2025 RPS Plan contains all the required elements listed in Table 1 of the 2025 ACR and is approved with modifications. PG&E must seek Commission approval of any RPS contracts consistent with existing procedures by submitting a Tier 3 or Tier 1 Advice Letter.

In its Draft 2025 RPS Plan, PG&E reports a sustained physical RPS short position beginning in 2023, primarily resulting from the Voluntary Allocation and Market Offer (VAMO) processes.[23] According to PG&E, with allocations and sales beginning deliveries in 2023, the VAMO mechanism lowered its Power Charge Indifference Adjustment (PCIA)-eligible RPS portfolio volume retained for its bundled service customers.[24] Other key factors affecting PG&E's RPS position include anticipated data center load growth affecting PG&E's load forecast and the reduction of RPS resources that were borrowed to meet Green Tariff/Shared Renewables (GTSR) program requirements.[25] PG&E notes that any

[23] PG&E Draft 2025 RPS Plan at 3.

[24] PG&E Draft 2025 RPS Plan at 4.

[25] PG&E Draft 2025 RPS Plan at 5.

future RPS-eligible resources procured to fulfill IRP procurement orders could offset the reductions in PG&E's RPS portfolio.[26]

To meet its RPS compliance needs, PG&E anticipates using both its existing RPS-eligible portfolio and banked resources. PG&E states that it intends to support customer affordability by utilizing its Bank while cost effectively building out its RPS portfolio to meet its future procurement needs.[27] PG&E plans to begin procurement early but in a gradual manner to reduce the risk of over-procurement.[28] PG&E's long-term RPS position strategy also includes possible sales of surplus volumes to balance portfolio needs and achieve cost-savings.[29]

As reported in its Draft 2025 RPS Plan, PG&E's RPS portfolio costs are expected to average about $1.9 billion per year during the period 2025-2035.[30]

Overall, the Commission finds PG&E's portfolio management strategy reasonable and approves its Draft 2025 RPS Plan as modified. The portfolio management strategy aims to meet short-term and long-term RPS requirements while seeking economical transactions that will promote affordability goals and optimize its RPS portfolio. The following sections primarily address PG&E's requests that require Commission approval. PG&E must update its Final RPS Plan as directed below.

[26] PG&E Draft 2025 RPS Plan at 6.

[27] PG&E Draft 2025 RPS Plan at 3.

[28] PG&E Draft 2025 RPS Plan at 7-8.

[29] PG&E Draft 2025 RPS Plan at 57-58.

[30] PG&E Draft 2025 RPS Plan at 127.

6.2.1. Pacific Gas and Electric Company's Request for Streamlined Approval for Short-Term Renewables Portfolio Standard Transactions with Terms of Up to Three Years

As discussed in Section 6.1 of this decision, PG&E's request is denied without prejudice. Any process changes for oversight of short-term transactions will be addressed in R.25-06-019.

6.2.2. Pacific Gas and Electric Company's Request for Authority to Procure Short-Term and Long-Term Renewables Portfolio Standard Resources

PG&E's request for authority to procure short-term and long-term RPS resources is approved.

PG&E requests authority to procure both long- and short-term RPS resources. PG&E states that while PG&E does not have a near-term RPS procurement need, PG&E requests authority to procure short-term RPS-eligible products to meet other portfolio needs such as Mid-term Reliability (MTR) bridging resources.[31] PG&E states that it may also procure short-term RPS products to cover gaps until long-term projects begin delivering, or to meet additional portfolio needs at the lowest cost.[32]

PG&E also plans to procure additional long-term RPS products to meet its future RPS obligations and address other portfolio needs, including energy, capacity, and other clean energy requirements set by SB 100, SB 1020 and the IRP proceeding. Because factors such as data center load growth may accelerate demand, and federal policy changes raise costs and complicate project

[31] PG&E Draft 2025 RPS Plan at 7-9, 15, and 111.

[32] PG&E Draft 2025 RPS Plan at 15.

development, PG&E is requesting authority to begin procurement now to reduce risks related to cost, development, regulatory changes and compliance.[33]

PG&E's request to enter into long-term and short-term procurement contracts for the purposes stated above is approved. In D.24-12-035, the Commission has recognized "the need for the IOUs to timely conduct solicitations to flexibly meet potential compliance needs and start planning for uncertainties." The Commission recognized the IOUs' procurement needs by stating "while the IOUs have banked resources, they may still need to require additional RPS resources for their energy and capacity needs as well as to meet GHG emission targets. We also recognize the need to plan ahead to continue to optimize RPS portfolios in an increasingly competitive renewable energy market; waiting to plan for procurement until the banked resources are depleted may not be the most cost-effective strategy."[34]

For the current planning cycle, the Commission maintains the same conclusion. While short-term purchases help PG&E fill near-term RNS gaps, as needed, long-term contracts should provide stability and help meet state's long-term contracting requirements under SB 350. Combining both short-term and long-term products allows the IOUs to balance resource types, terms and risk exposures.

For any long-term RPS transactions executed under this RPS Plan, PG&E must seek approval from the Commission via the Tier 3 Advice Letter process. Any Tier 3 Advice Letter submitted by the IOUs must clearly demonstrate that the resources procured under this procurement authority are RPS-eligible and

[33] PG&E Draft 2025 RPS Plan at 15-16.

[34] D.24-12-035 at 17.

meet either: (1) RPS needs, portfolio goals from their IRP filings, or a formally adopted IRP portfolio, or (2) any remaining IRP procurement needs to comply with orders issued through the RPS Plan implementation year. As stated in D.24-12-035, portfolio goals may include system reliability, greenhouse gas emission targets, or portfolio resource mix optimization. For any short-term transactions executed, PG&E must seek approval from the Commission via the Tier 1 Advice Letter process.

6.2.3. Pacific Gas and Electric Company's Request for Authority to Renegotiate Existing Contracts

PG&E requests to maintain authority to optimize its existing portfolio of RPS-eligible contracts by renegotiating existing contracts. PG&E states that it would pursue contract amendments related to but not limited to contract price reductions, extensions of contract terms, increased buyer curtailment flexibility, and repowering of existing facilities and/or upgrades of existing facility equipment.[35] PG&E clarifies that any potential upgrades or change in commercial terms may result in existing resources potentially being shut down for a period of time before being repowered.[36]

PG&E's request aims to provide value to the ratepayers, and therefore, is approved. If any contract amendments or restatements result from renegotiations, PG&E must submit a Tier 3 Advice Letter for Commission review.

[35] PG&E Draft 2025 RPS Plan at 15-16.

[36] PG&E Draft 2025 RPS Plan at 16.

6.2.4. Pacific Gas and Electric Company's Request for Authority to Transact Renewables Portfolio Standard Products via Bilateral Negotiations

PG&E requests to maintain authority to transact bilaterally for the purchase and sale of both short- and long-term RPS products. PG&E states that the continuance of this authority will allow PG&E to take advantage of opportunities to optimize its portfolio in support of customer affordability.[37]

PG&E states that in the current market it frequently competes with other market participants to purchase or sell RPS products. PG&E believes that being allowed to transact bilaterally would align PG&E's transactional authority with other market participants and help PG&E to manage its portfolio more effectively while meeting its requirements at competitive costs for bundled customers.[38]

Given the increasing competitiveness in renewable energy markets, the Commission finds PG&E's request to enter into bilateral negotiations is reasonable. Bilateral negotiations may help fill specific gaps in PG&E's portfolio, *e.g.*, particular delivery shape, that may not be available in solicitations, and may yield favorable prices to benefit ratepayers. PG&E must continue to submit Tier 3 Advice Letters for any long-term RPS contracts resulting from bilateral negotiations and a Tier 1 Advice Letter for short-term transactions.

[37] PG&E Draft 2025 RPS Plan at 16.

[38] PG&E Draft 2025 RPS Plan at 16.

6.2.5. Pacific Gas and Electric Company's Request to Transact Bundled and Unbundled Renewables Portfolio Standard Sales for Less Than Five Years Forward

PG&E requests to maintain approval from the Commission to transact RPS sales for deliveries of less than five years forward from the execution date, seeking to clarify that its short-term sales authority is inclusive of both bundled and unbundled RPS products.[39] PG&E believes the flexibility to offer extended delivery terms and inclusion of both bundled and unbundled products would make its sales solicitations more competitive. According to PG&E, this approach can better match buyer needs while giving PG&E opportunity to sell products it may not need for compliance or bundled load, especially if lower cost options or other resources like its RPS bank are available. Longer-term sales can also help balance the portfolio as new resources come online in later years.[40]

Under its 2022 RPS Plan, PG&E was authorized to transact bundled RPS sales for a period of up to two years from the execution date, and in its 2023 Plan, the Commission extended this authority for an additional three years, for a total of five years. Under its 2024 RPS Plan, PG&E's request for approval to transact bundled RPS sales up to five years forward was granted.

For the current planning cycle, the Commission again finds PG&E's request for approval to transact bundled and unbundled RPS sales up to five years forward reasonable and approves it. PG&E must seek Commission approval of any RPS contracts consistent with existing procedures by submitting a Tier 1 or Tier 3 Advice Letter.

[39] PG&E Draft 2025 RPS Plan at 17.

[40] PG&E Draft 2025 RPS Plan at 17.

6.2.6. Pacific Gas and Electric Company's Request for Authority to Bid into Other Market Participant-Initiated Competitive Solicitations

PG&E requests authority to participate in other market participants' competitive solicitations. Under its 2024 RPS Plan, the Commission granted PG&E authority to procure short-term and long-term RPS resources and sell short-term RPS resources, only, through competitive solicitations.

Given PG&E's RPS portfolio needs for short- and long-term products and need to sell, its request for authority to bid into other market participant-initiated competitive solicitations is reasonable and granted.

PG&E must submit a Tier 3 Advice Letter for approval of long-term transactions and a Tier 1 Advice Letter for short-term transactions.

6.2.7. Pacific Gas and Electric Company's Request for Authority to Transact via Brokers and Exchanges

PG&E requests to continue its authority to conduct RPS transactions through brokers and exchanges. PG&E believes that "maintaining this authority will support a level playing field, permit PG&E to access potentially lower cost products, therefore allowing PG&E to implement its portfolio optimization strategy to meet its RPS requirements and other portfolio needs while maximizing customer affordability."[41]

PG&E's request is reasonable and approved. Given PG&E's RPS procurement needs, PG&E is authorized to procure and sell short-term and long-term RPS products through brokers and exchanges.

[41] PG&E Draft 2025 RPS Plan at 18.

6.2.8. Pacific Gas and Electric Company's Request to Retire Renewable Energy Credits for Low Carbon Fuel Standard Credits

D.23-12-008 granted PG&E the authority to claim incremental Low-Carbon Fuel Standard (LCFS) Credits through the retirement of RECs.[42] D.24-12-035 further allowed PG&E to retire RECs for LCFS credits from either the PCIA-eligible portfolio or its own shares of Voluntary Allocations, or both.[43] PG&E requests to continue its authority.

With the growth of electric vehicle (EV) adoption, PG&E anticipates higher participation in its current and future EV programs, along with more barriers to address in supporting transportation electrification.[44] According to PG&E, to increase the amount of credits and credit revenues to fund the LCFS programs, claiming incremental LCFS Credits through retirement of RECs demonstrates that PG&E is utilizing zero carbon-intensity electricity for EV charging.

PG&E's request is reasonable and approved. PG&E may retire RECs for LCFS credits from either the PCIA-eligible portfolio or its own shares of Voluntary Allocations, or both.

6.2.9. Deficiencies in Pacific Gas and Electric Company's Draft 2025 Renewables Portfolio Standard Plan

PG&E's Draft 2025 RPS Plan meets the requirements of the 2025 ACR except for an inconsistency identified in Section V (Project Development Status Update) of its Draft 2025 RPS Plan.

[42] D.23-12-008 at OP 9.

[43] D.24-12-035 at OP 15.

[44] PG&E Draft 2025 RPS Plan at 19.

In PG&E's Draft 2025 RPS Plan, under Section V (Project Development Status Update) the Commercial Online Dates (CODs) for the Camptonville Biopower 1 project do not match between the Excel file version of the PDSU template, the PDSU template attached to the RPS Plan as Appendix P, and Table 5-1 of the RPS Plans narrative. In addition, the Project Notes cell (column W) of the Excel file version of the PDSU includes notes for the Camptonville Biopower 1 project, while the Project Notes cell of the PDSU in Appendix P is blank. These CODs and project notes should be clarified, and PG&E must ensure that the information provided in Section V of the RPS Plan narrative, the PDSU Excel file, and the PDSU in Appendix P is consistent and up to date.

PG&E must correct the inconsistencies described above in its Final 2025 RPS Plan.

6.3. Southern California Edison Company's Draft 2025 Renewables Portfolio Standard Plan

SCE's updated Draft 2025 RPS Plan contains all the required elements listed in Table 1 of the 2025 ACR. SCE's updated Draft 2025 RPS Plan is approved with modifications. SCE must seek Commission approval of any RPS contracts consistent with existing procedures by submitting a Tier 3 or Tier 1 Advice Letter.

In its Draft 2025 RPS Plan, SCE forecasts a need for additional RPS-eligible resources. According to SCE's deterministic analysis, SCE will need to procure 17,748 gigawatt-hours (GWh) by the end of the compliance period 2028-2030 (CP 6) to meet its CP 6 RPS compliance requirements.[45] If SCE takes into account high levels of uncertainty around load growth and generation output that is

[45] SCE Draft 2025 RPS Plan at 1.

expected to change as CP 6 gets closer in time, it may need to procure up to 29,400 GWh by the end of 2030.[46] This analysis includes the executed contracts SCE has signed to meet its IRP MTR procurement requirements. These contracts will provide 5,200 GWh of RECs in CP 5 and 16,200 GWh of RECs in CP 6.[47]

The main factor affecting SCE's RPS position is the change in annual energy demand. SCE reports that its First Quarter 2025 bundled sales forecast reflects an average 5.8 percent increase in annual energy demand between 2025 and 2035 compared to the previous forecast used in last year's plan. For the years 2028 through 2031, the bundled sales forecast is about 5.3 percent higher each year than the prior forecast.[48] According to SCE, this increase is driven by data center load and lower solar PV generation due to updated cost estimates, and the City of Huntington Beach reverting to bundled service with SCE.[49]

SCE intends to meet its RPS compliance requirements by procuring additional RPS-eligible resources through its Clean Energy Request for Offers (RFOs) (for IRP), RPS solicitations, and bilateral negotiations.[50] Procuring both new and existing RPS resources, as well as Portfolio Content Category (PCC) 1, PCC 2, PCC 3 RECs, will provide SCE flexibility to meet its RPS targets.[51]

As noted in its Draft 2025 RPS Plan, SCE's RPS portfolio costs are expected to average about $2.1 billion per year during the period 2025-2035.[52]

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[46] SCE Draft 2025 RPS Plan at 1.

[47] SCE Draft 2025 RPS Plan at 2.

[48] SCE Draft 2025 RPS Plan at 14-15.

[49] SCE Draft 2025 RPS Plan at 14-15.

[50] SCE Draft 2025 RPS Plan at 2.

[51] SCE Draft 2025 RPS Plan at 11-12.

[52] SCE Draft 2025 RPS Plan at Appendix D.

Overall, the Commission finds SCE's portfolio management strategy reasonable and approves its RPS Plan as modified. SCE's Draft 2025 RPS Plan demonstrates a well-reasoned approach to meet short- and long-term RPS requirements. The following sections primarily address SCE's requests that require Commission approval.

6.3.1. Southern California Edison Company's Request for Authority to Procure Additional Renewables Portfolio Standard-Eligible Resources

SCE requests authority to procure up to 29,400 GWh of additional RPS-eligible new and existing resources to meet its CP 6 RPS requirements.[53] SCE supports its request by several factors, including the following:

1. Supply shortage issues, uncertainty in new tariffs, and potential reductions in the Inflation Reduction Act (IRA) tax credits available to renewable energy and battery energy storage projects have caused significant delays in both resource contracting and resources coming online.[54]
2. As the interconnection requests to California Independent System Operator more than doubles, a significant number of projects have been delayed in the interconnection queue.[55]
3. Macroeconomic market changes and electrification have caused variation in SCE's load and existing renewable generation, resulting in greater variability in SCE's RPS position.[56]
4. There is increasing competition for RECs due to retail sellers procuring RECs to meet their increasing RPS

[53] SCE Draft 2025 RPS Plan at 2, 9-12.

[54] SCE Draft 2025 RPS Plan at 3 and 11.

[55] SCE Draft 2025 RPS Plan at 3-4.

[56] SCE Draft 2025 RPS Plan at 12, 29.

compliance targets, and commercial and industrial participants procuring RECs to meet their corporate clean energy targets.[57]

5. There is need to procure additional renewables to serve as a buffer to cover risk of project delays and failure.[58]
6. Procuring sufficient resources to meet SCE's MTR compliance obligations for all categories, including Diablo Canyon Replacement and firm zero-emitting, and actively negotiating to meet IRP clean energy requirements through solicitations authorized in the IRP docket is not sufficient for SCE to meet its RPS compliance requirements.[59]
7. SCE believes it is prudent to start procuring early since there are five years left until 2030 when SCE has a procurement need to comply with its CP 6 RPS goal.[60]

SCE also expresses a need for existing resources, as they might be procured at lower costs, are already online and can deliver RECs immediately. Also, these resources are already operationalized within SCE's contract management, settlement, and bidding systems.[61] Therefore, in SCE's view, extending or renewing contracts with them would reduce risk compared to new projects, which may face development delays or interconnection backlogs.[62]

Upon review, the Commission concludes that SCE's request for additional procurement is adequately justified. In D.24-12-035, the Commission found that authorizing early solicitation would help the IOUs meet their RPS needs, procure

[57] SCE Draft 2025 RPS Plan at 12.

[58] SCE Draft 2025 RPS Plan at 29.

[59] SCE Draft 2025 RPS Plan at 9.

[60] SCE Draft 2025 RPS Plan at 10.

[61] SCE Draft 2025 RPS Plan at 11.

[62] SCE Draft 2025 RPS Plan at 11.

competitive resources, and address overlapping procurement needs in an efficient and cost-effective manner.[63] The Commission also cautioned that the authorization granted would not obligate the IOUs to procure any resources unless the IOUs deem it necessary, with all transactions being subject to the Commission's review and approval.[64] The directive remains the same this year.

Based on the supporting factors SCE presented in its Draft 2025 RPS Plan, SCE's request to procure new and existing RPS-eligible resources using long- or short-term contracts is reasonable and approved with modifications. Any Tier 3 Advice Letter to be submitted by SCE must show that the contracts procured under this procurement authority are RPS-eligible and meet either RPS needs, portfolio goals from their IRP filing, or formally adopted IRP portfolio, or any remaining IRP procurement needs for orders issued through the RPS implementation year. Portfolio goals may include system reliability, greenhouse gas emission targets, or portfolio resource mix optimization. SCE must continue to strike the appropriate balance between meeting RPS needs in a cost-effective manner and meeting regulatory procurement requirements.

6.3.2. Southern California Edison Company's Request for Authority to Purchase and Sell Portfolio Content Category 1, Portfolio Content Category 2, and Portfolio Content Category 3 Renewable Energy Credits

SCE's request for authority to buy and sell RECs is approved with modifications.

[63] D.24-12-035 at 17.

[64] D.24-12-035 at 17.

SCE requests authority to purchase and sell PCC 1, PCC 2, and PCC 3 RECs. SCE states that this flexibility will ensure SCE's continued compliance with RPS requirements in CP 5, help meet the target for CP 6, and continue optimizing its portfolio.[65] To facilitate the purchase and sale of RECs, SCE requests authority to issue solicitations for short-term and long-term RECs, participate in other market participants' REC RFOs, and to enter into bilateral contracts for the purchase and sale of RECs. Further, to remain competitive with other retail sellers, SCE also requests authority to purchase RECs through brokers and exchanges at prices and term lengths consistent with upfront and achievable standards and criteria.[66] SCE also notes that in compliance with D.18-12-003 on the Tree Mortality Non-Bypassable Charge, it will sell RECs and related energy associated with its Bioenergy Renewable Auction Mechanism contracts.

SCE has a need for RPS-eligible resources to meet the compliance target for CP 6 and beyond. Due to the inherent risk associated with completion of new projects, variations in load and existing renewable generation, and five years of time between now and the need to meet the 2030 CP 6 goal, SCE may need flexibility to purchase and sell RECs be able to meet its RPS goals. Therefore, the Commission finds SCE's request reasonable and approves it with modifications. SCE is authorized to purchase and sell PCC 1, PCC 2, and PCC 3 RECs, using solicitations, other market participants' solicitations, bilateral negotiations, brokers and exchanges. SCE must submit a Tier 1 Advice Letter for approval of short-term transactions and a Tier 3 Advice Letter for long-term transactions.

[65] SCE Draft 2025 RPS Plan at 13.

[66] SCE Draft 2025 RPS Plan at 13.

6.3.3. Southern California Edison Company's Request for Approval of Bid Solicitation Protocols

In its Draft 2025 RPS Plan, SCE submits for Commission approval its procurement protocols for new resources and existing resources,[67] REC transaction protocols as the basis for all its REC transactions for short-term and long-term purchases and sales,[68] and least-cost best-fit (LCBF) evaluation criteria, including consideration of workforce development and disadvantaged communities.[69] SCE proposes to eliminate the interim Renewable Integration Cost Adder (RICA) from its RPS valuation framework.[70] SCE notes that RICA was adopted in D.14-11-042 as a temporary tool until a final methodology could be developed. SCE explains that the interim approach relied on assumptions and analyses from 2014 that no longer accurately reflect current grid conditions. SCE adds that RICA aimed to differentiate intermittent renewable resources from traditional generation by accounting for additional system integration costs. However, with current procurement efforts increasingly focused on clean energy resources, this distinction has become less relevant. SCE highlights that it also excludes RICA from its Clean Energy RFO valuation framework to avoid misleading results due to outdated assumptions.

Upon review, the Commission finds SCE's proposed protocols reasonable and approves them.

[67] SCE Draft 2025 RPS Plan at 80, Appendices I.1, I.2, J.1., and J.2.

[68] SCE Draft 2025 RPS Plan at 81, Appendix M.1.

[69] SCE Draft 2025 RPS Plan at 82 and Appendix H.1.

[70] SCE Draft 2025 RPS Plan at 82.

6.3.4. Southern California Edison Company's Request for Approval of Agreements

SCE seeks approval of three agreements: Pro Forma Renewable Power Purchase Agreement (PPA); Pro Forma PCC 1 REC Agreement; and Pro Forma PCC 3 REC Agreement.[71]

SCE's 2025 Pro Forma Renewable PPA is based on the technology neutral pro forma contract approved by the Commission in Resolution E-5004 for contracting for In-Front-of-Meter renewable energy resources and incorporates provisions from SCE's MTR contracts. SCE explains that there have been changes to the 2025 Pro Forma Renewable PPA to incorporate recent changes to the Technology Neutral Pro Forma contract to harmonize language with the version used in SCE's 2024 Clean Energy RFO. The substantive terms and conditions remain consistent with the 2024 Pro Forma Renewable PPA, except for specific changes noted in the summary table of major changes to pro forma contracts.

SCE states that relatively minor changes have been made to the 2025 Pro Forma PCC 1 Confirmation and PCC 3 REC Agreement.[72]

Upon review, the Commission finds that the substantive terms and conditions of the agreements remain consistent with the 2024 Pro Forma agreements and the submitted changes are reasonable. Therefore, SCE's Pro Forma Renewable PPA, Pro Forma PCC 1 REC Agreement, and Pro Forma PCC 3 REC Agreement submitted in its Draft 2025 RPS Plan are approved.

[71] SCE Draft 2025 RPS Plan at 16-17.

[72] SCE Draft 2025 RPS Plan at 16-17.

6.3.5. Southern California Edison Company's Request for Approval to Retire Renewable Energy Credits for Low-Carbon Fuel Standard Funded Programs

SCE seeks Commission authorization in its Draft 2025 RPS Plan to participate in claiming incremental LCFS credits through the retirement of RECs. SCE expects that customer participation in SCE's LCFS-funded programs will increase over time as EV adoption increases and SCE's program operations mature. SCE notes that it first received approval in its 2022 RPS Plan to claim incremental LCFS Credits through the retirement of RECs demonstrating the use of zero carbon-intensity electricity for transportation electrification charging. The same authorization was granted again in the 2023 planning cycle.

If SCE has sufficient PCC 3 RECs to claim incremental LCFS credits, it plans to retire those RECs. In doing so, SCE will determine the fair market value of the RECs and compensate bundled customers accordingly, with any remaining value going to the LCFS program.[73] SCE currently believes the best way to determine the value is to use the higher of the most recent REC sale value or the three-month weighted average price from Platts. If SCE determines that this calculation does not represent the fair market value, it will apply a reasonable adder to ensure bundled customers are fully compensated.[74]

SCE's request is reasonable and approved. SCE may retire RECs for LCFS-funded programs.

[73] SCE Draft 2025 RPS Plan at 129.

[74] SCE Draft 2025 RPS Plan at 129.

6.3.6. There Are No Deficiencies in Southern California Edison Company's Draft 2025 Renewables Portfolio Standard Plan

The Commission staff did not identify any deficiencies in SCE's Draft 2025 RPS Plan. SCE's Draft 2025 RPS Plan meets the requirements of the 2025 ACR.

6.4. San Diego Gas & Electric Company's Draft 2025 Renewables Portfolio Standard Plan

SDG&E's updated Draft 2025 RPS Plan contains all the required elements listed in Table 1 of the 2025 ACR. SDG&E's updated Draft 2025 RPS Plan is approved with modifications. SDG&E must seek Commission approval of any RPS contracts consistent with existing procedures by submitting a Tier 3 or Tier 1 Advice Letter.

SDG&E reports that even though SDG&E met its CP 4 RPS requirements by achieving 53 percent renewable energy, load departure commencing in 2021 and the VAMO process commencing in 2023 led to significant changes in its RPS portfolio.[75] Currently, SDG&E anticipates that its RPS position will fall short beginning in the current compliance period.

SDG&E intends to meet its future RPS obligations by utilizing the bank and/or holding a solicitation or entering into agreements to procure long-term and/or short-term resources, depending on the benefits of these transactions to the ratepayers.[76] SDG&E also intends to optimize its portfolio in the near-term through both the purchase and/or sales of RECs via solicitations, bilateral sales agreements, and/or brokerages and exchanges in the form of short-term transactions.[77]

[75] SDG&E Draft 2025 RPS Plan at 23.

[76] SDG&E Draft 2025 RPS Plan at 24.

[77] SDG&E Draft 2025 RPS Plan at 24.

SDG&E intends to manage any potential over-procurement due to departing load by banking it for future compliance needs, terminating contracts, as appropriate, selling excess procurement, or transferring the obligation to a new party as permitted by the contract.[78]

Overall, SDG&E's procurement strategy is reasonable; it demonstrates a balanced approach to meeting short- and long-term RPS requirements and is approved with modifications.

6.4.1. San Diego Gas & Electric Company's Request for Authority to Utilize Banked Renewable Energy Credits

Due to SDG&E's RPS short position starting in CP 5, SDG&E requests the authority to utilize its banked RECs procured before 2023 starting from the year SDG&E begins a short position through 2035, as needed.[79] SDG&E's request aims to limit additional costs for RPS compliance and potentially protect bundled customers from rate impacts.

The Commission finds SDG&E's request to use its banked RECs to meet its RPS needs is cost-effective, and consistent with RPS rules, and therefore approves it.

6.4.2. San Diego Gas & Electric Company's Request for Option to Procure Renewable Energy Credits for Compliance

As an alternative to using its banked RECs, SDG&E requests authority to conduct optional REC purchases from new or existing resources, either through short-term or long-term contracts, if doing so is more beneficial to its portfolio

[78] SDG&E Draft 2025 RPS Plan at 25.

[79] SDG&E Draft 2025 RPS Plan at 7, 24, Appendix 1.

based on cost and need in the 2025 RPS planning cycle.[80] Towards this end, using the RNS forecast in Appendix 1, SDG&E has set both a volumetric cap and a capacity limit on the amount of new eligible renewable resources it may procure should it choose to hold a solicitation.[81]

According to SDG&E's Draft 2025 RPS Plan, in order to have flexibility in its planning to meet RPS obligations in a cost-effective manner, SDG&E may pursue short-term optimization opportunities, including the purchase and/or sale of RPS products through solicitations, bilateral agreements, or brokers and exchanges.[82] According to SDG&E, these actions are driven by the fast-paced market for RECs.

The Commission approves SDG&E's request for the option to procure RECs for compliance through solicitations, bilateral agreements, or brokers and exchanges. SDG&E must submit a Tier 1 or Tier 3 Advice Letter for review and approval of short-term and long-term purchases, respectively. SDG&E must also demonstrate that contracts are RPS-eligible and that they are either needed to meet RPS needs or that the contracts are necessary to comply with IRP procurement orders.

6.4.3. San Diego Gas & Electric Company's Request for Authority to Sell Renewables Portfolio Standard Volumes

In its Draft 2025 RPS Plan, SDG&E requests authorization to sell RPS volumes from its RPS portfolio, including PCIA-eligible resources; its PCIA-eligible portfolio allocation; and RECs that were not required to be offered

[80] SDG&E Draft 2025 RPS Plan at 8.

[81] SDG&E Draft 2025 RPS Plan at 8, 23, and Appendix 1.

[82] SDG&E Draft 2025 RPS Plan at 24.

or allocated under D.21-05-030. These sales would be conducted in accordance with SDG&E's RECs Sales Framework to provide customer benefits while maintaining RPS compliance.[83]

To further balance its portfolio, SDG&E may sell REC volumes from the PCIA-eligible portfolio prior to the distribution of the VAMO transactions. In addition, SDG&E may sell volumes not allocated through the VAMO process if those volumes are not needed for compliance. Potential revenues from these sales could help support affordability for both bundled and unbundled customers.[84]

If SDG&E forecasts excess RECs in its portfolio, it will perform a short- and long-term quantitative and qualitative cost benefit analysis associated with the RECs to determine next steps, *i.e.*, bank or sell.[85] A quantitative analysis would consider SDG&E's RPS position, time value of revenues from the potential REC sale, and the potential REC replacement cost, while a qualitative analysis would consider the impact on market liquidity and SDG&E's RPS position.

Because selling excess RECs can provide savings to ratepayers while maintaining SDG&E's RPS compliance, SDG&E's request for the option to sell RPS volumes is reasonable and approved with modifications. SDG&E must submit a Tier 1 Advice Letter for review and approval of short-term sales.

[83] SDG&E Draft 2025 RPS Plan at 8.

[84] SDG&E Draft 2025 RPS Plan at 8.

[85] SDG&E Draft 2025 RPS Plan at 34 and Appendix 15.

6.4.4. San Diego Gas & Electric Company's Request for Flexibility to Buy and Sell Renewable Energy Credits in the Same Year and/or Compliance Period

SDG&E requests approval for flexibility to manage its RPS portfolio by conducting short-term REC sales, and both short-term and long-term RPS procurement in the same year and/or compliance period. This flexibility would enable SDG&E to meet compliance obligations, respond to increasing market competition, adapt to changing market conditions, and pursue the most cost-effective options for its bundled customers.[86] SDG&E asserts that granting this authority would allow SDG&E to respond more quickly to market dynamics and manage its portfolio more efficiently.

Because approving this strategy would allow SDG&E to manage its RPS portfolio more efficiently and cost-effectively, the Commission finds SDG&E's portfolio optimization reasonable and approves it with modification. SDG&E is authorized to conduct the approved transactions in the same year.

6.4.5. San Diego Gas & Electric Company's Authorization to Participate in Requests for Offers and Utilize Both Brokers and Exchanges

To maintain flexibility in meeting its RPS compliance obligations and ensure a level playing field among market participants, SDG&E requests authority to procure or sell RECs through participating in RFOs, and using brokers and exchanges.[87]

SDG&E's request to procure or sell RECs through RFO participation, brokers and exchanges is reasonable and is approved. The use of brokers and

[86] SDG&E Draft 2025 RPS Plan at 8.

[87] SDG&E Draft 2025 RPS Plan at 8-9, 24.

exchanges for short-term RPS transactions (five years or less) requires approval with a Tier 1 Advice Letter, while long-term RPS procurement transactions require approval with a Tier 3 Advice Letter.

6.4.6. San Diego Gas & Electric Company's Request for an Updated Approval Process for Short-Term Transactions

SDG&E proposes an updated approval process for short-term RPS transactions, lasting up to three years, to enable trading with brokers and through exchanges.[88]

As discussed in Section 6.1 of this decision, SDG&E's request is denied without prejudice. This matter will be addressed in R.25-06-019.

6.4.7. Deficiencies in San Diego Gas & Electric Company's Draft 2025 Renewables Portfolio Standard Plan

SDG&E's Draft 2025 RPS Plan meets the requirements of the 2025 ACR except for the following deficiencies:

(1) *Section III. Compliance with Recent Legislation & Impact of Regulatory Changes*: For the paragraphs on SB 100 and SB 1020, SDG&E does not summarize how its RPS Plan complies or aligns with these two pieces of legislation.

(2) *Section V. Project Development Status Update:* SDG&E does not provide a narrative description of its three projects that are in development but not yet online. As required by the 2025 ACR, for each project in development, the narrative description in the RPS Plan must include:

   a. Project/facility name, technology type, capacity procured from project, location (city & county), length of contract, COD;

   b. Any significant deviations in project development updates reported in previous RPS Plans;

[88] SDG&E Draft 2025 RPS Plan at 9.

c. Each facility's current development phase (should differentiate projects whether they are in the pre-construction, construction, or post-construction development phase); and

d. Status of any new required transmission line construction and/or any transmission upgrades necessary for each facility.

(3) *Section XIII. Cost Quantification:*

a. The "Total RPS Eligible Procurement" volumes for the year 2024 do not match between the RNS template and Table 3 of the Cost Quantification template. These different values should be reconciled; and

b. The values in rows 53-58 of Table 2 in the Cost Quantification template do not match between the Cost Quantification template attached to the public version of SDG&E's RPS Plan and the Cost Quantification template submitted as an Excel file, as well as the template attached to the confidential version of the RPS Plan. SDG&E must ensure that the information provided in the Cost Quantification template submitted as an Excel file and the information provided in the templates attached to its RPS Plan narrative is consistent and up to date.

SDG&E must correct the deficiencies listed above in its Final 2025 RPS Plan.

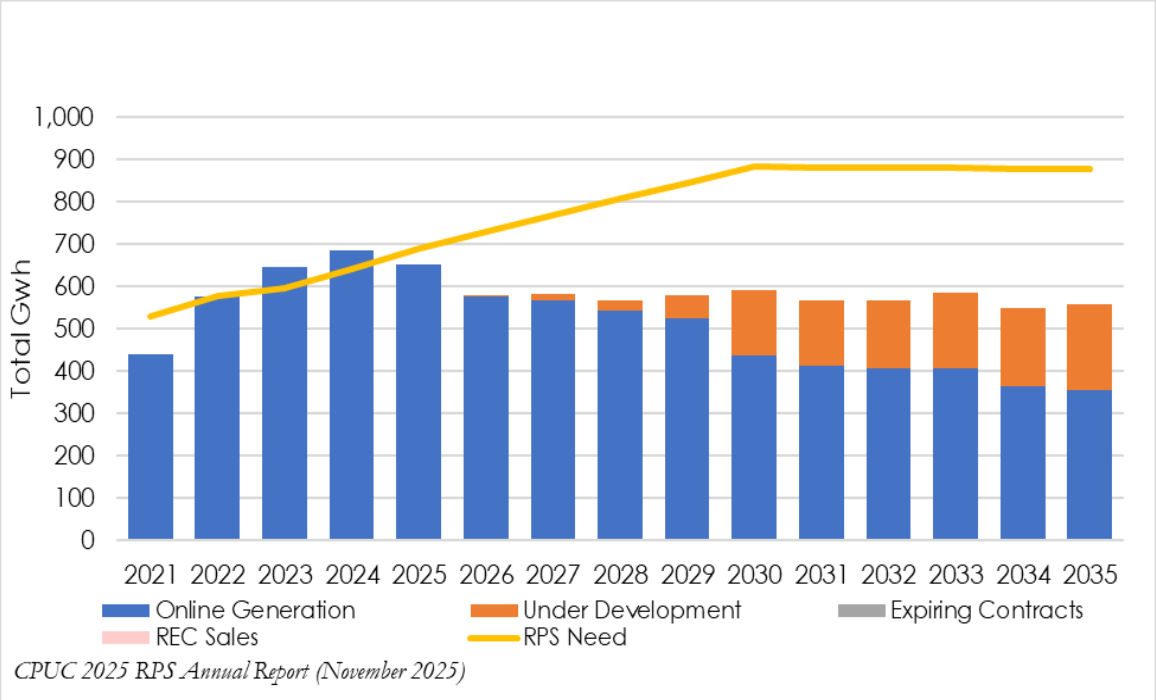
7. Small and Multi-Jurisdictional Utilities

SMJUs comprise a small but relevant share of California's energy market. Following a review of aggregated RNS templates in their Draft 2025 RPS Plans, the Commission finds that the three SMJUs (BVES, PacifiCorp, and Liberty, collectively) need to procure more RPS eligible renewables beginning in 2025 to meet their respective RPS requirements (*see* Figure 2).

Unlike PG&E, SCE, and SDG&E, the SMJUs can meet their RPS procurement obligations without satisfying the Portfolio Content Category

Requirement, codified in Pub. Util. Code Section 399.16, that aims to ensure most renewable energy procurement is in the form of in-state generation. As such, SMJUs may satisfy their RPS procurement obligations through pure compliance instruments such as unbundled RECs.[89] Given their near-term need for RPS-compliant resources, the Commission continues to encourage SMJUs to consider early procurement of resources rather than last-minute purchases of unbundled RECs.

Figure 2: Aggregated Small and Multi-Jurisdictional Utilities' Progress Towards 60 Percent Renewables Portfolio Standard



In this section, we discuss the SMJUs' Draft 2025 RPS Plans and direct modifications to each, as necessary.

[89] Pub. Util. Code § 399.17(b). The performance-based ratemaking limitations in Section 399.16 are explained in D.11-12-052 Sections 3.5-3.7.

7.1. Bear Valley Electric Service, Inc.'s Draft 2025 Renewables Portfolio Standard Plan

Upon review, the Commission finds that BVES' Draft 2025 RPS Plan meets the requirements of the 2025 ACR. Accordingly, the Commission approves the BVES' Draft 2025 RPS Plan with no modifications.

In its Plan, BVES states that it has historically met most of its RPS procurement requirement with unbundled RECs, but anticipates meeting its current and future RPS obligations using a combination of unbundled and bundled procurement, as well as owned renewable generation (the Solar and Battery Projects).[90] To that point, BVES explains that its long-term PPA with Shell Energy North America is expected to meet the bulk of its RPS needs through 2035.[91] In addition, BVES reports that it has negotiated bilateral short-term agreements to obtain 70,000 PCC 3 RECs to be delivered in the years spanning 2025-2027, which will support BVES in meeting its RPS requirements for the current compliance period.[92] BVES also notes that it filed Application 24-05-020 to develop and own a five-megawatt solar and battery project to help meet its future RPS needs.[93]

7.2. Liberty's Draft 2025 Renewables Portfolio Standard Plan

Upon review, the Commission finds that Liberty's Draft 2025 RPS Plan meets the requirements of the 2025 ACR except for a few noted inconsistent statements. Accordingly, the Commission approves Liberty's Draft 2025 RPS Plan with modifications.

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[90] BVES Draft 2025 RPS Plan at 2-3, 12.

[91] BVES Draft 2025 RPS Plan at 3.

[92] BVES Draft 2025 RPS Plan at 3.

[93] BVES Draft 2025 RPS Plan at 2, 13.

In its Draft 2025 RPS Plan, Liberty states that it intends to meet the majority of its RPS obligations using the output from the existing Luning Solar Project and Turquoise Solar Project.[94] Further, Liberty explains that until such time as transmission upgrades within the NV Energy Balancing Area Authority are operational and provide access to more flexible renewable resources, any additional procurement necessary for RPS compliance will likely be met with PCC 3 REC purchases. Liberty states that it is in the market to buy PCC 3 RECs to meet the RPS requirements and plans to procure additional PCC 3 RECs over and above its current year procurement obligations to ensure compliance in future years.[95]

Liberty reports that energy delivered through its 2021 Nevada Energy Services Agreement (ESA) will serve the bulk of its RPS procurement requirement through December 2025.[96] Because its ESA ends in December 2025, Liberty is currently negotiating to extend the ESA and expects to submit an agreement to the Commission before the end of the year.

Liberty's Luning Expansion Project, approved by the Commission in D.23-08-032, will not contribute to meeting Liberty's RPS needs because the project is suspended due to several factors, including the need to fund wildfire mitigation efforts and cost changes.[97]

The Commission identified several deficiencies in Liberty's Draft 2025 RPS Plan. Liberty must correct the following deficiencies in its Final 2025 RPS Plan.

[94] Liberty Draft 2025 RPS Plan at 2, 4.

[95] Liberty Draft 2025 RPS Plan at 4.

[96] Liberty Draft 2025 RPS Plan at 3, 8-9.

[97] Liberty Draft 2025 RPS Plan at 10.

(1) *Section IV.A.1. Long Term Procurement:*

a. On page 13 of its Draft 2025 RPS Plan, Liberty states that "as provided in the following Table 2, Liberty's plan approaches the RPS obligation but will need to procure additional REC contracts to meet it in CP 6." This statement seems inconsistent with the figures in Table 2 and Liberty's RNS template, where the figures show that Liberty has an RPS need earlier than CP 6. Liberty must revise or clarify this statement.

b. On page 14 of its Draft 2025 RPS Plan, Liberty proposes a timeline for the procurement of RECs "to meet the current compliance period," where Liberty would assess its needs for RECs in October 2025 and solicit RECs, if needed, in April and July of 2026. Liberty proposed a similar timeline and process in its 2024 RPS Plan, where it would procure RECs, if needed, in April and July of 2025. Liberty should provide an update on whether it procured RECs in 2025, as proposed in the timeline presented in its 2024 RPS Plan, and provide details on the quantity, and delivery terms and years.

c. On page 15 of its Draft 2025 RPS Plan, Liberty states that "RECs from both [Luning Solar Project and the Turquoise Solar Project] already satisfy the long-term procurement requirement." However, the data in Table 2 shows that Liberty fails to meet the long-term contracting requirement. In other parts of its Draft 2025 RPS Plan, Liberty states that it is reliant on other sources of long-term procurement besides Luning and Turquoise to satisfy its long-term contracting requirement. Liberty should clarify these inconsistent statements.

(2) *Section X.A. Bid Solicitation Protocols*: In Attachment D (Solicitation Materials) to its Draft 2025 RPS Plan, Liberty refers to solicitation materials included in its Final 2022 RPS Plan and does not attach those protocols to its current Plan. Liberty should attach solicitation materials to its

Draft 2025 RPS Plan or provide a link, if one exists, to the public website where public solicitation materials can be found for recent, ongoing, or future relevant RPS solicitations.

7.3. PacifiCorp's Draft Renewables Portfolio Standard Plan

PacifiCorp's Draft 2025 RPS Plan (Updated 2025 On-Year Supplement to its 2025 IRP) meets the requirements of the 2025 ACR except for an instance where PacifiCorp did not provide all the required information for Transportation Electrification forecasting. Accordingly, the Commission approves PacifiCorp's Draft 2025 RPS Plan with modifications.

PacifiCorp has historically relied on existing eligible renewable energy within PacifiCorp's portfolio and unbundled PCC 3 REC procurement to meet its RPS requirements. In its current Draft RPS Plan, PacifiCorp states that it intends to meet its RPS requirements with existing and proxy eligible renewable energy and RECs, consistent with its integrated system planning; and RECs procured through RFPs seeking unbundled RECs that are RPS eligible.[98] In December 2023, PacifiCorp issued a REC RFP and entered into a long-term agreement for 40,000 RECs per year starting in 2024.[99] Based on its 2025 IRP, PacifiCorp has concluded that an additional REC RFP will not be required to meet the compliance needs for future compliance periods.[100]

In its Draft RPS Plan, PacifiCorp states that it used the California Energy Commission's (CEC) Integrated Energy Policy Report (IEPR) forecast from 2021 for its transportation electrification forecast, but does not explain why it did not

[98] PacifiCorp Draft 2025 RPS Plan at 5.

[99] PacifiCorp Draft 2025 RPS Plan at 5.

[100] PacifiCorp Draft 2025 RPS Plan at B-3.

use the more recent 2024 IEPR forecast, which was available at the end of January 2025. As per the 2025 ACR, if a retail seller is not using the most up-to-date IEPR forecast, it must provide reasoning for its choice of the IEPR forecast vintage year.

8. Community Choice Aggregators and Electric Service Providers

The Commission approves the CCAs' and ESPs' Draft 2025 RPS Plans with modifications. To make this determination, the Commission reviewed 25 CCA and 10 ESP Draft 2025 RPS Plans for completeness, accuracy of information, and compliance with the 2025 ACR. Based on our review, CCA and ESP Draft 2025 RPS Plans complied with most of the 2025 ACR requirements. Section 8.1 and Section 8.2 of this decision provide an overview of actual and projected RPS procurement for ESPs and CCAs to meet future RPS obligations. Sections 8.3.1 through 8.3.12 of this decision provide a description of the Commission's findings and disposition of CCAs' and ESPs' Draft 2025 RPS Plans.

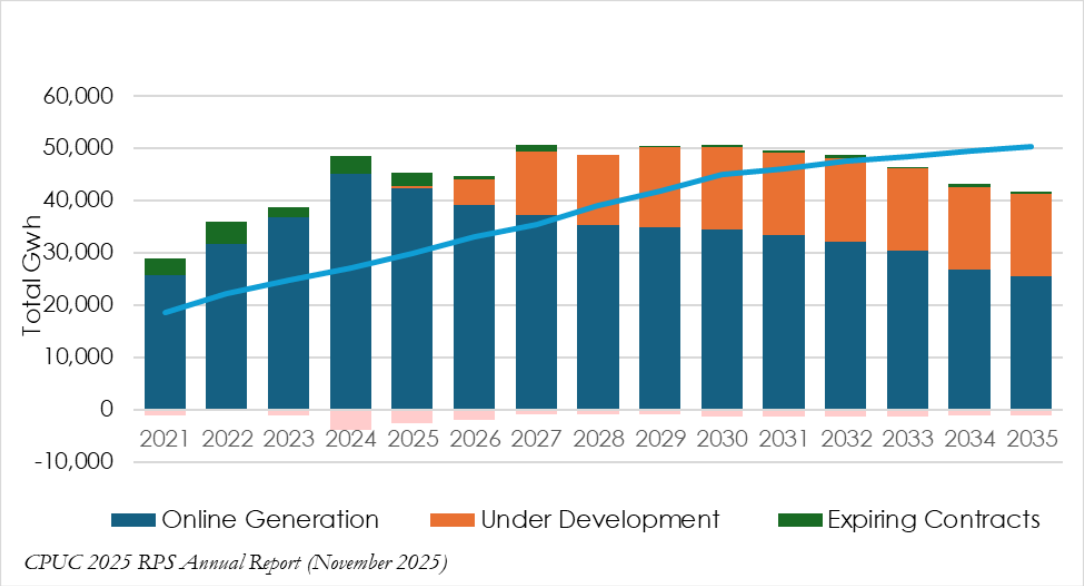
8.1. Community Choice Aggregators' Procurement Needs

Collectively, the CCAs have executed enough renewable energy contracts to exceed their forecasted need in 2025 and plan to serve over 64,000 GWh of retail load in 2025.[101]

Based on the CCAs' RNS reporting, several CCAs are expected to need additional RPS procurement beginning in 2025 or 2026. Collectively, CCAs may need additional RPS procurement beginning in 2028 if there are delays to a significant quantity of projects in development.

[101] Based on an Energy Division staff analysis of aggregated retail seller 2025 RNS templates, as submitted in their draft 2025 RPS Plans.

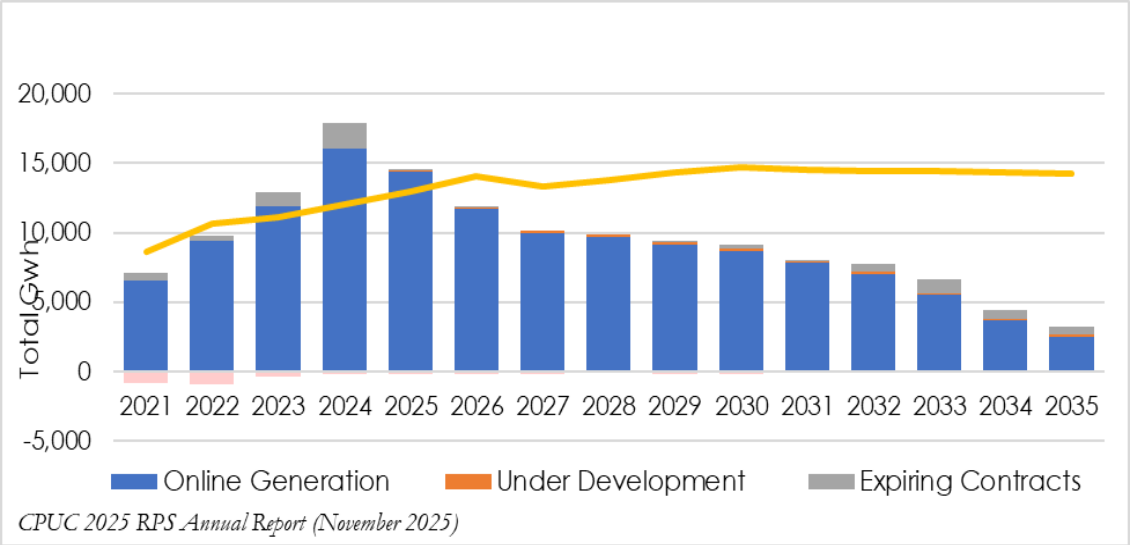
Figure 3: Aggregated Community Choice Aggregators' Progress Toward 60 Percent Renewables Portfolio Standard



8.2. Electric Service Providers' Procurement Needs

The Commission reviewed Draft 2025 RPS Plans filed by 10 ESPs. Based on the ESPs' reporting of their RNS positions, we find that the ESPs will collectively need additional procurement to meet RPS obligations beginning in 2026, as shown in Figure 4. This is due to the ESPs' historical reliance on short-term contracts to match their RPS obligation with their overall retail sales.

Figure 4: Aggregated Electric Service Providers' Progress Toward 60 Percent Renewables Portfolio Standard



8.3. Issues to Address in the Final 2025 Community Choice Aggregators' and Electric Service Providers' Renewables Portfolio Standard Plans

The Commission identified several deficiencies in the CCAs' and ESPs' Draft 2025 RPS Plans. In addition to minor errors, many deficiencies were related to instances where the retail seller failed to demonstrate how it would meet future RPS compliance requirements. Further, most of the errors in CCA RPS Plans involved instances where the CCA did not provide all the required information for Transportation Electrification forecasting or where the CCA made errors with their RNS calculations. These findings are listed in Sections 8.3.1 through 8.3.12 of this decision. The retail sellers identified in the paragraphs and tables below must update the relevant sections of their draft RPS Plans in their final submittal.

8.3.1. Portfolio Supply and Demand

The 2025 ACR requires that retail sellers' RPS Plans must include an assessment of annual or multi-year portfolio supplies and demand to determine

the optimal mix and need for eligible renewable energy resources with deliverability characteristics that may consist of peaking, dispatchable, baseload, firm, and as-available capacity, and any additional factors, such as curtailment rights. The assessment should also cover all years through 2035 and a near-term planning horizon that accounts for both portfolio supply and demand. The retail seller's RPS Plan must also explain how the quantitative analysis provided in response to Section VIII of the 2025 ACR supports this assessment. Lastly, the assessment should describe how procurement, allocations, or sales planned for the period covered by the 2025 RPS Plans is consistent with the evaluation of supply and demand.

According to our assessment of their Draft 2025 RPS Plans, the Commission finds that the City of Palmdale must provide additional information as described below.

Table 1: **Portfolio Supply and Demand**

Retail Seller	Commission Finding
City of Palmdale	On page 7 of its Draft RPS Plan, the City of Palmdale states that its RPS procurement will be focused on needing to fill "remaining long-term RPS needs in Compliance Period 4 and short-term RPS needs in 2023." This statement is not aligned with other descriptions of its RPS position. The City of Palmdale must update this section to describe its progress towards meeting CP 5 and CP 6 compliance requirements and provide an assessment of portfolio supply and demand for a time horizon through 2035.

8.3.2. Long-Term Procurement

Pursuant to D.17-06-026, retail sellers must specifically show that 65 percent of their procurement that is designated to meet their RPS requirement consists of contracts with term lengths of 10 years or more. To ensure compliance

with this D.17-06-026 provision, the 2025 ACR explains that RPS Plans should demonstrate how retail sellers are satisfying this long-term procurement requirement.

According to our assessment of their Draft 2025 RPS Plans, the Commission finds that CleanPowerSF, Pilot Power, and Shell Energy must provide additional information as shown in Table 2 below.

Table 2: **Long-Term Procurement**

Retail Seller	Commission Finding
CleanPowerSF	The narrative in Section IV.A.1 of its Draft 2025 RPS Plan lacks a quantitative assessment of CleanPowerSF's long-term RPS position. Although it provides figures in megawatt-hours for deliveries it expects to receive in 2028 from projects in development on page 14 of its plan, these figures are not paired with figures for contracts that are online; and CleanPowerSF lacks a quantitative evaluation to show how these figures relate to its projected long-term contracting requirements. As per the 2025 ACR, CleanPowerSF must provide in its RPS plans narrative "a quantitative assessment of retail sellers' long-term RPS positions that is clear enough to gauge a retail seller's long-term RPS position. It must include specific long-term procurement values in gigawatt-hours (GWh) for current and future compliance period."[102]
Pilot Power	In Section IV.A.1 (Long-term Procurement), Pilot Power does not provide a quantitative assessment of its long-term RPS contracting position. Per the 2025 ACR, Pilot Power's narrative on long-term RPS procurement planning must include a quantitative assessment of its long-term RPS positions that is clear enough to gauge a retail seller's long-term RPS position.[103] It must include specific long-term

[102] 2025 ACR at 15.

[103] 2025 ACR at 15.

Retail Seller	Commission Finding
	procurement values in gigawatt-hours for current and future compliance periods. Charts and graphs alone are insufficient as they lack the specificity the Commission needs to evaluate a retail seller's long-term RPS position.
Shell Energy	Shell Energy states that it is "well positioned to meet its continuing obligations" for the long-term contracting requirement in current and future compliance periods.[104] However, this statement is inconsistent with Shell Energy's long-term contracting progress as shown in Table 1. Further, Shell Energy explains that "it cannot provide a detailed timeline for how it will execute long-term contracts to meet the 65 percent requirement" because it is impossible for Shell Energy to predict the size of its retail customer load, or the magnitude of its RPS procurement compliance obligation, over a 10-year planning horizon given the short-nature of its contracts with its customers.[105] This explanation of Shell Energy's uncertain long-term procurement outlook is also inconsistent with Shell Energy's assertion that it is well positioned to meet its current and future long-term contracting requirements. Shell Energy must revise this section to more accurately describe its long-term contracting position and to provide more concrete steps for how it will address its current long-term procurement shortfall.

8.3.3. Forecasting for Increased Transportation Electrification

Per the 2025 ACR, all retail sellers must address local transportation electrification adoption trends while planning for portfolio diversity and renewable resource procurement to meet incremental RPS requirements.[106] All

[104] Shell Energy Draft 2025 RPS Plan at 9.

[105] Shell Energy Draft 2025 RPS Plan at 9-10.

[106] 2025 ACR at 17-18.

retail sellers must demonstrate that transportation electrification is quantitively accounted for in their RPS procurement plans.

According to our review of their Draft 2025 RPS Plans, the Commission finds that the CCA Plans are missing information regarding transportation electrification. These retail sellers must provide additional information as listed in Table 3 below.

Table 3: Forecasting for Transportation Electrification

Retail Seller	Commission Finding
Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, City of Palmdale, City of Pomona, City of Santa Barbara, Clean Energy Alliance, Lancaster Choice Energy, Orange County Power Authority, Pico Rivera, Pioneer Community Energy, Rancho Mirage Energy Authority, San Jacinto Power	Although they provided information on transportation electrification forecasting in their Draft 2025 RPS Plans, these retail sellers did not include the required table or chart showing the annual load from transportation electrification as forecasted in their analysis, nor did they compare it with the IEPR transportation electrification demand forecast results. Retail sellers must include a table and/or chart showing the annual load from transportation electrification as forecasted in their analysis. These graphics must also compare the retail seller's transportation electrification load results to the IEPR transportation electricity demand forecast results, as required by the 2025 ACR.[107]
Central Coast Community Energy, Marin Clean Energy, Redwood Coast Energy Authority	These retail sellers do not reference what vintage/year CEC IEPR forecast is used as the basis for their transportation electrification forecasts. As per the 2025 ACR, retail sellers must identify what vintage IEPR forecast they

[107] 2025 ACR at 18.

Retail Seller	Commission Finding
	used in their forecasts. If a retail seller is not using the most up-to-date IEPR forecast, it must provide reasoning for its choice of vintage year for the IEPR forecast.
Apple Valley Choice Energy, Ava Community Energy, City of Palmdale, City of Pomona, City of Santa Barbara, Clean Energy Alliance, Lancaster Choice Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera, Pioneer Community Energy, Rancho Mirage Energy Authority, San Jacinto Power, 3 Phases Renewables, BP Energy	These retail sellers report that their transportation electrification forecasts are derived from the 2023 CEC IEPR forecast but do not explain why they did not use the more recent 2024 IEPR forecast, which was available at the end of January 2025. As per the 2025 ACR, if a retail seller is not using the most up-to-date IEPR forecast, it must provide reasoning for its choice of the IEPR forecast vintage year.

8.3.4. Portfolio Optimization

Per the 2025 ACR, all retail sellers should describe how they are planning to optimize portfolios in the Portfolio Optimization section of their Draft 2025 RPS Plans. Portfolio optimization descriptions should include policies, goals, strategies, solicitations, any Requests for Information, and coordination efforts across Commission program requirements and retail sellers.

Table 4: Portfolio Optimization

Retail Seller	Commission Finding
Shell Energy	The Portfolio Optimization section of Shell Energy's Draft 2025 RPS Plan is missing. Shell Energy must provide this section and describe its plans to optimize its RPS portfolio.

8.3.5. Project Development Status Update

Pub. Util. Code Section 399.13 requires retail sellers to include a status update of their project development schedule for all eligible renewable energy resources currently under contract in their RPS Plans. This information is important because it allows the Commission to monitor each retail seller's ability to meet RPS compliance obligations and report RPS capacity additions and new RPS contracts to the Legislature. In their Draft 2025 RPS Plans, most CCAs and ESPs include their respective PDSU spreadsheet, however some retail sellers have missing or inconsistent information.

Shell Energy and Marin Clean Energy must resolve inconsistencies related to Section V (Project Development Status Update) in their Final 2025 RPS Plans, as detailed in Table 5 below.

Table 5: Project Development Status Update

Retail Seller	Commission Finding
Marin Clean Energy	For multiple projects, the CODs, county locations, length of contracts, and network upgrade/transmission status do not match between Marin Clean Energy's PDSU template and Table 7 of its RPS Plans narrative. Marin Clean Energy must clarify these online dates and other project development information.
Shell Energy	The projected online dates for Shell Energy's CapeStation and SunZia contracts do not match between its RPS Plan narrative and its PDSU template. On page 29 of its Draft 2025 RPS Plan, Shell Energy states

Retail Seller	Commission Finding
	that "CapeStation has an anticipated online date of January 1, 2026, and SunZia has an anticipated online date of October 1, 2026." However, on its PDSU, the online date for CapeStation is listed as October 1, 2026, and the online date for SunZia is listed as January 1, 2026. Shell Energy must clarify these dates and provide the correct projected COD dates for the two contracts.

8.3.6. Potential Compliance Delays

Pursuant to Pub. Util. Code Section 399.13(a)(6)(B), retail sellers must provide a narrative that describes any potential project development delays, reduced generation, and projected changes in load. Further, retail sellers must show how these delays will impact the retail seller's RPS compliance, including its RPS net short, progress towards 65 percent long-term procurement, and procurement decisions. Finally, retail sellers are required to identify methods to account for and minimize these delays.

Upon review of the CCAs' and ESPs' Draft 2025 RPS Plans, the Commission finds that Commercial Energy has not described how it would address potential compliance delays.

Table 6: **Potential Compliance Delays**

Retail Seller	Commission Finding
Commercial Energy	On page 18 of its Draft 2025 RPS Plan, Commercial Energy states that if "barriers to the development of new renewable generation facilities that may be needed to meet the state's RPS goals of 60 percent by 2030 arise during the 2025-2035 planning period, any corresponding deficiency in the overall amount of RPS products could possibly result in compliance delays for Commercial Energy." Commercial Energy does not describe how it would address this potential delay. As required by the 2025 ACR, Commercial Energy must

Retail Seller	Commission Finding
	describe how it would minimize or address this potential compliance delay in its Final 2025 RPS Plan.

8.3.7. Risk Assessment

Pub. Util. Code Section 399.13(a)(6)(F) requires that retail sellers conduct a risk assessment to determine the potential that an eligible renewable energy resource will not be built, or that construction will be delayed or reduced in size, resulting in delivery of electricity that does not conform with contract terms. Retail sellers must discuss compliance risk, risk modeling and risk factors, system reliability, and lessons learned in subsections of their Draft 2025 RPS Plan, as instructed by the 2025 ACR.

Based on our review of their Draft 2025 RPS Plans, we direct CleanPowerSF to update or clarify risk assessment-related information as described in Table 7 below.

Table 7: **Risk Assessment**

Retail Seller	Commission Finding
CleanPowerSF	Although CleanPowerSF identified various individual risks to its RPS portfolio on pages 46-47 of its Draft 2025 RPS Plan, it did not assess the severity of these individual risks. As per the 2025 ACR, CleanPowerSF must describe the severity of the individual risks (*e.g.*, high, medium, low) it has identified.

8.3.8. Lessons Learned — Risk Assessment

As instructed by the 2025 ACR, retail sellers must include a discussion of lessons learned in assessing RPS portfolio risk, including how other retail sellers'

risk assessments were used to guide the risk assessments of those with less experience serving retail load.[108]

Based on our review of their Draft 2025 RPS Plans, we direct Calpine Energy Solutions to update or clarify risk assessment-related information as described in Table 8 below.

Table 8: Lessons Learned — Risk Assessment

Retail Seller	Commission Finding
Calpine Energy Solutions	On page 30 of its Draft 2025 RPS Plan, Calpine Energy Solutions states that it monitors other retail sellers' RPS Compliance positions, and when a retail seller fails to meet RPS requirements, it analyzes the cause of the failure and applies any new understandings to its own RPS portfolio. Since there have been a few instances of retail sellers failing to meet RPS compliance requirements in the past, Calpine Energy Solutions should provide some specific examples of lessons learned from those past compliance failures.

8.3.9. Renewable Net Short Calculations

RNS calculations show the amount of new renewable generation capacity, including resources obtained through short-term and long-term procurement, that must be built in California or delivered from out-of-state sources or both to meet RPS targets. In their draft RPS Plans, retail sellers are required to provide both a quantitative and narrative response that shows how their risk assessments as described in Section VIII of their 2025 RPS Plans have been incorporated into their 2025 RNS calculations.

[108] 2025 ACR at 27.

Upon our review of their Draft 2025 RPS Plans, the retail sellers listed below must address identified inconsistencies related to Section VIII ([RNS] Calculation) in their RPS Plans, as detailed in Table 9.

Table 9: **Renewable Net Short Calculation**

Retail Seller	Commission Finding
City of Pomona	On page 78 of its Draft 2025 RPS Plan, the City of Pomona states that 5.98 percent of its future renewables deliveries were at risk and that it applied this percentage as failure rates for existing and online generation when preparing its RNS calculations in rows 14 and 16 of its RNS template. However, the sum of the values entered in the RNS template Excel files at rows 14 and 16 are different from what is reported on page 79 in the RNS Calculations narrative. The City of Pomona must clarify the values reported in this section of the RPS Plan narrative, the RNS template attached to its RPS Plan, and the RNS template Excel file that was submitted to Energy Division.
Lancaster Choice Energy	On page 78 of its Draft 2025 RPS Plan, Lancaster Choice Energy states that it applies a 9.47 percent failure rate for both facilities in development and online generation. However, in other parts of this section Lancaster Choice Energy states that this failure rate is 7.72 percent. Lancaster Choice must clarify these figures.
Pico Rivera	On page 78 of its Draft 2025 RPS Plan, Pico Rivera states that 6.07 percent of its future renewables deliveries were at risk and that it applied this percentage as failure rates for existing and online generation when preparing its RNS calculations in rows 14 and 16 of its RNS template. However, the sum of the values entered in the RNS template Excel files at rows 14 and 16 are different from what is reported on page 79 in the RNS Calculations

Retail Seller	Commission Finding
	narrative. Pico Rivera must clarify the values reported in this section of the RPS Plan narrative, the RNS template attached to its RPS Plan, and the RNS template Excel file that was submitted to Energy Division.
Shell Energy	1) Shell Energy's RPS Plan narrative and RNS template for this section do not provide insight into Shell Energy's RPS position for 2025 and subsequent years and compliance periods. The narrative for this section does not clearly describe Shell Energy's quantitative progress towards RPS requirements, as required by the 2025 ACR.[109] Shell Energy must provide a quantitative description of its progress towards RPS requirements for the current and future compliance periods. 2) The RNS template submitted by Shell Energy is incomplete and is inconsistent with the current status of its RPS procurement as reported in other areas of its RPS Plan. First, the values reported on Shell Energy's RNS template are inconsistent with Shell Energy's long-term contracting progress in Table 1 on page 10 of its Draft 2025 RPS Plan. Second, for the year 2025 and all future years, Shell Energy does not distinguish between RECs that are forecasted to be generated from online generation and RECs that are expected to be generated from facilities in development (Variables Fa and Fb on RNS template), even though its PDSU section and template reports that it has two contracts in development that do not come online until January and October of

[109] 2025 ACR at 28.

Retail Seller	Commission Finding
	2026. Shell Energy must distinguish RPS-eligible procurement between online generation and RPS facilities in development when calculating RPS net short in the RNS template, according to the 2025 ACR.[110] Third, for the year 2025 and all future years, Shell Energy does not break out its total forecasted RPS eligible procurement by REC PCC. For the year 2025 and all future years, Shell Energy must fill in Variables F0, F1, F2, and F3 in order to distinguish its forecasted procurement as PCC 0, PCC 1, PCC 2, or PCC 3 RECs.

8.3.10. Minimum Margin of Procurement

Per RPS requirements, retail sellers must define a MMoP in their RPS Plans to show how risk will be mitigated if renewable projects under contract are delayed or terminated, or projects do not perform as expected.

Per the directives of the 2025 ACR, "all retail sellers should follow the format and numbering convention directed in Table 1. Uniform format and templates will enable parties, bidders, and the Commission to easily access, review and compare the RPS Plans. All sections should be numbered in the same way, without skipping any sections, for ease of Commission review."[111]

Table 10: **Minimum Margin of Procurement**

Retail Seller	Commission Finding
City of Palmdale	On page 81, the City of Palmdale states that modeling demand-side sensitivities for its MMoP calculations is important during "upcoming customer enrollments." The City of Palmdale should clarify whether it is

[110] 2025 ACR at 28, fn.35.

[111] 2025 ACR at 10.

Retail Seller	Commission Finding
	planning additional customer enrollments or if this is an outdated phrase left over from a previous RPS Plan that was prepared when it launched as a CCA.
City of Santa Barbara	On page 87, the City of Santa Barbara states that modeling demand-side sensitivities for its MMoP calculations is important during "upcoming customer enrollments." The City of Santa Barbara should clarify whether it is planning additional customer enrollments or if this is an outdated phrase left over from a previous RPS Plan that was prepared when it launched as a CCA.
Shell Energy	Section IX.A.2 (MMoP Scenarios) is missing from Shell Energy's Draft 2025 RPS Plan. Although Shell Energy states that it does not develop scenarios to address RPS procurement above the minimum procurement level,[112] it must still provide this section and follow the directed format and numbering convention in accordance with the instructions of the 2025 ACR.

8.3.11. Bid Solicitation Protocols

Pursuant to Pub. Util. Code Section 399.13(a)(6)(C), 2025 RPS Plans must include a bid solicitation protocol that sets forth the need for eligible renewable energy resources of each deliverability characteristic, required online dates, and locational preferences, if any. The solicitations should be consistent with the retail seller's portfolio supply and demand assessment (Section IV) and RNS position (Section VIII). Further, retail sellers are also required to consistently report solicitations across all relevant retail sellers' Draft 2025 RPS Plans and report their participation in joint solicitations.

[112] Shell Energy Draft 2025 RPS Plan at 42.

According to our review of their Draft 2025 RPS Plans, the retail sellers listed below must correct minor errors identified in Section X (Bid Solicitation Protocols) of their Draft 2025 RPS Plans.

Table 11: **Bid Solicitation Protocols**

Retail Seller	Commission Finding
City of Palmdale	On page 82 of its Draft 2025 RPS Plan, the City of Palmdale states that it "will begin the process of developing a renewable energy solicitation approximately nine to twelve months before CCA service commencement." The City of Palmdale should clarify or remove this statement since it has already launched as a CCA.
Shell Energy	Shell Energy does not provide Section X.A (Bid Solicitation Protocols) in the format required by the 2025 ACR and appears to have it reversed with the section below it. Here, it provides a section for "Solicitation Protocols for Renewable Sales" information when the 2025 ACR requires that this section provide information for "Bid Selection Protocols." Shell Energy must provide the correct section and formatting in accordance with the instructions of the 2025 ACR. The 2025 ACR directs that "All retail sellers should follow the format and numbering convention directed in Table 1. Uniform format and templates will enable parties, bidders, and the Commission to easily access, review and compare the RPS Plans. All sections should be numbered in the same way, without skipping any sections, for ease of Commission review."[113]

8.3.12. Solicitation Protocols for Renewables Sales

Shell Energy does not provide this section in the format required by the 2025 ACR and appears to have it reversed with the section above it. Here, it

[113] 2025 ACR at 10.

provides a section for "Bid Selection Protocols" information when the ACR requires that this section provide information for "Solicitation Protocols for Renewable Sales." Shell Energy must provide the correct section and formatting in accordance with the instructions of the 2025 ACR. The ACR directs that "All retail sellers should follow the format and numbering convention directed in Table 1. Uniform format and templates will enable parties, bidders, and the Commission to easily access, review and compare the RPS Plans. All sections should be numbered in the same way, without skipping any sections, for ease of Commission review."[114]

9. Procedural Matters

This decision affirms all rulings made by the ALJ and assigned Commissioner in this proceeding. This decision also considers several motions in Sections 9.1 through 9.4.

9.1. Motion to Be Exempt from Filing Renewables Portfolio Standard Plans

On June 30, 2025, BREMUS filed a motion to be exempted from filing its 2025 RPS Plan and future RPS Plans, claiming that it is a deregistered ESP.

In D.13-11-024, the Commission provided guidance on the applicability of a motion for provisional waiver from filing future RPS Plans. Because BREMUS has completed deregistration and their ESP number 1398 was terminated effective May 2025, the motion by BREMUS to be exempted from filing its 2025 RPS Plan and future RPS plans is granted.

9.2. Motion to File Confidential Comments

On July 28, 2025, Cal Advocates filed a motion for an order allowing it to file under seal the confidential version of *Cal Advocates' Comments on the Draft*

[114] 2025 ACR at 10.

2025 Renewables Portfolio Standard Procurement Plans (Cal Advocates' Comments). Cal Advocates' Comments include multiple references to materials that SCE and PG&E claim are confidential. SCE labeled such information as confidential pursuant to D.06-06-066, D.08-04-023, D.21-11-029, Pub. Util. Code Section 454.5(g), and California code sections related to the treatment of Trade Secret information.[115] PG&E labeled such information as confidential pursuant to D.06-06-066 as modified by D.21-11-029, Pub. Util. Section 454.5(g), and the May 21, 2014 ALJ's Ruling on Renewable Net Short issued in R.11-05-005. Cal Advocates states that its reliance on the materials that the SCE and PG&E claim are confidential is necessary to support the arguments in Cal Advocates Comments.[116]

Having reviewed the Motion of Cal Advocates for an order allowing it to file under seal the confidential version of Cal Advocates' Comments, and good cause shown, the motion is granted.

9.3. Southern California Edison Company's and San Diego Gas & Electric Company's Motions to Update Plans and Motions to File Under Seal; Cal Advocates' Motion to File Under Seal

On August 11, 2025, SCE filed the *Motion of SCE (U 388-E) to Update its Draft 2025 RPS Plan* and the *Motion of SCE (U 388-E) for leave to file the Confidential Version of its Motion to Update Draft 2025 RPS Plan under Seal*. On August 11, 2025, SDG&E also filed *the Motion of SDG&E (U902 E) for Leave to File Under Seal the Unredacted Version of its Update to its Draft 2025 RPS Plan*. The motions to update

[115] Cal Advocates Motion, July 28, 2025, at 1, referencing PG&E's and SCE's Motions for Leave to File the Confidential Material in their Draft 2025 RPS Plans.

[116] Cal Advocates Motion, July 28, 2025, at 2.

Draft 2025 RPS Plans are submitted in compliance with the 2025 ACR and are granted.

In response to SCE's and SDG&E's motions to update their plans and file under seal, Cal Advocates filed a response on August 26, 2025. Concurrently, Cal Advocates filed a motion for leave to file under seal the confidential version of the *Response of the Public Advocates Office to Motions to Update Draft 2025 Renewables Portfolio Standard Procurement Plans* (Cal Advocates' Response to Updated RPS Plans). Cal Advocates Response to Updated RPS Plans contains multiple references to materials that SDG&E and SCE claim are confidential. Cal Advocates notes that SDG&E labeled such information as confidential pursuant to D.06-06-066, et seq., and applicable statutory provisions including, but not limited to, Pub. Util. Code Section 454.5(g), Pub. Util. Code Section 583, Government Code Section 6254(k), and General Order 66-D. In addition, SCE labeled such information as confidential pursuant to D.06-06-066, D.08-04-023, D.21-11-029, and Pub. Util. Code Section 454.5(g). Cal Advocates argues that Cal Advocates' reliance on the materials that SDG&E and SCE claim are confidential is necessary to support the arguments in Cal Advocates confidential response.

Good cause being shown, Cal Advocates' motion for leave to file under seal the confidential version of Cal Advocates' Response to Updated RPS Plans is granted.

On September 5, 2025, concurrent with its reply to Cal Advocates' response, SCE filed a motion for leave to file its reply to Cal Advocates' response on the motion to update the Draft 2025 RPS Plan under seal. In its motion, SCE states that the confidential information included in its reply contains market sensitive information and therefore must be protected from public disclosure.

Upon review, good cause being shown, SCE's motion for leave to file under seal its reply to Cal Advocates' response dated September 5, 2025, is granted.

9.4. Motions for Confidentiality — 2025 Draft Renewables Portfolio Standard Plans

The motions for confidentiality of retail sellers named in Table 12 are partially approved. The Commission reviewed Draft 2025 RPS Plans to ensure retail sellers did not excessively redact information. This decision orders retail sellers identified in the table below to correct their excess redactions in their Final 2025 RPS Plans.

The underlying principle of confidentiality pursuant to the 2025 ACR and D.06-06-066, as modified by D.21-11-029, is about making information publicly accessible to the greatest extent possible while protecting certain market-sensitive information. As such, the party seeking confidentiality protection for data in RPS Plans must make claims consistent with the confidentiality matrices in D.06-06-066, as modified by D.21-11-029. The party seeking confidentiality bears the burden of proof.

We find some retail sellers have excessively redacted the information, which is out of compliance with prior Commission guidance. The table below lists retail sellers for whom Commission review found unauthorized redactions. Final 2025 RPS Plans must be revised to comply with the guidance in D.06-06-066, as modified by D.21-11-029.

Table 12: Confidentiality Redactions and Commission Findings

Retail Seller	Commission Finding
Central Coast Community Energy	The columns for the years 2028-2035 on Figure 1 on page 12 of its Draft 2025 RPS Plan (redlined plan, at 14) are inappropriately redacted. Energy forecasts

Retail Seller	Commission Finding
	are confidential for the future two years and current year/year of filing. Various rows on Table 1 on page 12 (redlined plan, at 14-15) are inappropriately redacted: (1) "State RPS Requirement" percentages for the years 2025-2035 must be unredacted. These percentages are not energy forecasts, they are RPS program compliance requirements. (2) "Executed Long-term Procurement" percentages for the years 2028-2035 must be unredacted. Energy forecasts are confidential for the future two years and current year/year of filing. (3) "Executed Long-term Procurement" percentages for the years 2028-2035 must be unredacted. Energy forecasts are confidential for the future two years and current year/year of filing. There are three redactions of procured capacity information on page 14 of its Draft 2025 RPS Plan which are not claimed in its Motion to File Under Seal (MFUS). Central Coast Community Energy must either update its MFUS with more specific information to justify these redactions or must remove the redactions. There are two redactions of procured capacity information on page 21 of its Draft 2025 RPS Plan which are unsupported in its MFUS. Central Coast Community Energy must either update its MFUS with more specific information to justify these redactions or must remove the redactions.

Retail Seller	Commission Finding
Marin Clean Energy	The Contract Start Dates and Contract End Dates on the PDSU template are inappropriately redacted for all the projects on the table except for the Cormorant and Allium projects. Contract terms and price information are confidential until 30 days after the commercial operation date or 18-months after contract execution.
Orange County Power Authority	The Expected Annual Generation and Total Contract Volume figures on the PDSU template are inappropriately redacted. Orange County Power Authority must either update its MFUS with more specific information to justify these redactions or must remove the redactions. Contract terms and price information are confidential until 30 days after the commercial operation date or 18 months after contract execution.
Peninsula Clean Energy	Peninsula Clean Energy's MFUS does not explain why the Project Name, Location information, Contract Length, Contract Start and End Dates, Contract Capacity, Expected Annual Generation, Total Contract Volume, and Commercial Operation Date columns are redacted on the PDSU template. Contract terms and price information are confidential until 30 days after the commercial operation date or 18 months after contract execution. Peninsula Clean Energy must either update its MFUS with more specific information to justify these redactions or must remove the redactions.
San Jose Clean Energy	San Jose Clean Energy inappropriately redacts variables Fa, Fb, F, Ga, and Gb for the years 2028 and beyond on its RNS template. This information pertains to "gross RPS position", which can only be redacted for the current year and two forecast years (while "net RPS position", or "optimized net short",

Retail Seller	Commission Finding
	information that pertains to REC bank usage can be redacted indefinitely for all future years). San Jose Clean Energy must update its MFUS with more specific information to justify these redactions or must remove the redactions.
Silicon Valley Clean Energy Authority	On page 16 of its Draft 2025 RPS Plan, Silicon Valley Clean Energy Authority redacts a sentence but does not claim confidentiality protection for it in its MFUS. Silicon Valley Clean Energy Authority must update its MFUS with more specific information to justify these redactions or must remove the redactions. Silicon Valley Clean Energy Authority inappropriately redacts variables Ga and Gb for the years 2028 and beyond on its RNS template. This information pertains to "gross RPS position", which can only be redacted for the current year and two forecast years (while "net RPS position," or "optimized net short," information that pertains to REC bank usage can be redacted indefinitely for all future years). Silicon Valley Clean Energy Authority must update its MFUS with more specific information to justify these redactions or must remove the redactions.
Sonoma Clean Power Authority	In Section V (Project Development Status), Sonoma Clean Power Authority's MFUS does not explain why for some of its developing projects, the project names, contract capacity, contract lengths, expected annual generation, total contract volume, and locations are redacted. Sonoma Clean Power Authority must either update its MFUS with more specific information to justify these redactions or must remove the redactions.

Retail Seller	Commission Finding
Valley Clean Energy Alliance	Valley Clean Energy Alliance redacts capacity amounts for contracts in development on pages 6, 36, and 47 of its Draft 2025 RPS Plan narrative but does not claim confidential treatment for these redactions in its MFUS. Valley Clean Energy Alliance must either update its MFUS with more specific information to justify these redactions or must remove the redactions. Valley Clean Energy Alliance redacts capacity amounts, location, and term lengths for contracts in development on pages 17, 68, and 70 of its Draft 2025 RPS Plan narrative but does not claim confidential treatment for these redactions in its MFUS. Valley Clean Energy Alliance must either update its MFUS with more specific information to justify these redactions or must remove the redactions.
3 Phases Renewables	In its MFUS, 3 Phases Renewables claims confidential protection for redactions in a transportation electrification forecast table in Section IV.A.1 of its Draft 2025 RPS Plan. However, in its Draft 2025 RPS Plan, the table appears in another section, Section IV.B.1. 3 Phases Renewables must clarify the location of these redactions in its MFUS in order to receive confidential treatment for the redactions.
BP Energy	In its MFUS, BP Energy claims confidential protection for redactions in a transportation electrification forecast table in "Section IV.A.1" of its Draft 2025 RPS Plan. However, in its Draft 2025 RPS Plan, the table appears in another section, Section IV.B.1. BP Energy must clarify the location

Retail Seller	Commission Finding
	of these redactions in its MFUS in order to receive confidential treatment for the redactions.
Shell Energy	In Figure 1 on page 10 of its Draft 2025 RPS Plan, Shell Energy inappropriately redacts the "Total Retail Sales (MWh)" figures in the "Compliance Period 4 (2021-2024)" column. This is past information, and current and forecast retail sales (load) data is only confidential for the current year/year of filing and the two subsequent forecast years. Also, Shell Energy's public RNS Template publicly discloses retail sales figures. Shell Energy must un-redact these figures. In Figure 1 on page 10 of its Draft 2025 RPS Plan, Shell Energy inappropriately redacts the "Total Long Term RPS Eligible Procurement (MWh)," "65% of SENA RPS Long Term Requirement (MWh)," "Compliance Total," and "65% of Compliance Total" figures in the "Compliance Period 4 (2021-2024)" column. This is past information, and current and forecast energy supply data is only confidential for the current year/year of filing and the two subsequent forecast years. Shell Energy must un-redact these figures. In Figure 1 on page 10 of its Draft 2025 RPS Plan, on the bar chart, Shell Energy inappropriately redacts the "Total Retail Sales (MWh)," "Total Long Term RPS Eligible Procurement (MWh)," and "65% of SENA RPS Long Term Requirement (MWh)" bars in the "Compliance Period 4 (2021-2024)" group of bars. This is past information, and current and forecast retail sales (load) and energy supply data is only confidential for the current year/year of filing and the two subsequent forecast years. Also, Shell

Retail Seller	Commission Finding
	Energy's public RNS Template discloses retail sales figures. Shell Energy must un-redact these figures. In Figure 1 on page 10 of its Draft 2025 RPS Plan, Shell Energy inappropriately redacts the "Total Retail Sales (MWh)" figures in the "Compliance Period 6 (2028-2030)" column. Current and forecast retail sales (load) data is only confidential for the current year/year of filing and the two subsequent forecast years. Also, Shell Energy's public RNS Template publicly discloses retail sales figures. Shell Energy must un-redact these figures. In Figure 1 on page 10 of its Draft 2025 RPS Plan, Shell Energy inappropriately redacts the "Total Long Term RPS Eligible Procurement (MWh)," "65% of SENA RPS Long Term Requirement (MWh)," "Compliance Total," and "65% of Compliance Total" figures in the "Compliance Period 6 (2028-2030)" column. Current and forecast energy supply data is only confidential for the current year/year of filing and the two subsequent forecast years. Shell Energy must un-redact these figures. In Figure 1 on page 10 of its Draft 2025 RPS Plan, on the bar chart, Shell Energy inappropriately redacts the "Total Retail Sales (MWh)," "Total Long Term RPS Eligible Procurement (MWh)," and "65% of SENA RPS Long Term Requirement (MWh)" bars in the "Compliance Period 6 (2028-2030)" group of bars. Current and forecast retail sales (load) and energy supply data is only confidential for the current year/year of filing and the two subsequent forecast years. Also, Shell Energy's public RNS Template discloses retail sales figures. Shell Energy must un-redact these figures.

Retail Seller	Commission Finding
The Regents of the University of California	In Figure 1 on page 11 of its Draft 2025 RPS Plan, on the bar chart, UC Regents inappropriately redacts the Long-term RNS figures represented in the bars for the years 2028, 2029, and 2030. Current and forecast energy supply data is only confidential for the current year/year of filing and the two subsequent forecast years. UC Regents must un-redact these figures.

10. Summary of Public Comments

Rule 1.18 of the Commission's Rules of Practice and Procedure (Rules) allows any member of the public to submit written comment in any Commission proceeding using the "Public Comment" tab of the online Docket Card for that proceeding on the Commission's website. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding. There are no relevant public comments on the Docket Card of this proceeding beyond the party comments mentioned herein.

11. Comments on Proposed Decision

The proposed decision of ALJ Nilgun Atamturk in this matter was mailed to the parties in accordance with Pub. Util. Code Section 311 and comments were allowed under Rule 14.3. Comments were filed on _____, and reply comments were filed on _____ by _____.

12. Assignment of Proceeding

John Reynolds is the assigned Commissioner and Nilgun Atamturk and Darryl J. Gruen are the assigned ALJs in this proceeding.

Findings of Fact

1. Three IOUs, three SMJUs, 25 CCAs, and 10 ESPs submitted Draft 2025 RPS Plans.

2. All but two retail sellers are forecasted to meet the 65 percent long-term contract procurement requirement in the 2025-2027 compliance period (CP 5).

3. For 2024, the IOUs reported that 44 percent of PG&E's load, 49 percent of SCE's load, and 49.99 percent of SDG&E's load was met by RPS-eligible resources.

4. In D.25-08-009, the Commission noted that it may consider the oversight of short-term transactions, among other procurement transactions, in the new IRP proceeding, the RA proceeding or its successor, or another applicable proceeding.

5. The R.25-06-019 scoping memo and ruling issued on October 28, 2025 expressly includes within its scope the review and necessary modifications to the IOU bundled procurement plans, procurement rules and oversight, activities associated with Pub. Util. Code Section 454.5, and any other issues that materially impact procurement policies, practices, and/or procedures, including proposals for oversight processes for short-term RPS transactions.

6. PG&E's Draft 2025 RPS Plan contains the required elements in Table 1 of the 2025 ACR.

7. PG&E has a sustained physical RPS short position beginning in 2023.

8. Key factors affecting PG&E's RPS position are VAMO processes, changes in load forecast due to data center load growth, and the reduction of RPS resources that were borrowed to meet GTSR program requirements.

9. Using its existing RPS-eligible portfolio as well as banked resources will help PG&E meet its RPS compliance needs and support customer affordability.

10. Beginning procurement early, but in a gradual manner, may help PG&E reduce over-procurement risk.

11. Because data center load growth may accelerate demand, and federal policy changes raise costs and complicate project development, beginning to procure in this planning cycle may reduce risks for PG&E's portfolio related to cost, development, regulatory changes and compliance.

12. While short-term purchases help PG&E fill near-term RNS gaps, long-term contracts could provide stability and help meet state's long-term contracting requirements under SB 350.

13. Combining transactions of both short-term and long-term RPS-eligible products allows the IOUs to balance resource types, terms, and risk exposures.

14. Pursuing contract amendments related to but not limited to contract price reductions, extension of contract terms, increased buyer curtailment flexibility, and repowers of existing facilities and/or upgrades of existing facility equipment may provide value to PG&E's customers.

15. Bilateral negotiations may allow PG&E to transact swiftly and take advantage of opportunities to optimize its portfolio.

16. Extending the authority to transact bundled and unbundled RPS sales for less than five years forward provides PG&E flexibility to manage its portfolio.

17. Participating in other market participants' competitive solicitations may maximize value for PG&E's customers.

18. Being able to transact via brokers and exchanges may provide PG&E flexibility to manage its portfolio.

19. The ability to retire RECs for LCFS credits will provide flexibility and demonstrate that PG&E is utilizing zero carbon-intensity electricity for EV charging.

20. PG&E's Draft 2025 RPS Plan meets the requirements of the 2025 ACR except for the inconsistency identified in Section V (Project Development Status Update) of its Plan.

21. SCE's Updated Draft 2025 RPS Plan contains each of the elements required in Table 1 of the 2025 ACR.

22. SCE forecasts a need for additional RPS-eligible resources to meet its RPS CP 6 requirements.

23. According to SCE's deterministic analysis, SCE will need to procure 17,748 GWh by the end of CP 6 to meet its CP 6 RPS compliance requirements.

24. If uncertainty is accounted for, SCE may need to procure up to 29,400 GWh of additional RPS eligible new and existing resources to meet its CP 6 RPS requirements

25. The key factor affecting SCE's RPS position is the change in annual energy demand driven by data center load and lower solar PV generation due to updated behind-the-meter cost estimates, and the City of Huntington Beach reverting to bundled service with SCE.

26. SCE needs flexibility to purchase PCC 1, PCC 2, and PCC 3 RECs to ensure continued compliance with RPS requirements in CP 5 and help meet the requirements for CP 6.

27. PCC 1, PCC 2, and PCC 3 RECs sales will allow SCE to continue optimizing its portfolio.

28. SCE submitted changes to its procurement protocols for new resources and existing resources, REC transaction protocols as the basis for all its REC transactions for short-term and long-term purchases and sales, and LCBF evaluation criteria, including consideration of workforce development and disadvantaged communities.

29. SCE submitted changes to the 2025 Pro Forma Renewable PPA, Pro Forma PCC 1 REC Agreement, and Pro Forma PCC 3 REC Agreement to harmonize language among different versions or implement minor changes.

30. Customer participation in SCE's LCFS-funded programs is expected to increase over time as EV adoption increases and SCE's program operations mature.

31. There are no deficiencies in SCE's Draft 2025 RPS Plan.

32. SDG&E's Draft 2025 RPS Plan contains the required elements of the 2025 ACR except for the deficiencies identified in Section 6.4.7 of this decision.

33. Load departure commencing in 2021 and the VAMO process commencing in 2023 led to significant changes in SDG&E's RPS portfolio.

34. SDG&E anticipates that its RPS position will fall short beginning in the current compliance period.

35. Using banked RECs may help SDG&E meet its RPS compliance requirements in a cost-effective manner.

36. REC purchases from new or existing resources, either through short-term or long-term contracts, may be beneficial to SDG&E by providing flexibility to meet its portfolio needs in a cost-effective manner.

37. Selling RPS volumes not allocated to VAMO process and not used for RPS compliance may promote affordability for SDG&E's customers.

38. Having flexibility to manage its RPS portfolio by conducting short-term REC sales, and both short-term and long-term RPS procurement in the same year would enable SDG&E to meet compliance obligations, respond to increasing market competition, adapt to changing market conditions, and pursue the most cost-effective options for its bundled customers.

39. Allowing SDG&E to procure or sell RECs through participating in RFOs will provide SDG&E flexibility in meeting its RPS obligations.

40. There are deficiencies in four sections of SDG&E's Draft 2025 RPS Plan: Compliance with Recent Legislation & Impact of Regulatory Changes, PDSU, and Cost Quantification.

41. The three SMJUs (BVES, PacifiCorp, and Liberty, collectively) need to procure more RPS eligible renewables beginning in 2025 to meet their respective RPS requirements.

42. BVES' Draft 2025 RPS Plan contains the required elements of the 2025 ACR.

43. Liberty's Draft 2025 RPS Plan contains the required elements of the 2025 ACR except for several deficiencies identified in the Long-Term Procurement and Bid Solicitation Protocols sections of its Draft 2025 RPS Plan.

44. PacifiCorp's Draft 2025 RPS Plan contains the required elements of the 2025 ACR except for the missing information regarding its transportation electrification forecast.

45. Based on the CCAs' RNS reporting, several CCAs are expected to need additional RPS procurement beginning in 2025 or 2026.

46. The ESPs will collectively need additional procurement to meet RPS obligations beginning in 2026.

47. There are noted deficiencies in the CCAs' and ESPs' Draft 2025 RPS Plans regarding the following sections: Portfolio Supply and Demand, Long-Term Procurement, Forecasting for Increased Transportation Electrification, Portfolio Optimization, PDSU, Potential Compliance Delays, Risk Assessment, Lessons Learned — Risk Assessment, RNS Calculations, MMoP, Bid Solicitation Protocol, and Solicitation Protocols for Renewables Sales.

48. BREMUS has completed deregistration, and their ESP number was terminated effective May 2025.

49. SCE's Motion to update its Draft 2025 RPS Plan is submitted in compliance with 2025 ACR.

50. SCE's Motion to File its Updated RPS Plan under Seal is reasonable since its updated Plan contains confidential, market-sensitive information.

51. SDG&E's Motion to File its Updated RPS Plan under seal is reasonable since SDG&E's Updated Plan contain confidential, market-sensitive information.

52. Cal Advocates' motion to file its comments under seal is reasonable since Cal Advocates' Comments include multiple references to materials that are confidential.

53. Cal Advocates' Response to Updated RPS Plans contains multiple references to materials that are confidential.

54. SCE's September 5, 2025, reply to Cal Advocates Response contains market sensitive information.

55. Retail sellers identified in Section 9.4 of this decision have excessively redacted information in their Draft 2025 RPS Plans.

Conclusions of Law

1. The IOUs' requests to eliminate the Tier 1 Advice Letter review process should be denied without prejudice.

2. The IOUs should continue to file a Tier 3 Advice Letter for approval of long-term transactions and a Tier 1 Advice Letter for short-term transactions that are conducted in accordance with the transaction framework approved in their RPS Plans until the Commission considers the oversight of short-term transactions in R.25-06-019.

3. PG&E's Draft 2025 RPS Plan should be approved with modifications.

4. PG&E's request for authority to procure long-term and short-term RPS contracts should be approved.

5. PG&E should be authorized to optimize its existing portfolio of RPS-eligible contracts by renegotiating these contracts.

6. PG&E's request for authority to transact RPS products through bilateral negotiations should be approved.

7. PG&E's request to transact bundled and unbundled RPS sales for deliveries of less than five years forward from the execution date should be approved.

8. PG&E should be authorized to participate in other market participants' competitive solicitations.

9. PG&E should be authorized to conduct RPS transactions through brokers and exchanges.

10. PG&E should be authorized to retire RECs for LCFS credits.

11. PG&E should correct the inconsistency identified in Section V (Project Development Status Update) of its Draft 2025 RPS Plan.

12. SCE's Updated Draft 2025 RPS Plan should be approved with modifications.

13. SCE's request for authority to procure additional RPS-eligible new and existing resources should be approved.

14. SCE's request to purchase and sell PCC 1, PCC 2, and PCC 3 RECs should be approved.

15. SCE's procurement protocols for new resources and existing resources, REC transaction protocols as the basis for all its REC transactions for short-term and long-term purchases and sales, and LCBF evaluation criteria, including

consideration of workforce development and disadvantaged communities should be approved.

16. SCE's Pro Forma Renewable PPA, Pro Forma PCC 1 REC Agreement, and Pro Forma PCC 3 REC Agreement should be approved.

17. SCE should be allowed to claim incremental LCFS credits through the retirement of RECs.

18. SDG&E's Draft 2025 RPS Plan should be approved with modifications.

19. SDG&E's request for the authority to use banked RECs should be approved.

20. SDG&E's request for the option to procure RECs for compliance through solicitations, bilateral agreements, or brokers and exchanges should be approved.

21. SDG&E's request for authority to sell RPS volumes should be approved.

22. SDG&E's request to buy and sell RECs in the same year should be approved.

23. SDG&E should address in its Final 2025 RPS Plan the deficiencies listed in Section 6.4.7 of this decision.

24. The Draft 2025 RPS Plan filed by BVES should be approved and deemed final.

25. The Draft 2025 RPS Plan filed by Liberty should be approved with modifications.

26. Liberty should correct the deficiencies identified in Section 7.2 of this decision in its Final 2025 RPS Plan.

27. The Draft 2025 RPS Plan filed by PacifiCorp should be approved with modifications.

28. PacifiCorp should correct the deficiencies identified in Section 7.3 of this decision in its Final 2025 RPS Plan.

29. The CCAs and ESPs identified in this decision should correct the relevant section of their plans in their Final 2025 RPS Plans.

30. The City of Palmdale should update the Portfolio Supply and Demand section of its Draft 2025 RPS Plan.

31. CleanPowerSF should provide additional analysis for the Long-Term Procurement section of its Draft 2025 RPS Plan.

32. Pilot Power must provide additional information pertaining to its long-term RPS position in the Long-Term Procurement section of its Draft 2025 RPS Plan.

33. Shell Energy should revise the Long-Term Procurement section of its plan to more accurately describe its long-term contracting position and to provide more concrete steps for how it will address its current long-term procurement shortfall.

34. CCAs and ESPs listed in Table 3 of this decision should provide additional information regarding transportation electrification.

35. Shell Energy should provide the Portfolio Optimization section and describe how it is planning to optimize its RPS portfolio in its Final 2025 RPS Plan.

36. Marin Clean Energy should resolve inconsistencies related to the PDSU section of its Draft 2025 RPS Plan.

37. Shell Energy should resolve inconsistencies related to the PDSU section in its Final 2025 RPS Plan.

38. Commercial Energy should describe how it would minimize or address this potential compliance delay in its Final 2025 RPS Plan.

39. CleanPowerSF should update or clarify information pertaining to risk assessment in its Final 2025 RPS Plan.

40. Calpine Energy Solutions should update or clarify information pertaining to Lessons Learned — Risk Assessment in its Final 2025 RPS Plan.

41. The City of Pomona should clarify information pertaining to RNS calculations in its Final 2025 RPS Plan.

42. Lancaster Choice Energy should clarify information pertaining to RNS calculations in its Final 2025 RPS Plan.

43. Pico Rivera should clarify information pertaining to RNS calculations in its Final 2025 RPS Plan.

44. Shell Energy should revise its RNS calculations section of its Draft 2025 RPS Plan according to the directives provided in Section 8.3.9 of this decision.

45. The City of Palmdale should revise the MMoP section of its Draft 2025 RPS Plan as directed in Section 8.3.10 of this decision.

46. The City of Santa Barbara should revise the MMoP section of its Draft 2025 RPS Plan as directed in Section 8.3.10 of this decision.

47. Shell Energy should provide the missing MMoP section in its Final 2025 RPS Plan.

48. The City of Palmdale should revise Bid Solicitation Protocol section of its Draft 2025 RPS Plan as directed in Section 8.3.11 of this decision.

49. Shell Energy should resolve the formatting issues pertaining to the Bid Solicitation Protocol section of its Draft 2025 RPS Plan as directed in Section 8.3.11 of this decision.

50. Shell Energy should provide Solicitation Protocols for Renewable Sales section of its Draft 2025 RPS Plan in the correct section and formatting in accordance with the 2025 ACR instructions.

51. It is reasonable to grant BREMUS' motion to be exempt from filing this year's and future years' RPS Plans.

52. SCE's and SDG&E's motions to update their Draft 2025 RPS Plans should be granted.

53. SCE's Motion to File its Updated RPS Plan under seal should be granted.

54. SDG&E's Motion to File its Updated RPS Plan under seal should be granted.

55. The motion of Cal Advocates for an order allowing it to file under seal the confidential version of Cal Advocates' Comments should be granted.

56. Cal Advocates' motion for leave to file under seal the confidential version of Cal Advocates' Response to Updated RPS Plans should be granted.

57. Retail sellers as identified in Table 12 should un-redact non-confidential material in their Final 2025 RPS Plans to comply with guidance in D.06-06-066, as modified by D.21-11-029.

58. This proceeding should remain open.

O R D E R

IT IS ORDERED that:

1. Pursuant to the authority provided in Public Utilities Code Section 399.13(a)(1), the Draft 2025 Renewables Portfolio Standard Procurement Plans filed by Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company are accepted, as modified herein.

2. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must file a clean version and a redlined copy of their Final Renewables Portfolio Standard Procurement Plans as a compliance filing in this proceeding within 30 days of the issuance date of this decision.

3. Pacific Gas and Electric Company's request for streamlined approval for short-term Renewables Portfolio Standard transactions with terms of up to three years is denied without prejudice.

4. Pacific Gas and Electric Company's request for authority to procure short-term and long-term Renewables Portfolio Standard (RPS) eligible resources is approved to the extent the procurement is either needed to meet RPS needs or to comply with California Public Utilities Commission's procurement-related orders issued in the Integrated Resource Planning proceeding.

5. Pacific Gas and Electric Company is authorized to renegotiate the contracts in its Renewables Portfolio Standard portfolio.

6. Pacific Gas and Electric Company's request to transact Renewables Portfolio Standard eligible products via bilateral negotiations is approved.

7. Pacific Gas and Electric Company's request to transact bundled and unbundled Renewables Portfolio Standard eligible product sales for deliveries of less than five years forward from the execution date is approved.

8. Pacific Gas and Electric Company is authorized to participate in other market participants' competitive solicitations.

9. Pacific Gas and Electric Company is authorized to conduct Renewables Portfolio Standard transactions through brokers and exchanges.

10. Pacific Gas and Electric Company is authorized to retire renewable energy credits for the Low Carbon Fuel Standard credits.

11. Pacific Gas and Electric Company must address the deficiencies identified in Section 6.2.9 of this decision in its Final 2025 Renewables Portfolio Standard Plan.

12. Southern California Edison Company is authorized to procure additional Renewables Portfolio Standard (RPS) eligible resources to the extent the

procurement is either needed to meet RPS needs or to comply with California Public Utilities Commission's procurement-related orders issued in the Integrated Resource Planning proceeding.

13. Southern California Edison Company is authorized to purchase and sell short-term and long-term portfolio content category (PCC) 1, PCC 2, and PCC 3 renewable energy credits.

14. Southern California Edison Company is authorized to use solicitations, other market participants' solicitations, bilateral contracts, brokers, and exchanges to procure renewable energy credits.

15. Southern California Edison Company's revised bid solicitation protocols are approved.

16. Southern California Edison Company's revised agreements are approved.

17. Southern California Edison Company is authorized to retire renewable energy credits for the Low Carbon Fuel Standard funded programs.

18. San Diego Gas & Electric Company is authorized to use banked renewable energy credits consistent with excess procurement rules to meet its Renewables Portfolio Standard compliance requirements.

19. San Diego Gas & Electric Company's request to procure long-term renewables portfolio standard eligible resources is approved to the extent the procurement is either needed to meet Renewables Portfolio Standard needs or to comply with the California Public Utilities Commission's procurement-related orders issued in the Integrated Resource Planning proceeding

20. San Diego Gas & Electric Company's request to procure renewable energy credits for compliance through solicitations, bilateral agreements, or brokers and exchanges is approved.

21. San Diego Gas & Electric Company's request for authorization to sell Renewables Portfolio Standard eligible products is approved.

22. San Diego Gas & Electric Company's request to buy and sell renewable energy credits in the same year is approved.

23. San Diego Gas & Electric Company is authorized to participate in requests for offers, and use brokers and exchanges for procuring or selling renewable energy credits.

24. San Diego Gas & Electric Company's request for an updated approval process for short-term transactions is denied without prejudice.

25. San Diego Gas & Electric Company should address the deficiencies listed in Section 6.4.7 of this decision in its Final 2025 Renewables Portfolio Standard Plan.

26. Pursuant to the authority provided in Public Utilities Code Section 399.13(a)(1), the Draft 2025 Renewables Portfolio Standard Procurement Plan filed by Bear Valley Electric Service, Inc. is accepted and deemed final.

27. Pursuant to the authority provided in Public Utilities Code Section 399.13(a)(1), the Draft 2025 Renewables Portfolio Standard Procurement Plan filed by Liberty Utilities (CalPeco Electric), LLC is accepted as modified.

28. Liberty Utilities (CalPeco Electric), LLC must address the deficiencies listed in Section 7.2 of this decision in its Final 2025 Renewables Portfolio Standard Plan and must file a clean version and a redlined copy of its Final Renewables Portfolio Standard Procurement Plan as a compliance filing in this proceeding within 30 days of the issuance date of this decision.

29. Pursuant to the authority provided in Public Utilities Code Section 399.13(a)(1), the Draft 2025 Renewables Portfolio Standard Procurement Plan filed by PacifiCorp d/b/a Pacific Power is accepted as modified.

30. PacifiCorp d/b/a Pacific Power must address the deficiencies listed in Section 7.3 of this decision in its Final 2025 Renewables Portfolio Standard Plan and must file a clean version and a redlined copy of its Final Renewables Portfolio Standard Procurement Plan as a compliance filing in this proceeding within 30 days of the issuance date of this decision.

31. The City of Palmdale must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Portfolio Supply and Demand, Transportation Electrification, Minimum Margin of Procurement, and Bid Solicitation Protocol in Sections 8.3.1, 8.3.3, 8.3.10, and 8.3.11 of this decision.

32. The City of Pomona must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Renewable Net Short Calculation in Section 8.3.9 of this decision.

33. The City of Santa Barbara must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Minimum Margin of Procurement in Section 8.3.10 of this decision.

34. CleanPowerSF must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Long-Term Procurement and Risk Assessment in Sections 8.3.2 and 8.3.7 of this decision.

35. Lancaster Choice Energy must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Renewable Net Short Calculation in Section 8.3.9 of this decision.

36. Marin Clean Energy must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Project Development Status Update in Sections 8.3.5 of this decision.

37. Pico Rivera Innovative Municipal Energy must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Renewable Net Short Calculation in Section 8.3.9 of this decision.

38. The following retail sellers must file their Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Forecasting for Increased Transportation Electrification in Section 8.3.3 of this decision: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, City of Palmdale, City of Pomona, City of Santa Barbara, Clean Energy Alliance, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Jacinto Power, 3 Phase Renewables, Inc., and BP Energy Retail Company California LLC.

39. Calpine Energy Solutions must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Lessons Learned — Risk Assessment in Section 8.3.8 of this decision.

40. Commercial Energy must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding the Potential Compliance Delays in Section 8.3.6 of this decision.

41. Pilot Power must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding Long-Term Procurement in Section 8.3.2 of this decision.

42. Shell Energy Solutions must file its Final 2025 Renewables Portfolio Standard Procurement Plan to address findings regarding Long-Term Procurement, Portfolio Optimization, Project Development Status Update, Renewable Net Short Calculations, Minimum Margin of Procurement, Bid

Solicitation Protocol, and Solicitation Protocols for Renewables Sales in Section 8.3.2, Sections 8.3.4-8.3.5, and Sections 8.3.9-8.3.12 of this decision.

43. Pursuant to Public Utilities Code Section 365.1(c)(1), the Draft 2025 Renewables Portfolio Standard (RPS) Procurement Plans filed by the following Community Choice Aggregators are accepted and deemed final: Clean Power Alliance of Southern California; Desert Community Energy; King City Community Power; San Diego Community Power; San Jose Clean Energy; Silicon Valley Clean Energy; Sonoma Clean Power Authority; and Valley Clean Energy Alliance. All other Community Choice Aggregators listed in the Summary section of this decision must file their Final 2025 RPS Procurement Plans as a compliance filing in this proceeding within 30 days of the issuance date of this decision.

44. Pursuant to Public Utilities Code Section 365.1(c)(1), the Draft 2025 Renewables Portfolio Standard (RPS) Procurement Plans filed by the following Electric Service Providers (ESP) are accepted and deemed final: Calpine Power America-CA, LLC; Constellation NewEnergy, Inc.; Direct Energy Business, LLC; and The Regents of the University of California. All other ESPs listed in the Summary section of this decision must file their Final 2025 RPS Procurement Plans as a compliance filing in this proceeding within 30 days of the issuance date of this decision.

45. Any Draft 2025 Renewables Portfolio Standard Plan that does not require a correction or clarification is deemed as final.

46. The motions to update Draft 2025 Renewables Portfolio Standard Procurement Plans and file them under seal, filed by Southern California Edison Company and San Diego Gas & Electric Company, are granted.

47. The motion of Public Advocates Office at the California Public Utilities Commission to file under seal the *Cal Advocates' Comments on the Draft 2025 Renewables Portfolio Standard Procurement Plans (Confidential Version)*, filed July 28, 2025, is granted.

48. The motion of the Public Advocates Office at the California Public Utilities Commission for leave to file under seal the confidential version of the *Response of the Public Advocates Office to Motions to Update Draft 2025 Renewables Portfolio Standard Procurement Plans*, dated August 26, 2025, is granted.

49. The *Motion of Southern California Edison Company (U 388-E) for leave to file its Reply to the Public Advocates Office's Response on the Motion to Update the Draft 2025 [Renewables Portfolio Standard] Procurement Plan under Seal*, dated September 5, 2025, is granted.

50. The motions seeking confidentiality filed by the retail sellers are granted, in part. As noted in Table 12 — Confidentiality Redactions and Commission Findings in Section 9.4 of this decision, these retail sellers must each remove the excess redactions in their Final 2025 Renewables Portfolio Standard (RPS) Procurement Plans within 30 days of the issuance date of this decision.

51. All rulings by the assigned Commissioner and the assigned Administrative Law Judge are affirmed.

52. All motions not otherwise ruled on are deemed denied.

53. Rulemaking 24-01-017 remains open.

This order is effective today.

Dated _____, at Sacramento, California.