

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



FILED

12/02/25

04:59 PM

R2506019

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

Rulemaking 25-06-019
(Filed June 26, 2025)

**DECEMBER 2, 2025 INTEGRATED RESOURCE PLAN PROCUREMENT UPDATE
COMPLIANCE FILING OF DIRECT ENERGY BUSINESS, LLC**

[PUBLIC VERSION]

December 2, 2025

Cem Turhal
Direct Energy
1301 McKinney Street
Houston, TX 77010
Telephone (925) 699-6687
Email: cem.turhal@nrg.com

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

Order Instituting Rulemaking to Continue
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**DECEMBER 2, 2025 INTEGRATED RESOURCE PLAN PROCUREMENT UPDATE
COMPLIANCE FILING OF DIRECT ENERGY BUSINESS, LLC
[PUBLIC VERSION]**

Pursuant to Decision (“D.”) 19-11-016, D.20-12-044, D.21-06-035, and D.23-02-040 of the California Public Utilities Commission (the “Commission”), and the Energy Division’s Filing Requirements Overview for December 2, 2025, IRP Procurement Compliance Filing & Data Request (“Filing Requirements”) and other guidance, Direct Energy Business, LLC (“Direct Energy”) formally submits its December 2, 2025 Integrated Resource Plan Procurement Update Compliance Filing. Pursuant to D.24-02-047 Ordering Paragraph 16(b), Direct Energy previously filed a Tier 2 Advice letter to request an extension of the deadline to procure long lead-time resources.

This compliance filing contains the details and descriptions of the IRP procurement that Direct Energy has undertaken to date. Direct Energy continues to meet its procurement obligations in accordance with the state’s reliability and clean energy goals.

This filing includes:

- Public Attachment 1: RDTv.3_5_4
- Public Attachment 2: Crosswalk Table
- Confidential Attachment 3: Direct Energy MTR Procurement to Date
- Confidential Attachment 4: Remediation Plan
- Confidential Attachment 5: Existing Contract Amendment

- Confidential Attachment 6A: New Signed Contract
- Confidential Attachment 6B: New Signed Contract Amendment

A motion to file confidential information under seal is being filed concurrently with this filing.

Dated: December 2, 2025

Respectfully submitted,

/s/ Cem Turhal

Cem Turhal
Direct Energy
1301 McKinney Street
Houston, TX 77010
Telephone (925) 699-6687
Email: cem.turhal@nrg.com

VERIFICATION

I am the attorney for Direct Energy Business, LLC (“Direct Energy”) and am authorized to make this verification on its behalf. Direct Energy is absent from the County of Sacramento, California, where I have my office, and I make this verification for that reason. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed on December 2, 2025 at Sacramento, California.

/s/ Jedediah J. Gibson
JEDEDIAH J. GIBSON
DOWNEY BRAND LLP
621 Capitol Mall, 18th Floor
Sacramento, California 95814
Telephone: 916.444.1000
Facsimile: 916.444.2100
Email: jgibson@downeybrand.com

Attorneys for Direct Energy Business, LLC

ATTACHMENT 1

**DIRECT ENERGY'S INTEGRATED RESOURCE PLAN PROCUREMENT UPDATE
RESOURCE DATA TEMPLATE**

(PUBLIC VERSION)

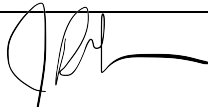
RDT Certification Form – Verification Declaration

Load Serving Entity Full Name:	Direct Energy Business, LLC	
Load Serving Entity Abbreviation:	DEB	
Submission Type:	Mid-Term Reliability (D.21-06-035)/Supplemental Mid-Term Reliability (D.23-02-040)	
Date of Filing:	12/2/2025	

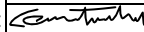
Consistent with Rules 1.1 & 1.11 of the CPUC's Rules of Practice and Procedure, this Procurement Showing has been verified by an officer of the corporation or organization, who expressly certifies, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this showing;
2. I have reviewed, or have caused to be reviewed, this showing;
3. Based on my knowledge, information, or belief, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, information, or belief, this filing contains all of the information required to be provided by CPUC orders, rules, and regulations.

LSE Officer

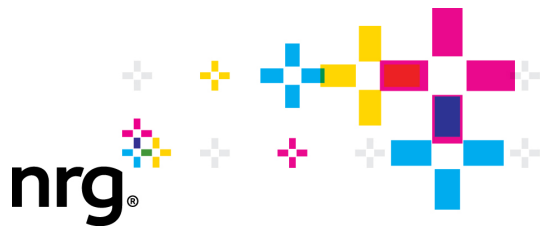
Title:	Senior Director, West Power Trading	
Name:	Jay Robertson	
Email:	jay.robertson@nrg.com	
Phone:		
Signature:		

Backup Contact Information

Title:	Director of Regulatory Affairs	
Name:	Cem Turhal	
Email:	cem.turhal@nrg.com	
Phone:		
Signature:		

Load Serving Entity Information

LSE Address Line 1:	1301 McKinney St	
LSE Address Line 2:		
LSE City:	Houston	
LSE State:	TX	
LSE Zip:	77010	



NRG Energy, Inc.
804 Carnegie Center
Princeton, NJ 08540

November 20, 2025

To: Jay Robertson

From: Joseph A. Holtman

CC: Robert Gaudette
Bill Evans
Brian Curci
Kevin Masucci
Marty Ryan
Shawny McBride
Steven Haugenes
Lisa Balder

Re: Temporary Delegation of Authority

This memorandum is to confirm and establish that I have delegated to Jason Robertson, Senior Director, West Power Trading, all of the powers and authority that I have as Vice President of Direct Energy Business, LLC; Direct Energy Marketing Limited; Direct Energy Services, LLC and NRG Business Marketing LLC.

(The "Companies"), whether arising by action or delegation of the Board of Directors of the Companies (the "Board"), by operation of Delaware law, or otherwise.

This delegation of authority shall be in effect from November 24 through November 26, 2025. Such delegation shall be automatically extended until the earlier of my return or such time as the Board may otherwise determine.

A handwritten signature in black ink, appearing to read "Joseph A. Holtman", is written in a cursive, flowing style.

Joseph A. Holtman
Vice President, Power Trading

	A	B	C	D	E	F	G	H	I	J	K	L	M
	lse_unique_contract_id	resource	alternative_resource_name	contract_status	project_interconnection_position	interconnection_substation	marginal_addition	marginal_addition_to	total_nameplate_capacity	contracted_nameplate_capacity	sep_contracted_mw_nqc	contract_gwh_annual	is_hybrid_paired
1													
2	raonly2021IRP1_generic	FIFTHS_2_FSSBT	FIFTH STANDARD BATTERY	Online					137			-	NotHybrid
3	raonly2021IRP1_dcr	FIFTHS_2_FSSBT	FIFTH STANDARD BATTERY	Online					137			-	NotHybrid
4	energy_Clearway_1	VICPAS_2_SLOSR1	ARICA SOLAR	Online					49.5				NotHybrid
5	energy_Clearway_2	VICPAS_2_SOCSR3	ARICA SOLAR	Online					20				NotHybrid
6	RAonly_Hecate_Chiquito	NEW_GENERIC_BATTERY_STORAGE	CHIQUITO GRID	Development	SCE WDT1635	ROSAMOND 66kV			80			-	NotHybrid
7	RAonly_Antelope	NEW_GENERIC_BATTERY_STORAGE		Development					250			-	NotHybrid
8	RAonly_Antelope1	NEW_GENERIC_BATTERY_STORAGE		Development					250			-	NotHybrid

	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB
	can_charge_from_grid	total_generator_mw	contracted_generator_mw	total_storage_mw	contracted_storage_mw	solar_technology_sub_type	storage_technology_sub_type	total_storage_depth_mwh	contracted_storage_depth_mwh	viability_cod_reasonableness	viability_technical_feasibility	viability_financing_sitecontrol	resource_mix	11911016_vamo_ghgfre	buy_sell_own
1															
2							Li	548							
3							Li	548							
4						1Axis									
5						1Axis									
6							Li	320		4	3	3			
7							Li	2000							
8							Li	2000							

	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO	AP	AQ	AR	AS
1	counterparty	generator_supplier	developer_name	capacity_area	capacity_sub_area	cpuc_approval_ref	county	COD_year	COD_month	COD_day	contract_start_date_year	contract_start_date_month	contract_start_date_day	contract_end_date_year	contract_end_date_month	contract_end_date_day	contract_execution_date_year
2			RWE	GreaterFresno	Greater Fresno Coalinga		FresnoCounty	2023	6	2	2023	7	1	2033	7	1	2022
3			RWE	GreaterFresno	Greater Fresno Coalinga		FresnoCounty	2023	6	2	2023	7	1	2033	7	1	2022
4			CLEARWAY	SCE	No_sub_area		RiversideCounty	2024	6	1	2024	6	1	2034	12	31	2022
5			CLEARWAY	SCE	No_sub_area		RiversideCounty	2024	6	1	2024	6	1	2034	12	31	2022
6			HECATE	SCE	No_sub_area		RiversideCounty	2027	6	1	2027	6	1	2037	5	31	2024
7					No_sub_area			2028	6	1	2028	6	1	2038	5	31	2025
8					No_sub_area			2028	6	1	2028	6	1	2038	5	31	2025

[illegible]

	CC
	notes
1	
2	8, leaving 102 MW contracted nameplate available
3	ontracted nameplate de-rated to 22.8 MW 5-hr and
4	meet DCR procurement obligation. Separated into two
5	Energy only agreement contractually paired with
6	tion delays; name needs added to resource list and
7	tion; name needs added to resource list and alternat
8	is will be shown as double counted in the summary

	A	B	C	D	E	F
1	lse_unique_contract_id	lse_selected_mtr_tranche	%_nameplate/tranche_non_hybrid	%_nameplate/tranche_hybrid_gen	%_nameplate/tranche_hybrid_storage	elcc_non_hybrid
2	raonly2021IRP1_generic	tranche_1	17%			storage_2023_mtr_2
3	raonly2021IRP1_generic	tranche_2	55%			storage_2024_mtr_2
4	raonly2021IRP1_generic	tranche_3	17%			storage_2025_mtr_2_post_nov302022
5	raonly2021IRP1_generic	tranche_4	5%			storage_2026_mtr_2_post_nov302022
6	raonly2021IRP1_dcr	tranche_2	100%			storage_2024_mtr_2
7	RAonly_Hecate_Chiquito	tranche_4	34%			storage_2026_mtr_2_post_nov302022
8	RAonly_Hecate_Chiquito	tranche_5	42%			storage_2027_mtr_2
9	RAonly_Antelope	tranche_6	4%			storage_2028_mtr_2
10	RAonly_Antelope1	tranche_6	4%			storage_2028_mtr_2
11						
12						
13						
14						
15						
16						
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	G	H	I	J	K	L
1	elcc_hybrid_gen	elcc_hybrid_storage	p50_annual_mwh_he_17	p50_annual_mwh_post_he_17	round_trip_efficiency	engineering_assessment_confirmation
2						
3						
4						
5						
6						TRUE
7						
8						
9						
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11						
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15						
16						
17						
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	M	N	O	P	Q
1	contract_in_uc	uc_is_hybrid_paired	hybrid	uc_resource_id	resource_lookup
2	TRUE	NotHybrid	FALSE	FIFTHS_2_FSSBT	storage
3	TRUE	NotHybrid	FALSE	FIFTHS_2_FSSBT	storage
4	TRUE	NotHybrid	FALSE	FIFTHS_2_FSSBT	storage
5	TRUE	NotHybrid	FALSE	FIFTHS_2_FSSBT	storage
6	TRUE	NotHybrid	FALSE	FIFTHS_2_FSSBT	storage
7	TRUE	NotHybrid	FALSE	_NEW_GENERIC_BATTERY_STORAGE	storage
8	TRUE	NotHybrid	FALSE	_NEW_GENERIC_BATTERY_STORAGE	storage
9	TRUE	NotHybrid	FALSE	_NEW_GENERIC_BATTERY_STORAGE	storage
10	TRUE	NotHybrid	FALSE	_NEW_GENERIC_BATTERY_STORAGE	storage
11	FALSE	0	0	0	0
12	FALSE	0	0	0	0
13	FALSE	0	0	0	0
14	FALSE	0	0	0	0
15	FALSE	0	0	0	0
16	FALSE	0	0	0	0
17	FALSE	0	0	0	0
18	FALSE	0	0	0	0
19	FALSE	0	0	0	0
20	FALSE	0	0	0	0
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43	FALSE	0	0	0	0
44	FALSE	0	0	0	0
45	FALSE	0	0	0	0
46	FALSE	0	0	0	0
47	FALSE	0	0	0	0
48	FALSE	0	0	0	0
49	FALSE	0	0	0	0
50	FALSE	0	0	0	0
51	FALSE	0	0	0	0

	R	S	T	U	V	W
1	uc_d2106035_procurement_cat	ontracted_nameplate_cap: contracted_generator_m		uc_contracted_storage_mw	uc_contracted_storage_depth_mwh	storage_duration_hrs
2	general					
3	general					
4	general					
5	general					
6	ZE_gen_paired_dr					
7	general					
8	general					
9	long_duration_storage					
10	general					
11	0	0	0	0	0	0.0
12	0	0	0	0	0	0.0
13	0	0	0	0	0	0.0
14	0	0	0	0	0	0.0
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32	0	0	0	0	0	0.0
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34	0	0	0	0	0	0.0
35	0	0	0	0	0	0.0
36	0	0	0	0	0	0.0
37	0	0	0	0	0	0.0
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41	0	0	0	0	0	0.0
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47	0	0	0	0	0	0.0
48	0	0	0	0	0	0.0
49	0	0	0	0	0	0.0
50	0	0	0	0	0	0.0
51	0	0	0	0	0	0.0

	X	Y	Z	AA	AB	AC	AD	AE
1	storage_lookup_key	uc_contract_start_year	:_contract_start_mon	uc_contract_start_day	is_non_grid_charging	is_general	is_ZE_gen_paired_dr	is_firm_ZE
2	4hr_storage_2023_mtr_2	2023	7	1	FALSE	TRUE	FALSE	FALSE
3	4hr_storage_2024_mtr_2	2023	7	1	FALSE	TRUE	FALSE	FALSE
4	4hr_storage_2025_mtr_2_post_nov302022	2023	7	1	FALSE	TRUE	FALSE	FALSE
5	4hr_storage_2026_mtr_2_post_nov302022	2023	7	1	FALSE	TRUE	FALSE	FALSE
6	5hr_storage_2024_mtr_2	2023	7	1	FALSE	FALSE	TRUE	FALSE
7	4hr_storage_2026_mtr_2_post_nov302022	2027	6	1	FALSE	TRUE	FALSE	FALSE
8	4hr_storage_2027_mtr_2	2027	6	1	FALSE	TRUE	FALSE	FALSE
9	8hr_storage_2028_mtr_2	2028	6	1	FALSE	FALSE	FALSE	FALSE
10	8hr_storage_2028_mtr_2	2028	6	1	FALSE	TRUE	FALSE	FALSE
11		0	0	0		FALSE	FALSE	FALSE
12		0	0	0		FALSE	FALSE	FALSE
13		0	0	0		FALSE	FALSE	FALSE
14		0	0	0		FALSE	FALSE	FALSE
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24		0	0	0		FALSE	FALSE	FALSE
25		0	0	0		FALSE	FALSE	FALSE
26		0	0	0		FALSE	FALSE	FALSE
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28		0	0	0		FALSE	FALSE	FALSE
29		0	0	0		FALSE	FALSE	FALSE
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32		0	0	0		FALSE	FALSE	FALSE
33		0	0	0		FALSE	FALSE	FALSE
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44		0	0	0		FALSE	FALSE	FALSE
45		0	0	0		FALSE	FALSE	FALSE
46		0	0	0		FALSE	FALSE	FALSE
47		0	0	0		FALSE	FALSE	FALSE
48		0	0	0		FALSE	FALSE	FALSE
49		0	0	0		FALSE	FALSE	FALSE
50		0	0	0		FALSE	FALSE	FALSE
51		0	0	0		FALSE	FALSE	FALSE

	AF	AG	AH	AI	AJ	AK	AL	AM
1	is_long_duration_storage	is_ilt	contract_date	ssumed_Tranch	decision_elcc_non_hybrid	decision_elcc_hybrid_gen	decision_elcc_hybrid_storage	valid_contract_start_date
2	FALSE	FALSE	7/1/2023	tranche_1	mtr	0	0	TRUE
3	FALSE	FALSE	7/1/2023	tranche_1	mtr	0	0	TRUE
4	FALSE	FALSE	7/1/2023	tranche_1	mtr	0	0	TRUE
5	FALSE	FALSE	7/1/2023	tranche_1	mtr	0	0	TRUE
6	FALSE	FALSE	7/1/2023	tranche_1	mtr	0	0	TRUE
7	FALSE	FALSE	6/1/2027	tranche_5	mtr	0	0	TRUE
8	FALSE	FALSE	6/1/2027	tranche_5	mtr	0	0	TRUE
9	TRUE	TRUE	6/1/2028	tranche_6	mtr	0	0	TRUE
10	FALSE	FALSE	6/1/2028	tranche_6	mtr	0	0	TRUE
11	FALSE	FALSE	1/0/1900	0	0	0	0	0
12	FALSE	FALSE	1/0/1900	0	0	0	0	0
13	FALSE	FALSE	1/0/1900	0	0	0	0	0
14	FALSE	FALSE	1/0/1900	0	0	0	0	0
15	FALSE	FALSE	1/0/1900	0	0	0	0	0
16	FALSE	FALSE	1/0/1900	0	0	0	0	0
17	FALSE	FALSE	1/0/1900	0	0	0	0	0
18	FALSE	FALSE	1/0/1900	0	0	0	0	0
19	FALSE	FALSE	1/0/1900	0	0	0	0	0
20	FALSE	FALSE	1/0/1900	0	0	0	0	0
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23	FALSE	FALSE	1/0/1900	0	0	0	0	0
24	FALSE	FALSE	1/0/1900	0	0	0	0	0
25	FALSE	FALSE	1/0/1900	0	0	0	0	0
26	FALSE	FALSE	1/0/1900	0	0	0	0	0
27	FALSE	FALSE	1/0/1900	0	0	0	0	0
28	FALSE	FALSE	1/0/1900	0	0	0	0	0
29	FALSE	FALSE	1/0/1900	0	0	0	0	0
30	FALSE	FALSE	1/0/1900	0	0	0	0	0
31	FALSE	FALSE	1/0/1900	0	0	0	0	0
32	FALSE	FALSE	1/0/1900	0	0	0	0	0
33	FALSE	FALSE	1/0/1900	0	0	0	0	0
34	FALSE	FALSE	1/0/1900	0	0	0	0	0
35	FALSE	FALSE	1/0/1900	0	0	0	0	0
36	FALSE	FALSE	1/0/1900	0	0	0	0	0
37	FALSE	FALSE	1/0/1900	0	0	0	0	0
38	FALSE	FALSE	1/0/1900	0	0	0	0	0
39	FALSE	FALSE	1/0/1900	0	0	0	0	0
40	FALSE	FALSE	1/0/1900	0	0	0	0	0
41	FALSE	FALSE	1/0/1900	0	0	0	0	0
42	FALSE	FALSE	1/0/1900	0	0	0	0	0
43	FALSE	FALSE	1/0/1900	0	0	0	0	0
44	FALSE	FALSE	1/0/1900	0	0	0	0	0
45	FALSE	FALSE	1/0/1900	0	0	0	0	0
46	FALSE	FALSE	1/0/1900	0	0	0	0	0
47	FALSE	FALSE	1/0/1900	0	0	0	0	0
48	FALSE	FALSE	1/0/1900	0	0	0	0	0
49	FALSE	FALSE	1/0/1900	0	0	0	0	0
50	FALSE	FALSE	1/0/1900	0	0	0	0	0
51	FALSE	FALSE	1/0/1900	0	0	0	0	0

	AN	AO	AP	AQ	AR	AS
1	do_tranches_match?	tranche_elcc_match_non_hybrid	tranche_elcc_match_hybrid_gen	tranche_elcc_match_hybrid_storage	mtr_heuristic_check	elcc_non_hybrid_resource
2	TRUE	TRUE	0	0	TRUE	storage
3	TRUE	TRUE	0	0	TRUE	storage
4	TRUE	TRUE	0	0	TRUE	storage
5	TRUE	TRUE	0	0	TRUE	storage
6	TRUE	TRUE	0	0	TRUE	storage
7	FALSE	TRUE	0	0	TRUE	storage
8	TRUE	TRUE	0	0	TRUE	storage
9	TRUE	TRUE	0	0	TRUE	storage
10	TRUE	TRUE	0	0	TRUE	storage
11	0	0	0	0	TRUE	0
12	0	0	0	0	TRUE	0
13	0	0	0	0	TRUE	0
14	0	0	0	0	TRUE	0
15	0	0	0	0	TRUE	0
16	0	0	0	0	TRUE	0
17	0	0	0	0	TRUE	0
18	0	0	0	0	TRUE	0
19	0	0	0	0	TRUE	0
20	0	0	0	0	TRUE	0
21	0	0	0	0	TRUE	0
22	0	0	0	0	TRUE	0
23	0	0	0	0	TRUE	0
24	0	0	0	0	TRUE	0
25	0	0	0	0	TRUE	0
26	0	0	0	0	TRUE	0
27	0	0	0	0	TRUE	0
28	0	0	0	0	TRUE	0
29	0	0	0	0	TRUE	0
30	0	0	0	0	TRUE	0
31	0	0	0	0	TRUE	0
32	0	0	0	0	TRUE	0
33	0	0	0	0	TRUE	0
34	0	0	0	0	TRUE	0
35	0	0	0	0	TRUE	0
36	0	0	0	0	TRUE	0
37	0	0	0	0	TRUE	0
38	0	0	0	0	TRUE	0
39	0	0	0	0	TRUE	0
40	0	0	0	0	TRUE	0
41	0	0	0	0	TRUE	0
42	0	0	0	0	TRUE	0
43	0	0	0	0	TRUE	0
44	0	0	0	0	TRUE	0
45	0	0	0	0	TRUE	0
46	0	0	0	0	TRUE	0
47	0	0	0	0	TRUE	0
48	0	0	0	0	TRUE	0
49	0	0	0	0	TRUE	0
50	0	0	0	0	TRUE	0
51	0	0	0	0	TRUE	0

	AT	AU	AV	AW	AX	AY	AZ	BA
1	elcc_hybrid_gen_resource	elcc_match_resource_type_non_hybrid	elcc_match_resource_type_hybrid_gen	elcc_value_nonhybrid	elcc_value_hybrid_gen	elcc_value_hybrid_storage	culated_nqc_non_hyblated_nqc_hybrid	
2	0	TRUE	0	96.30%	0.00%	0.00%		
3	0	TRUE	0	90.70%	0.00%	0.00%		
4	0	TRUE	0	75.10%	0.00%	0.00%		
5	0	TRUE	0	76.60%	0.00%	0.00%		
6	0	TRUE	0	92.05%	0.00%	0.00%		
7	0	TRUE	0	76.60%	0.00%	0.00%		
8	0	TRUE	0	74.00%	0.00%	0.00%		
9	0	TRUE	0	90.10%	0.00%	0.00%		
10	0	TRUE	0	90.10%	0.00%	0.00%		
11	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
12	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
13	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
14	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
15	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
16	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
17	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
18	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
19	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
20	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
21	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
22	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
23	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
24	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
25	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
26	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
27	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
28	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
29	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
30	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
31	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
32	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
33	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
34	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
35	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
36	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
37	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
38	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
39	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
40	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
41	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
42	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
43	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
44	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
45	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
46	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
47	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
48	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
49	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
50	0	0	0	0.00%	0.00%	0.00%	0.0	0.0
51	0	0	0	0.00%	0.00%	0.00%	0.0	0.0

	BB	BC	BD	BE	BF	BG	BH
1	calculated_nqc_hybrid_storage	alculated_nqc_hybrid_total_nq	calculated_general_nqc_total	calculated_llt_nqc_total	dcr_is_storage_contract	dcr_not_energy_only	dcr_5_hr_battery_size
2					FALSE	TRUE	-
3					FALSE	TRUE	-
4					FALSE	TRUE	-
5					FALSE	TRUE	-
6					TRUE	TRUE	
7					FALSE	TRUE	-
8					FALSE	TRUE	-
9					FALSE	TRUE	-
10					FALSE	TRUE	-
11	0.0	0.0	0.0	0.0	0.0	0	-
12	0.0	0.0	0.0	0.0	0.0	0	-
13	0.0	0.0	0.0	0.0	0.0	0	-
14	0.0	0.0	0.0	0.0	0.0	0	-
15	0.0	0.0	0.0	0.0	0.0	0	-
16	0.0	0.0	0.0	0.0	0.0	0	-
17	0.0	0.0	0.0	0.0	0.0	0	-
18	0.0	0.0	0.0	0.0	0.0	0	-
19	0.0	0.0	0.0	0.0	0.0	0	-
20	0.0	0.0	0.0	0.0	0.0	0	-
21	0.0	0.0	0.0	0.0	0.0	0	-
22	0.0	0.0	0.0	0.0	0.0	0	-
23	0.0	0.0	0.0	0.0	0.0	0	-
24	0.0	0.0	0.0	0.0	0.0	0	-
25	0.0	0.0	0.0	0.0	0.0	0	-
26	0.0	0.0	0.0	0.0	0.0	0	-
27	0.0	0.0	0.0	0.0	0.0	0	-
28	0.0	0.0	0.0	0.0	0.0	0	-
29	0.0	0.0	0.0	0.0	0.0	0	-
30	0.0	0.0	0.0	0.0	0.0	0	-
31	0.0	0.0	0.0	0.0	0.0	0	-
32	0.0	0.0	0.0	0.0	0.0	0	-
33	0.0	0.0	0.0	0.0	0.0	0	-
34	0.0	0.0	0.0	0.0	0.0	0	-
35	0.0	0.0	0.0	0.0	0.0	0	-
36	0.0	0.0	0.0	0.0	0.0	0	-
37	0.0	0.0	0.0	0.0	0.0	0	-
38	0.0	0.0	0.0	0.0	0.0	0	-
39	0.0	0.0	0.0	0.0	0.0	0	-
40	0.0	0.0	0.0	0.0	0.0	0	-
41	0.0	0.0	0.0	0.0	0.0	0	-
42	0.0	0.0	0.0	0.0	0.0	0	-
43	0.0	0.0	0.0	0.0	0.0	0	-
44	0.0	0.0	0.0	0.0	0.0	0	-
45	0.0	0.0	0.0	0.0	0.0	0	-
46	0.0	0.0	0.0	0.0	0.0	0	-
47	0.0	0.0	0.0	0.0	0.0	0	-
48	0.0	0.0	0.0	0.0	0.0	0	-
49	0.0	0.0	0.0	0.0	0.0	0	-
50	0.0	0.0	0.0	0.0	0.0	0	-
51	0.0	0.0	0.0	0.0	0.0	0	-

	BI	BJ	BK	BL	BM	BN
1	dcr_required_energy_battery	dcr_round_trip_efficiency_loss	dcr_energy_requirement	dcr_net_energy_available	dcr_noncharging_hybrid_flag	dcr_nqc_from_gen
2	-	-	-	-	FALSE	-
3	-	-	-	-	FALSE	-
4	-	-	-	-	FALSE	-
5	-	-	-	-	FALSE	-
6					FALSE	
7	-	-	-	-	FALSE	-
8	-	-	-	-	FALSE	-
9	-	-	-	-	FALSE	-
10	-	-	-	-	FALSE	-
11	-	-	-	-	0	-
12	-	-	-	-	0	-
13	-	-	-	-	0	-
14	-	-	-	-	0	-
15	-	-	-	-	0	-
16	-	-	-	-	0	-
17	-	-	-	-	0	-
18	-	-	-	-	0	-
19	-	-	-	-	0	-
20	-	-	-	-	0	-
21	-	-	-	-	0	-
22	-	-	-	-	0	-
23	-	-	-	-	0	-
24	-	-	-	-	0	-
25	-	-	-	-	0	-
26	-	-	-	-	0	-
27	-	-	-	-	0	-
28	-	-	-	-	0	-
29	-	-	-	-	0	-
30	-	-	-	-	0	-
31	-	-	-	-	0	-
32	-	-	-	-	0	-
33	-	-	-	-	0	-
34	-	-	-	-	0	-
35	-	-	-	-	0	-
36	-	-	-	-	0	-
37	-	-	-	-	0	-
38	-	-	-	-	0	-
39	-	-	-	-	0	-
40	-	-	-	-	0	-
41	-	-	-	-	0	-
42	-	-	-	-	0	-
43	-	-	-	-	0	-
44	-	-	-	-	0	-
45	-	-	-	-	0	-
46	-	-	-	-	0	-
47	-	-	-	-	0	-
48	-	-	-	-	0	-
49	-	-	-	-	0	-
50	-	-	-	-	0	-
51	-	-	-	-	0	-

	BO	BP	BQ
1	dcr_battery_nqc	dcr_total_nqc	dcr_eligibility_test
2	-	-	-
3	-	-	-
4	-	-	-
5	-	-	-
6			
7	-	-	-
8	-	-	-
9	-	-	-
10	-	-	-
11	-	-	-
12	-	-	-
13	-	-	-
14	-	-	-
15	-	-	-
16	-	-	-
17	-	-	-
18	-	-	-
19	-	-	-
20	-	-	-
21	-	-	-
22	-	-	-
23	-	-	-
24	-	-	-
25	-	-	-
26	-	-	-
27	-	-	-
28	-	-	-
29	-	-	-
30	-	-	-
31	-	-	-
32	-	-	-
33	-	-	-
34	-	-	-
35	-	-	-
36	-	-	-
37	-	-	-
38	-	-	-
39	-	-	-
40	-	-	-
41	-	-	-
42	-	-	-
43	-	-	-
44	-	-	-
45	-	-	-
46	-	-	-
47	-	-	-
48	-	-	-
49	-	-	-
50	-	-	-
51	-	-	-

	A	B	C	D	E	F	G	H
1				tranche_1	tranche_2	tranche_3	tranche_4	tranche_5
2				2023	2024	2025	2026	2027
3	LSE:	DEB						
4		ESP	Obligation (Enter data in this row)					
5		Summary of unique_contracts	Total NQC reported (non-LLT and non-DCR)					
6			Total NQC reported (LLT)					
7			Total NQC Entered					
8			Total NQC vs Obligation					
9		Summary of mtr_NQC_validation	Calculated NQC (general including DCR)					
10			Calculated vs Total Reported NQC					
11			Calculated NQC vs Obligation					
12		Summary with Pending D.23-02-040 Compliance trades	Enter values on this row:					
13			Total NQC vs Proposed Obligation					
14			Calculated NQC vs Proposed Obligation					
15		Summary of LLT	Calculated LLT NQC					
16			Total Reported LLT NQC					
17		Summary of DCR NQC	Calculated DCR NQC					
18			Total Reported DCR NQC					
19								
20			DCR portfolio net energy					
21								
22								
23		lse_unique_contract_id	lse_selected_mtr_tranche	uc_d2106035_procurement_cat	hybrid	is_non_grid_charging	engineering_assessment_confirmation	% nameplate/tranche non hybrid
24		raonly2021IRP1_generic	tranche_1	general	FALSE	FALSE	(blank)	17%
25			tranche_2	general	FALSE	FALSE	(blank)	55%
26			tranche_3	general	FALSE	FALSE	(blank)	17%
27			tranche_4	general	FALSE	FALSE	(blank)	5%
28		raonly2021IRP1_dcr	tranche_2	ZE_gen_paired_dr	FALSE	FALSE	TRUE	100%
29		RAonly_Hecate_Chiquito	tranche_4	general	FALSE	FALSE	(blank)	34%
30			tranche_5	general	FALSE	FALSE	(blank)	42%
31		RAonly_Antelope1	tranche_6	general	FALSE	FALSE	(blank)	4%
32		RAonly_Antelope	tranche_6	long_duration_storage	FALSE	FALSE	(blank)	4%

	I	J	K	L	M	N	O	P
1	tranche_6	MTR Total						
2	2028	All						
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22	% nameplate/tranche hybrid gen	% nameplate/tranche hybrid storage	Contract total calculated MTR general NQC MW	Total reported MTR general NQC MW	Contract total calculated MTR LLT NQC MW	Total reported MTR LLT NQC MW (unique_contracts)	Total reported MTR DCR nqc MW	Sum of Cal_vs_reported_Diff
23								
24								
25								
26								
27								
28								
29								
30								
31								

ATTACHMENT 2

CROSSWALK COVER PAGE

(PUBLIC VERSION)

CROSSWALK TABLE

Document Name	LSE Unique Contract ID	Milestone Requirement Met and/or NP Contract Validation	Decision & Tranche	Compliance Filing Date and Location	Location in Zipfile Provided via Energy Division File Transfer Protocol
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BAT TERY_STORAGE_Confirmation Letter.pdf	Raonly2021IR P1	Milestone 1: Executed Contract, NP Contract Validation – Nameplate Value (1 of 2)	D.21-06-035, D.23-02-040, 2023	February 1, 2023, Attachment 3(a)	Fifth Standard Project, 1st PDF in zipfile labeled: "Fifth_2022 Confirmation Letter".
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BAT TERY_STORAGE_Notice of Exercise.pdf	Raonly2021IR P1	Milestone 1: Site Control	D.21-06-035, D.23-02-040, 2023	February 1, 2023, Attachment 3(b)	Fifth Standard Project, 6th PDF in zipfile labeled: "Fifth_Notice of Exercise".
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BAT TERY_STORAGE_Notice of Exercise Map Drawing.pdf	Raonly2021IR P1	Milestone 1: Site Control	D.21-06-035, D.23-02-040, 2023	February 1, 2023, Attachment 3(c)	Fifth Standard Project, 5th PDF in zipfile labeled: "Fifth_Notice of Exercise Map Drawing".
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BAT TERY_STORAGE_Interconnection Agreement.pdf	Raonly2021IR P1	Milestone 1: Signed Interconnection Agreement	D.21-06-035, D.23-02-040, 2023	February 1, 2023, Attachment 3(d)	Fifth Standard Project, 5th PDF in zipfile labeled: "Fifth_Interconnection Agreement".
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BAT TERY_STORAGE_Development Progress Report.pdf	Raonly2021IR P1	Milestones 1 and 2: Project Timeline and Current Work Status	D.21-06-035, D.23-02-040, 2023	February 1, 2023, Attachment 3(e)	Fifth Standard Project, 7th PDF in zipfile labeled: "Fifth_Development Progress Report".

CROSSWALK TABLE

DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_EPC Agreement.pdf	Raonly2021IR P1	Milestone 2: Notice to Proceed	D.21-06-035, D.23-02-040, 2023	February 1, 2023, Attachment 3(f)	Fifth Standard Project, 8th PDF in zipfile labeled: "Fifth_EPC Agreement".
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_April 13, 2023 Confirmation Letter.pdf	Raonly2021IR P1	Milestone 1: Executed Contract, NP Contract Validation – Nameplate Value (2 of 2)	D.21-06-035, D.23-02-040, 2023	August 1, 2023, Attachment 3(a)	Fifth Standard Project, 3rd PDF in zipfile labeled: "Fifth_ 2023 Confirmation Letter", NP Contract Validation at page 14 of PDF.
DEB_Fifth Standard PV, LLC_NEW_G ENERIC_BATTERY_STORAGE_COM Notice.pdf	Raonly2021IR P1	Milestone 3: Commercial Operation	D.21-06-035, D.23-02-040, 2023	August 1, 2023, Attachment 3(b)	Fifth Standard Project, 2nd PDF in zipfile labeled: "Fifth_COM Notice".
DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXIS_Power Purchase Agreement.pdf	energy_Clearway	Milestone 1: Executed Contract, NP Contract Validation – Nameplate Value	D.21-06-035, 2024	August 1, 2023, Attachment 3(c)	Arica Project, 3rd PDF in zipfile labeled: "Arica_PPA", NP validation on page 56 of PDF.
DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXIS_Interconnection Agreement.pdf	energy_Clearway	Milestone 1: Signed Interconnection Agreement	D.21-06-035, 2024	August 1, 2023, Attachment 3(d)	Arica Project, 5th PDF in zipfile labeled: "Arica_IA".
DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXIS	energy_Clearway	Milestone 1: Site Control	D.21-06-035, 2024	August 1, 2023, Attachment 3(e)	Arica Project, 2nd PDF in zipfile labeled: "Arica_ROW".

CROSSWALK TABLE

<i>S_Right of Way.pdf</i>					
<i>DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXIS_June Monthly Report.pdf</i>	energy_Clearway	<i>Milestones 1 and 2: Project Timeline and Current Work Status</i>	<i>D.21-06-035, 2024</i>	<i>August 1, 2023, Attachment 3(f)</i>	<i>Arica Project, 1st PDF in zipfile labeled: "Arica_Timeline".</i>
<i>DEB_Arica Solar, LLC_NEW_G ENERIC_SOLAR_1AXIS_Notice to Proceed.pdf</i>	energy_Clearway	<i>Milestone 2: Notice to Proceed</i>	<i>D.21-06-035, 2024</i>	<i>August 1, 2023, Attachment 3(g)</i>	<i>Arica Project, 4th PDF in zipfile labeled: "Arica_NTP".</i>
<i>DEB_Arica Solar, LLC_VICPAS_2_SLOSR1_COD_Sloth.pdf</i>	energy_Clearway_1	<i>Milestone 3: Commercial Operation</i>	<i>D.21-06-035, 2024</i>	<i>June 3, 2024, Attachment 3(a)</i>	<i>Arica Project, 5th PDF in zipfile labeled: "Arica_NTP".</i>
<i>DEB_Arica Solar, LLC_VICPAS_2_SOCSR3_COD_Sol Catcher.pdf</i>	energy_Clearway_2	<i>Milestone 3: Commercial Operation</i>	<i>D.21-06-035, 2024</i>	<i>June 3, 2024, Attachment 3(b)</i>	<i>Arica Project, 6th PDF in zipfile labeled: "Arica_NTP".</i>
<i>DEB_Chiquito Grid, LLC_NEW_G ENERIC_BATTERY_STORAGE_RA Purchase Agreement.pdf</i>	RAonly_Hecat e_Chiquito	<i>Milestone 1: Executed Contract, Project Timeline, NP Contract Validation – Nameplate Value</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(c)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: "Chiquito_RA Purchase Agreement".</i>
<i>DEB_Chiquito Grid, LLC_NEW_G ENERIC_BATTERY_STORAGE_Ground Lease Option Agreement.pdf</i>	RAonly_Hecat e_Chiquito	<i>Milestone 1: Site Control</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(d)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: "Chiquito_Ground Lease Option Agreement".</i>

CROSSWALK TABLE

<i>DEB_Chiquito Grid, LLC_NEW_GENERIC_BATTERY_STORAGE_Lease Option Agreement – She - Xu.pdf</i>	RAonly_Hecat e_Chiquito	<i>Milestone 1: Site Control</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(e)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: “Chiquito_Lease Option Agreement”.</i>
<i>DEB_Chiquito Grid, LLC_NEW_GENERIC_BATTERY_STORAGE_Lease Option Extension.pdf</i>	RAonly_Hecat e_Chiquito	<i>Milestone 1: Site Control</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(f)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: “Chiquito_Lease Option Extension”.</i>
<i>DEB_Chiquito Grid, LLC_NEW_GENERIC_BATTERY_STORAGE_Interconnection Agreement.pdf</i>	RAonly_Hecat e_Chiquito	<i>Milestone 1: Signed Interconnection Agreement</i>	<i>D.23-02-040, 2026</i>	<i>June 3, 2024, Attachment 3(g)</i>	<i>Chiquito Grid Project, 1st PDF in zipfile labeled: “Chiquito_Interconnection Agreement”.</i>

CROSSWALK TABLE

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ATTACHMENT 3

DIRECT ENERGY MTR PROCUREMENT TO DATE

(Confidential in its entirety)

ATTACHMENT 4

REMEDIATION PLAN

(Confidential in its entirety)

ATTACHMENT 5

CONTRACT AMENDMENT (DELAY)

(Confidential in its entirety)

ATTACHMENT 6(A)

NEW SIGNED CONTRACT

(Confidential in its entirety)

ATTACHMENT 6(B)

NEW SIGNED CONTRACT AMENDMENT

(Confidential in its entirety)