



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

FILED

12/10/25

01:35 PM

R2506019

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

R.25-06-019

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
NOTICE OF EX PARTE COMMUNICATION**

Leanne Bober,
Director of Regulatory Affairs and Deputy
General Counsel
Lauren Carr,
Senior Manager, Regulatory Affairs and
Market Policy

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION
1121 L Street, Suite 400
Sacramento, CA 95814
Telephone: (510) 980-9815
E-mail: regulatory@cal-cca.org

December 10, 2025

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

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

R.25-06-019

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
NOTICE OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4(a) of the California Public Utilities Commission (Commission) Rules of Practice and Procedure,¹ California Community Choice Association² (CalCCA) hereby gives notice of the ex parte communication in which the participants discussed CalCCA's recommendations in response to the *Administrative Law Judge's Ruling Seeking Comments on Electricity Portfolios for 2026-2027 Transmission Planning Process and Need for Additional Reliability Procurement*³ (Ruling), dated September 30, 2025.

DATE AND TIME: Monday, December 8, 2025, 1:30 PM-2:00 PM.

LOCATION: Webex.

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

² California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

³ *Administrative Law Judge's Ruling Seeking Comments on Electricity Portfolios for 2026-2027 Transmission Planning Process and Need for Additional Reliability Procurement*, R.25-06-019 (Sept. 30, 2025): <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M582/K082/582082526.PDF>.

NAME(S) AND TITLE(S) OF NON-COMMISSION PERSONS PRESENT:

Leanne Bober, CalCCA - Director of Regulatory Affairs and Deputy General Counsel;
Eric Little, CalCCA - Director of Market Design; Lauren Carr, CalCCA - Senior Manager,
Regulatory Affairs and Market Policy; Andrew Mills, CalCCA - Director of Data Analytics; and
Neal Reardon, Sonoma Clean Power Authority - Director, Regulatory Affairs.

NAME(S) AND TITLE(S) OF COMMISSION PERSON(S) PRESENT:

Kyle Navis, Senior Advisor to Commissioner Matthew Baker; and Manisha Lakhanpal,
Advisor to Commissioner Matthew Baker.

DESCRIPTION OF COMMUNICATION:

CalCCA began the discussion by explaining that ad hoc procurement orders can create market distortions and contribute to cost increases, making them not the most effective mechanism for bringing new resources online. CalCCA explained that community choice aggregators (CCA) are committed to procuring for the communities they serve absent a Commission procurement directive, but procurement orders can serve as policy shocks that unnecessarily shift market power to developers. Mr. Reardon provided Sonoma Clean Power Authority's experience in the market before and after procurement orders. Participants discussed how CalCCA's recommendations mask LSE net positions to help prevent adverse market impacts of procurement orders.

Next, CalCCA provided data comparing historical load forecasts to observed historical load. CalCCA explained that the load growth forecasted in the 2024 Integrated Energy Policy Report (IEPR) Update is unprecedented and very uncertain. CalCCA stated that the California Energy Commission has indicated that it will further refine the process for incorporating large

loads into the IEPR forecasts. For these reasons, CalCCA recommended a cautious approach to ordering procurement for reliability needs driven by a highly uncertain load forecast.

CalCCA recommended that, if the Commission orders procurement, it should structure a procurement order in a manner that manages uncertainty and promotes affordability. CalCCA proposed two procurement tranches: 2,000 megawatts (MW) of procurement in Tranche 1 (2029-2030) and 2,000 MW in Tranche 2 (2031-2032), with a commitment to reevaluate in 2027 the need for an additional 2,000 MW of procurement. CalCCA stated that procurement tranches will provide compliance flexibility, accommodate project delays, and account for uncertainty. It also stated that the reassessment of total need in 2027 would allow for the incorporation of updated information about large load interconnections and import availability as the need becomes closer.

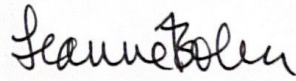
Finally, CalCCA recommended other elements the Commission should adopt for any procurement order, including: (1) the ability for load-serving entities (LSE) to use excess procurement beyond Mid Term Reliability requirements towards future compliance requirements; (2) individual LSE procurement requirements rather than central procurement; (3) requirements for generic capacity procurement rather than technology- or attribute-specific procurement; and (4) extended compliance rules adopted in Decision (D.) 25-09-007.⁴

⁴ D.25-09-007, *Decision Granting, with Modifications, Southern California Edison Company's Petition for Modification of Decisions 23-02-040 and 24-02-047*, R.20-05-003 (Sept. 18, 2025): <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M581/K576/581576925.PDF>.

WRITTEN MATERIALS PROVIDED:

CalCCA presented slides, attached hereto, to support its recommendations, entitled *Assessing the Need for an Additional Procurement Order*, dated December 8, 2025.

Respectfully submitted,

A handwritten signature in black ink, reading "Leanne Bober". The signature is written in a cursive style with a large, stylized "L" and "B".

Leanne Bober,
Director of Regulatory Affairs and Deputy
General Counsel
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

December 10, 2025

**ATTACHMENT
TO
CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
NOTICE OF EX PARTE COMMUNICATION**

**ASSESSING THE NEED FOR AN ADDITIONAL PROCUREMENT ORDER
December 8, 2025**

Assessing the Need for an Additional Procurement Order

December 8, 2025

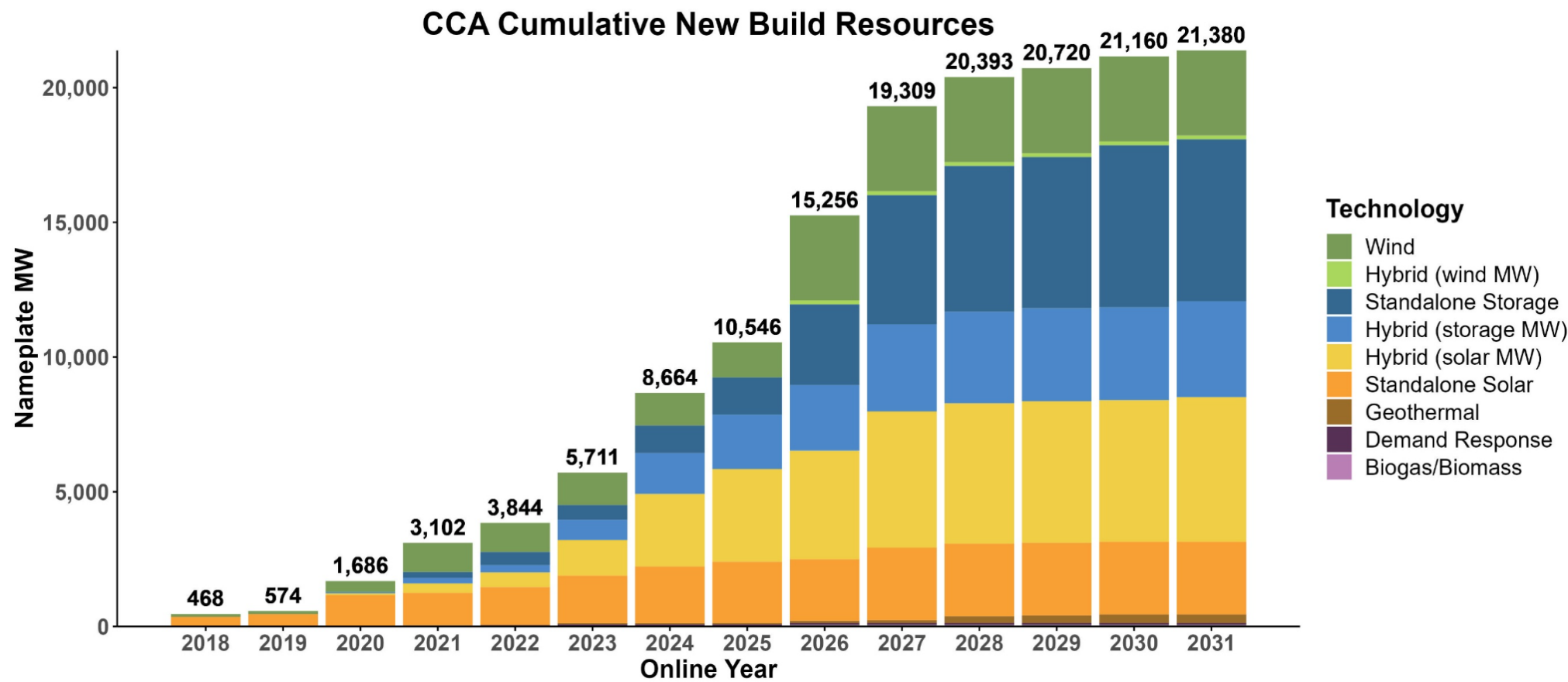
Key Considerations

Ad-hoc procurement orders are not the most effective mechanism for bringing new resources online

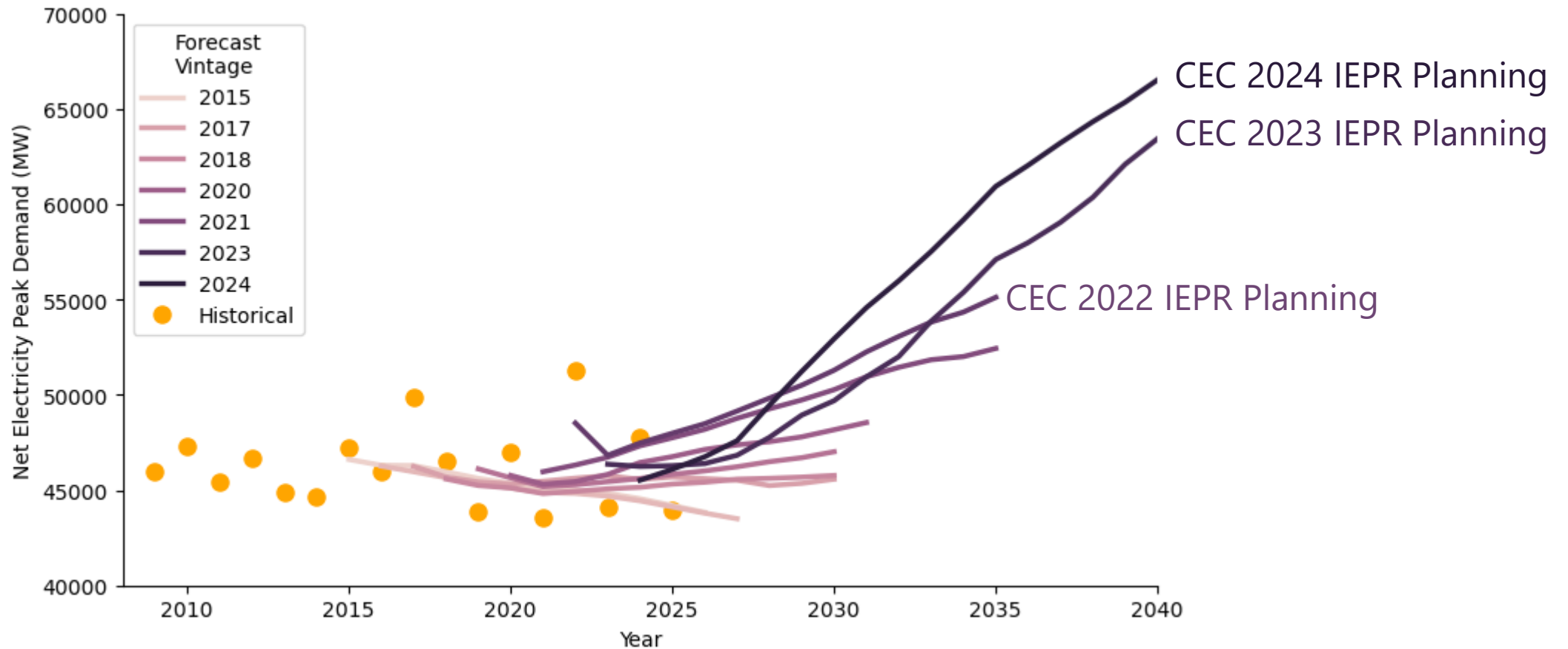
The uncertainty around the unprecedented forecasted load growth must be considered when setting procurement targets

A cautious and flexible approach to ordering procurement will result in more affordable outcomes for customers

CCAs are Committed to Procuring for the Communities They Serve Absent a Commission Procurement Directive

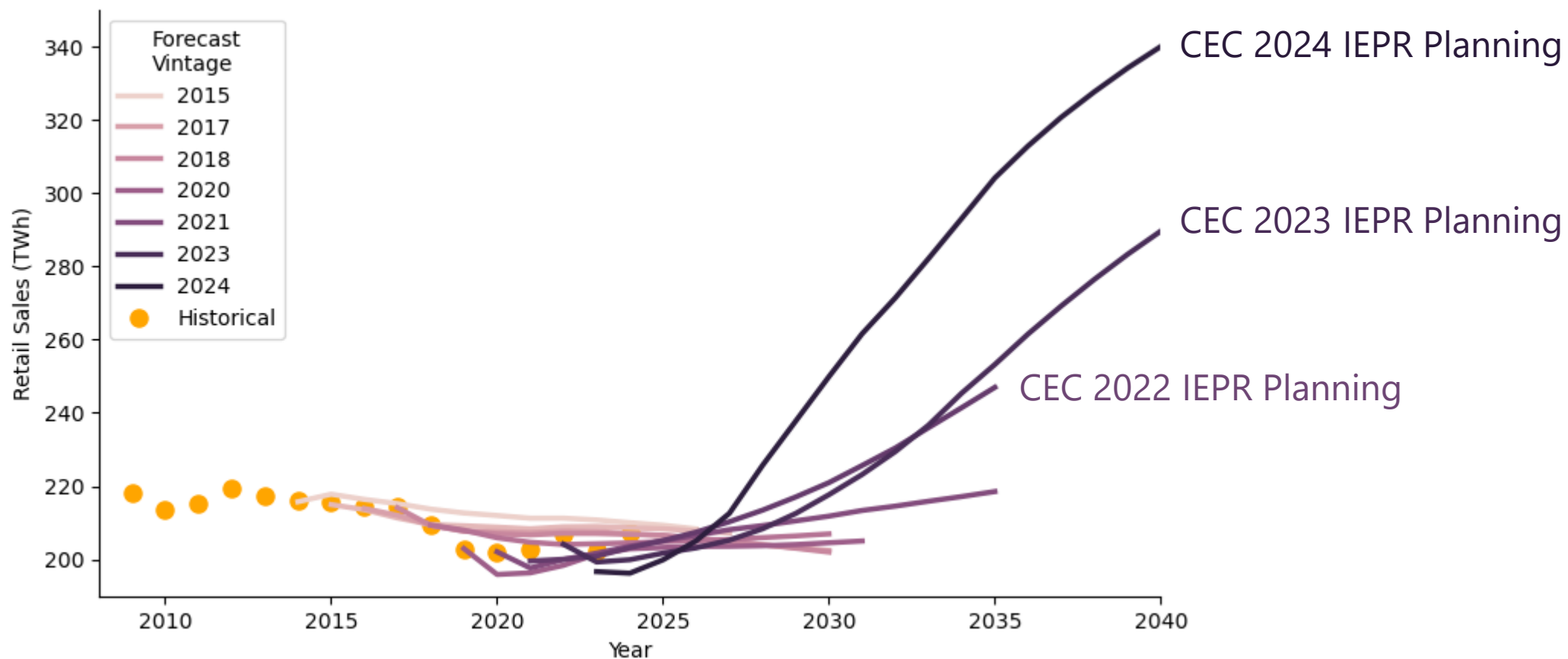


CEC IEPR Peak Demand Forecasts Are Evolving: 1-in-2 CAISO Coincident Peaks



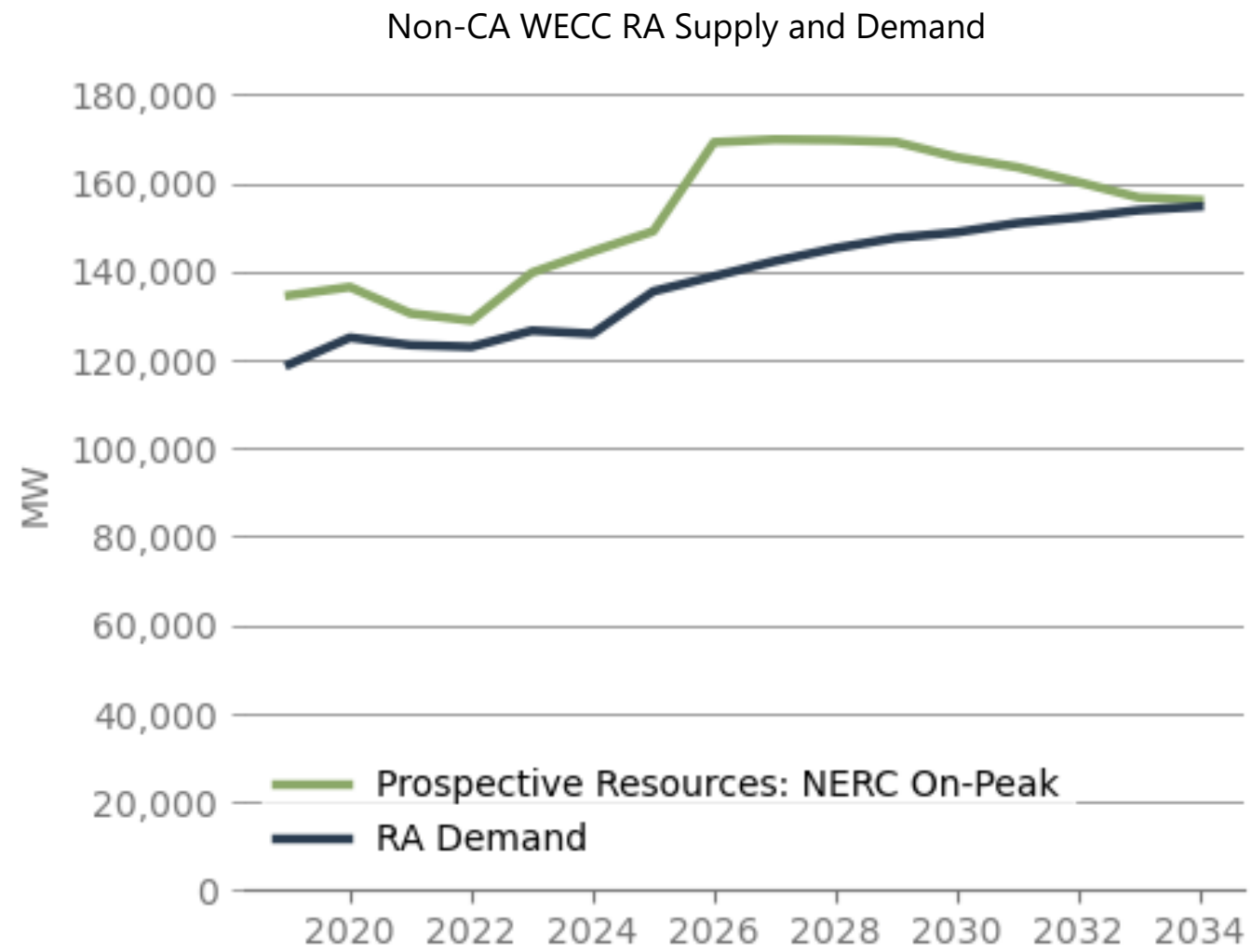
Source: CalCCA analysis of CEC load forecasts from 2015-2024 IEPR Planning Scenarios and CAISO System Demand data from oasis.caiso.com

CEC IEPR Sales Forecasts Are Even More Extreme: CAISO Retail Sales



Sources: CalCCA analysis of CEC sales forecasts from 2015-2024 IEPR Planning Scenarios and CAISO System Demand data from oasis.caiso.com.
Note: CAISO historical load data is converted to retail sales by assuming an average of 4% losses.

Further Study is Needed Before Determining Whether to Modify Import Assumptions



Source: CalCCA analysis of NERC Long-Term Reliability Assessments (2019-2024)

If the Commission Orders Procurement, CalCCA's Proposed Path Forward Manages Uncertainty and Promotes Affordability

Procurement tranches to provide compliance flexibility, accommodate project delays, and account for uncertainty

- **Tranche 1** (2029-2030): 2,000 MW
- **Tranche 2** (2031-2032): 2,000 MW; commit to a reevaluation in 2027 of the need for an additional 2,000 MW of procurement

Other elements:

- ✓ Account for excess LSE procurement
- ✓ Individual LSE procurement
- ✓ Generic capacity only
- ✓ Extended compliance rules adopted in D.25-09-007