

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



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

Rulemaking 25-10-003

**AMERICAN CLEAN POWER-CALIFORNIA TRACK 1 PROPOSALS**

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January 23, 2026

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In accordance with the December 12, 2025 *Assigned Commissioner’s Scoping Memo and Ruling* issued by California Public Utilities Commission (“Commission” or “CPUC”) President, Alice Reynolds, American Clean Power – California (“ACP-California”)<sup>1</sup> submits the following Track 1 proposals pertaining to Energy-Only (“EO”) resources.

**INTRODUCTION**

ACP California offers two proposals for the Commission and parties’ consideration. First, ACP-California proposes updates to the Resource Adequacy (“RA”) program charging sufficiency requirements to allow EO resources to count for storage charging sufficiency tests, subject to certain conditions discussed below. Adopting this proposal would satisfy a growing need for energy resources, fulfill the Commission’s own findings in the Integrated Resources Planning (“IRP”) process regarding the need for EO resources and the Commission’s affordability objectives. By focusing transmission expenditures on resources that are needed

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<sup>1</sup> The American Clean Power Association (“ACP”) is the voice of companies from across the clean power sector that are providing cost-effective solutions to the climate crisis while creating jobs, spurring massive investment in the American economy, and driving high tech innovation across the United States. ACP’s mission is to transform the U.S. power grid to a low-cost, reliable, and renewable power system. ACP-California is a state project of ACP, representing companies who develop, own, and operate utility-scale solar, storage, land-based wind, offshore wind, enhanced geothermal, conventional geothermal, and transmission assets to power a clean and renewable economy for California and the West.

during peak conditions, the Commission will fulfill its own policy. We also recognize other parties may file energy-sufficiency proposals and welcome collaboration towards a common party proposal.

Second, ACP-California proposes updates to the qualifying capacity (“QC”) accreditation rules for wind and solar resources. We recommend eliminating the exceedance methodology and rely solely on the worst day average analysis. This proposal would provide interim improvements to wind and solar accreditation to better reflect their capacity contributions. This proposal should be implemented in RA-year 2028.

### **ACP-CALIFORNIA PROPOSAL #1: ENERGY SUFFICIENCY, ENERGY-ONLY (“ES-EO”)**

#### **I. Proposal**

ACP-California proposes allowing EO resources to count for the CPUC Resource Adequacy program’s charging sufficiency requirements, subject to the following conditions:

- a. The CPUC would direct Energy Division to update the Master Resource Database to include energy-only resources. Energy Division would also separate storage and co-located energy-only resources, so they can be shown and contracted separately.
- b. The EO resource is under contract with a load-serving entity (“LSE”) who will use it for energy sufficiency, with a Must Bid Obligation to the California Independent System Operator (“CAISO”), stipulated in the contract, and potentially subject to affidavit requirements for the scheduling coordinator to submit bids. This is similar, but not the same as a must offer obligation. A “must-bid” requirement would create visibility for the CAISO and ensure that charging sufficiency resources actually provide energy for charging.
- c. The EO resource is paired in a supply plan with a storage resource in the same generic area (i.e., Southern California or Northern California). For example, an LSE would be precluded from showing an EO solar resource in Southern California if it only had unmet charging needs for storage resources in Northern California. This

regional pairing methodology expands the potential universe of energy sufficiency contributions, facilitating near-term development and contracting for Full Capacity Deliverability Status (“FCDS”) storage and EO solar under separate LSE contracts.

- d. The CPUC would work with CAISO to enable better visibility of EO charging resources (e.g., forecasting, deliverability studies, Customer Interface Resource Adequacy implementation, etc.).

## **II. Procedural Background**

ACP-California and other parties have offered various EO proposals in prior RA rulemaking cycles. In the IRP, ACP-California and numerous other parties have pointed out that there is a clear need to stimulate significant quantities of EO resources to match those selected in various iterations of the Preferred System Plan. Yet, there is no market mechanism to fulfill that need.<sup>2</sup> While the Commission has allowed EO resources behind the same point of interconnection with storage resources to count for charging sufficiency, it has not allowed broader inclusion of EO resources. In past decisions discussed herein, the Commission has largely pointed to concerns of CAISO regarding the inclusion of EO resources. In particular, the CAISO has taken issue with their lack of visibility into EO resources in deliverability studies, the need for a mechanism to report and validate EO resources in RA supply plans to avoid overcounting, and the CAISO’s own tariff provisions requiring RA resources to be deliverable.<sup>3</sup>

In Decision (“D.”) 23-04-010, the CPUC set a requirement that only FCDS resources could count towards the Slice of Day (“SOD”) charging sufficiency requirements. That requirement was later modified to allow EO resources behind the same point of interconnection

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<sup>2</sup> See for example, *American Clean Power – California Comments on 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 (October 22, 2025), p. 5.

<sup>3</sup> See for example, D.23-04-010, p. 35; D.25-06-048, p 78.

as an FCDS storage resource to count. Further changes are necessary and can be implemented consistent with the CAISO tariff and study practices.

In D.23-04-010 the CPUC took note of the CAISO's opposition to allowing EO resources, noting that:

CAISO advises that only Full Capacity Deliverability Status (FCDS), Partial Capacity Deliverability Status (PCDS), or Interim Deliverability Status (IDS) resources can provide RA capacity under the CAISO tariff. Under the tariff, CAISO will reduce the Local Regulatory Authority (LRA)-established QC values for any part that proves to be undeliverable. CAISO asserts that EO resources cannot be used for RA to serve load or to charge storage across the transmission system and that should not change under the SOD framework.<sup>4</sup>

After this determination, the CAISO removed its Energy-Only Offpeak deliverability status study options, noting there was little demand for the study options.

In recent RA cycles, the Commission has evaluated proposals for energy-only resources in D.25-06-048 and made modest changes to allow energy-only co-located resources to count for charging sufficiency. The CPUC recently rejected other proposals again citing CAISO's concerns regarding necessary changes to the CAISO tariff to enable counting of energy-only resources to count for capacity obligations.

Unlike California Community Choice Association's proposal, which was rejected in the last IRP cycle, ACP-California's ES-EO proposal would not allow energy-only resources to be counted for capacity obligations. Instead, energy-only resources would only count toward satisfying the program's charging sufficiency requirements.

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<sup>4</sup> D.23-04-010, p. 35.

### **III. Discussion**

#### **A. ACP-California's Proposal Would Address Concerns Expressed in Prior Commission Decisions with EO Proposals.**

Updating charging sufficiency requirements would not create inconsistencies with the CAISO tariff. The Commission has fulfilled its obligations as an LRA by providing CAISO with a single monthly capacity value fully supported by deliverable resources. The single monthly capacity value is validated against the supply plans the CAISO receives, in conformance with the CAISO tariff. Adopting ACP-California's proposal would not change the capacity value provided to the CAISO. The capacity shown to the Commission for the single monthly value would be fully supported by FCDS, PCDS or IDS resources.

Energy sufficiency is a CPUC planning and compliance issue that is solely within its purview as an LRA. Moreover, we are not aware of any other LRA that has a charging sufficiency requirement that it has implemented under its purview over qualifying capacity determinations. In other words, ACP-California's proposal would remain consistent with the CAISO tariff because it would only allow EO resources to count for charging sufficiency for showings to the CPUC, and would not affect the "RA capacity" that is shown to the CAISO.

ACP-California has crafted this proposal to be responsive to the concerns and issues cited in past cycles. Under the current SOD rules, charging sufficiency capacity can only count to the extent that it exceeds an LSE's hourly compliance obligation, thus it would not replace or deplete RA supply. To be clear, under this proposal, EO resources would only be used for charging sufficiency, and would not be used for satisfying the hourly load obligation of an LSE.

We have also included proposals for ensuring visibility of these resources and to avoid double counting in the year-ahead and month-ahead validation processes. We are not proposing a requirement for a must-offer obligation. Instead, energy-only resources would have a must-bid

obligation, which would achieve the same goal of ensuring availability, but could be enforced through contractual requirements that can be reviewed or audited when LSEs submit their RA plans. By including EO resources in supply plans that also include storage, the CPUC and CAISO would prevent overcounting.

In sum, the proposal does not change the requirements for RA products and would not conflict with the CAISO tariff. Instead, it acknowledges a separate energy sufficiency product originating from a single LRA's RA program which would only count when the energy-only capacity is in excess of an LSE's hourly load obligations.

Finally, we would support the CAISO's development of a study process to satisfy its desire for increased visibility into the deliverability of EO resources and to evaluate potential constraints in off-peak periods. However, longer-term enhancement to the CAISO's processes should not prevent near-term action by the Commission on this proposal. A near-term signal from the Commission is necessary for resource developers to make the appropriate elections in Clusters 15 and 16.

**B. Adopting an EO proposal in this RA cycle is Critical to Achieve the Development of the Reliable Resource Fleet Aligned with the 2026-2027 TPP.**

EO resources have long played a significant role in the state's IRP and Transmission Planning Process ("TPP"), a role which is becoming more tangible with accelerating energy sufficiency and clean energy requirements. Excluding the energy contributions of EO resources (as modeled in IRP and TPP from the CPUC-RA program's novel energy sufficiency constraint) results in a series of suboptimal outcomes:

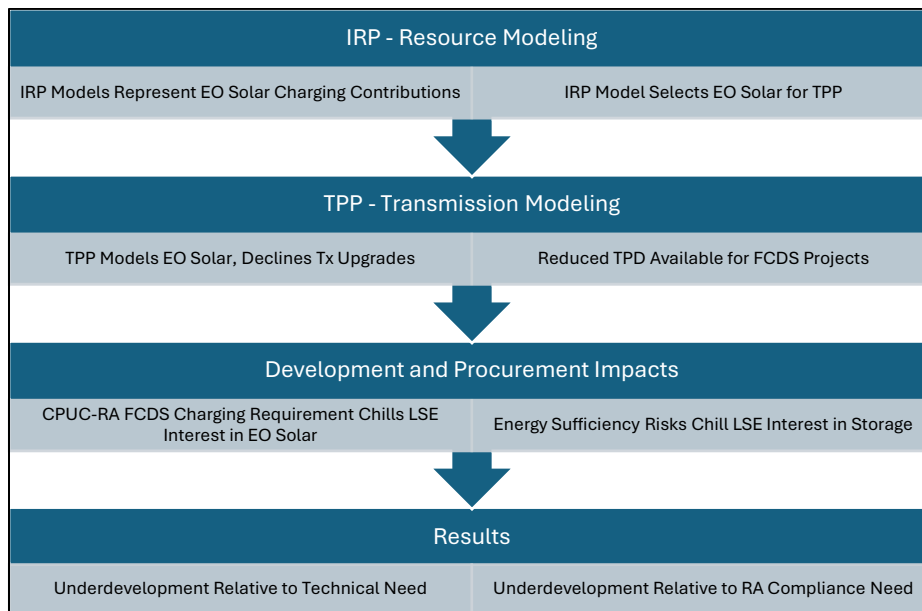
- (i) **IRP models (and selects) EO as a contributor to energy sufficiency.** Modeling approaches within the IRP, which operationally recognize energy sufficiency contributions of EO resources (as well as off-peak, non-RA imports) and credit storage

for the benefits of EO solar. This modeling approach is contradictory to requirements within the RA program which constrain energy sufficiency contributions to defined FCDS resources (see Table 1 for discussion of current methods).

**(ii) IRP and TPP under-select transmission upgrades relative to RA requirements.** When the CPUC classifies TPP base-case resources as EO, CAISO approves fewer transmission upgrades than it would if those resources were designated as FCDS. This in turn reduces systemwide TPD availability. Under CAISO’s policy-driven TPP process, FCDS resources are included in deliverability studies, and CAISO proposes and approves the transmission upgrades needed to deliver them. By contrast, EO resources are excluded from these deliverability studies, so the TPP does not approve new transmission to accommodate them – meaning CAISO’s policy-driven studies do not create new TPD for EO resources in the base cases. As a result, when resources are categorized as EO, it is unlikely that the TPP will approve transmission upgrades that would increase system TPD.

**(iii) LSEs move cautiously in light of energy sufficiency concerns.** LSEs can be hesitant to procure much-needed storage capacity given the uncertain path to meeting energy sufficiency requirements and the more limited market for FCDS generation.

These effects are summarized in Figure 1 below.



**Figure 1: IRP-TPP-RA Process Flow**

It is important to recognize that the RA charging sufficiency requirements are significantly more stringent than those in either the IRP or the CAISO’s RA program, and introduce a novel challenge for CPUC-jurisdictional LSE RA compliance. While the 2026-2027 TPP selects a blend of FCDS and EO solar, it is not clear that the model adequately identifies sufficient FCDS solar in the context of the more stringent charging sufficiency requirement within the RA program, as shown in Table 1. Note that Table 1 represents ACP-California’s best understanding of the current methodologies and is offered with intent to review and revise based on input from Energy Division, CAISO, and stakeholders.

	<b>IRP (RESOLVE)</b>	<b>IRP (SERVM)</b>	<b>CPUC-RA</b>	<b>CAISO-RA</b>
<b>Operational Assessment (e.g., Hourly Energy)</b>	Charging sufficiency assessed from RA resources (FCDS resources), EO resources, and non-RA imports <sup>5</sup> .	FCDS and EO resources both modeled as solar resources.	Charging sufficiency assessed from RA resources and paired EO resources.	Charging sufficiency not assessed.
<b>Capacity Assessment (e.g., Effective Load Carrying Capability [“ELCC”] Constraint)</b>	EO resources excluded from ELCC-based RA assessment but contribute to Storage ELCC <sup>6</sup> .	Not Applicable	EO resources cannot directly serve capacity requirements.	EO resources cannot directly serve capacity requirements.
<b>Transmission Assessment</b>	EO resources do not trigger High System Need or Secondary System Need upgrades <sup>7</sup> .	Not Applicable	TPD / FCDS required for RA program participation.	TPD / FCDS required for RA program participation.

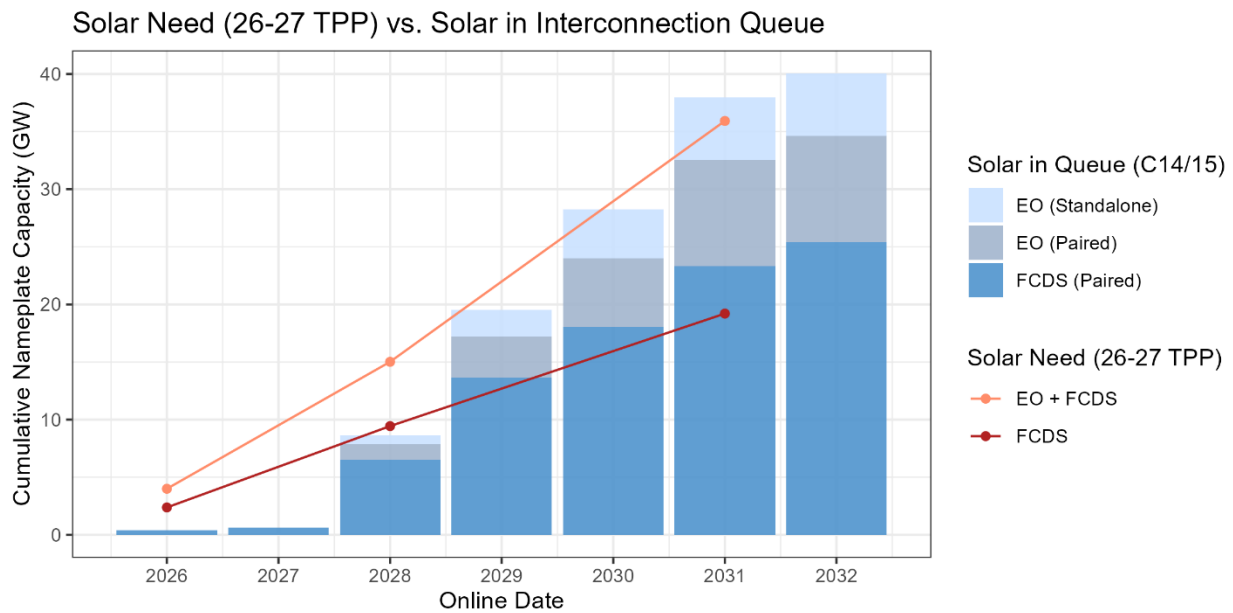
**Table 1: Current Methodological Approaches to Energy Only-Energy Sufficiency Problem (Preliminary Draft for Review, Revision and Discussion)**

<sup>5</sup> CPUC, Inputs & Assumptions, 2024 – 2026 Integrated Resource Planning (IRP), (February 2025) (hereinafter referred to as “February 2025 I&A”), p. 89: “The FCDS or EODS status of a resource does not impact how it is represented in RESOLVE’s operational module – the total installed capacity of the resource is used when simulating hourly system operations, regardless of FCDS or EODS designation.” Available at: [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2024-2026-irp-cycle-events-and-materials/2025\\_draft\\_inputs\\_and\\_assumptions\\_doc\\_20250220.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2024-2026-irp-cycle-events-and-materials/2025_draft_inputs_and_assumptions_doc_20250220.pdf).

<sup>6</sup> This understanding is based on ACP-California’s cross-referencing of reported storage ELCC values, which appear to be indexed to all solar resources including FCDS, EO, and BTM solar.

<sup>7</sup> February 2025 I&A, p. 89.

The net effect of these disparate approaches is to underestimate transmission upgrade requirements and consequent deliverability supply relative to compliance requirements of the CPUC’s RA program. The 2026-2027 TPP’s identified needs are presented in Figure 2, set against the resources currently in Clusters 14 and 15.<sup>8</sup> In the 2026-2027 TPP Base Case, nearly 17 GW of EO resources, nearly all of which are solar, are selected to be built by 2031 (Figure 1). RESOLVE simultaneously selected 19 GW of FCDS solar resources for the same time period for a total of 35.9 GW of total solar, as well as 18.5 GW of storage, all of which is FCDS.<sup>9</sup>



**Figure 2: TPP Needs Compared with Interconnection Queue Data<sup>10,11</sup>**

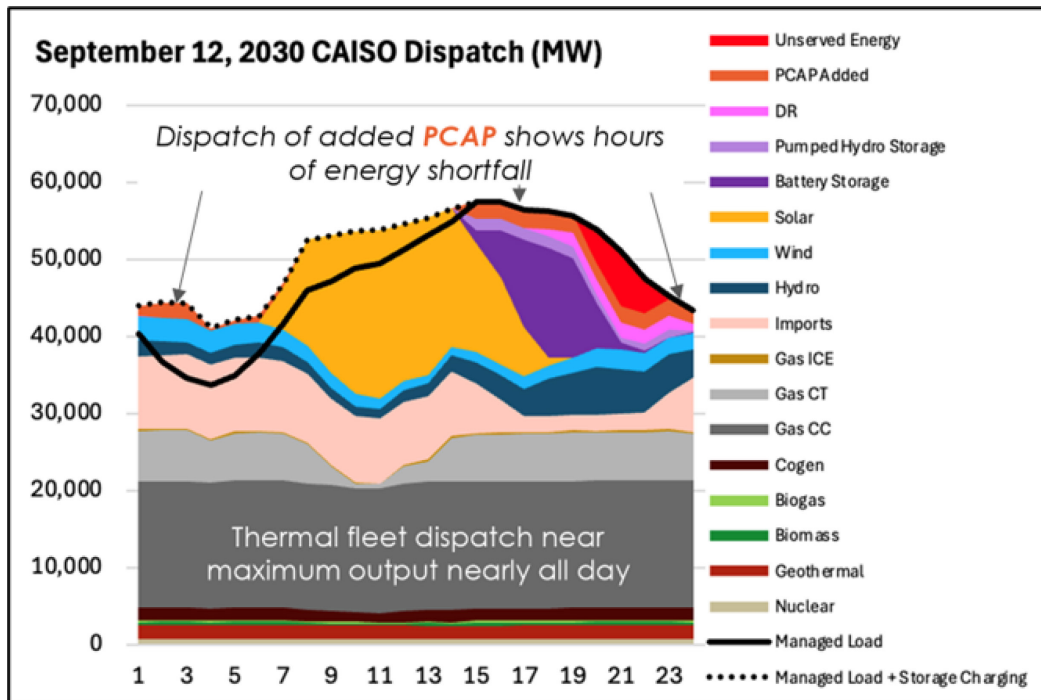
<sup>8</sup> Note: While the queue clusters separate paired and standalone resources, the RESOLVE model only identifies EO and FCDS.

<sup>9</sup> 25-27 TPP Base Case Results Viewer, available at: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/2024-26-irp-cycle-events-and-materials/assumptions-for-the-2026-2027-tpp>.

<sup>10</sup> *Id.*

<sup>11</sup> Queue data for Cluster 15 from: CAISO Cluster 15 Interconnection Requests (December 16, 2025). Available at: <https://www.caiso.com/documents/cluster-15-interconnection-requests.xlsx>; Queue data for Cluster 14 from: The CAISO Controlled Grid Generation Queue (January 20, 2026). Available at: <https://www.caiso.com/documents/publicqueueereport.xlsx>.

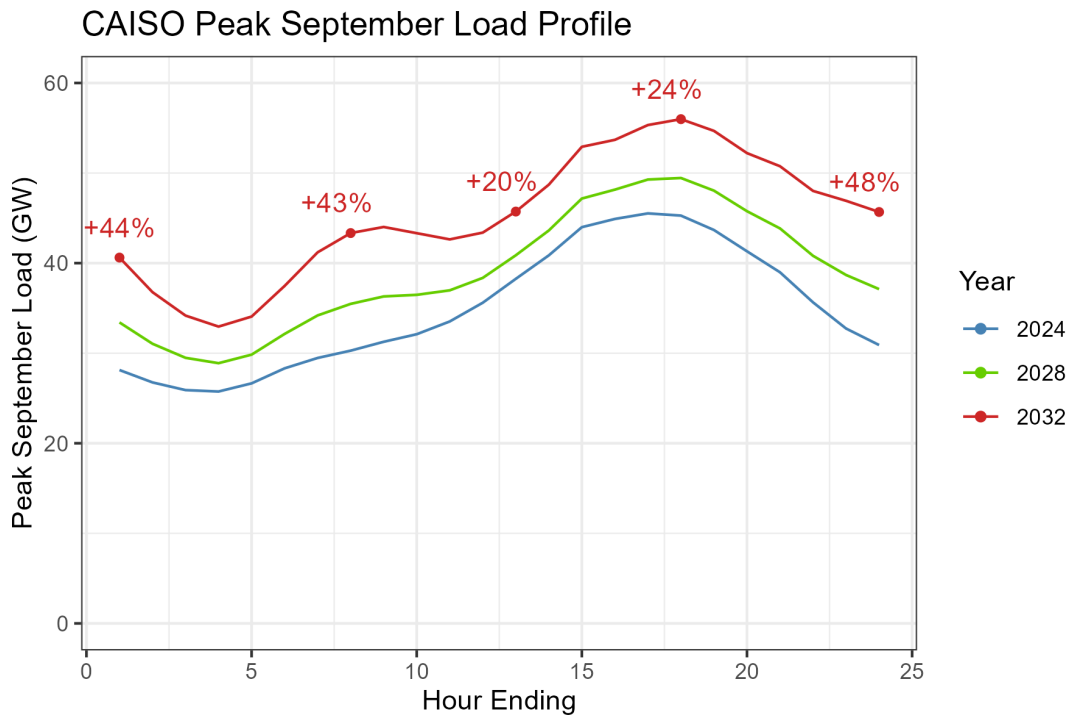
In the context of the FCDS RA requirement for charging sufficiency, this analysis raises questions regarding the modeling design decisions and subsequent distribution of FCDS and EO resources within the TPP portfolios. Specifically, Energy Division’s recent analysis of 2029-2032 needs (reproduced below in Figure 3) shows significantly tighter margins for energy sufficiency than prior studies, with much higher energy demand for direct load service competing with charging sufficiency requirements. However, this risk is considerably exacerbated when considering the share of energy and capacity needs apparently met with non-RA, off-peak import resources (pink), as well as the need to replace perfect capacity and unserved energy with incremental capacity resources, which will further elevate charging sufficiency requirements.



**Figure 3: Energy Sufficiency Mechanics in 2030 from Energy Division Analysis<sup>12</sup>**

<sup>12</sup> CPUC, Mid-Term Need Determination Analysis (September 30, 2025), p.24. Available at: [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2025\\_09\\_need-determination-analysis.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2025_09_need-determination-analysis.pdf).

While additional investigation and discussion is needed to conclusively diagnose an energy sufficiency gap, it is reasonable to assume that the import and PCAP / EUE adjustments will daylight a much narrower energy sufficiency position than has been seen in previous studies, if not an outright deficiency.



**Figure 4: 2024 IEPR Demand Forecast (Average September Day)<sup>13</sup>**

Energy sufficiency pressure can also be inferred directly from the recent IEPR forecast adjustments, as the load shape not only grows substantially in magnitude but shifts in shape to increase off-peak energy demand at a faster pace than mid-day and on-peak needs. This is demonstrated in Figure 4.

In contrast to the 2029-2032 study, which assessed the reliability position from the perspective of the current baseline, the 2026-2027 TPP augments the portfolio with necessary

<sup>13</sup> California Energy Commission, TN# 262289 from Docket No. 24-IEPR-03, CED 2024 Hourly Forecast – CAISO – Planning\_Scenario – correction 32025 (March 21, 2025). Available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=262289&DocumentContentId=98796>.

resources based on a variety of reliability and environmental constraints. In theory, the less stringent deliverability mechanics for EO resources in the IRP should be addressed through RESOLVE’s ELCC mechanics, which are intended to endogenize energy sufficiency requirements in resource value. However, it is ACP-California’s understanding that the ELCC surfaces utilized in RESOLVE are indexed not strictly between FCDS storage and FCDS solar, but between FCDS storage and all solar resources – inclusive of FCDS, EO, and BTM solar.<sup>14</sup>

If this understanding is correct, energy sufficiency constraints may be present across both the ELCC surfaces and the hourly “roundtrip modeling” assessments performed in RESOLVE and SERVM (that incorporate the phantom off-peak imports) resulting in significant reliance on the EO solar fleet to charge storage resources, although restricted within the CPUC-RA framework. The corresponding avoided transmission upgrades leave developers and LSEs with little pathway to achieve compliance under the RA program.

*i. The FCDS requirement for charging sufficiency disincentivizes investment in EO resources and raises costs.*

The effect of the FCDS requirement for charging sufficiency compliance stifles both procurement and development of energy sufficiency resources. On the developer side, there is no product for charging sufficiency availability in off peak hours. Without RA/IRP value, EO resources can sell REC value only, which is insufficient to develop an economical project. Furthermore, the IRP program currently lacks a mechanism to give LSEs a compliance target for GHG reduction which would drive EO procurement aligned with IRP outcomes. For LSEs, stringent charging-sufficiency requirements challenge their willingness to procure much-needed standalone storage resources.

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<sup>14</sup> This conclusion is based on ACP-California’s review of published storage ELCCs cross-referenced to specific portfolios and inferences from recent ELCC study results, but merits further review and discussion.

Furthermore, FCDS upgrades are expensive and should be allocated optimally to promote affordability. The median cost of upgrades to provide FCDS, based on data provided for use in the CPUC IRP process by CAISO in 2023,<sup>15</sup> is \$203k/MW of FCDS. Using a 15% capacity factor, which is consistent with the dispatch assumptions CAISO uses for solar for the Pacific Gas & Electric Company (“PG&E”) area in the High System Need deliverability studies,<sup>16</sup> we estimate that the 17 GW of EO solar in the CAISO interconnection queue would require roughly 2.6 GW of FCDS at an estimated price tag of approximately \$520 Million.

To the extent resources that would have been developed for energy sufficiency purposes absorb TPD in order to qualify under the RA program rather than taking EO service, we risk expensive, suboptimal utilization of the scarce deliverability resource.

*ii. FCDS requirements exacerbate delay risks*

We note that deliverability network upgrades (DNU) triggered by projects awarded deliverability in the CAISO process are at risk of significant delay given the current backlog of transmission projects at the CAISO’s three Transmission Owners. Currently 63% and 70% of PG&E and Southern California Edison transmission upgrades are delayed past their original in-service dates according to the CPUC’s 2025 1174 report.<sup>17</sup> For projects delayed due to bundling dependencies, financing, weather, land rights, and project design, median delay times often exceed 30 months. Furthermore, projects in Cluster 15 will not receive their TPD allocations, if

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<sup>15</sup> CAISO, Transmission capability estimates for use in the CPUC's IRP process - Revised 6/28/2023, available at: <http://www.caiso.com/Documents/Transmission-Capability-Estimates-for-use-in-the-CPUCs-Integrated-Resource-Planning-Process.xlsx>.

<sup>16</sup> CAISO, Deliverability Assessment Dispatch Methodology Update for Solar and Wind (June 26, 2024). Available at: <https://www.caiso.com/documents/deliverability-assessment-dispatch-methodology-jun-26-2024.pdf>.

<sup>17</sup> CPUC, 2025 California Renewables Portfolio Standard Annual Report (November 2025). Available at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2025/2025-california-renewables-portfolio-standard-rps-annual-report.pdf>.

awarded, until summer 2027, per the CAISO schedule. This means projects requiring FCDS in C15 may face substantial delays in network upgrades between 2027 and their expected online dates in 2029-2032. While the Commission and Transmission owners should focus resources and attention to address these delays, providing a clearer pathway for the development and crediting of EO resources could avoid exacerbating this delay risk and would reduce the quantity of upgrades Transmission Owners will be responsible for in the same planning horizon.

## **ACP-CALIFORNIA PROPOSAL #2: RA SOLAR AND WIND ACCREDITATION**

### **I. Introduction**

ACP California proposes to adopt limited changes to the accreditation frameworks for solar and wind resources in 2028. First, ACP-California proposes transitioning solar and wind profiles to a direct application of the current worst day methodology, eliminating the exceedance step, as an interim measure on the path to development of potential probabilistic solar and wind profiles. ACP-California notes its support for further development of a revised method for solar and wind accreditation for CAISO supply plan showings for CPUC-jurisdictional LSEs, along with parallel efforts to align the supply plan requirements (e.g., Planning Reserve Margin) with revised QC values.

ACP-California's accreditation proposal would provide incremental benefits in accreditation accuracy and fairness and address immediate challenges regarding CAISO's backstop authority with limited administrative burden.

### **II. Procedural Background**

ACP-California has been an active stakeholder in the development of solar and wind resource profiles throughout the Resource Adequacy Reform initiative. Most recently, ACP-

California offered proposals to address limitations to the accreditation methods for both CPUC and CAISO showings.<sup>18</sup>

For CPUC showings, ACP-California proposed a probabilistic accreditation framework to align Slice of Day profile generation with the concepts, data inputs, and methodologies used for ELCC analysis, while also offering an interim alternative through the direct application of the existing worst day methodology without the exceedance step. This proposal was intended to provide for accuracy, stability and fairness, in addition to alignment across programs.

For CAISO showings, ACP-California proposed several alternate methods to the existing peak hour translation methodology. This proposal was intended to address various challenges and concerns related to CAISO's backstop authority and other CAISO processes impacted by the current methodology.

Following D.25-06-048, Energy Division staff presented analyses of these methods at the November 2025 Resource Adequacy workshops.<sup>19</sup> ACP-California sincerely appreciates Energy Division's analysis and collaboration in the development of these methods.

### **III. Slice of Day Accreditation Proposal – Elimination of Exceedance Step**

After extensive discussion with Energy Division staff related to the Energy Resource Modeling ("ERM") datasets and its potential translation into probabilistic profiles, ACP-California recommends deferring adoption of the full probabilistic method, pending further resolution of data and methodological questions. In lieu of adopting the probabilistic method for

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<sup>18</sup> *American Clean Power – California Resource Adequacy Track 3 Proposal*, R.23-10-011 (January 17, 2025). Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M553/K679/553679243.PDF>.

<sup>19</sup> CPUC, LDES and VER Accreditation Workshop (November 4, 2025), Slides 124-163. Available at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/resource-adequacy-history/r23-10-011/20251104-ver--ldes-workshop-final.pdf>.

2028, ACP-California recommends eliminating the exceedance methodology, and instead directly applying the worst day average.

ACP-California remains interested in a transition to a probabilistic methodology and views the expected expanding role of Slice of Day accreditation within the Integrated Resource Plan as a valuable process to press further into ERM data and methodological questions. This process will provide additional daylight and validation to ensure ERM profiles accurately and fairly translate to specific zones, address questions regarding curtailment, and test different parameters within the accreditation methodology. In particular, these discussions would be well-informed through benchmarking with analysis within SERVIM to corroborate shapes during modeled loss of load events.

A transition to direct application of the worst day profiles provides significant benefits with minimal administrative burden. The worst day profiles are currently calculated as a step on the path to the current exceedance approach and can be drawn directly from the existing process with no incremental effort. This method has been characterized as “the simplest and most accurate method for determining performance on high-load days”<sup>20</sup> while “build[ing] in conservativeness... and substantially simplif[y]ing the resource counting process.”<sup>21</sup>

Adopting the direct use of the worst day profile beginning in Compliance Year 2028 allows the Commission to make incremental progress while focusing its efforts on resolution other key RA program design features, including implementation of Unforced Capacity rules,

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<sup>20</sup> *Opening Comments of Pacific Gas and Electric Company (U 39 E) on the Proposed Decision on Phase 2 of the Resource Adequacy Reform Track*, R. 21-10-002 (March 23, 2023), p. 3. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M504/K402/504402013.PDF>.

<sup>21</sup> *Comments of the Public Advocates Office on the Workshop Report on Final Proposals from Reform Track Phase 2*, R.21-10-002 (December 1, 2022), p. 7. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M499/K459/499459539.PDF>.

calibration of the Planning Reserve Margin, and implementation of RA components of the Integrated Resource Plan.

Finally, ACP-California expresses its appreciation for the analysis provided by Energy Division and the CAISO to inform options for CAISO supply plan showings from CPUC-jurisdictional LSEs. ACP-California is supportive of adopting an alternative method and is interested in the ELCC method with caveats related to potential divergence between ELCCs produced by CAISO modeling and the distinct analytical ecosystem producing IRP ELCCs and Slice of Day valuations.<sup>22</sup> We recommend further discussion of these methods in this or subsequent tracks of the RA proceeding. However, as discussed at the November 2025 workshop, this change cannot be made in isolation without parallel adjustments to provide a balanced set of resource requirements through adjustments to either the load requirement or the Planning Reserve Margin (“PRM”). As the requirement to use gross load is currently required by the CAISO tariff, the Commission should explore methods to adjust the PRM to account for potential changes (primarily reductions) to the QC value of solar and wind resources.

## **CONCLUSION**

ACP-California appreciates the opportunity to submit these proposals and looks forward to continued collaboration with the Commission, CAISO and other parties. We request the Commission adopt our Proposal #1 to address the urgent reliability and affordability challenges created by the current charging sufficiency construct. We also welcome informal and formal feedback and are open to consolidating our proposal with other parties offering similar

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<sup>22</sup> CPUC, LDES and VER Accreditation Workshop (November 4, 2025), Slides 150-164. Available at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/resource-adequacy-history/r23-10-011/20251104-ver--ldes-workshop-final.pdf>.

approaches to addressing energy sufficiency barriers for EO resources. In addition, the Commission should adopt ACP-California's Proposal #2 for wind and solar accreditation to better reflect the capacity contributions of these resources.

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Respectfully submitted,

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