

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



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

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**CALPINE LLC'S UNFORCED CAPACITY PROPOSAL FOR THE
RESOURCE ADEQUACY PROGRAM**

Matthew Barmack
Vice President, Market and Regulatory Policy
Diana S. Gallegos
Director, Governmental and Regulatory Affairs
CALPINE LLC
3003 Oak Road, Suite 400
Walnut Creek, CA 94597
Tel. (925) 557-2267
Email: Matthew.Barmack@calpine.com
Email: Diana.Gallegos@calpine.com

Katie Jorrie
Chasity Hendren
DAVIS WRIGHT TREMAINE LLP
50 California Street, 23rd Floor
San Francisco, CA 94111
Tel. (415) 276-6500
Fax. (415) 276-6599
Email: katiejorrie@dwt.com
Email: chasityhendren@dwt.com

Attorneys for Calpine LLC

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Pursuant to the *Assigned Commissioner’s Scoping Memo and Ruling*, issued on December 12, 2025 (“Ruling”), Calpine LLC (“Calpine”) respectfully submits this Track 1 interdependent unit unforced capacity (“UCAP”) proposal.¹

I. INTRODUCTION

Calpine appreciates the opportunity to submit a UCAP proposal to resolve the limitations of a unit-specific UCAP framework for interdependent units. The currently proposed unit-specific UCAP framework does not accurately reflect the reliability of interdependent units. For example, the Geysers geothermal facility operates as an integrated system, with a shared steam field that allows for the reallocation of thermal energy among multiple generating units. Applying a unit-specific UCAP approach to the Geysers would fail to capture its flexibility to shift production between different units within the facility.

To appropriately reflect the operational characteristics of the Geysers and potentially other interdependent units, Calpine proposes the following UCAP approach:

- Maintain the current non-UCAP net qualifying capacities (“NQC”);
- Cap facility-wide showings at the reliable capacity of the whole facility; and

¹ Calpine LLC, formerly participating as Calpine Corporation, is filing a Notice of Party Name Change concurrently with these Comments.

- Implement facility-level constraints in resource adequacy (“RA”) compliance.

Such an approach ensures accurate capacity accreditation while minimizing changes or added complexity to existing processes.

II. ISSUE: OPERATIONAL INTERDEPENDENCIES OF MULTI-UNIT GEOTHERMAL FACILITIES

Calpine’s geothermal facilities operate as an integrated system, allocating thermal energy from a shared steam field across multiple generating units to maintain overall production levels. This structure differs materially from standalone units that operate independently with dedicated fuel and heat sources. The interdependence of the Geysers units allows steam to be reallocated among units during unit-level outages, ensuring reliable energy and capacity delivery at the aggregate facility level.

Under the proposed unit-specific UCAP framework, capacity accreditation on a unit-specific basis overlooks the operational flexibility and interdependencies of multi-unit geothermal resources, such as the Geysers. The unit-specific UCAPs would reflect the historic performance of the units on average, including how steam has been allocated historically, but it might fail to reflect how specific units could perform in the event of any *specific outage*. This approach inaccurately reduces RA supply by limiting the facility’s ability to reflect its true, predictable aggregate output. Consider the following hypothetical: 2 units rated at 100 megawatts (“MW”) each (200 MW total nameplate capacity) always produces 100 MW. If UCAP accreditation assigns 50 MW to each unit, an outage on one unit would reduce the available accredited capacity of the entire facility to 50 MW, even though the facility could still produce 100 MW of RA capacity by redistributing steam.

III. SOLUTION: FACILITY LEVEL CAPACITY ACCREDITATION

To better reflect an interdependent unit’s aggregate reliability and operational characteristics, Calpine proposes maintaining the current non-UCAP NQCs for individual units while capping

aggregate facility showings at the reliable capacity of the entire facility. Calpine recommends that the Commission enforce this cap through the RA compliance process, similar to how it enforces Point of Interconnection (“POI”) limits for co-located resources. Calpine expounds upon each element of its proposal further below.

A. Maintain Current Non-UCAP NQCs for Individual Units

Calpine proposes to preserve the status quo NQCs for individual units at their current non-UCAP levels. These values generally reflect the maximum deliverable output that a unit might produce, accounting for constraints on generating capacity and limits on steam reallocation to specific units. Thus, these constitute appropriate caps on showings from any specific unit.

Aggregate showings for the facility would be capped at an estimate of the reliable capacity of the entire facility. For instance, the facility-level cap could be derived from the sum of the unit-specific UCAP values.

B. Cap Facility-Wide RA Showings at Reliable Aggregate Capacity

While individual units may be able to support production up to their current NQC, there is generally insufficient steam to support production at the full current NQC of every unit at the same time. Calpine already reflects this aggregate constraint in RA sales and showings for the Geysers. However, it would be reasonable to explicitly reflect this constraint in the RA compliance process by capping showings across all units at an estimate of the reliable capacity of the whole facility. Based on empirical analysis and understanding of the Commission’s proposed UCAP methodology, Calpine suggests that the sum of the unit-specific UCAPs may constitute a reasonable facility-level cap.²

² Note that as Calpine continues to invest in the Geysers, it will be important to be able to modify both unit-specific NQCs and aggregate showing caps to reflect those investments.

C. Implement Facility-Level Constraints in RA Compliance, Mirroring POI Constraints

Implementing constraints that apply to multiple units in the Master Resource Database and other aspects of the RA compliance process introduces some additional complexity. However, there is precedent in the treatment of co-located units subject to a POI constraint which could be leveraged for the Geysers. For instance, co-located resources behind a single POI may have NQCs that exceed the POI limit, and the Commission ensures that aggregate showings comply with that limit. Following this model, the Commission could validate that showings across individual Geysers units do not exceed an estimate of reliable capacity of the facility as a whole. Unlike POI constraints, which are annual, estimates of the reliable capacity for linked units at the same facility may need to vary by season, as the Commission is proposing to vary UCAP values by season.

IV. NO MODIFICATIONS NEEDED FOR CAISO COMPLIANCE PROCESSES

Importantly, Calpine's proposal does not require any modifications to CAISO's existing RA validation framework. CAISO's responsibilities are limited to validating RA Plan and Supply Plan showings at the individual-resource level, ensuring that each resource's RA showing does not exceed its NQC and that the RA Plan and Supply Plan submitted for that unit are consistent. Because Calpine's proposal maintains each Geysers unit's existing NQC as the unit-specific cap on RA showings, CAISO's current validation processes can continue to function as designed, with no need for additional review or new validation rules.

V. CONCLUSION

Calpine respectfully requests that the Commission adopt its proposed approach to capacity accreditation for the Geysers geothermal facility and potentially other similarly situated resources. By maintaining the current non-UCAP NQCs for individual units, capping aggregate facility showings, and implementing facility level constraints in the RA compliance process, the

Commission can ensure that the operational flexibility and reliability of such resources are accurately reflected. This approach avoids unnecessary reductions in RA supply while maintaining consistency with existing CPUC and CAISO validations processes. Calpine looks forward to further discussions on its proposal.

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Respectfully submitted,

/s/

Katie Jorrie
Chasity Hendren
DAVIS WRIGHT TREMAINE LLP
50 California Street, 23rd Floor
San Francisco, CA 94111
Tel. (415) 276-6500
Fax. (415) 276-6599
Email: katiejorrie@dwt.com
Email: chasityhendren@dwt.com

Attorneys for Calpine LLC