

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

02/17/26

04:59 PM

R2506019

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

Rulemaking 25-06-019

**THE PUBLIC ADVOCATES OFFICE NOTICE  
OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides this notice of ex parte communication in the above-captioned proceeding.

On February 12, 2026, at 9:30 AM, Cal Advocates representatives Julie Halligan, Program Manager, Radu Ciupagea, Program and Project Supervisor, Paul Worhach, Senior Public Utilities Regulatory Analyst, and Matt Miley, Staff Attorney, met with Victor Smith, Deputy Chief of Staff to Commissioner Darcie Houck, and Erica Petrofsky, Advisor to Commissioner Darcie Houck.

On February 12, 2026, at 11:30 AM, the same Cal Advocates representatives met with Sarah Goldmuntz and Khalil Johnson, Advisors to President Alice Reynolds, and Adam Buchholz, Advisor and Interim Chief of Staff to Commissioner John Reynolds, and Amin Younes, Advisor to Commissioner John Reynolds.

On February 12, 2026, at 1:00 PM, the same Cal Advocates representatives met with Justin Ong, Chief of Staff to Commissioner Matthew Baker, and Kyle Navis, Senior Advisor to Commissioner Matthew Baker.

On February 12, 2026, at 2:00 PM, the same Cal Advocates representatives met with Julian Buchwalter, Advisor to Commissioner Karen Douglas, and Cristina Lizarraga, Policy Assistant to Commissioner Karen Douglas.

The meetings occurred orally via web conference and were initiated by Cal Advocates. The meeting with Commissioner Houck's office lasted slightly over 20 minutes, and the remainder of the meetings each lasted approximately 30 minutes. Cal Advocates distributed written material during each communication, a copy of which is attached to this ex parte notice.

During each of the meetings, Cal Advocates discussed several of its concerns and recommendations regarding the proposed *Decision Requiring 2029-2032 Electric Resource Procurement and Transmitting Portfolios for 2026-2027 Transmission Planning Process* (PD), filed January 14, 2026, in Rulemaking 25-06-019, the integrated resource planning (IRP) proceeding. First, Cal Advocates recommended that the Commission clarify that the PD's 50 percent cap on storage procurement applies only to standalone storage resources that do not have a physical or contractually paired energy component. Cal Advocates stated that without this clarification the PD would require procurement of significantly more generation than is necessary to adequately charge the procured storage, at significantly greater ratepayer cost. Cal Advocates recommend that the Commission allow load-serving entities (LSEs) flexibility to procure the other half of the proposed procurement tranche from least-cost resources, including storage paired with generation, that have the greatest value for ratepayers. Next, Cal advocates recommended that the Commission modify the PD to allow LSEs to utilize the compliance flexibility mechanism established in Decision 25-09-007 to achieve the PD's 2030 and 2032 procurement orders. Finally, Cal Advocates recommended that the Commission modify the PD to reserve transmission for the future deliverability of all out-of-state wind resources in its base case portfolio. Cal Advocates emphasized that Commission reservation of transmission for the full amount of 2036 out-of-state wind resources would mitigate the risk that lower-value resources occupy transmission that the Commission's IRP modeling only supports for the deliverability of higher-value resources.

Respectfully submitted,

/s/ MATT MILEY  
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February 17, 2026

# **ATTACHMENT**

# Cal Advocates' IRP PD Comments

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Proceeding No: R.25-06-019 | Commission Agenda: 02/26/2026 | Date: 02/12/2026

- Cal Advocates' Position: With respect to the January 14, 2026 Proposed Decision (PD) in the Integrated Resource Planning (IRP) proceeding, the California Public Utilities Commission (Commission) should make the following modifications:
    - Apply the proposed cap on storage procurement to standalone storage only;
    - Allow load-serving entities (LSEs) to utilize the compliance flexibility mechanism from Decision (D.) 25-09-007 to address project delay risks; and
    - Reserve transmission for the full volume of 2036 out-of-state wind resources.
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## **The Commission should apply the proposed cap on storage procurement only to standalone storage resources that have no paired energy component.**

- The PD would limit energy storage procurement to 50 percent of each proposed procurement tranche. The PD states that the cap is necessary to encourage the development of energy generating resources to adequately charge storage to support system reliability.
- However, the PD would require procurement of significantly more generation than is necessary to adequately charge the procured storage, at significantly greater ratepayer cost.
- The Commission should instead cap the standalone storage capacity at 50 percent and allow LSEs to flexibly procure the other half from least-cost resources, including storage paired with generation, that has the greatest value for ratepayers.

## **The Commission should allow LSEs to utilize the compliance flexibility mechanism from D.25-09-007 to address their project delay risks.**

- The PD disallows LSEs from using the compliance flexibility mechanism from D.25-09-007, on the grounds that the procurement orders' lead times suffice to address delay risks.
- However, project delay risks are widespread, and the lead time associated with a Commission decision does not prevent emergent delays later in time.
- Without the compliance flexibility mechanism, LSEs will need to procure larger and larger volumes of resources in order to hedge these systemic project risks – a suboptimal outcome.

## **The Commission should reserve transmission for all 2036 out-of-state wind resources in the 2026-2027 Transmission Planning Process base case portfolio.**

- The PD proposes to reserve transmission for only 6,096 MW of the 7,036 MW of 2036 out-of-state wind resources in the base case portfolio, to preserve optionality for other resources.
- The Commission should instead reserve transmission for the full amount of 2036 out-of-state wind resources, so that lower-value resources do not occupy transmission that the IRP modeling only supports for the deliverability of higher-value resources.
- The Commission can unwind reservations in the future to provide optionality.