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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 (Filed October 9, 2025)

JOINT OPENING COMMENTS OF CALIFORNIA ENERGY STORAGE ALLIANCE, FORM ENERGY, HYDROSTOR, AND FOURTH POWER

ON

PARTIES' TRACK 1 PROPOSALS FOR ACCREDITATION OF LONG-DURATION ENERGY STORAGE UNDER SLICE-OF-DAY

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COMMENTS

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the California Energy Storage Alliance ("CESA"), Form Energy, Hydrostor, and Fourth Power ("Joint LDES Parties") hereby submit these joint comments on parties' opening proposals for the accreditation of long-duration energy storage ("LDES") resources under the slice-of-day resource adequacy program, pursuant to the scope and schedule in the Assigned Commissioner's Scoping Memo And Ruling ("Ruling") filed on December 12, 2025, for parties' and the Commission's consideration. This joint filing is submitted by CESA, which is authorized to file on behalf of the undersigned Joint LDES Parties.

I. Introduction

In its January 23, 2026, proposal, the Joint LDES Parties provided a comprehensive proposal for how all energy resources over 8 hours in duration could be shown under the slice-of-day framework. The proposal set forth a way to determine the sufficiency of energy available to charge such resources, so that the Commission is confident that they can reasonably be expected to discharge during the slice-of-day's "worst day" period. After gaining valuable feedback from individual meetings with the IOUs, CCAs, Cal Advocates, and CPUC staff, the Joint LDES Parties rooted their proposal in the following principles:

- **Recognition of physical capabilities, supported by charging**: LSEs should be permitted to show LDES resources for their full physical duration (up to the current 24-hour SOD limit), provided that they can demonstrate a realistic expectation of sufficient charging energy.
- **Reflection of operations**: The determination of energy sufficiency for LDES resources should be grounded in how LDES systems actually function—specifically their

purpose and ability to move energy from prior periods into grid stress periods, which occurs over multiple days.

- **Methodological consistency**: The accounting methodology should be principled and broadly applicable to various types of LDES resources.
- **Safeguarding customers and reliability**: The methodology should protect customers from unnecessary costs and must contribute to ensuring resource adequacy.
- **Implementability:** The accounting for LDES resources must be straightforward for LSEs to implement, and for Commission Staff to verify.

The proposal offered a logical framework for calculating the amount of energy that is reasonably expected to be available to charge LDES resources in the days *leading up to* the "worst day" under the slice-of-day program, so that they could *discharge on* the worst day– consistent with LDES resources' purpose, design, and operational expectations. The proposal recognized that the CPUC could update the methodology after gaining operational experience with LDES. Further, the Joint LDES Parties presented this proposal at the Workshop on Track 1 Proposals hosted by the Commission on February 10, 2026.[1] This workshop allowed parties an opportunity to discuss the proposal and the assumptions made by the proposal in real time.

In contrast, the Public Advocates Office at the California Public Utilities Commission ("Cal Advocates") provided a proposal grounded in several major unrealistic and unsupported expectations. Most notably, the Cal Advocates proposal "assumes that the supply and load conditions of those forward days are the same as the "worst day" SOD load and supply conditions for the compliance month"[2] and "uses energy available on the SOD "worst day" showing day

[1] Slides available at https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/resource-adequacy-history/2-10-2026-track-1-proposals/feb-10-workshop-slides.pdf

[2] Cal Advocates' Opening Proposal at 5.

as the basis for determining energy sufficiency."[3] As highlighted in Section II.A.D. of our comments, the Integrated Energy Policy Report (IEPR) forecasts demonstrates that California's grid typically possesses a significant energy surplus in the days leading up to a monthly peak. The comments of Ava Community Energy provides data and analysis with a similar finding. The Cal Advocates also provide no evidence to support their unrealistic expectation that an LDES owner would choose to charge their battery during the highest priced periods on the worst day instead of lower priced periods leading up to the worst day.

By saddling customers with the costs of *acquiring energy for* LDES resources during the times of scarcity that energy could actually be *provided by* LDES resources, the Cal Advocates proposal would lead to an exorbitant level of additional costs without any reliability benefit.

For these reasons, the Commission must reject the Cal Advocates proposal. Additionally, we note that the Cal Advocates proposal was not presented by Cal Advocates or discussed at the workshops in February alongside other proposals for consideration in Track 1. This means that the process, to date, has not allowed an opportunity for party discussion of the merits and detractors of the proposal. The Commission should decline to adopt a proposal that has not had the benefit of group discussion alongside other proposals that did have the benefit of being discussed, especially given the shortcomings of the proposal discussed in these comments.

II. The Cal Advocates' proposal is built on flawed assumptions about LDES charging that will harm ratepayers, as its assumptions are inconsistent with how LDES resources are treated in planning frameworks and how they are likely to operate in practice.

The Cal Advocates proposal is based on flawed assumptions, explained further below. If adopted, these assumptions would drive toward a resource adequacy program that causes harm to

[3] Cal Advocates' Opening Proposal at 6

ratepayers, and inappropriately de-value LDES resources that can provide critical reliability to the California grid using excess energy from times of abundance and lower cost.

A. While Cal Advocates seeks to establish "energy sufficiency," for LDES resources, its proposal actually creates an "over-procurement" problem.

The Cal-Advocates' proposal, termed the "Multi-Day Energy Sufficiency Requirement" (MDESR) ignores the fundamental principles of long-duration storage assets and forces Load Serving Entities (LSEs) to procure redundant, expensive capacity for a reliability need that does not exist. This is because the MDESR looks to the slice-of-day period, the "worst day," to determine if there is sufficient energy to charge LDES resources. By requiring LDES resources to find charging energy during the most constrained 24-hour period of the month, the MDESR treats these resources as if they cycle daily. LDES resources are expressly not designed to cycle daily, and usually physically cannot. Instead, they are designed to carry charge into grid stress periods, using energy from periods when it is abundant and lower cost.

This assumption of using "worst day" energy to charge LDES resources, upon which the Cal Advocates' proposal is based, effectively nullifies the multi-day balancing benefit these resources are specifically designed — and procured — to provide. At its core, this assumption undermines the purposes of the slice-of-day program, making it tailored to unrealistic and impossible scenarios. This would send a signal to LSEs to make sure that they have unnecessary excess energy available on the worst day, the most expensive and problematic days to procure energy. This will result in LSEs, and ultimately ratepayers paying for the procurement of additional and unnecessary resources to charge LDES resources that, in practice, will already be charged and are specifically designed to *provide* energy on that day.

B. The MDESR proposal would force ratepayers to pay twice for the same reliability.

Under the Cal Advocates' framework, ratepayers would be saddled with a significant and unnecessary financial burden. Customers would be forced to pay once for the LDES capacity designed to bridge grid stress events and then pay a second time for additional capacity to charge LDES that are only "needed" because of Cal Advocates' proposed restrictive and inaccurate accounting assumptions. This "double-buying" of capacity and redundant peak-day charging resources is economically inefficient, does not address needed reliability concerns, and needlessly increases costs for California ratepayers.

Rather than forcing ratepayers to pay for LDES resource capacity, plus charging energy on the "worst day," where the resources are actually designed to dispatch, customers should benefit from the ability of LDES resources to move energy from abundant and low-cost periods into the worst day. This is the appropriate price signal, and the appropriate framework for protecting customers. The Joint LDES Parties' proposal accomplishes this design.

C. The MDESR inaccurately assumes the grid is just as stressed on non-worst days as it is on the "worst days."

The Cal Advocates' proposal assumes that supply and load conditions in the days leading up to a peak event are just as strained as the peak event itself. Specifically, they explain: "[t]he MDESR Proposal assumes that the supply and load conditions of those forward days [before the slice-of-day's worst day] are the same as the "worst day" SOD load and supply conditions for the compliance month."[4] This is a fundamental logical error. By definition, a month's "worst day' is an outlier—the extreme peak of stress. In reality, the days preceding such an event almost invariably have lower loads and a significant surplus of renewable energy available for charging.

[4] Cal Advocates' Opening Proposal at 5.

Cal Advocates claims this assumption "approximates reality"[5] based on an analysis of CAISO OASIS data mentioned in footnote 16 of their opening proposal, yet they fail to provide this data or any empirical support for such a counter-intuitive claim. Using the most constrained day as a proxy for the days preceding it is not a "practical consideration";[6] it is a distortion of grid physics that artificially inflates the cost of charging. The Commission should not adopt the Cal Advocates' proposal because this assumption understates the amount of energy available to LDES resources to carry into the slice-of-day period, harming customers by requiring more energy resources than necessary to meet its slice-of-day program requirement.

D. IEPR data confirms that sufficient excess energy exists on the days preceding grid stress events.

Cal Advocates argues that assuming "worst-day" conditions for the entire charging period of LDES resources is a practical consideration to avoid data complexity, and that it approximates reality.[7] However, actual expected load data suggests that this simplification is highly problematic, and would result in a significant distortion of reality that ignores the surplus energy available on the grid during non-peak days.

Analysis of Integrated Energy Policy Report (IEPR) forecasts demonstrates that California's grid typically possesses a significant energy surplus in the days leading up to a monthly peak. Using the hourly demand forecast data from the California Energy Demand, 2025-2045,[8] The Joint LDES Parties calculated the amount of excess energy available in each of the 8 days leading up to the worst day by determining the difference in load for each hour of the

[5] *Id*. at 7.
[6] *Id*. at 6.
[7] *Id*. at 6, 7.
[8] 2025 Integrated Energy Policy Report, California Energy Demand, 2025-2045, available at: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2025-integrated-energy-policy-report-0.

day relative to the "worst day".[9] This analysis reveals the amount of "slack" in the system compared to the worst day. Assuming that LSEs have enough resources to serve loads in the worst day, as is demanded by the slice-of-day program, this reduced load in each day represents a clear and expected opportunity to charge long-duration storage resources, and is an amount of energy available above and beyond whatever excess energy is available on the worst day. In other words, it reveals the extent to which the Cal Advocates' proposal overlooks available energy due to the overly conservative approach embedded in their proposal.

This analysis shows that for a typical compliance month in 2030, the additional energy available in the CAISO system over three days preceding the worst day is 222 GW-hours, and the additional energy available over the eight days preceding the worst day is 559 GW-hours. These results are shown in Table 1 below. This is a massive amount of additional energy and **would be enough to charge an estimated 10-25+ GW of of long-duration energy storage systems**.[10]

Table 1: CAISO Excess Energy in Days Leading up to the Worst Day in 2030 by Month (MWh)

Month / Days Before	1	2	3	4	5	6	7	8	3-day Total	8-day Total
January	9,427	20,705	121,527	104,596	27,927	19,079	17,093	18,607	**151,659**	**338,961**
February	4,645	10,700	92,361	79,388	15,102	11,285	8,015	10,823	**107,706**	**232,319**
March	9,168	19,473	114,947	80,821	28,087	21,156	15,792	22,827	**143,588**	**312,271**
April	20,757	54,261	166,925	139,837	82,564	77,717	71,868	76,430	**241,943**	**690,359**
May	31,562	46,807	146,985	112,412	63,364	35,634	13,222	55,968	**225,354**	**505,954**
June	24,727	68,892	215,310	189,833	128,024	112,724	95,675	106,061	**308,929**	**941,246**
July	39,942	74,025	236,596	218,505	129,352	113,297	100,493	106,432	**350,563**	**1,018,642**
August	29,208	74,033	217,769	173,874	111,105	36,609	62,315	83,390	**321,010**	**788,303**
September	33,103	78,622	247,635	208,126	147,768	86,076	39,984	76,344	**359,360**	**917,658**
October	18,336	45,474	148,431	108,649	66,711	25,340	-842	14,781	**212,241**	**426,880**
November	12,071	27,402	116,694	91,110	38,777	28,097	14,554	22,746	**156,167**	**351,451**

[9] This approach assumes that on the days leading up to the worst day, there is the same amount of energy available on the system as during the worst day.
[10] This assumes an average LDES duration of 40 hours and that the each LDES resource is 50% charged before the three-eight days preceding the worst day.

December	5,514	10,949	68,069	80,713	16,906	3,784	-1,070	2,024	**84,532**	**186,889**
Average	**19,872**	**44,279**	**157,771**	**132,322**	**71,307**	**47,567**	**36,425**	**49,703**	**221,921**	**559,244**

Visualized in a different way, Figures 1a and b below show the hourly load profiles for April and September for CAISO in that same year.

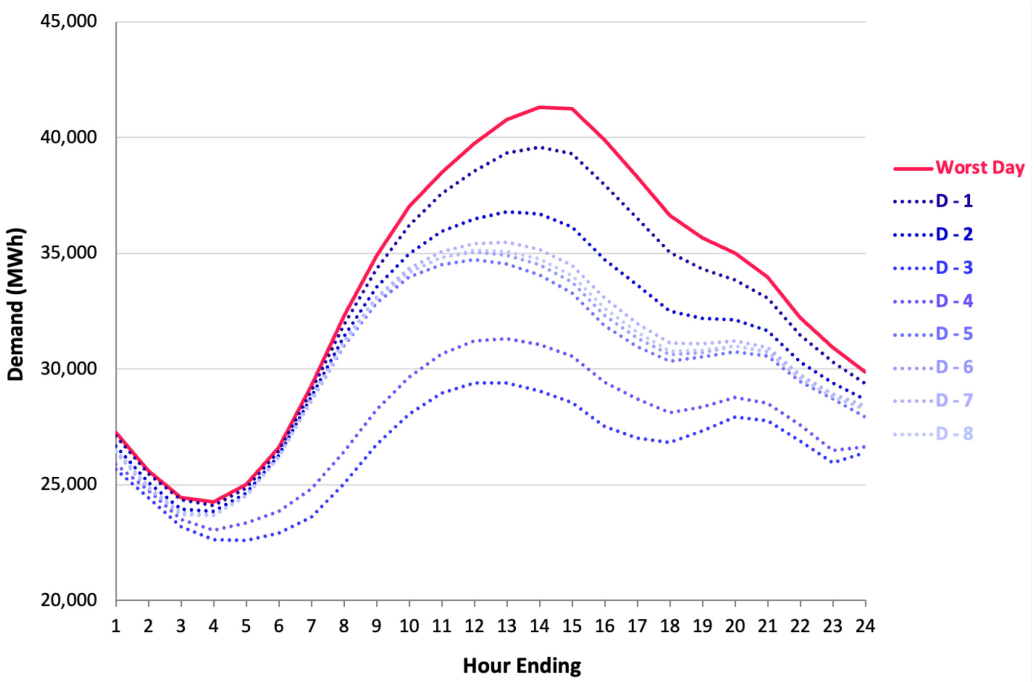

Figure 1a: CAISO Hourly Load Profiles in Days Leading up to the Worst Day for the month of April

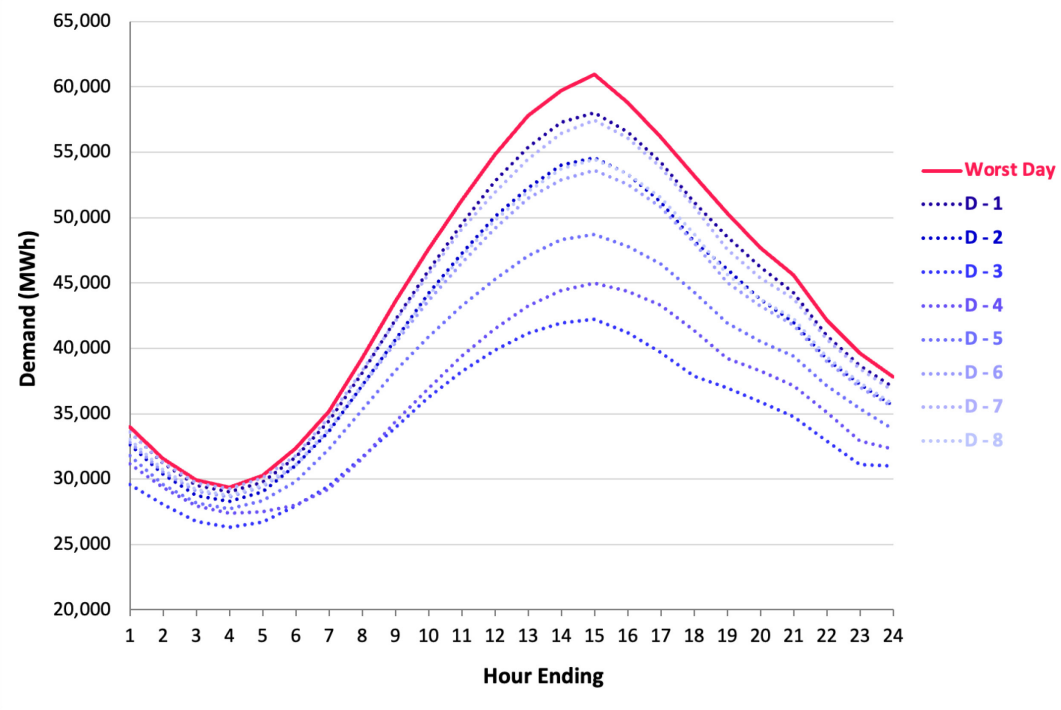

Figure 1b: CAISO Hourly Load Profiles in Days Leading up to the Worst Day for the month of September

These conclusions hold at the individual planning area levels as well, shown below for Pacific Gas and Electric Company (PG&E) where the excess energy available on the 3 and 8 days preceding the coincident peak day of the month averages 93 GWh and 237 GWh. Again, this is enough to charge several GWs of LDES resources.

Table 2: PG&E Excess Energy in Days Leading up to the Worst Day in 2030 by Month

Month / Days Before	1	2	3	4	5	6	7	8	3-day Total	8-day Total
January	4,226	10,592	56,142	47,069	15,705	10,356	9,246	9,855	**70,960**	**163,191**
February	760	3,205	40,797	30,861	5,438	-2,352	-4,213	-2,840	**44,762**	**71,656**
March	5,604	9,001	46,581	33,174	11,381	9,088	7,256	8,495	**61,186**	**130,580**
April	8,967	21,840	71,979	59,060	33,089	31,151	28,546	30,249	**102,786**	**284,881**
May	41,271	44,480	87,574	71,918	50,018	42,894	39,857	47,415	**173,325**	**425,427**
June	14,163	37,194	108,681	102,431	67,398	59,117	50,766	56,101	**160,038**	**495,851**
July	15,840	33,351	100,802	92,744	54,540	48,098	43,671	45,256	**149,993**	**434,302**
August	4,699	12,050	65,767	53,282	18,033	8,243	20,276	22,946	**82,516**	**205,296**
September	9,796	27,601	78,349	80,535	47,233	40,129	34,913	37,039	**115,746**	**355,595**
October	5,108	11,423	52,365	35,943	19,157	5,343	-4,702	-2,811	**68,896**	**121,826**
November	1,327	3,572	45,113	30,571	6,700	6,390	1,195	4,518	**50,012**	**99,386**
December	2,891	5,407	25,543	31,397	5,771	-1,674	-4,625	-3,368	**33,841**	**61,342**
Average	**9,554**	**18,310**	**64,974**	**55,749**	**27,872**	**21,399**	**18,516**	**21,071**	**92,838**	**237,444**

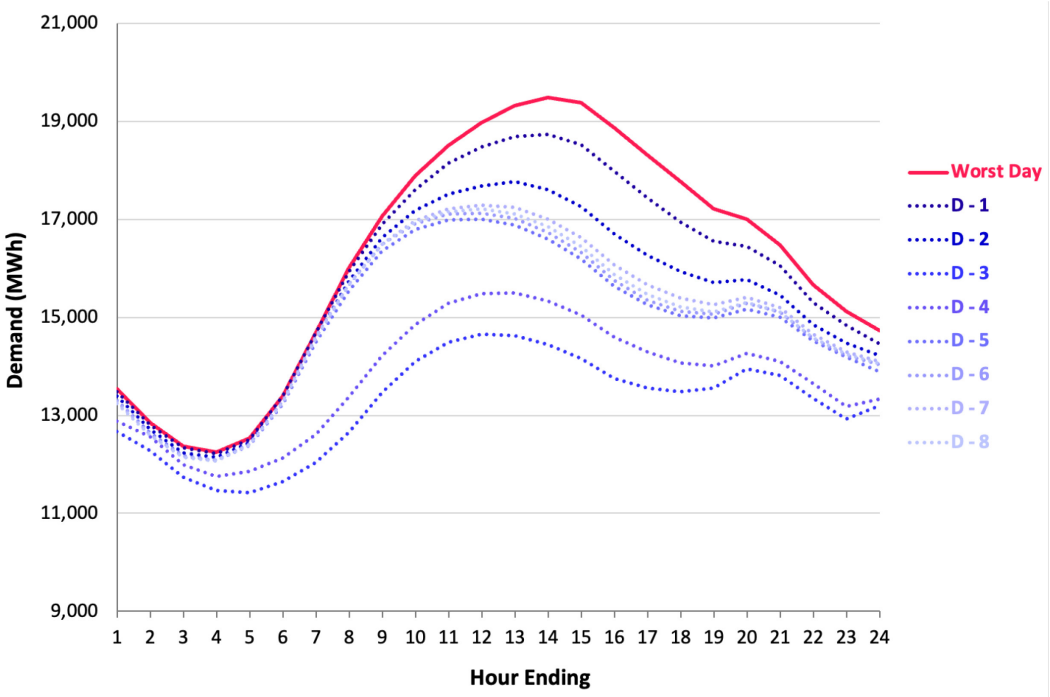

Figure 2a: PG&E Hourly Load Profiles in Days Leading up to the Worst Day for the month of April

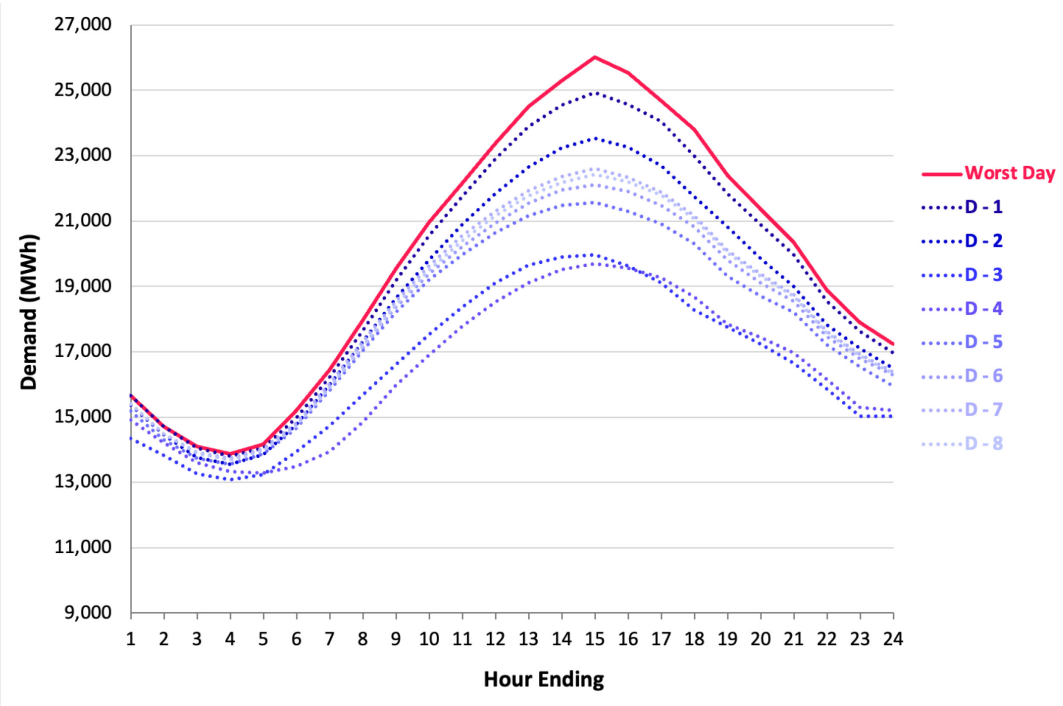

Figure2b: PG&E Hourly Load Profiles in Days Leading up to the Worst Day for the month of September

This data proves that the simplifying assumption Cal Advocates makes (that the non-worst days leading up to the slice-of-day period are just as bad as the worst days from a grid stress point of view) has significant consequences for customers. It masks that LDES resources can provide tremendous value for customers by harnessing this excess energy and dispatching it when the grid needs it the most. When the Commission accounts for the energy that is actually available on the grid—rather than defaulting to the most constrained 24-hour period—it becomes clear that LDES resources can be fully charged without requiring additional, redundant procurement. The Joint LDES Parties proposal to calculate this data or use a monthly slack value is the most appropriate way to capture this reality within the slice-of-day framework.

E. The MDESR is overly-conservative by assuming that LDES resources would have no charge on an average basis, even though they are designed to carry charge from day to day.

Cal Advocates' proposal advocates for an accounting framework where every LDES resource is assumed to start its charging period at 0% state of charge. This assumption treats LDES and even multi-day storage assets as if they must be "refueled" from empty on the grid's most expensive days. Just as a driver rarely lets her car get to a completely empty fuel tank, LDES resources are specifically designed and managed to "carry" charge across multiple days precisely to prepare for anticipated stress events. Forcing an assumption of 0% charge is unreasonably conservative and ignores the primary operational purpose of these assets. The Joint LDES Parties proposed 50% initial state of charge is a far more reasonable assumption that reflects a mid-point and better approximates the expected physical reality of how these resources are managed for reliability. The Joint LDES Parties also recommend that these values be considered and potentially tuned in the future.

III. The Cal Advocates' proposal does not appropriately account for various energy storage resource durations.

The MDESR proposed by Cal Advocates applies a uniform charging multiplier of four (*i.e.* four times the "worst day" excess energy) across all multi-day resources, regardless of their actual duration or design. This "one-size-fits-all" approach fails to recognize that a resource's ability to "shift" energy from periods of abundance is directly tied to physical capacity.

A resource with a discharge of multiple days has a vastly different operational profile than a much shorter-duration resource because it is designed to carry charges from extended periods and discharge that energy for extended periods. If it were to do otherwise, it would be wasting the capability it was specifically designed for.

The Joint LDES Parties' proposal, which scales the number of "charging days" from 2 to 8 days based on the resource's physical duration, is better reflective of reality because it matches the accounting period to the physical capability of the resource to bank and carry energy.

The Cal Advocates argue that the one-size-fits all approach may be justified by the fact that CAISO can order operational variations for storage resources during a four-day period leading to a grid stress event. Relying wholly on this four-day directive window, however, does not address the fundamental differences in purposes for which various duration energy storage systems are designed. These resources still have operational and physical differences. Additionally, it introduces an assumption of a "critical emergency" into the slice-of-day accounting program that is not present in the assumptions for any other resources. For example, short-duration storage resources are not assumed to be operating under such directives in the slice-of-day program, and it would be unfair and provide warped signals to apply such a standard to only LDES resources.

IV. LDES and multi-day resources do not require a change to the Slice-of-Day framework.

In its proposal, Cal Advocates requests the creation of a "Minimum Continuous Day Discharge" requirement (MCDD). The purpose of this value would be to establish the number of days over which an LDES resource must be available to dispatch before receiving credit under the resource adequacy program. This proposal seems to be adopted, in part, because they believe resources that dispatch for multiple days at a time somehow do not fit within the existing program. They recommend that over time, the Commission should impose a multi-day dispatch requirement on these resources in order to match the services that they provide with a reliability mandate.

Cal Advocates proposes to set this value at one day for now (matching it with the existing program), but they explicitly suggest that the Commission should increase this requirement if and when it identifies a specific need for multi-day reliability. This creates a potential trigger that would allow the Commission to hold multi-day resources to a performance standard that is not required of any other resource in the RA program.

Cal Advocates' MCDD proposal is not necessary, and the Commission does not need to determine at this time whether the resource adequacy program should focus on periods longer than 24-hours. This is because LDES and multi-day resources are no different than any other resource when it comes to the basic mechanics of the Slice-of-Day construct. The purpose of the SOD framework is to evaluate all resources to determine how they are reasonably expected to dispatch on the "worst day" of the month. While multi-day storage is physically capable of providing capacity over periods that far *exceed* the 24-hour SOD window, that capability simply means they can do *more* than is required under the current construct—it does not mean the construct itself must change.

The treatment of natural gas-fired plants under the slice-of-day may be a good parallel to consider; many likely can dispatch continuously for days or weeks at a time. Yet, under slice-of-day, they are treated as firm across all hours over which they are expected to have fuel, up to the full 24 hours. They are not subjected to a multi-day requirement, or multi-day analysis, simply because they have the capability to deliver beyond the slice-of-day period. The same logic should apply to LDES.[11]

Consequently, the Cal Advocates' view that the MDESR is warranted because the SOD framework will eventually need to expand into multi-day periods for multi-day storage is incorrect. The specific physical attributes of a resource should not drive the design of the entire reliability construct. The Commission can maintain the integrity of the SOD program as it exists today by simply applying an accurate analysis of how multi-day resources deploy within that 24-hour window.

V. The Cal Advocates' MDESR proposal would be discriminatory toward LDES resources by imposing a multi-day standard for dispatch that is not applied to any other resources.

Holding LDES to a multi-day standard in a 24-hour program, as suggested by Cal Advocates' MCDD proposal, would be unprincipled and result in a piecemeal regulatory construct. The current resource adequacy program, and specifically the slice-of-day framework, is built entirely around a resource's ability to serve loads during a 24-hour period, representing peak grid stress. As noted above, every other resource on the grid—from gas-fired thermal plants to 4-hour lithium-ion batteries—is accounted for based solely on its ability to meet loads

[11] If a whole new resource adequacy construct were developed in California to look at multi-day periods, it may be appropriate at that time to evaluate all resources' abilities to deliver capacity across that time period, but natural gas plants and LDES alike (plus all other resources) would need to be evaluated on that basis.

within that 24-hour window. By proposing the MCDD, Cal Advocates is inviting the Commission to impose a multi-day resource adequacy requirement on a single class of resources which is not only unnecessary, but would be discriminatory.

Contrary to the Cal Advocates' suggestion, if the Commission determines that there is a systemic need for multi-day reliability, it should establish a technology-neutral, system-wide standard where all resources can compete in their ability to meet the identified need. Forcing LDES to meet a multi-day discharge requirement while allowing a gas plant or short-duration battery to ignore the days preceding or following the SOD window is the definition of discriminatory treatment. Such an approach would undermine the value of LDES resources. And, this de-valuing would be especially ironic because it would be due to the fact that such resources *can* meet multi-day loads, even though the MCDD would presumably be increased because of an identified need for multi-day reliability.

VI. The Cal Advocates' proposal is not justified by its view that it avoids complex data needs.

Cal Advocates argues that by using data already contained within the 24-hour slice-of-day window (*i.e.* "worst day" excess energy) to calculate charging sufficiency for the preceding days, the Commission can avoid the need for LSEs to submit new, complex datasets or historical profiles. In their view, data simplicity is a controlling goal that outweighs the need for a more granular look at the days leading up to a grid stress event.

While the Joint LDES Parties appreciate the desire for an administratively simple framework, simplicity should not be used as a shield for a fundamentally flawed approach. As established in the preceding sections, using the "worst day" of the month as a proxy for charging availability is factually inaccurate and leads directly to a double-buying of resources, or costly over-procurement by customers.

The data problems cited by Cal Advocates can be reasonably and practically overcome without overwhelming LSEs or Commission Staff. In the Joint LDES Parties' proposal, we have offered a simplified implementation path: the use of "Monthly Slack Values" (or monthly multipliers). These values would be generated by the Commission or LSEs using existing Integrated Energy Policy Report (IEPR) forecasts to represent the typical load and supply delta in the days preceding the "worst day." This approach captures the physical reality of energy availability—using energy from periods of abundance—without requiring LSEs to develop bespoke daily profiles for every showing. It provides a middle path that maintains the integrity of the SOD construct while reflecting the multi-day capability of the resources being accredited.

VII. Conclusion

The Commission faces a choice between an LDES charging sufficiency proposal based on an artificial scarcity that will unnecessarily cost customers, and one based on an expected grid reality that reflects the ability of LDES resources to bring low-cost and abundant power to the grid during the worst days. The Cal Advocates' MDESR proposal is built on the flawed premise that long-duration energy storage must find its fuel on the very day the grid is most stressed. As established in these comments, this approach is logically inconsistent with grid physics, discriminatory toward LDES resources, and creates a significant burden for California's ratepayers.

In contrast, the Joint LDES Parties' proposal offers a principled, workable, and economically efficient path forward. By accounting for where charging energy actually comes from—the days of verifiable greater energy abundance and lower energy cost leading up to a peak event—the Commission can accurately value LDES while boosting reliability. It can also allow LDES resources to realize their value and provide that value to customers.

For the reasons set forth above, the California Energy Storage Alliance, Form Energy, Hydrostor, and Fourth Power respectfully request that the Commission adopt the Joint LDES Parties' Proposal for LDES accreditation and reject the MDESR framework.

This joint filing is submitted by CESA, which is authorized to file on behalf of the undersigned Joint LDES Parties.

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