

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



FILED

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

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**MIDDLE RIVER POWER LLC COMMENTS ON PROPOSED INPUTS &
ASSUMPTIONS FOR THE 2028 LOSS-OF-LOAD-EXPECTATION STUDY**

Nuo Tang
Director, Commercial & Regulatory
Tina Chase
Director, Western Regulatory & Market Affairs
Middle River Power LLC
4350 Executive Drive, Suite 320
San Diego, California 92121
Phone: (619) 229-3770
Email: ntang@mrpgenco.com
Email: tchase@mrpgenco.com

Joe Dubinski
Senior Vice President & General Counsel
Middle River Power LLC
1 N Franklin St., Suite 2600
Chicago, IL 60606
Phone: (312) 381-8559
Email: jdubinski@mrpgenco.com

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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

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MIDDLE RIVER POWER LLC COMMENTS ON PROPOSED INPUTS & ASSUMPTIONS FOR THE 2028 LOSS-OF-LOAD-EXPECTATION STUDY

In accordance with Administrative Law Judge Debbie Chiv’s *Administrative Law Judge’s Ruling Modifying 2028 Loss of Load Expectation Study Schedule* (“ALJ Ruling”), issued on March 30, 2026, Middle River Power LLC (“MRP”) hereby submits these comments on Energy Division’s (“ED”) *Proposed Inputs and Assumptions: SERVVM 2026 Data Updates in Support of Resource Adequacy (RA) and Integrated Resource Planning (IRP)* (“Proposed I&A”), provided on April 9, 2026,¹ and the related workshop on April 14, 2026.²

I. INTRODUCTION

MRP appreciates ED’s efforts to explain the detailed analysis underlying the proposed Inputs and Assumptions (“I&A”) for the 2028 Loss-of-Load-Expectation (“LOLE”) Study. This is a significant undertaking, and as described in more detail below, MRP recommends several process improvements and clarifications to streamline the study process and facilitate stakeholder review.

¹ All citations to ED’s Proposed I&A are to Appendix A of Administrative Law Judge Debbie Chiv’s *Administrative Law Judge’s Ruling on Energy Division’s Proposed Inputs and Assumptions*, issued on April 10, 2026, <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M604/K541/604541829.PDF>.

² See *Workshop on 2026 LOLE Inputs and Assumptions* at <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/resource-adequacy-homepage/resource-adequacy-history>.

II. DISCUSSION

A. The LOLE Study Methodology Should Be Refined to Ensure the Inclusion of New In-Development Resources

ED's Proposed I&A document, as well as the April 14 workshop slides, state that "[i]f the 2028 electric system is found to be unreliable (annual LOLE > 0.1), staff will reduce LOLE in individual months by adding Perfect Capacity (PCAP)."³ MRP recommends that, to the extent feasible, ED instead utilize new in-development resources added to the CAISO Generation Interconnection Resource ID Report after the August 2025 vintage referenced in Table 1 of ED's Proposed I&A document.⁴ As ED acknowledged during the workshop, there is no PCAP accreditation in the Slice of Day ("SOD") RA framework, thus additional work would be required to translate the PCAP amount into a resource need and resulting reserve margin, likely using combustion turbine ("CT") and/or a combination of solar and storage assumptions. Although solar and storage may represent a portion of planned development resources, new CT development is unlikely, and relying entirely on these technologies would be inaccurate. Conversely, incorporating new in-development resource data would yield robust results by better aligning LOLE study results with the anticipated makeup of California's future portfolio, as well as reducing, and potentially eliminating, the need for any PCAP assumptions and associated translation work. MRP understands the need for a baseline cutoff date, which necessarily excludes more recent data, but encourages ED to consider using new in-development resources added after this date in the event capacity must be added to reach 0.1 LOLE. If this proves

³ *Proposed I&A*, at 48; see also *Resource Adequacy (R.25-10-003) Track 2 Workshop Proposed Inputs and Assumptions Update*, April 14, 2026, at 74, https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/r25-10-003/ra_draft_i-a_workshop_20260414.pdf.

⁴ *Proposed I&A*, at 10.

infeasible, of the two translation options provided, MRP recommends that ED use solar and storage assumptions given that this would be more realistic than assuming additional CT buildout.

B. The Final I&A Would Benefit from Additional Clarification

Several elements of ED's Proposed I&A require clarification. First, during the April 14 workshop, ED indicated in discussion via the Webex chat that the Final I&A will be used to produce an unforced capacity ("UCAP") based planning reserve margin ("PRM"), and that a physical maximum ("Pmax") based PRM *may* also be provided. MRP submits that both a UCAP-based and Pmax-based PRM should be provided to maintain consistency with ED's Track 1 Proposal and provide a PRM that the Commission can use if UCAP is either delayed or not adopted. ED's Track 1 Proposal states that Staff "propose[s] to retain the current methodology for calculating [qualifying capacity] QC for resources subject to UCAP, as QC values interact with [California Independent System Operator] CAISO tariff requirements and will remain unchanged."⁵ In other words, there are two distinct use cases for the PRM, RA SOD compliance and CAISO RA processes, which necessitates the calculation of two PRMs.⁶

Second, during the workshop, contradicting information was provided regarding PRM granularity (annual, seasonal, and monthly). Staff suggested that the LOLE study would result in annual and seasonal PRMs while the Proposed I&A document mentions surfacing annual and monthly LOLE and requests stakeholder comments on the proposed approach.⁷ MRP supports

⁵ *Energy Division Staff Proposals in Proceeding R.25-10-003*, January 23, 2026, at 32, <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M596/K296/596296848.PDF>.

⁶ *Middle River Power LLC Reply Comments on Track 1 Proposals*, March 20, 2026, at 3-7, <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M602/K998/602998717.PDF>.

⁷ *Proposed I&A*, at 48.

ED’s proposal to “concentrate LOLE in the summer months of June through September,”⁸ as this could result in annual and seasonal PRMs that are more balanced. MRP recommends the LOLE analysis provide annual and seasonal PRMs,⁹ and if time permits, monthly PRM values would also help to inform party discussions and proposals.

Finally, ED’s Proposed I&A states that “[u]nit maximum outputs are quantified at Net Dependable Capacity and do not use the capping at monthly NQC convention that IRP modeling uses.”¹⁰ This is understandable for certain resources such as wind or solar resources, but the LOLE study should also ensure that such resources are deliverable. Deliverability is a critical requirement of the RA program, and further detail regarding this element of the I&A would be helpful for stakeholders. MRP recommends that ED verify whether projects under development have deliverability to ensure that energy-only resources are not counted towards the deliverable supply, which could improperly inflate the PRM.

C. The LOLE Studies and PRM Proposals Should Be Clearly Delineated

MRP appreciates the opportunity for iterative stakeholder input on both the 2028 LOLE studies and 2028 and 2029 PRM proposals. As a process enhancement for this cycle, MRP recommends that the LOLE studies and PRM proposals be filed as separate documents, and that any deviations between the study results and proposals be supported by analysis. This is not intended to be a change to the schedule set forth in the ALJ Ruling or to yield multiple LOLE studies or PRM scenarios, rather it is an effort to ensure that the LOLE study results are clearly

⁸ *Id.*

⁹ MRP notes that a seasonal PRM may be most appropriate for the UCAP-based PRM, as this would align with the proposed UCAP framework.

¹⁰ *Proposed I&A*, at 10.

delineated from the PRM proposals, which have differed in the past. For example, in the prior LOLE study cycle, ED's December 2024 LOLE study included PRM proposals that deviated from the study results, making it difficult for stakeholders to understand the anticipated LOLEs.¹¹ The Commission subsequently adopted 2026 and 2027 PRMs that were simply directionally consistent with the results of ED's LOLE studies,¹² a decision that was similarly problematic in that the anticipated LOLEs were unclear. Going forward, PRM proposals that differ from the LOLE study results should be contained in their own separate documents and paired with supporting analysis. In practice, this would result in ED, and any stakeholder that performs its own LOLE study, filing an LOLE study with an attachment for each PRM proposal. Providing this level of transparency would help to facilitate well-informed feedback and enable stakeholders to better understand the impact of the ultimately adopted 2028 and 2029 PRMs.

I. CONCLUSION

MRP appreciates the opportunity to provide these comments.

Respectfully submitted,

s/ Joe Dubinski

Joe Dubinski

Senior Vice President & General Counsel

Middle River Power LLC

1 N Franklin St., Suite 2600

Chicago, IL 60606

Phone: (312) 381-8559

Email: jdubinski@mrpgenco.com

¹¹ *Appendix B to Loss of Load Expectation Study for 2026: Revised Slice of Day Tool Analysis*, December 20, 2024, at 2-3, https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/slice-of-day-compliance-materials/appendix-b-lole-and-sod-prm-proposal_dec2024.pdf.

¹² *Decision Adopting Local Capacity Obligations for 2026-2028, Flexible Capacity Obligations for 2026, and Program Refinements* (D.25-06-048; R.23-10-011), June 27, 2025, at 34, 38, <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M571/K237/571237404.PDF>.

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