



**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  
COMMENTS ON PROPOSED INPUTS AND ASSUMPTIONS  
FOR 2028 LOSS OF LOAD EXPECTATION STUDY**

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**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

**AMERICAN CLEAN POWER-CALIFORNIA  
COMMENTS ON PROPOSED INPUTS AND ASSUMPTIONS  
FOR 2028 LOSS OF LOAD EXPECTATION STUDY**

In accordance with the March 30, 2026 *Administrative Law Judge’s Ruling Modifying 2028 Loss of Load Expectation Study Schedule* and the April 10, 2026 *Administrative Law Judge’s Ruling on Energy Division’s Proposed Inputs and Assumptions*, both issued by Administrative Law Judge Debbie Chiv, American Clean Power – California (“ACP-California”)<sup>1</sup> respectfully submits the following comments on the Proposed Inputs & Assumptions (“Draft I&A”) released April 9, 2026. ACP-California’s members are active participants in the Resource Adequacy (“RA”) market and share the California Public Utilities Commission’s (“Commission”) interests in an effective, efficient, and stable RA program that is capable of serving the state’s reliability needs at least cost and in alignment with the state’s environmental policies.

ACP-California’s recommendations focus on three areas of the Draft I&A:

- Representation of Uncontracted Import Energy

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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.

- Annual and Monthly Modeling and Compliance Dynamics
- Implementation of Unforced Capacity

In these comments, ACP-California provides an overview of its questions, concerns, and recommendations, and cites to reports and other regulatory discussions supporting its recommendations.

### **I. Representation of Uncontracted Import Energy**

The role of import resources is a key input assumption in the Commission’s resource planning proceedings and has increasingly significant implications for the Commission’s Loss of Load Expectation (“LOLE”) study. ACP-California recognizes the import assumption as a key uncertainty within the study and one which may be fairly difficult to parameterize “accurately” given unknowns regarding the resource balance in the broader west. ACP-California urges Energy Division to reconsider past practices regarding the import assumption and to refresh its assumption and methodology to reflect the expected declining availability of uncommitted energy resources from legacy trading partners.

Specifically, ACP-California is concerned that the most recent import assumptions used in the development of the 2026-2027 Transmission Planning Process (“TPP”) Portfolio and the Mid-Term Reliability Procurement Order for 6,000 megawatts (“MW”) of effective capacity significantly overstate the ability of the California Independent System Operator (“CAISO”) system to rely on neighboring utilities to support CAISO reliability. The Draft I&A does not materially depart from this past assumption creating a material risk of over-reliance on unspecified imports.<sup>2</sup>

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<sup>2</sup> See Draft I&A p. 43, and the Commission’s Inputs & Assumptions for 2024-2026 Integrated Resource Planning (February 2025), p. 138, 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)

**A. The Commission Should Revise Load and Resource Forecasts for External Zones or Exclude External Zones from Study.**

The Draft I&A maintains the past practice of modeling CAISO in connection with external zones that have been calibrated based on data from the Western Electricity Coordinating Council (“WECC”) Anchor Dataset and a survey of Integrated Resource Planning (“IRP”) data. As discussed at length in ACP-California’s comments on the 2026-2027 TPP Portfolios,<sup>3</sup> ACP-California is concerned that this legacy approach may no longer be suitable given the rapidly shifting reliability landscape in the broader west.

In contrast to the prior analysis, which did not find regional reliability risks until 2030, serious reliability concerns have emerged with nearly all of CAISO’s historic resource trading partners. This is likely a function of the dated information provided in the WECC Anchor Data Set (from 2024),<sup>4</sup> the surge in regional load forecasts, including for CAISO, and significant delays in regional resource development due to federal trends and other headwinds affecting or delaying new capacity development.

A survey of recent planning studies highlights serious deficiencies across the west, with few if any utilities reporting substantial length available for resale to CAISO:

- **California – 10 gigawatts (“GW”) by 2032:** The Commission’s 2025 Mid-Term Need Determination Analysis identified a gap of 6,000 MW of effective capacity by 2032, while assuming the availability of up to 4,000 MW of uncontracted imports in peak hours, and up to 10,000 MW of uncontracted imports in off-peak hours.<sup>5</sup>

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<sup>3</sup> See *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* (October 22, 2025), R.25-06-019, pp. 7-14, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M584/K704/584704073.PDF>.

<sup>4</sup> WECC Anchor Data Set (July 5, 2024), available at: <https://www.wecc.org/program-areas/reliability-planning-performance-analysis/reliability-modeling/anchor-data-set-ads>.

<sup>5</sup> *Mid-Term Need Determination Analysis* (September 30, 2025), 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).

- **Pacific Northwest – 12 GW by 2030:** Energy and Environmental Economics (“E3”) identified a gap of 8,700 MW by 2030, a value that assumes 3,750 MW of firm imports, with only approximately 3 GW of resources in development.<sup>6</sup>
- **Nevada – 3-5 GW by 2030:** NV Energy’s preliminary IRP analysis identifies a capacity deficiency of approximately 3-5 GW by 2030.<sup>7</sup>
- **Arizona:** Both Arizona Public Service<sup>8</sup> and the Salt River Project<sup>9</sup> forecast thousands of megawatts of new loads by 2030.
- **New Mexico:** Public Service Company of New Mexico appears to be approximately in balance, with deficiencies emerging under a high economic growth scenario.<sup>10</sup>
- **Colorado:** Public Service Company of Colorado projects a gap of 1,600 MW by 2030 in their 2025 Resource Adequacy filing.<sup>11</sup>

ACP-California is concerned that these regional deficiencies are not accurately reflected in either the WECC Anchor Dataset or prior IRP filings, resulting in a significantly rosier view of regional reliability within the model than should be expected in reality. For example, PacifiCorp’s 2025 IRP dramatically reduced new resource acquisitions in comparison to the 2023

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<sup>6</sup> E3, *Resource Adequacy and the Energy Transition in the Pacific Northwest* Final Report (April 2026), available at: [https://www.ethree.com/wp-content/uploads/2026/04/E3-NW-RA-Final-Report\\_040826.pdf](https://www.ethree.com/wp-content/uploads/2026/04/E3-NW-RA-Final-Report_040826.pdf).

<sup>7</sup> NV Energy, 2026 Integrated Resource Plan (“IRP”) Stakeholder Briefing (January 14, 2026), available at: [https://www.nvenergy.com/publish/content/dam/nvenergy/brochures\\_arch/cleanenergy/2026-IRP-Stakeholder-Briefing.pdf](https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/cleanenergy/2026-IRP-Stakeholder-Briefing.pdf).

<sup>8</sup> Arizona Public Service, Large Load Users Development in Arizona Workshop (April 16, 2026), available at: <https://docket.images.azcc.gov/E000050833.pdf?i=1776811221614>.

<sup>9</sup> Salt River Project, Large Load Workshop, Arizona Corporation Commission (April 16, 2026), available at: <https://docket.images.azcc.gov/E000050832.pdf?i=1776811221614>.

<sup>10</sup> Public Service Company of New Mexico (“PNM”), PNM IRP Facilitated Stakeholder Workshop 5 (April 15, 2026), available at: <https://gridworks.org/wp-content/uploads/2026/04/PNM-IRP-2026-Workshop-5-for-Posting.pdf>.

<sup>11</sup> Public Service Company of Colorado, Xcel Energy - PSCo Resource Adequacy 2025 (April 28, 2025), available at: [https://xcelnew.my.salesforce.com/sfc/p/#1U0000011ttV/a/R3000006QOWH/8BVhp\\_eRQJ3fOfVvEpzeu2spaM7t1GDhZnRIUKLy7N8](https://xcelnew.my.salesforce.com/sfc/p/#1U0000011ttV/a/R3000006QOWH/8BVhp_eRQJ3fOfVvEpzeu2spaM7t1GDhZnRIUKLy7N8).

IRP,<sup>12</sup> and the recent 2025 IRP update introduced a reliance on market imports to meet firm capacity needs.<sup>13</sup>

**B. The Commission Should Remove Pacific Northwest hydro designated as remote generators.**

The Draft I&A assigns 8.31% of Pacific Northwest hydro as a remote generator available to the CAISO system as a dedicated resource based on historic total energy flows reported from the California Air Resources Board emissions inventory.<sup>14</sup> Similar to the methodology for uncontracted imports, this assumption aligns with past IRP and RA processes, but creates risks of overreliance in light of the trends discussed above.

This assumption errs in conflating energy sales from the Pacific Northwest, commonly structured as “index-plus” transactions for carbon-free attributes which defer scheduling and delivery of energy to the seller, with true firm reliability commitments from these resources aligned with the Commission’s or CAISO’s RA requirements. While the Commission has a framework for requiring bidding in unspecified import contracts, there is no guarantee beyond year-ahead and month-ahead showings that these resources will actually be available to the CAISO. Further exacerbating this risk, it is not atypical for the sellers of these transactions to require the buyers to provide replacement energy, which may be committed from CAISO generators (among other sources), negating some or all energy flows into CAISO from a reliability perspective.

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<sup>12</sup> PacifiCorp, *2025 Integrated Resource Plan* (March 31, 2025), available at: [https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025\\_IRP\\_Vol\\_1.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025_IRP_Vol_1.pdf).

<sup>13</sup> PacifiCorp, *2025 Integrated Resource Plan Update* (March 31, 2026), available at: [https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025\\_IRP\\_Update.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025_IRP_Update.pdf).

<sup>14</sup> Draft I&A, p. 24.

Moving forward, the implementation of the Western Resource Adequacy Program (“WRAP”), and broader trends toward tightening markets in the broader west are likely to reduce the availability of these resources from an energy, capacity, or environmental attribute perspective. Grant County Public Utility District (“Grant PUD”), which has supplied a significant share of California’s hydro imports, recently advised its board that its resale strategy would need to be revisited given rising native loads and corresponding reliability and environmental requirements.<sup>15</sup>

**C. The Commission Should Proactively Evaluate New Priority Exports.**

In addition to adjusting the import assumptions, we also recommend the Commission analyze the risk that utilities in other Balancing Authority Areas may seek to contract with capacity native to CAISO that has historically been available to serve CAISO load. In light of declining capacity prices and risks of derating (e.g., Unforced Capacity), it is possible that resources inside CAISO will commit to sell capacity outside of CAISO and in light of the capacity constraints in other regions noted above, the Commission should plan for generators within the CAISO footprint to serve as priority exports to other regions. It is likely that this interest will grow as WRAP and the proposed EDAM RA program go into effect. ACP-California recommends the Commission coordinate with CAISO to remove any generators with forward commitments outside of CAISO from the RA study. As data on priority exports becomes available, the Commission should proactively remove CAISO generators from its inputs/assumptions that are committed as priority exports.<sup>16</sup>

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<sup>15</sup> Grant PUD, Commission recap, 8/12/2025 -- Power costs to rise as Grant PUD grows, diversifies (August 15, 2025), available at: <https://www.grantpud.org/blog/commission-recap-8-12-2025-power-costs-to-rise-as-grant-pud-grows-diversifies>.

<sup>16</sup> Draft I&A, p. 24.

## **II. Annual and Monthly Modeling and Compliance Dynamics**

ACP-California reiterates its past support for the use of annual reliability metrics and the application of a Planning Reserve Margin (“PRM”) framework that would require sufficient reliability resources to mitigate reliability risk throughout any risk month.<sup>17</sup>

From a methodological perspective, ACP-California recommends identifying what portfolio is needed to meet reliability on an annual basis. This analysis should then be used to ensure any month with reliability risk – likely summer peak months for the near-term, but potentially extending the analysis to include winter peak months. This could include a distinct PRM for winter months which requires load-serving entities to show resources up to the full portfolio assessed as needed for system reliability.

As the LOLE study is translated into a PRM, ACP-California encourages the Commission to solicit party input on the translation process, including proposals to ensure sufficient reliability across key months and conformance with the 1-10 LOLE requirements set forth in state statute.<sup>18</sup>

## **III. Implementation of Unforced Capacity**

ACP-California appreciates the Commission’s ongoing efforts to implement Unforced Capacity and looks forward to additional detail in the study. We also encourage the Commission to evaluate how derated resources can more effectively utilize and market their full interconnection and capacity value. The Commission should evaluate adjustments to the must-

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<sup>17</sup> See *American Clean Power – California Track 1 Revised Proposals* (Feb. 23, 2024), R.23-10-011, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M526/K148/526148079.PDF>.

<sup>18</sup> Public Utilities Code § 380(b)(4) mandates that the CPUC’s Resource Adequacy (RA) program must be designed to: “[r]easonably maintain a standard measure of reliability, such as a one-day-in-10-year loss-of-load expectation or a similarly robust reliability metric adopted by the commission, and use it for planning purposes.”

offer obligation to ensure that resources can develop additional capacity to fully utilize their interconnection capacity. In addition, the Commission should direct Energy Division to coordinate with staff working on the IRP proceeding to evaluate how physical capacity additions to maximize interconnection value can count as incremental for IRP procurement orders.

#### **IV. Conclusion**

ACP-California appreciates the opportunity to comment on the inputs and assumptions and commends staff for their efforts to ensure the inputs and assumptions fairly reflect future reliability conditions. We also thank staff for their collaboration with parties on this important work.

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Respectfully submitted,

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