

**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

**REPLY COMMENTS OF EDF POWER SOLUTIONS ON PROPOSED  
DECISION**

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June 26, 2026

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**I. Introduction**

In accordance with Rule 14.3(d) of the Commission’s Rules of Practice and Procedure, Electricite de France power solutions North America (“EDFps”) submits the following reply comments in response to the proposed *Decision Adopting Local Capacity Obligations for 2027-2029, Flexible Capacity Obligations for 2027, and Program Refinements* (“PD”), issued on June 1, 2026. EDFps’ opening comments focused on one issue. With this reply, EDFps expresses its position on an important policy issue raised by other parties, in agreement with those specified parties.

**II. The PD’s Determination Regarding Bidding and Allocation for Specified CAISO Market Products Should be Reversed**

A number of parties contend that the determinations in the PD regarding the bidding and revenue allocation for new California Independent System Operator (CAISO) Imbalance Reserve (IR) and Reliability Capacity (RC) products constitute legal and factual error and must be reversed. EDFps agrees with these parties.

The PD incorrectly conflates IR and RC with resource adequacy capacity. As REV Renewables states “(w)hile the Commission highlights how IR and RC work in concert and both

*serve reliability needs, that observation does not establish that both are RA capacity products. Many products serve reliability needs without being classified as capacity – spinning reserves and ancillary services are prime examples – and the Commission should treat IR no differently.”*<sup>1</sup> CAISO describes the distinction between IR and RC and RA capacity and RUC capacity and explains that “...the presumption that all RA already compensates for IR and RC is misplaced. This erroneous conclusion, and the resulting bidding restrictions, would have adverse consequences for reliability, market efficiency, and the benefits we expect to receive from regional markets.”<sup>2</sup> Along the same line, CESA points out that “...(i)t is incorrect to categorize Imbalance Reserves as an RA capacity product...the product itself provides intra-hour flexibility like the current flexible ramping product, and unlike the RUC products which provide inter-hour flexibility.”<sup>3</sup>

EDFps also concurs with parties Middle River Power LLC<sup>4</sup>, Independent Energy Producers Association<sup>5</sup>, and American Clean Power California, particularly in explaining the upset that the PD would create in requiring renegotiation of existing contracts.<sup>6</sup>

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<sup>1</sup> *REV Renewables, LLC Opening Comments on the Proposed Decision Adopting Local Capacity Obligations for 2027-2029, Flexible Capacity Obligations for 2027, and Program Refinements.* June 22, 2026. Page 4.

<sup>2</sup> *Opening Comments of the California Independent System Operator Corporation on the Proposed Decision Adopting Local Capacity Obligations for 2027-2029, Flexible Capacity Obligations for 2027, and Program Refinement.* June 22, 2026. Pages 4-5.

<sup>3</sup> *Comments of the California Energy Storage Alliance on Administrative Law Judge’s Proposed Decision Adopting Local Capacity Obligations for 2027-2029, Flexible Capacity Obligations for 2027, and Program Refinements.* June 22, 2026. Page 14.

<sup>4</sup> *Middle River Power LLC Opening Comments on Track 1 Proposed Decision.* June 22, 2026. Pages 8-9.

<sup>5</sup> *Independent Energy Producers Association’s Comments on Proposed Decision Adopting Local Capacity Obligations for 2027-2029, Flexible Capacity Obligations for 2027, and Program Refinements.* June 22, 2026. Page 4.

<sup>6</sup> *American Clean Power-California Opening Comments on Proposed Decision Adopting Local Capacity Obligations for 2027-2029, Flexible Capacity Obligations for 2027, and Program Refinements.* June 22, 2026. Pages 7-11.

### III. Conclusion

EDFps supports the comments of other parties and joins them in contending that the PD's determinations relating to bidding and classification of IR and RC are improper and must be reversed.

Respectfully submitted,

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