BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue Oversight of Electric Integrated Resource Planning and Related Procurement Processes.	Rulemaking 25-06-019

WESTLIGHT ENERGY
2026 INTEGRATED RESOURCE PLAN

PUBLIC VERSION

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Counsel to WestLight Energy

August 7, 2026

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OF THE STATE OF CALIFORNIA

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In accordance with the requirements of California Public Utilities Code Sections 454.51 and 454.52, Ordering Paragraph 14 of the California Public Utilities Commission's ("Commission") *Decision Adopting 2021 Preferred System Plan* ("D.22-02-004"), and the June 15, 2022 *Administrative Law Judge's Ruling Finalizing Load Forecasts and Greenhouse Gas Emissions Benchmarks for 2022 Integrated Resource Plan Filings*, WestLight Energy ("WestLight") hereby submits its 2026 Integrated Resource Plan ("IRP") and related documents to the Commission for certification.

Attached to this filing are the following documents associated with WestLight's 2026 IRP:

- Attachment A – Narrative Template (Public Version);
- Attachment B – Resource Data Template (Public Version);
- Attachment C – Clean System Power Calculator;
- Attachment D – Signed Board Attestation of Approval of IRP.

WestLight thanks the Commission for its time and effort in the 2026 IRP cycle and respectfully requests the Commission certify its 2026 IRP as consistent with the requirements of Sections 454.52(b)(3) and 454.51(d) and (e) of the California Public Utilities Code, and Commission direction.

Respectfully submitted,

/s/ Ann C. Springgate

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Dated: August 7, 2026

OFFICER VERIFICATION

I, Shawn Marshall, am an officer of WestLight Energy, and am authorized to make this verification on its behalf. The statements in the documents attached hereto are true of my own knowledge, except as to matters that are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet formats used in the supporting documents used to file this report have not been altered from the version issued or approved by the Energy Division.

I declare under penalty of perjury that the preceding is true and correct.

Executed on August 7, 2026 at Redwood City, California



Shawn Marshall
Chief Executive Officer
WestLight Energy

ATTACHMENT A

Standard LSE Plan

WESTLIGHT ENERGY

2026 INTEGRATED RESOURCE PLAN

AUGUST 10, 2026

Public Version

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I. Executive Summary

In accordance with the requirements of Senate Bill 350 and the California Public Utilities Commission (CPUC or Commission) 2024-2027 IRP Filing Requirements, WestLight Energy (WestLight), formerly known as Peninsula Clean Energy (PCE), respectfully submits its 2026 Integrated Resource Plan (IRP). The IRP is comprised of this written narrative as well as the following attachments as provided by the CPUC:

i. Completed CPUC Resource Data Template (RDT) - 8MMT Conforming
ii. Completed CPUC Clean System Power Calculator (CSP Calculator) - 8 MMT Conforming

This IRP was approved by WestLight's Board of Directors on July 23, 2026, and the resolution documenting this approval is attached as Appendix D.

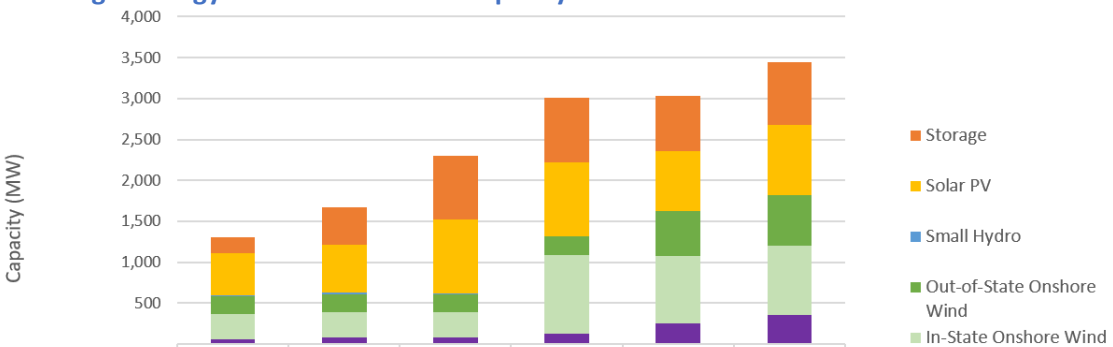
In the 2024-2027 IRP cycle, WestLight staff performed the modeling in-house. WestLight staff used the MATCH (Modeling Around-The-Clock Hourly energy) model, as discussed in further detail in Section II.b, to develop the cost-optimal portfolio that met all the specified planning goals. Staff then used the proprietary PowerSIMM software, developed by Ascend Analytics, to perform a stochastic evaluation of the selected portfolio.

WestLight is submitting a single conforming portfolio that exceeds the emissions reduction goals of the 8 Million Metric Tons of CO_2 (MMT) scenario. This preferred portfolio meets all the regulatory requirements of the IRP process and implements WestLight's voluntary goal to deliver 100% renewable energy on an annual basis by 2030 in a manner that can maximize WestLight's goal of hourly matching of renewable energy to its load while prioritizing reducing grid emissions and customer costs. Table 1 shows how WestLight's Preferred Portfolio performs better than its emissions benchmarks. Figure 1 shows the portfolio composition by nameplate capacity. In the sections below, WestLight provides further details on the composition of this portfolio and discusses its methodology for portfolio development.

Table 1: WestLight Energy Preferred Portfolio Emissions

	2028	2030	2035	2040	2045
Assigned Load Forecast (GWh)	3,899	4,452	5,998	7,181	7,957
8 MMT GHG Benchmark (MMT CO_2)		0.359	0.310	0.280	0.151
WestLight Energy Preferred Portfolio Emissions (MMT CO_2)	0.131	0.226	0.253	0.212	0.150

Figure 1: WestLight Energy Preferred Portfolio Capacity



	Current Portfolio	2028	2030	2035	2040	2045
Storage	197	458	772	787	669	758
Solar PV	505	590	904	904	737	863
Small Hydro	15	15	15	11		
Out-of-State Onshore Wind	220	220	220	220	550	620
In-State Onshore Wind	304	316	307	969	819	840
Geothermal	61	75	80	121	255	358

This Integrated Resource Plan is organized into the following sections. Section II, Study Design, describes WestLight's planning objectives, modeling methodology, and key assumptions used to develop its Preferred Portfolio. Section III, Study Results, presents the results of the portfolio analysis, including the Preferred Portfolio, greenhouse gas emissions, local air pollutant and disadvantaged community analyses, cost and rate impacts, system reliability, and planning assessments for existing resources, hydroelectric generation, long-duration storage, clean firm resources, out-of-state wind, offshore wind, and transmission. Section IV, Action Plan, describes WestLight's expected procurement activities, customer and community programs, procurement products, barriers and risks to implementing the Preferred Portfolio, and recommendations for improving California's integrated resource planning process. Finally, Section V, Lessons Learned, summarizes key observations from this planning cycle and identifies opportunities to improve future resource planning and procurement.

a. About WestLight Energy

Following a comprehensive feasibility study and consistent with AB 32 voluntary action pathways, elected officials from each member jurisdiction within San Mateo County unanimously agreed to form Peninsula Clean Energy in February 2016 to meet local climate action goals and benefit San Mateo County. The agency was established as a joint powers authority consisting of the County of San Mateo and all twenty of its towns and cities. The mission of the agency is to provide affordable, clean electricity and advance local solutions that lower costs, reduce pollution, and strengthen community resilience. In 2020, following another comprehensive feasibility study, elected officials from the City of Los Banos voted to join the agency, and service for Los Banos customers began in 2022. In 2026, Peninsula Clean Energy adopted the name WestLight Energy to better reflect the communities it serves and provide a clearer, more recognizable identity as the organization continues to grow and support the clean energy transition. While the name has changed, WestLight Energy's mission, programs, and commitment to serving its communities remain unchanged. Today, WestLight Energy is a joint powers authority consisting of the County of San Mateo, all twenty of its towns and cities, and the City of Los Banos in Merced County.

WestLight provides cleaner electricity at lower rates than the incumbent investor-owned utility (IOU), Pacific Gas & Electric Company (PG&E). WestLight plans for and secures commitments from a diverse portfolio of carbon free and renewable energy-generating resources to reliably serve the electric energy requirements of its customers over the near-, mid-, and long-term planning horizons. WestLight was the second CCA in California to obtain an investment-grade credit rating from Moody's in May 2019. WestLight currently maintains investment-grade ratings of A3 from Moody's and A- from Standard & Poors (S&P). WestLight also offers programs to customers, including those that advance the adoption of electric transportation and transition building fuel uses to low carbon electricity. For more information on WestLight Energy, please go to www.westlightenergy.org.

As part of its mission-driven, collaborative, not-for-profit, locally focused roots, WestLight is committed to the following guiding principles[1]:

1. Environmental Impact
   WestLight was founded on the vision of a sustainable world for everyone; a world in which energy choice can dramatically reduce harmful greenhouse gas emissions by accelerating the transition from a fossil-based grid to one that runs principally on carbon-free and renewable resources. WestLight will continue to be a champion for the environment in its procurement and program initiatives. WestLight will continue to include environmental justice in its decision-making and support new clean energy technologies that leverage local renewables to benefit energy resilience and reliability.
2. Customer-Focused Approach
   WestLight would not exist without its customers. Keeping customer and community needs at the forefront of decision-making and program design while seeking to provide affordable energy is central to WestLight's continued success and will be at the core of what differentiates WestLight from other providers in the future. WestLight's customers are not only the clients it serves; they are WestLight's critical partners in the transition to a clean energy future.
3. Economic Development
   In its quest to expand renewable energy production, support electrification, and reduce greenhouse gases, WestLight will serve as an economic engine for its service area. This includes maintaining affordable electric generation rates, investing in local decarbonization and electrification efforts, supporting the development of electrified housing, advancing new local renewable energy projects, and strengthening the green economy through local workforce development and jobs.
4. Driving Innovation
   WestLight will continue to be an innovator and thought leader in the CCA industry — recognized locally, statewide and nationally for its leading-edge renewable procurement strategies, scalable building and transportation programs and policies, workforce DEAI initiatives, and piloted distributed energy resource projects. These efforts, designed to be replicated, will maximize environmental, economic, and customer impact while resulting in broader market change.

[1] https://www.westlightenergy.org/wp-content/uploads/2026/03/Our-Strategy-at-a-Glance-2026-2030-Strategic-Plan.pdf

In addition to these guiding principles, WestLight is committed to the following strategic policies in its 2026-2030 strategic plan:

1. Procurement

WestLight will maintain a 100% zero-carbon power resource portfolio according to the CEC's Power Source Disclosure Program while working towards delivering 100% renewable energy on an annual basis by 2030 through strategic and cost-effective procurement that can maximize WestLight's 24/7 hourly matching of renewable energy to WestLight's load while prioritizing reducing grid emissions and customer costs. This policy statement encompasses the following key elements:

- Continued commitment to achieving industry-leading renewable energy targets
- Built-in flexibility on the 24/7 hourly matching goal to balance against cost impacts on WestLight's customers
- Emphasis on strategic procurement to minimize cost and risk exposure to WestLight, limit cost pressures for customers, and maintain WestLight's financial health
- Targeted 60% minimum Renewable Portfolio Standard (RPS) of WestLight's annual retail sales prior to 2030, with flexibility on the remaining portfolio composition to balance incremental gains toward the 100% renewable goal while maintaining cost competitiveness
- Operating WestLight's resource fleet to reduce grid emissions by displacing fossil fuel generation

2. Equity Programs

WestLight will reduce GHGs as quickly as possible by continuing to deliver programs and services that benefit all customers, including designing certain programs and services with equity and vulnerable customers' needs in mind by:

- Prioritizing rate affordability for all customers
- Advancing policy initiatives and utilizing external (non-WestLight-ratepayer) funding for programs that benefit vulnerable and equity customers, improving affordability and access to WestLight services and benefits
- Partnering with community-based organizations (CBOs) as outreach partners to engage diverse and vulnerable communities, support equity customers, and gather feedback on ways to improve its services

3. Distributed Energy Resources

WestLight will accelerate the development of carbon-free distributed energy resources (DERs) to drive innovation and market transformation of distributed and advanced energy technologies, accelerate greenhouse gas (GHG) reductions, and enhance community resilience, including:

- Expanding DER project development support
- Increasing customer access to capital for DER/electrification projects
- Providing technical assistance and support for local resiliency projects
- Advancing relevant policy development and advocacy

4. Operational Excellence

WestLight will invest in its people, infrastructure, systems, and processes to strengthen effectiveness, efficiency, and resiliency. WestLight operations will align with industry best practices, leverage technology, and support a high-performing workforce equipped to meet evolving customer and stakeholder needs, while advancing the Agency's commitments to diversity, equity, and inclusion. Operational enhancements support WestLight's ability to meet its mission and include:

- Maintaining strong and effective Agency governance
- Best-in-class rate analysis/design and prudent financial management
- Scaling project and process optimization through effective use of technology
- Empowering an agile, motivated, and diverse workforce
- Driving decisions with quality data
- Ensuring cybersecurity and IT resilience
- Promoting equity and accessibility in operations
- Managing risk and maintaining regulatory compliance

WestLight is governed by its publicly elected Board of Directors. Each member jurisdiction from San Mateo County, plus the City of Los Banos, has one seat on WestLight's Board of Directors (except for San Mateo County, which has two) for a total of 23 elected officials acting as board members.

The Board of Directors is responsible for setting the overall strategy for WestLight Energy, including rate setting and energy procurement decisions. Board meetings are held on the fourth Thursday of each month at 6:30 PM at WestLight's offices in Redwood City. As prescribed by the Brown Act, all Board meetings are open to the public both in-person and via online video conferencing and all meeting materials are posted online. The decisions of the Board are binding requirements for WestLight Energy.

WestLight is a member of California Community Power (CC Power), a joint powers authority comprised of nine CCAs that facilitates collaborative long-term resource procurement. Through CC Power, member agencies jointly procure large-scale and emerging clean energy resources, allowing participating CCAs to diversify risk, achieve economies of scale, and support development of technologies that may be difficult to procure independently.

WestLight is also a member of the California Community Choice Association (CalCCA), a statewide trade association representing community choice aggregators throughout California. Through CalCCA, WestLight collaborates with other CCAs on legislative, regulatory, and policy matters affecting community choice energy programs and their customers. CalCCA advocates before the California Public Utilities Commission, California Energy Commission, California Independent System Operator, and state legislature on issues including resource planning, procurement, resource adequacy, customer affordability, and local energy choice. Participation in CalCCA helps ensure that the interests of WestLight and its customers are represented in statewide energy policy discussions and decision-making processes.

i. Enrolled Customers

WestLight serves over 315,000 customer accounts representing approximately 780,000 residents. Table 2 illustrates the breakdown between commercial/industrial customers and residential customers in WestLight's service territory.

Table 2: WestLight Energy Breakdown by Customer Type

Stats as of Dec. 2025	Total WestLight Energy	Residential	Commercial, Industrial
Number of Customer Accounts	315,159	286,491	28,668
		91%	9%
Total Retail Sales (MWh in 2025)	3,397,185	1,379,550	2,017,635
		40%	60%

Customers are automatically enrolled in WestLight and have the option to opt-out and return to PG&E for bundled electric service. Customer participation rates are expressed as the proportion of customer accounts currently served by WestLight relative to the total number of electric customer accounts in the WestLight service territory eligible for WestLight service.[2] The remaining percentages of accounts reflects the subset of customer accounts who have voluntarily opted out of the WestLight electric service, retaining bundled service by PG&E. As of publication, WestLight's customer participation rate is approximately 97.5%.

ii. Retail Products

Most WestLight customers can choose between two different product options, ECOplus and ECO100. Each product has a different amount of energy from renewable sources such as solar and wind. Table 3 summarizes WestLight customer product choice available to all customers in 2025. WestLight offers two additional limited-capacity products, Green Access and Green Transit, to eligible customers. Green Access is the tariff offered to customers in WestLight's Disadvantaged Communities Green Tariff (DAC-GT) program. Green Transit is a 100% renewable energy product that enables eligible public transit agencies to report zero-carbon intensity fuel under California Air Resources Board's (CARB) Low Carbon Fuel Standard program.

Table 3: Customer Product Choice (2025)

Stats as of Dec. 2025	Total WestLight Energy	ECOplus	ECO100
Number of Customer Accounts	315,159	308,939	6,220
		98%	2%
Total Retail Sales (MWh in 2025)	3,397,185	3,155,091	242,094
		93%	7%

ECOplus is WestLight's default electric option, in which new customers are automatically enrolled. ECOplus rates are typically set 5-10% below PG&E's generation rates, inclusive of the Power Charge Indifference Adjustment. Beginning in 2021, approximately half of the electricity for ECOplus comes from renewable sources, and half comes from GHG-free sources like large hydroelectric. One of WestLight's

2 Direct Access customers are not automatically enrolled in a CCA program and are therefore not reflected in WestLight's participation rate. The Direct Access (DA) Program allows a limited selection of non-residential consumers in California to purchase their electricity from an energy service provider (ESP) rather than from their investor-owned utility (IOU) or default electricity supplier.

strategic goals is to increase the proportion of renewable energy in the ECOplus product to a target of 100% renewable by 2030.

Customers can choose to "opt up" to ECO100 and receive 100% of their electricity from renewable energy resources. As of publication, ECO100 costs $0.01 per kilowatt-hour (kWh) more than ECOplus. As of the end of 2025, 6,220 accounts have opted-up to ECO100. As part of their emission reduction targets and sustainability goals, 16 cities and the County of San Mateo enrolled their accounts in ECO100. The ECO100 option also provides an opportunity for corporate customers to meet their own sustainability goals. For example, Visa[3] and Meta[4] have both chosen the ECO100 offering for their electricity use in San Mateo County. The ECO100 product has been certified by the Center for Resource Solutions' (CRS) Green-e certification program for each of the calendar years from 2018 through 2026.

II. Study Design

For the 2026 IRP filing, WestLight has developed one conforming portfolio (Preferred Portfolio) to meet the 8 MMT by 2045 target. WestLight's conforming portfolio assumes market fundamentals consistent with Ascend Analytics' Market Intelligence forecast updated in the first half of 2026. WestLight's Preferred Portfolio provides 100% renewable energy on an annual basis beginning in 2030.

WestLight performed all modeling, portfolio selection, and data template preparation internally.

WestLight's Preferred Portfolio uses the California Energy Commission's (CEC) 2024 Integrated Energy Policy Report (IEPR) Demand Forecast Update – Planning Forecast adopted on January 21, 2025, as modified by CPUC in the Administrative Law Judge's Ruling Setting Requirements for Individual Integrated Resource Plans Due June 1, 2026 (subsequently revised with an updated due date of August 10, 2026). WestLight's disaggregated demand forecast was provided by the CPUC in the tab "LSE Demand Forecasts" of the "Load Forecasts + GHG Benchmarks" Excel document available on the 2024-2027 IRP Website: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/2024-27-irp-cycle-events-and-materials

The portfolio uses inputs and assumptions consistent with those used to develop the 2025-2026 Transmission Planning Process (TPP) Portfolio with updates. WestLight's Preferred Portfolio achieves emissions below the assigned GHG Benchmark for the 8 MMT target. The Preferred Portfolio is described in detail in Section III. Study Results below.

In Decision 24-02-047, the CPUC published its review of WestLight's 2022 IRP. WestLight's IRP was found to be adequate in all areas, and was lauded as Exemplary in the following sections:

a) Study Results: Preferred Conforming Portfolios, Local Air Pollutants, Focus on Disadvantaged Communities, Cost and Rate Analysis
b) Action Plan: Proposed Procurement Activities and Potential Barriers

[3] https://www.westlightenergy.org/news-releases/peninsula-clean-energy-provides-visa-corporate-campus-100-renewable-electricity/

[4] https://www.westlightenergy.org/news-releases/facebook-switches-to-peninsula-clean-energys-eco100/

WestLight regularly undertakes an internal resource planning process to support its strategic goals and portfolio planning objectives. Because of the standardized assumptions required in the CPUC IRP process, WestLight's Preferred Portfolio may differ from the portfolios identified through its internal analysis. While the portfolios are generally similar in resource composition, where differences exist, WestLight's internal analysis is designed to better reflect the specific characteristics of its service territory, customer needs, and procurement strategy.

a. Objectives

WestLight's primary objectives in submitting this IRP are as follows:

1. To demonstrate that WestLight has a plan to meet its CEC 2024 IEPR load forecast through 2045, as modified by the CPUC in the Administrative Law Judge's Ruling Setting Requirements for Individual Integrated Resource Plans Due June 1, 2026 (subsequently revised with an updated due date of August 10, 2026);
2. To present WestLight's Preferred Portfolio, which complies with CPUC requirements to meet the 8 MMT by 2045 greenhouse gas emissions target and satisfies reliability requirements in all years of the planning horizon.

Further, WestLight meets both the requirements set out by the CPUC and continues to meet the objectives set out by WestLight's Board, including the voluntary goal to provide 100% renewable energy on an annual basis by 2030 through strategic and cost-effective procurement that can maximize hourly matching of renewable energy to WestLight's load while prioritizing reducing grid emissions and customer costs.

WestLight has been an early leader in advancing the concept of aligning renewable energy supply with customer demand on an hourly basis, helping to elevate industry understanding of the importance of hourly emissions reductions. Building on this foundation, WestLight is evolving its approach toward a more flexible framework that continues to prioritize emissions reductions while incorporating considerations of affordability and market availability. This refined strategy enables WestLight to make meaningful, incremental progress toward a portfolio capable of meeting its customers' load on an hourly basis, while leveraging storage dispatch to reduce grid emissions and maintaining a cost-effective, balanced portfolio that supports long-term financial sustainability.

In 2025, WestLight served its load with 100% carbon free resources, including approximately 60% renewable resources and the remaining 40% non-renewable GHG-free energy resources (large hydroelectric and nuclear resources). Looking forward to 2030, WestLight intends to replace the non-renewable GHG-free energy resources in its supply portfolio with renewable resources. Actual annual renewable content percentages may differ from projections, if resource availability or market conditions preclude cost-effective procurement, but the primary goal is to achieve a 100% RPS-eligible renewable supply no later than 2030.

In addition, the WestLight Energy Board has adopted the following specific policies to guide power procurement:

1. WestLight shall not use unbundled renewable energy credits (RECs) for meeting its renewable energy goals.[5]
2. In sourcing electricity and resource adequacy (RA), WestLight will not procure electricity or resource adequacy from coal facilities.[6]
3. WestLight has published an Inclusive and Sustainable Workforce Policy.[7] WestLight desires to facilitate and accomplish the following objectives through this policy:
    a. Support for and direct use of local businesses;
    b. Support for and direct use of union members from multiple trades;
    c. Support for and use of training and State of California approved apprenticeship programs, and pre-apprenticeship programs from within WestLight Energy's service territory; and
    d. Support for and direct use of green and sustainable businesses.
4. WestLight's Energy Risk Policy[8] (ERP), which provides a framework for effectively managing risks associated with energy procurement activities.
5. In March 2020, WestLight's Board voted to prohibit the procurement of Biomass energy[9].

WestLight's goal is to fulfill its open position with a diverse set of contracts. WestLight uses a portfolio risk management approach in its power purchasing program, seeking low-cost supply as well as diversity among technologies, production profiles, project sizes, project locations, counterparties, term lengths and timing of market purchases to cost average over time, including remaining cognizant of the value of open market positions. These factors are taken into consideration when WestLight engages the market, and WestLight has developed specific guidelines for each of these diversification factors.

In 2024, WestLight's Board adopted its Energy Risk Policy, which establishes a formal governance and risk management framework for energy procurement activities, including identification and categorization of key risk exposures such as market, counterparty, operational, and regulatory risks. The policy defines a structured system of internal controls, including segregation of duties across front, middle, and back-office functions to ensure effective risk monitoring, compliance, and reporting. It also delineates roles and responsibilities across the organization, including oversight by WestLight's Board and Risk Oversight Committee (ROC), and establishes delegated authorities and transaction limits to ensure that procurement activities are executed within defined risk tolerances and in alignment with organizational objectives.

5 WestLight policy on unbundled RECs: https://www.westlightenergy.org/wp-content/uploads/2017/01/PCE-Policy-11-final.pdf

6 WestLight policy excluding coal for power and resource adequacy: https://www.westlightenergy.org/wp-content/uploads/2017/01/Policy-12-Excluding-Coal-for-Power-and-Resource-Adequacy.pdf

7 WestLight Sustainable Workforce Policy: www.westlightenergy.org/wp-content/uploads/2024/11/Policy-10-Inclusive-and-Sustainable-Workforce-April-2023-.pdf

8 https://www.westlightenergy.org/wp-content/uploads/2025/02/Policy-23-Energy-Risk-Policy-November-2024.pdf

9 https://www.westlightenergy.org/wp-content/uploads/2020/04/2020-04-23-PCE-BOD-Agenda-Packet-updated.pdf

In 2025, WestLight conducted an internal planning process to inform key aspects of its procurement strategy. The outcomes of this process include the following:

Battery Operations: Operate WestLight's dispatchable resources to maximize grid benefits using CAISO market signals in order to reduce grid emissions, maximize market value, and provide clean dispatchable capacity when the grid needs it.

Renewable vs. Carbon-Free: Maintain WestLight's goal of achieving 100% renewable energy on an annual basis by 2030.

Contract Term Length: Target a portfolio mix in which approximately 60-85% of resources are secured through mid- and long-term contracts (greater than five years), with the remainder procured through short-term contracts.

Annual Long-Term Procurement Limit: Limit annual mid- and long-term procurement to no more than 20% of loss-adjusted load, with a recommended maximum contract term of 25 years.

b. Methodology

a) Modeling Tool(s)

The 2026 IRP analysis was conducted using a modeling tool that WestLight developed to identify the lowest-cost portfolio of contracted renewable energy and energy storage resources that could match its customer demand on a 24/7 basis, called the MATCH (Matching Around-the-Clock Hourly energy) model. The MATCH model is a deterministic portfolio optimization tool that determines the cost-optimal selection and dispatch of resources to meet load based on a set of assumptions and operating restrictions.

This portfolio and dispatch optimization model is based on the software architecture of an existing, open-source power system planning model called SWITCH[10], but has been substantially redesigned to meet the needs of modeling time-coincident renewable power portfolios for entities like WestLight.

Some key features of MATCH are:

- Cost-optimal resource selection and dispatch
- Ability to match supply and demand on an hourly basis
- Easy-to-use weather-correlated resource generation profiles
- Ability to dispatch storage either to meet load or to respond to market signals

The key inputs to the MATCH model are:

- Hourly load forecast
- Hourly market prices at each modeled node
- Available resource characteristics and costs (model can automatically develop resource generation profiles, or a user may enter a specified resource generation profile)
- Resource adequacy requirements

10 The SWITCH model is available at switch-model.org/

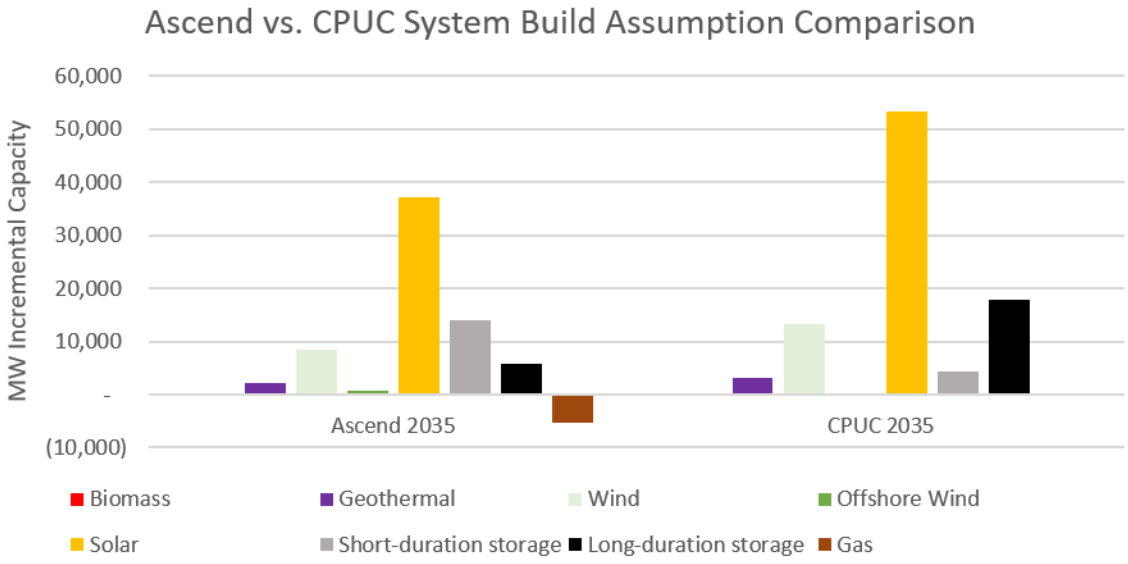
Once the cost-optimal portfolio was selected in MATCH, staff used the proprietary PowerSIMM software, developed by Ascend Analytics, to perform a stochastic evaluation of the selected portfolio under a variety of possible weather patterns and market prices.

In order to develop some of the inputs required for the modeling, WestLight Energy used Ascend Analytics' Market Intelligence (AscendMI) forecast released in January 2026. The Ascend Market forecast is updated twice a year and takes into account fundamental macro-level drivers such as market and regulatory structure, current federal and state policies, technology costs, and load forecasts. AscendMI provides a forecast of market prices and a supply stack forecast for resource builds and retirements.

The CPUC used RESOLVE to develop the 2025-2026 TPP with updates, which identifies the new resources needed to meet the 8 MMT by 2045 GHG emissions target.

Both RESOLVE and AscendMI are forecasting significant renewable resource capacity additions in future years to meet California's emissions reductions targets, with over 9 GW of new wind, 37-53 GW of new solar, and about 20 GW of new storage resources added to CAISO by 2035. Although there are differences between the two supply stacks, WestLight does not expect the use of AscendMI forecasts to cause significant differences in the selected resources in its Preferred Portfolio, versus what might have been selected if it relied only on RESOLVE outputs. Moreover, by using the AscendMI forecasts, WestLight can use the hourly nodal price forecasts developed by Ascend Analytics, which enables it to do sophisticated hourly dispatch modeling of its selected portfolio.

Figure 2: Comparison of AscendMI and RESOLVE Build Assumptions



MATCH and RESOLVE both optimize dispatch for a system under a given set of deterministic inputs. RESOLVE is a linear optimization model, which assesses dispatch based on representative days over a defined forecast horizon. MATCH differs in that it is a mixed integer program and performs hourly chronological dispatch for all 8760 hours in a simulation year. Both RESOLVE and MATCH identify the optimal resources to meet needs based on the available resources including generation and storage. Both models allow for the incorporation of different types of market and portfolio constraints including

renewable generation targets, capacity requirements and reserve margins, and timing of new build requirements. MATCH is further configurable to optimize for hourly renewable targets.

Table 4 below identifies the key differences between CPUC's RESOLVE and WestLight's MATCH modeling approaches.

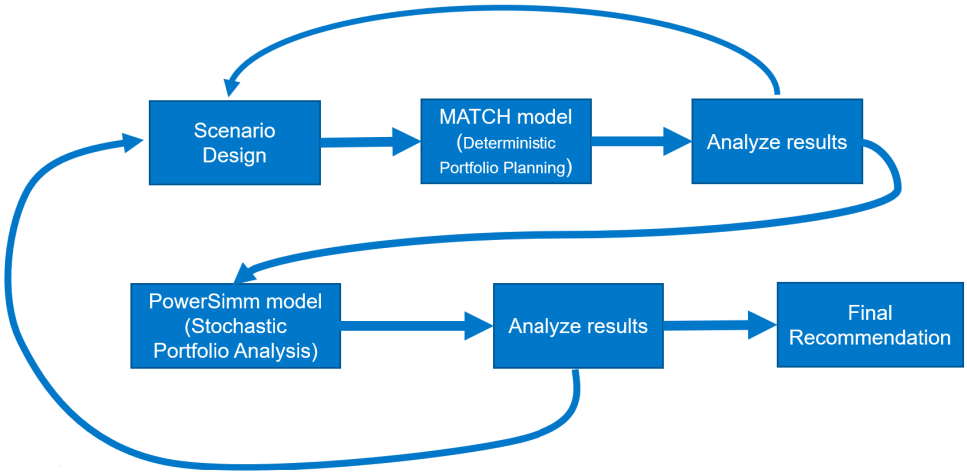
Table 4: Differences Between RESOLVE and MATCH Modeling Approaches

RESOLVE	MATCH
Groups resources into categories with similar operational characteristics (e.g., nuclear, coal, gas CCGT, gas peaker, renewables, storage, and demand-side resources) and models them collectively, while capturing key operational constraints.	Models each generator independently.
Linearized unit commitment where the commitment variable for each class of generators is a continuous variable rather than an integer variable.	Models the operating cost and performance parameters on a plant-level basis, where the optimization method uses a mixed integer program (MIP) to determine capacity build of each resource, and the hourly dispatch of each resource.
Run for a sampled set of representative days to approximate full-year operations, uses representative load and renewable profiles to reflect system conditions.	Modeled 8760 hours for each of the study years (2028, 2030, 2035, 2040, and 2045)
Models an entire market, in this case primarily CAISO, using a multi-zone framework that represents transmission flows, interties, and interactions with neighboring regions.	MATCH was used to model WestLight's portfolio within the CAISO market and does not model transmission constraints or CAISO import/exports. For this analysis, WestLight used the AscendMI fundamental forecast to provide the background CAISO market assumptions and modeled its portfolio within the market.
Allows for the incorporation of annual renewable and clean energy targets.	Allows for the incorporation of annual renewable generation goals or for hourly load-matching renewable generation goals

b) Modeling Approach

WestLight took an iterative approach to modeling, as illustrated in Figure 3 below. First, WestLight designed scenarios to run in the MATCH model. After running the model, the results were examined and often led back to redesigning the scenarios. Once WestLight developed the appropriate scenarios and ran the MATCH model, it used the selected portfolio from MATCH as inputs into the PowerSIMM model to perform stochastic analysis of its portfolio's performance. The evaluation of the stochastic performance could lead back to redesigning the scenarios. In this way, the modeling process was iterative until the final results were reached.

Figure 3: WestLight Energy Modeling Approach



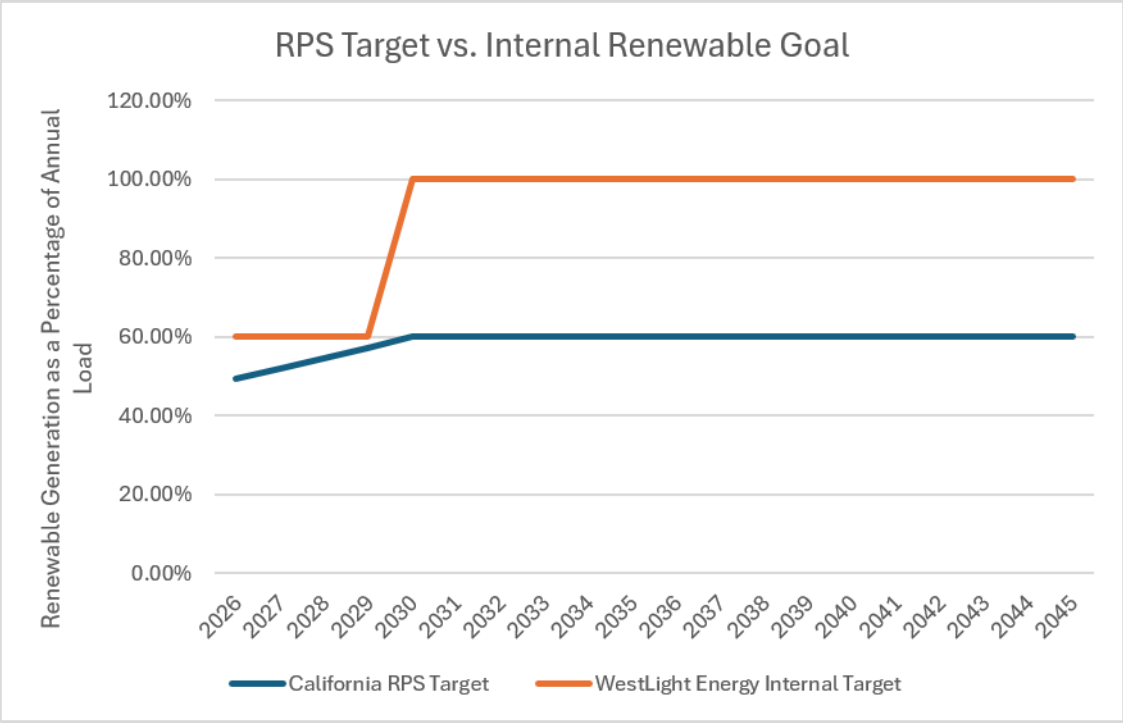
WestLight used assumptions consistent with the 2024-2027 IRP Filing Requirements, with some modifications as described below. WestLight used its voluntary renewable and GHG-free goals, which exceed the RPS targets. Specifically, WestLight's portfolios are designed to provide energy entirely from renewable and carbon free resources in years 2026 through 2029, and to provide 100% renewable energy on an annual basis in 2030 and later years.

Some key assumptions that are standardized by the Filing Requirements are the assigned load forecast, Reliability Procurement Requirement (RPR), and behind-the-meter solar capacity. WestLight used the annual volumes assigned by the Filing Requirements but used a customized load shape. WestLight used the Reliability Procurement Requirements as provided by the CPUC.

WestLight assumed resource availability consistent with the 2026-2027 TPP, with some updated assumptions regarding resource cost, based on its most recent procurement efforts. Resource costs were based on WestLight's assessment of the market conditions as of the spring of 2026, including the impacts of the One Big Beautiful Bill Act (OBBBA).

WestLight developed a single conforming portfolio that achieves emissions that are less than the 8MMT by 2045 GHG target.

Figure 4: Comparison of RPS Target to WestLight Energy's Internal Renewable Goals



Specific details on the modeling approach and assumptions are described in the sections below.

1. Load Assumptions

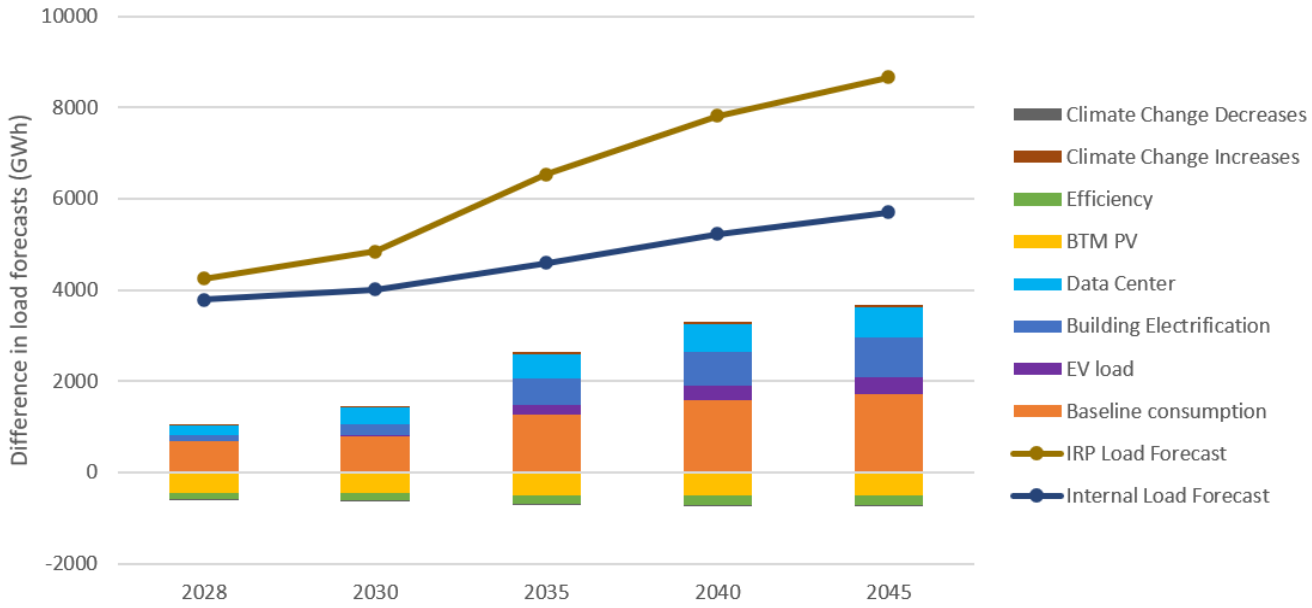
WestLight's annual load forecast and load modifier volumes assume the California Energy Commission's (CEC) 2024 Integrated Energy Policy Report (IEPR) demand forecast as modified by the CPUC in the Administrative Law Judge's Ruling Setting Requirements for Individual Integrated Resource Plans Due June 1, 2026 (subsequently revised with an updated due date of August 10, 2026).

Table 5: CEC 2024 IEPR Assigned Load (Managed Retail Sales) Forecast for WestLight Energy

WestLight Energy	2028	2030	2035	2040	2045
Load Forecast (GWh)	3,899	4,452	5,998	7,181	7,957

WestLight evaluated the projected load in the CEC 2024 IEPR demand forecast and the load profile in the CSP Calculator against internal forecasts. WestLight's internal load forecast is developed based on historical hourly meter data, and projections of future growth, including growth of electric vehicles and behind-the-meter rooftop solar. Figure 5 compares WestLight's load forecast with the CEC's 2024 IEPR forecast, with the differences decomposed into baseline load and load modifier components.

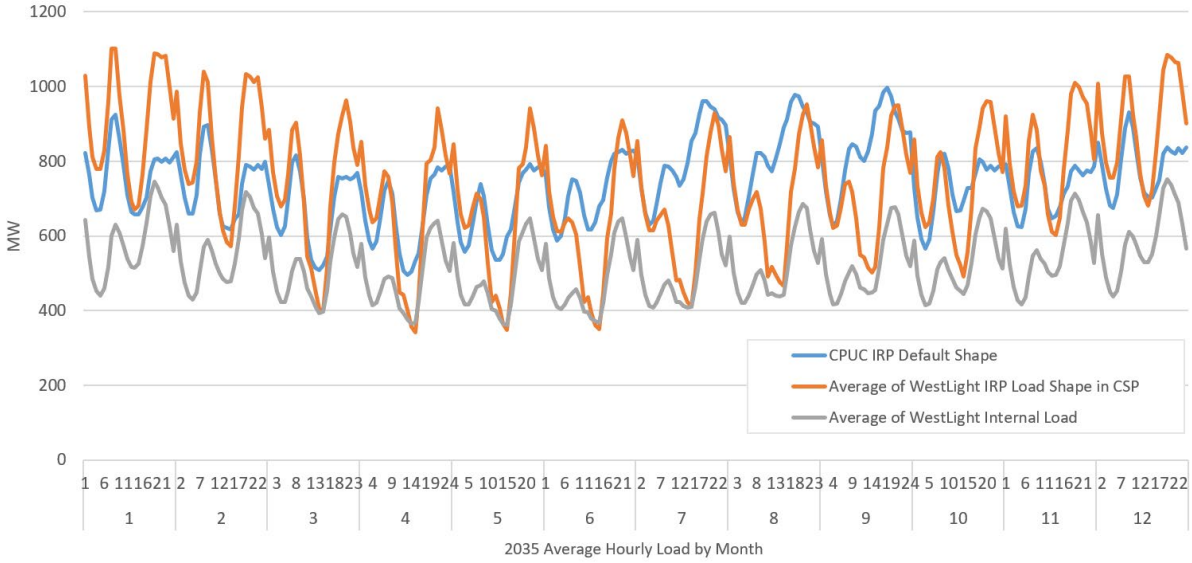
Figure 5: CEC and WestLight Energy's Internal Load Forecasts to 2045 and Sources of Differences



WestLight Energy's internal load forecast is lower than the IEPR forecast, particularly in the later years of the forecast period from 2035 to 2045. The difference is primarily driven by the CEC's assumptions for higher baseline consumption growth and greater EV load in later years, though these impacts are partially offset by the CEC's higher estimates of behind-the-meter solar PV capacity. WestLight incorporates the effects of energy efficiency, building electrification, and climate change directly into its baseline load forecast rather than modeling them as separate load modifiers. WestLight does not assume significant data center load growth within its service territory, which differs from statewide forecasting assumptions. This assumption is based on WestLight's assessment of local land availability, development trends, and real estate costs, as well as the absence of indications from customers, local jurisdictions, and PG&E that significant data center development is anticipated within its service area.

Additionally, WestLight's load shape differs significantly from the shapes in the CSP Calculator, due primarily to WestLight's service territory including the mild coastal climate of the San Francisco Peninsula in the Bay Area, which results in relatively higher winter load than those represented in the CSP Calculator. In order to model a conforming portfolio while still incorporating load shape from its internal forecast, WestLight used the CSP Calculator to develop a load profile that assumes the annual volumetric load and load modifier volumes assigned to WestLight by the CPUC (Managed Retail Sales Forecast, Behind-The-Meter Photovoltaics (BTM PV) Forecast, Electric Vehicle Load, Building Electrification, Energy Efficiency, Data Center Load, Climate Change Load Impact, and Behind-The-Meter Storage Losses), but uses custom shapes consistent with WestLight's internal forecast for Baseline: Non C&I shape, Baseline: C&I shape, Electric Vehicle Load shape, and Behind-The-Meter Photovoltaics shape. WestLight also specified a custom C&I Fraction of Baseline Demand. Figure 6 demonstrates the differences in load shape between WestLight's internal forecast, the default load shape in the CSP Calculator, and the customized load input that WestLight used for modeling. This figure shows average hourly load for each month of the year in 2035. WestLight's forecasted load shape is higher in the winter months and lower in the summer months than the default CSP Calculator load profile.

Figure 6: 2035 Average Hourly Load by Month



The behind-the-meter solar capacity assumed was based on the forecast assigned by the CPUC. WestLight's estimates of behind-the-meter solar capacity (based on interconnection data) are lower than the assigned capacity.

Table 6: CPUC Assigned Behind-The-Meter Solar Capacity (MW)

Reporting Year	2028	2030	2035	2040	2045
Assumed Behind-The-Meter Solar Capacity	386	419	515	584	652

2. Reliability Procurement Requirements

WestLight used the Reliability Procurement Requirements (RPR) assigned by the CPUC. Table 7 identifies the RPR for each of the reporting years. In the 2024-2027 IRP, resource capacity was modeled using a perfect capacity methodology, and a marginal effective load carrying capacity. Under this approach, LSE obligations are defined through RPR rather than peak load, and a planning reserve margin is not used.

Table 7: Assigned Reliability Procurement Requirements

Reporting Year	2028	2030	2035	2040	2045
RPR (MW)	807	674	808	956	1,078

3. GHG Benchmark

WestLight's LSE-specific GHG Benchmarks for the 8 MMT target, as assigned in the ALJ Ruling and adjusted by the Energy Division in the CSP Calculator to account for WestLight's share of state-wide behind-the-meter combined heat and power emissions, are identified in Table 8 below.

Table 8: LSE Specific GHG Emissions Benchmark

	2030 (MMT)	2035 (MMT)	2040 (MMT)	2045 (MMT)
GHG Emissions Benchmark – 8 MMT Conforming Portfolio	0.359	0.310	0.280	0.151

4. Other Assumptions

The inputs and assumptions used to develop and analyze WestLight's 2026 IRP portfolio are consistent with the 2024-2027 Filing Requirements. Significant input and assumptions data include:

- Load forecast
- Market cost of load
- Resources available to contract
- Resource contract costs
- Resource generation profiles
- Market revenue of resource generation
- Reliability requirements
- Qualifying capacity of resources
- Resource adequacy market value
- State and internal RPS targets
- Renewable energy attribute market value

In developing candidate resources for the 2026 IRP, WestLight modeled specific generators that had offered into recent solicitations, as well as generic resources with contract costs consistent with the RESOLVE model outputs for the 2026-2027 TPP, which incorporates the policy impacts of the OBBBA and tariffs. In addition, WestLight restricted the availability of certain generic resource types to reflect its assessment of market conditions as of spring 2026. Notably, WestLight did not include onshore wind or geothermal resources as eligible resources in its model until 2035.

Table 6: Generation candidate resource contract cost assumptions used for WestLight's 2026 IRP (Nominal PPA $/MWh)

Resource Technology	2028	2030	2035	2040	2045
Solar PV	$54-$65	$62-$70	$59-$67	$58-$66	$58-$65
Onshore Wind (in-state)	N/A	N/A	$84-$148	$156	$165
Onshore Wind (Out-of-State)	N/A	N/A	$114-$151	$122-$162	$130-$175
Offshore Wind	N/A	N/A	N/A	$294	$247-$298
Conventional Geothermal (Existing)	N/A	N/A	$90	$90	$90
Conventional Geothermal (New)	N/A	N/A	$102-$157	$113-$220	$171-$239

EGS Geothermal (New)	N/A	N/A	$125-$195	$125-$285	$304-$309

Table 7: Storage resource contract cost assumptions used for WestLight's 2026 IRP (Nominal$/kw-mo)

Resource Technology	2028	2030	2035	2040	2045
4 hr Storage (Paired with Solar PV)	$14.22	$14.35	$15.47	$20.52	$21.06
4hr Storage (Stand-Alone)	$14.22	$14.35	$15.47	$20.52	$21.06
8hr Storage (Stand-Alone)	$20.70	$24.07	$25.70	$34.60	$35.32
12hr Storage (Stand-Alone)	N/A	N/A	$45.41	$67.41	$69.91
24hr Storage (Stand-Alone)	N/A	N/A	$56.20	$82.90	$85.14
100hr Storage (Stand-Alone)	N/A	N/A	$63.51	$92.04	$94.49

Premiums for index-plus structured contracts for Portfolio Content Category 1 (PCC1) REC resources were developed based on Ascend's Market Intelligence forecast and WestLight's evaluation of current market conditions as of spring 2026. Because reselling RECs is an important risk reduction technique, and the ability to resell RECs is uncertain, WestLight differentiated between purchase cost and sale value of PCC1 index-plus contracts in its modeling. These prices are identified in Table 11 below.

Table 8: PCC1 Premium Costs Assumptions for Index-Plus Structured Contracts (Nominal$/MWh)

	2028	2030	2035	2040	2045
PCC 1 - Buy Premium ($/MWh)	$19.00	$22.41	$18.37	$20.32	$25.31
PCC 1 - Sell Premium ($/MWh)	$17.10	$20.17	$16.53	$18.29	$22.78

Contract costs for short term resource adequacy contracts were developed based on Ascend's Market Intelligence forecast and WestLight's evaluation of current market conditions as of spring 2026. Because reselling excess resource adequacy is an important risk reduction technique in its Preferred Portfolio, and the ability to resell resource adequacy in the future is uncertain, WestLight differentiated between the purchase cost and sale value of RA. The MATCH model uses shaped costs over the course of a year, with September as the highest value month.

Table 12 summarizes the September RA market value assumed in WestLight's modeling.

Table 9: Resource Adequacy Costs Assumptions for Short-Term RA-only Contracts (Nominal$/kw-mo)

	2028	2030	2035	2040	2045
September RA – Buy	$19.75	$21.33	$23.49	$53.62	$60.26
September RA – Sell	$17.78	$19.20	$21.14	$48.26	$54.23

5. *Existing Contracts*

WestLight included all power purchase agreements (PPAs) currently under contract or in negotiation as of March 30th, 2026, in its modelling. These PPAs are identified in Table 13 below.

Table 10: Existing Project-Specific PPA Contracts

#	Asset Name	Capacity (MW)	Storage Depth (MWh)	PPA Start Date	Contract Expiration	Technology
1	Bidwell	2		03/09/17	03/08/34	Small Hydro
2	Roaring	2		03/16/17	03/15/34	Small Hydro
3	Hatchet	7.5		03/09/17	03/08/37	Small Hydro
4	Clover	1		04/01/18	03/31/33	Small Hydro
5	Mustang	100		11/11/20	11/10/35	Solar
6	Wright	200		01/03/20	10/20/46	Solar
7	Sky River B	30.2		09/17/21	09/16/41	Wind
8	Geysers	35		07/01/22	06/30/32	Geothermal
9	Heber 2	26		01/01/23	12/31/38	Geothermal
10	Chaparral Solar	102		01/01/24	03/30/40	Solar
11	Chaparral Storage	52	208	03/31/25	03/30/40	Storage
12	Arica Solar	100		04/01/26	03/31/41	Solar
13	Arica Storage	50	200	04/01/24	03/31/41	Storage
14	Tumbleweed	14.8	118	06/01/26	05/30/41	8hr Storage
15	OME Fishlake	2.3		07/01/27	06/30/47	Geothermal
16	Ormat Portfolio - Dogwood	4.3		09/01/27	08/31/47	Geothermal
17	Ormat Portfolio – Balance of Supply	6.7		Various	Various	Geothermal

18	Dos Palos	3		03/14/25	03/13/45	DAC-GT Solar
19	Voyager	63.2		01/01/21	12/31/28	Wind
20	Shiloh	150		01/01/24	12/31/30	Wind
21	Darden III Solar	42.3		6/1/28	5/31/40	Solar
22	Darden III Storage	45.7	183	6/1/28	5/31/40	Storage
23	Darden IV Solar	42.3		6/1/28	5/31/40	Solar
24	Darden IV Storage	45.7	183	6/1/28	5/31/40	Storage
25	Burney Creek	3		1/1/24	12/31/38	Small Hydro
26	Calwind	8.7		1/1/23	12/31/28	Wind
27	Sunzia North	65.6		5/23/26	5/22/41	Wind
28	Sunzia South	154.4		5/23/26	5/22/41	Wind
29	Coram	13.5		3/1/26	2/28/31	Wind
30	Whitegrass	6		1/1/28	12/31/47	Geothermal
31	Nova	50	200	8/1/24	7/31/39	4 hr Storage
32	Lockhart	45	180	7/10/24	7/9/39	4 hr Storage
33	Gabriel 4 hr	65	260	6/1/27	5/31/42	4 hr Storage
34	Gabriel 8 hr	10	80	6/1/27	5/31/42	8 hr Storage
35	Wright Storage	80	320	10/21/26	10/20/46	4 hr Storage
36	Willow Rock	15	120	12/31/30	12/30/50	8 hr Storage

In addition to the executed PPAs, existing Resource Adequacy (RA) contracts and environmental products were included in the model. In its modeling, WestLight assumed contract extensions for several existing resources in its current portfolio, including the wind resources Sunzia Wind, Voyager Wind, and Shiloh Wind, as well as the Geysers geothermal resource.

WestLight also accounted for the costs and benefits of the cost allocation mechanism (CAM) resources in its portfolio. For CAM resources, WestLight relied on the most recent CPUC-approved allocation data available at the time of analysis. For 2026, CAM values reflect the final CAM allocations and requirements

published by the CPUC for the Resource Adequacy compliance year. For 2027 and subsequent years, CAM allocations were estimated using 2026 CAM allocation values and load share information as the basis for future-year projections. In particular, Central Procurement Entity (CPE) CAM allocations were estimated by applying WestLight's final 2026 monthly load share percentage to projected CPE procurement quantities for the applicable compliance year for the month of September. These estimates are intended to approximate future CAM allocations until updated CPUC allocation data become available.

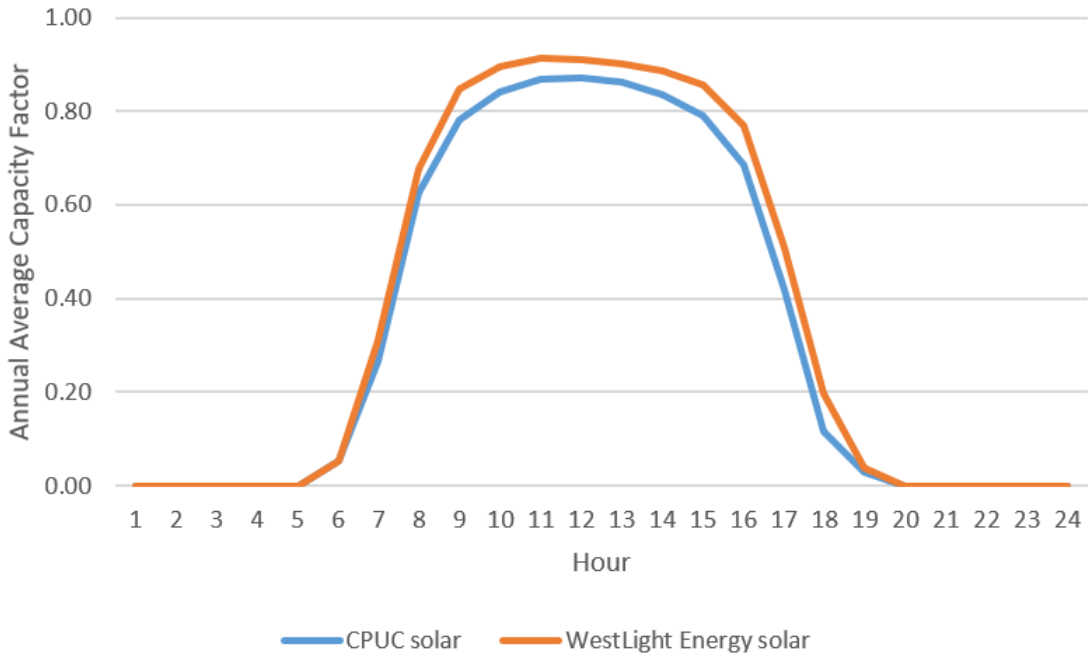
CAM allocations may consist of a variety of resource types, including hydroelectric resources and thermal generation resources, such as combined-cycle and peaking natural gas facilities. For purposes of this analysis, WestLight assumed future CAM allocations would be consistent with the resource mix it has historically received through September CAM allocations, which are primarily associated with thermal generation resources, and a small amount of battery storage. Accordingly, WestLight modeled its CAM allocation using its proportional share of PG&E's September CPE system CAM resources, which consist of battery storage, combined-cycle and peaking natural gas facilities. Because CAM resources are allocated by the CPUC, load-serving entities cannot decline these allocations and must account for them in their portfolio planning regardless of whether the resources align with their preferred procurement strategy.

6. Renewable Generation and Storage Profiles

WestLight used renewable generation profiles and storage dispatch profiles generally consistent with the profiles used by staff to develop the 2025-2026 TPP with updates. WestLight generated resource profiles for specific resources in the MATCH model using the National Laboratory of the Rockies (NLR) System Advisory Model (SAM). By using the System Advisory Model, all of the resource profiles were generated using consistent weather assumptions. This improves the correlation between resource profiles for purposes of modeling. For new generic resources, WestLight used the profiles provided in the RESOLVE code base and inputs.

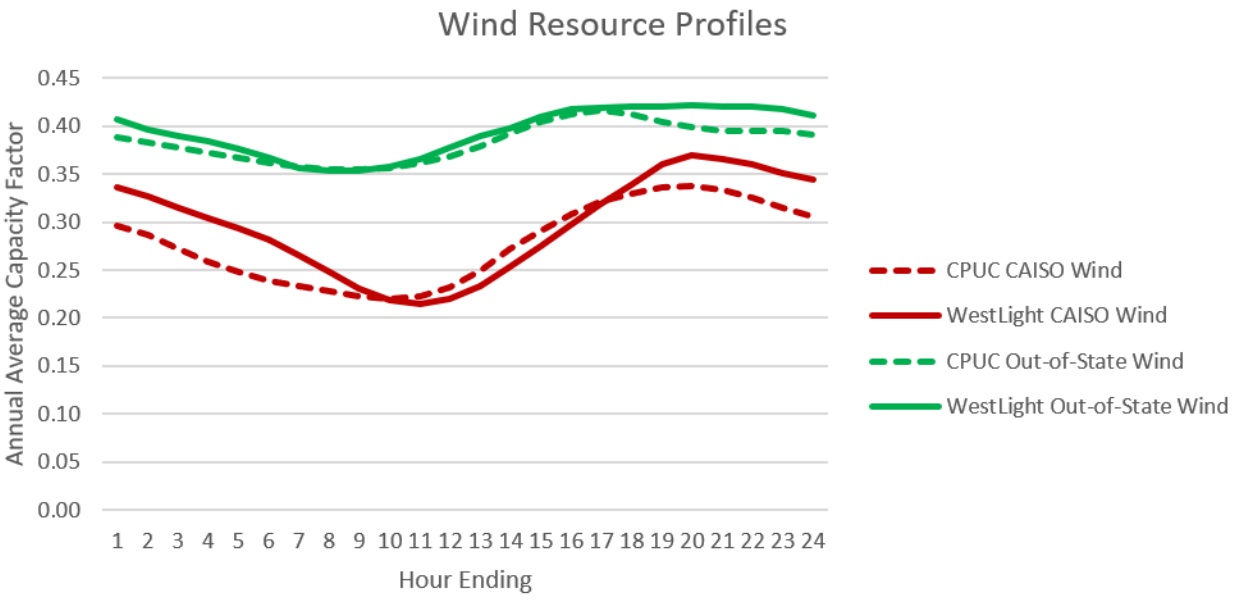
The solar resource profiles used in WestLight’s modeling are similar to the solar profiles provided by the CPUC in the CSP Calculator. Figure 7 compares the differences in the resource profiles. The WestLight Solar graphed below represents the generation-weighted average capacity of WestLight’s solar portfolio, which includes a mix of SAM shapes, for specific resources in its portfolio, and RESOLVE shapes, for new generic candidate resources.

Figure 7: Comparison of Solar Tracking Shapes



The wind resource profiles used in WestLight's modeling are very similar to the wind profiles provided by the CPUC in the CSP Calculator. WestLight used the profiles provided by the CPUC for offshore wind and new onshore candidate resources, and wind profiles provided by project developers or NLR SAM profiles for existing, contracted wind resources. Figure 8 compares the differences in the resource profiles.

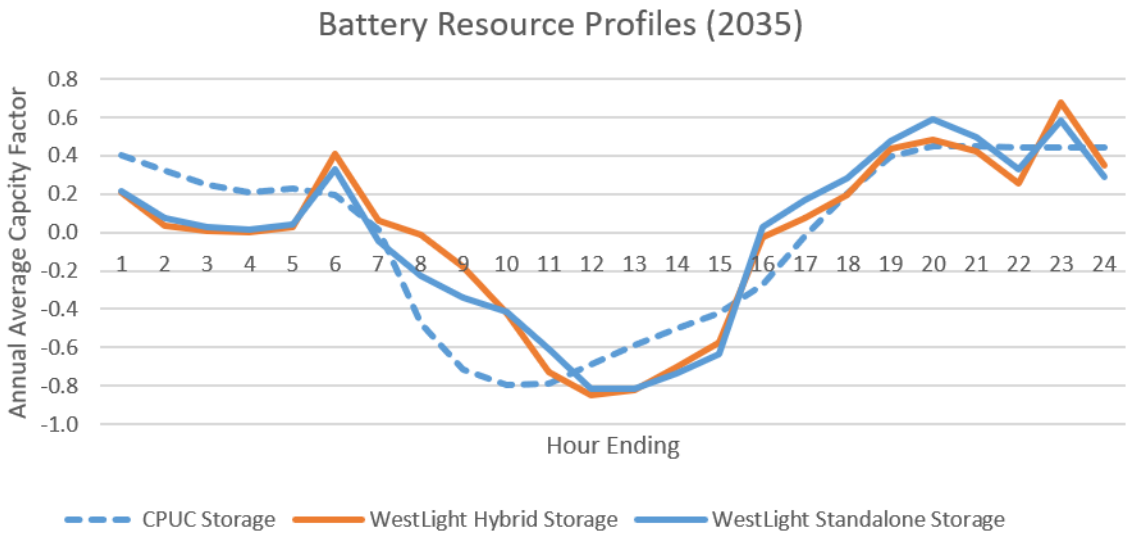
Figure 8: Comparison of Wind Shapes



WestLight's strategy is to operate its storage to maximize grid benefits using CAISO market signals, which maximizes market revenue, provides ramping and clean dispatchable capacity when the grid needs it most, and results in greater marginal emissions reductions compared to load-following storage dispatch.

To determine storage dispatch, the MATCH model uses hourly nodal price forecasts for each storage node. Storage resources are dispatched to charge during periods of lower prices and discharge when prices are higher to maximize economic value. Thus for the current IRP modeling, MATCH uses a dispatch-to-price versus a dispatch-to-load methodology to determine storage dispatch.

Figure 9: Comparison of Storage Dispatch



7. Geographic Distribution of New Resources

As described in the previous section, WestLight assumed resource availability based on specific resources offered in recent solicitations, as well as generic resources consistent with the 2026-2027 TPP. Specific resources have a known project location and can be grouped into geographic areas. Generic resources are assumed to be located within the geographic regions indicated in the 2026-2027 TPP.

WestLight's analysis took into account the different resource contract cost and resource generation market revenue forecasts for different geographic areas. Resources costs reflect the development costs such as site control, labor, materials, financing and developer profit and are representative of the power purchase agreement contract costs that WestLight expects to encounter in the market. Transmission constraints were not explicitly modeled, and were evaluated in a post-processing step, as described below in Section III. m. Transmission Planning. In some cases, transmission constraints make capacity additions in specific geographic locations more costly and would lead to a different geographic distribution of new resource additions. WestLight strongly supports the implementation of transmission expansion to support the addition of renewable capacity to the CAISO system in regions with promising renewable resource potential.

The tables below summarize the distribution of new resources into high-level geographic areas based on CPUC's RESOLVE areas. These tables include capacity from energy-only contracts.

Table 11: Preferred Portfolio Geographic Distribution of New Solar & Storage Resources (Cumulative MW, decreases represent expiration of existing contracts)

RESOLVE Area	2028	2030	2035	2040	2045
PGE Fresno – Solar	84.56	84.56	84.56	0	0
PGE Fresno – Storage	171.5	171.5	171.5	80	80
SCE Metro – Storage	75	75	75	75	0
SCE Northern – Solar	0	314	314	434	663.5
SCE Northern – Storage	0	314	329	449	678.5
Total	**331.0**	**959.0**	**974.0**	**1,038.1**	**1,421.9**

Table 12: Preferred Portfolio Geographic Distribution of New Wind Resources (Cumulative MW)

RESOLVE Area or Location	2028	2030	2035	2040	2045
PGE GBA	0	0	22	22	22
PGE Kern	0	0	22	22	22
PGE NE CA	0	0	0	0	51
PGE NGBA	50	50	245	245	245
SCE Eastern	0	0	72	72	72
SCE EOP	0	0	21	21	21
SCE NOL	0	0	108	108	108
SCE Northern	0	0	214	214	214
SDGE Imperial	0	0	85	85	85
Wyoming	0	0	0	330	400
Total	**50**	**50**	**789**	**1,119**	**1,240**

Table 13: Preferred Portfolio Geographic Distribution of New Geothermal Resources (Cumulative MW)

RESOLVE Area or Location	2030	2035	2040	2045
Nevada	13.8	13.8	13.8	13.8
Northeast CA	0.0	8.4	8.4	83.1
PGE NGBA	0.0	12.3	172.2	200.9
SCE NOL	0.0	16.8	16.8	16.8
SCE Eastern	0.0	3.4	3.4	3.4
SDGE Imperial	5.47	5.47	5.47	5.47
Total	**19.3**	**60.1**	**220.0**	**323.4**

8. Short-Term Contracts

WestLight's strategic procurement goals include targeting a diversity of contract term lengths to help manage portfolio risk. The inclusion of short-term contracts in a portfolio allows flexibility to manage changes in load, regulatory uncertainty, changing goals, and changes in market conditions. WestLight's

current strategic target is for short-term contracts, defined as less than five years in length, to make up between 15% and 40% of its portfolio.

In the near term, WestLight plans to rely on short-term contracts to provide energy-only volumes of large hydroelectric energy in years 2026-2029. WestLight also uses short-term contracts to procure resource adequacy under capacity-only contracts.

New resources typically require a long-term contract in order to be financed. Because WestLight's Preferred Portfolio includes mostly new resources to be added to its current portfolio, there is a disconnect between its short-term contracting goals and its plans to add new resources to its portfolio. WestLight could address this disconnect by seeking short-term contracts, potentially with existing resources instead of new resources. This disconnect between the risk-reduction benefits of short-term contracts, and the emissions reductions benefits of long-term contracts, will challenge all load serving entities in the state as California works towards the zero-emissions goals of SB100. To achieve zero emissions in state-wide retail electricity sales will likely require load-serving entities to develop significant new resources via long-term contracts (long-term contracts are necessary to facilitate the financing of new resources). However, adding significant volumes of energy via long-term contracts will potentially be in conflict with those load-serving entities' risk-reduction goals of limiting the proportion of long-term contracts in their portfolios and potentially increase customer costs. State-wide, the CPUC must be mindful of this fundamental conflict of risk reduction, affordability, and emissions reduction goals as Load Serving Entities navigate these issues.

9. Curtailment

WestLight assessed potential curtailment of resources in its Preferred Portfolio using a stochastic model in PowerSIMM. The model considers nodal prices to determine whether to curtail solar, wind, and other non-dispatchable resources on an hourly basis. WestLight tested two potential curtailment strategies: curtailment at negative nodal prices and curtailment when the nodal price is below the negative REC price. WestLight evaluated the curtailment level that has a 5% chance of being exceeded (P95), the curtailment level that has a 95% chance of being exceeded (P5), and the curtailment level that has a 50% chance of being exceeded (P50, or median). Table 17 below shows the P5, P50, and P95 curtailment estimates of the Preferred Portfolio in PowerSIMM.

The estimated curtailment of the portfolio is highest in 2030, when solar generation makes up the highest proportion of the portfolio. Given higher estimated energy prices for future years and increased proportion of wind and geothermal production in the portfolio, PowerSIMM calculates relatively little curtailment in the later model years. Under the strategy of curtailing production only when the nodal price is below the negative REC price (forecasted to be around $20 in future years), almost no curtailment occurs. The nodal price forecasts used in WestLight's modeling incorporate fundamental market drivers such as new renewable capacity additions to the system. However, if the fundamental market drivers change, or if fuel prices decrease, WestLight would expect the modeling results to change.

WestLight also assessed curtailment of its portfolio using the CSP Calculator. The CSP Calculator uses SERVM modeling performed by the CPUC to estimate hours in which excess generation on the system will be curtailed. The CSP Calculator estimates larger volumes of curtailment for the portfolio relative to PowerSIMM modeling from 2035-2045.

Table 17: Percent of Generation Curtailed under Different Curtailment Strategies

Curtailment Strategy	Probability	2028	2030	2035	2040	2045
Curtail at Negative Pricing	Median (P50)	7.2%	14.7%	1.2%	1.2%	0.9%
	Lower Curtailment (P5)	3.9%	6.1%	0.1%	0.1%	0.2%
	Higher Curtailment (P95)	9.9%	16.8%	1.7%	1.9%	1.6%
Curtail at Negative REC Value	Median (P50)	0.3%	0.2%	0.3%	0.4%	0.1%
	Lower Curtailment (P5)	0.0%	0.0%	0.0%	0.0%	0.0%
	Higher Curtailment (P95)	1.4%	1.0%	1.0%	0.8%	0.4%
CSP curtailment		6.4%	11.4%	10.6%	8.0%	9.5%

10. Metric Analysis

WestLight evaluated the model outputs using several key metrics. These metrics included cost, reliability, and RPS and emissions metrics.

Cost Metrics

WestLight evaluated portfolio cost on both an absolute and per-unit basis using the results of its stochastic analysis, allowing it to estimate the probability that portfolio costs will exceed specified levels. WestLight evaluated the P95 cost, the P5 cost, and the P50, or median cost.

- Portfolio Total Cost ($)
- Weighted Average Cost to Serve Load ($/MWh)
- Probability of Cost Exceedances (P5, P50, P95)

Reliability Metrics

WestLight evaluated its Preferred Portfolio using two distinct reliability metrics: an annual analysis based on its assigned Reliability Procurement Requirements and an evaluation of its portfolio using the CPUC's 24-hour Slice-of-Day RA Framework.

For the annual analysis of reliability, WestLight compared its assigned annual Reliability Procurement Requirement to the Net Qualifying Capacity of its portfolio in September to determine the open RA balance per the calculations in the Resource Data Template. The reliability metrics include the following:

- Surplus/Short megawatt (MW) compared to assigned Reliability Procurement Requirement

The second reliability metric was to evaluate the portfolio using the CPUC's 24-hour Slice-of-Day RA Framework. WestLight evaluated its Preferred Portfolio under the Slice-of-Day methodology using its share of the Total Reliability Need (TRN) from the IRP Filing Requirements to assess portfolio performance under this framework. The reliability metrics include the following:

- Comparison of 24-hr resource adequacy requirements vs supply, represented graphically

RPS and Emissions Metrics

WestLight evaluated the RPS content and the emissions associated with its portfolio. WestLight determined the RPS content as well as the long-term contract content (SB350 requires 65% of an LSE's

RPS content to be procured via a long-term contract of at least 10 years). WestLight also evaluated the carbon dioxide emissions associated with its portfolio using the CSP Calculator. These metrics can be summarized as:

- Long-term Contracting (% of Load);
- RPS Content (% of Load)
- Carbon Dioxide Emissions (MMT per year)

c) Alternative Assumptions

The alternative assumptions used in WestLight's modeling are described throughout Section II.b and are therefore not repeated here in detail. In general, WestLight relied on the assumptions published in the CPUC's 2025 Inputs and Assumptions document except where more recent, portfolio-specific, or resource-specific information was available and deemed more appropriate for evaluating WestLight's Preferred Portfolio.

The primary differences from the CPUC assumptions relate to load profiles, resource production profiles, and resource costs. WestLight utilized a custom hourly load shape that reflects the characteristics of its customer load while maintaining consistency with the total annual load volumes assigned by the CPUC. For existing and contracted resources included in WestLight's portfolio, it utilized resource-specific production profiles, including profiles developed using the National Laboratory of the Rockies' System Advisor Model, while generic candidate resources continued to use CPUC-provided generation profile assumptions. WestLight also utilized cost assumptions from the 2026-2027 TPP, which incorporates more recent market information and federal policy developments than the 2025-2026 TPP with updates. In addition, WestLight incorporated resource-specific cost information where available from recent solicitations and procurement activities, particularly for geothermal resources. Collectively, these alternative assumptions were intended to better reflect WestLight's specific portfolio characteristics and current market conditions, which influenced the relative attractiveness of certain resource types in the Preferred Portfolio.

Table 18. CPUC and WestLight Geothermal Nominal PPA price assumptions

		2026-2027 TPP			WestLight Energy		
Resource Type	**Region**	**2035**	**2040**	**2045**	**2035**	**2040**	**2045**
Conventional Geothermal	Northeast CA	$157	$220	$239	$102 - $157	$155 - $220	$171 - $239
Conventional Geothermal	PGE NGBA	$143	$207	$224	$102 - $143	$113 - $207	$171 - $224
Conventional Geothermal	SCE NOL	$143	$207	$224	$110- $143	$207	$224
Conventional Geothermal	SCE Eastern	$143	$207	$224	$102 - $143	$207	$224
Near field EGS	NorCal	$182	$272	$294	$125 - $195	$125 - $285	$294 - $309

III. Study Results

a. Conforming and Alternative Portfolios

WestLight's Preferred Portfolio uses the assigned load forecast and uses inputs and assumptions consistent with those used by staff to develop the 2025-2026 TPP with updates to identify the least cost set of resources to meet the respective 2030, 2035, 2040, and 2045 GHG Benchmark emissions, as calculated by the CSP Calculator. WestLight developed a single portfolio that meets the emissions targets and is presenting this portfolio as its Preferred Portfolio. The Preferred Portfolio achieves lower emissions than WestLight's proportional share of the 8 MMT GHG target. The load, GHG Benchmarks, and calculated GHG emissions for the portfolio, using the CSP Calculator, are presented in Table 19 below.

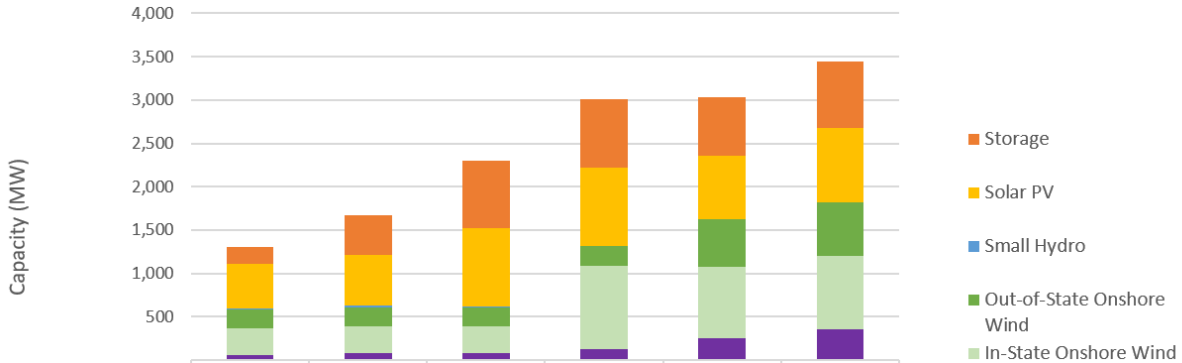
Table 19: Preferred Portfolio GHG Emissions Results

	2028	2030	2035	2040	2045
Assigned Load Forecast (GWh)	3,899	4,452	5,998	7,181	7,957
8 MMT GHG Benchmark (MMT CO_2)		0.359	0.310	0.280	0.151
WestLight Preferred Portfolio Emissions (MMT CO_2)	0.131	0.226	0.253	0.212	0.150

The Preferred Portfolio includes all of WestLight's currently executed contracts, as summarized in Table 13 above.

Net of contract expirations, the Preferred Portfolio adds an additional 561 MW of storage, 358 MW of solar, 536 MW of in-state onshore wind, 400 MW of out-of-state onshore wind, and 297 MW of geothermal by 2045. Due to contract expiration, the Preferred Portfolio results in 15 MW less small hydro in 2045 than is currently contracted. The selected capacity results in the lowest cost portfolio that meets WestLight's internal voluntary targets, and the assigned reliability and emissions targets. Figure 10 shows the annual cumulative capacity of the portfolio.

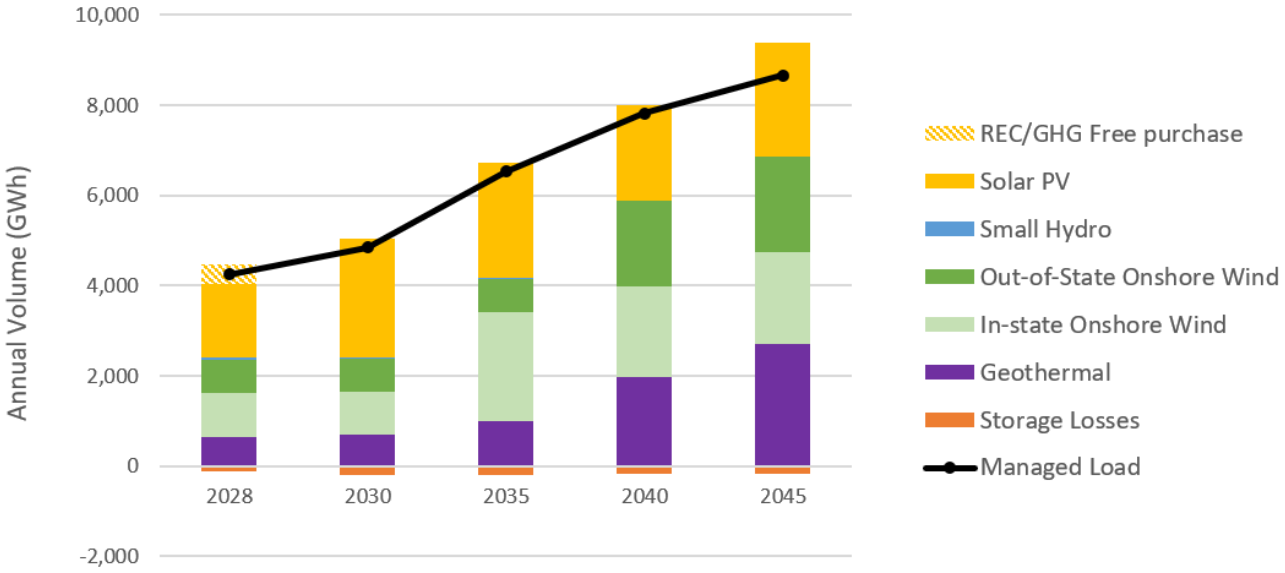
Figure 10: Preferred Portfolio Cumulative Capacity



	Current Portfolio	2028	2030	2035	2040	2045
Storage	197	458	772	787	669	758
Solar PV	505	590	904	904	737	863
Small Hydro	15	15	15	11		
Out-of-State Onshore Wind	220	220	220	220	550	620
In-State Onshore Wind	304	316	307	969	819	840
Geothermal	61	75	80	121	255	358

Figure 11 shows how WestLight meets its load in each year from a combination of existing PPAs, new resources, short-term renewable contracts and market purchases.

Figure 11: Preferred Portfolio Load and Generation

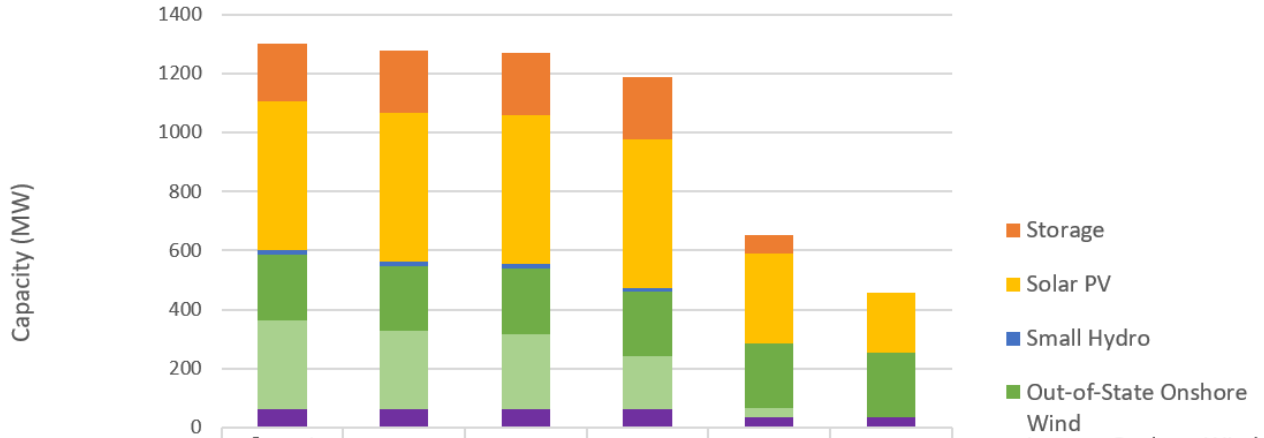


WestLight's Preferred Portfolio includes existing resources under contract, existing resources that it plans to contract with in the future, new resources under contract (expected to commence deliveries in 2026 and later), and new resources that it plans to contract with in the future. Existing resources are defined consistent with the definition used in the 2024-2027 IRP Filing Requirements Narrative Template and Resource Data Template (RDT), that is, resources in the RDT with contract statuses of "online" and

"planned existing." New resources are defined consistent with the definition used in the 2024-2027 IRP Filing Requirements Narrative Template and RDT, that is, resources in the RDT with contract statuses other than "online" and "planned existing," or rather, resources that are not online as of the IRP submission date of August 10, 2026.

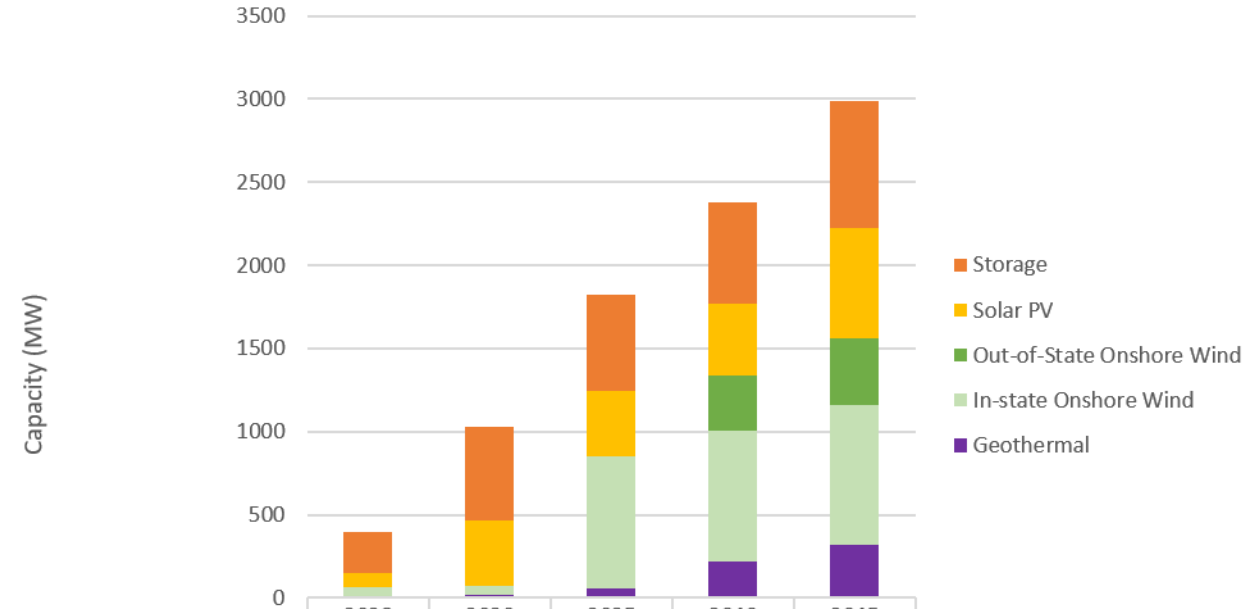
The figures below provide a summary of the existing and new resources currently in WestLight's portfolio, and those planned to be added between 2028 and 2045. Additional details are provided in the Resource Data Template.

Figure 12: Existing Resources in WestLight's Preferred Portfolio



	Current Portfolio	2028	2030	2035	2040	2045
Storage	197	212	212	212	65	0
Solar PV	505	505	505	505	303	200
Small Hydro	15	15	15	11	0	0
Out-of-State Onshore Wind	220	220	220	220	220	220
In-state Onshore Wind	304	266	257	180	30	0
Geothermal	61	61	61	61	35	35

Figure 13: New Resources in WestLight's Preferred Portfolio



	2028	2030	2035	2040	2045
Storage	246	560	575	604	758
Solar PV	85	399	399	434	663
Out-of-State Onshore Wind	0	0	0	330	400
In-state Onshore Wind	50	50	789	789	840
Geothermal	14	19	60	220	323

WestLight is not submitting an alternative portfolio.

Comparison to 2025-2026 Transmission Planning Process (TPP) Portfolio with Updates

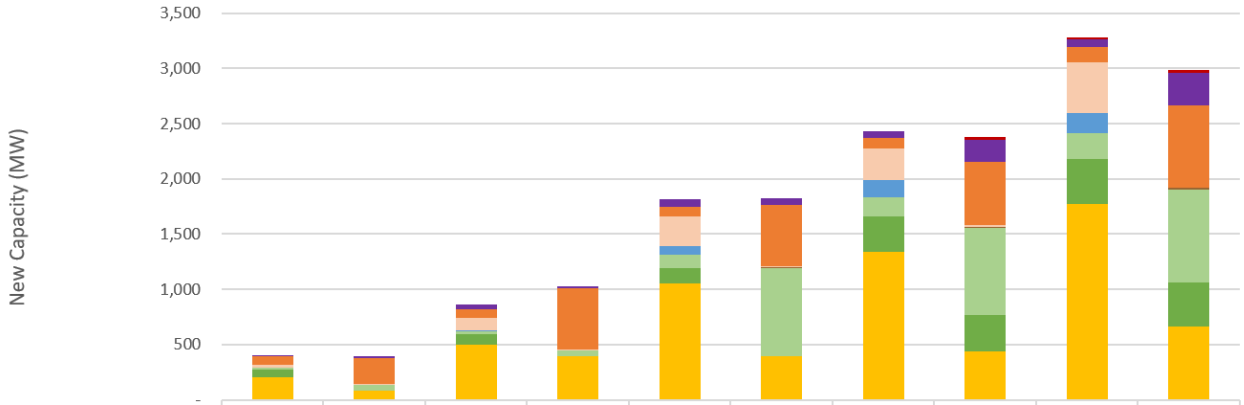
WestLight compared the new capacity assumed in the 2025-2026 TPP Portfolio with updates to the new capacity selected in its Preferred Portfolio. WestLight used its load share as calculated on the "Demand Inputs" tab of the CSP Calculator, which compares WestLight's annual retail sales volume to the entire CAISO system demand volume. WestLight's load share is approximately 1.7-2.1% depending on the model year.

As shown in Figure 14 below, WestLight's Preferred Portfolio results in a similar amount of total new capacity built compared to its load share of the 2025-2026 TPP. WestLight is planning for more new storage, wind and geothermal capacity than its load share of the 2025-2026 TPP would imply, and less solar capacity. WestLight did not constrain its modeling to procure only its proportional share of the wind and geothermal resources identified in the TPP. Instead, WestLight limited the availability of in state wind resources such that wind would not make up more than 50% of its generation portfolio. When selecting resources to contract, WestLight seeks to maintain a diverse portfolio that aligns with its load profile. WestLight utilized a custom load shape when developing its Preferred Portfolio, which includes higher winter peaks and lower summer peaks than the default CSP load profile. Wind and geothermal resources, as opposed to solar overbuild, emerged as a more cost-effective solution in order to meet assigned GHG emissions targets, reliability targets, and WestLight's voluntary goal of being 100% renewable by 2030. WestLight recognizes that if all load-serving entities pursued similar procurement strategies, the resulting

statewide portfolio composition would differ from the assumptions reflected in the TPP. Through its Preferred Portfolio, WestLight seeks to signal to state policymakers, regulators, and the market that wind and geothermal resources are favorable and valuable resources for achieving California's SB 100 goals, and that continued development of these resource types will be important to meeting the state's long-term decarbonization and reliability objectives. In addition, approximately half of the new storage capacity added between 2026 and 2028 consists of resources contracted to satisfy Mid-Term Reliability (MTR) procurement requirements. As a result, WestLight's initial resource mix differs from the assumptions reflected in the TPP portfolio, as MTR procurement activity across load-serving entities resulted in significant storage development due in part to storage being the most commercially available and readily deployable resource during the procurement period.

Certain resources reflected in the 2025–2026 TPP are not included in WestLight's Preferred Portfolio, including location-constrained 12-hour storage. WestLight's Preferred Portfolio also includes resources not reflected in the TPP, including an 8-hour compressed air energy storage project under contract with WestLight and Enhanced Geothermal Systems (EGS) beginning in the 2040 model year. WestLight incorporated EGS resource availability and cost assumptions based on recent CC Power solicitation results, and these resources were selected as cost-effective beginning in 2040.

Figure 14: Comparison of WestLight's Load Share of New Capacity in the 2025 Transmission Planning Portfolio (TPP) to New Capacity in WestLight Energy's 2026 Preferred Portfolio



	2028		2030		2035		2040		2045	
	TPP	IRP	TPP	IRP	TPP	IRP	TPP	IRP	TPP	IRP
EGS	-	-	-	-	-	-	-	26	15	26
Geothermal	10	14	43	19	63	60	65	194	69	297
Li-ion Battery (4-hr)	76	236	78	550	87	550	90	579	146	743
Li-ion Battery (8-hr)	29	10	114	10	275	10	286	10	453	-
Location-Constrained Storage (8-hr)	-	-	-	-	-	15	-	15	-	15
Location-Constrained Storage (12-hr)	-	-	5	-	77	-	164	-	182	-
In-State Wind	14	50	23	50	124	789	170	789	234	840
Out-of-State Wind	69	-	98	-	138	-	323	330	408	400
Offshore Wind	-	-	-	-	-	-	-	-	-	-
Solar	207	85	500	399	1,050	399	1,336	434	1,774	663

b. Preferred Conforming Portfolio

WestLight is submitting a single conforming portfolio, which is its Preferred Portfolio. The Preferred Portfolio adds a net additional 561 MW of storage, 358 MW of solar, 536 MW of in-state onshore wind, 400 MW of out-of-state onshore wind, and 297 MW of geothermal by 2045. Due to contract expiration, the Preferred Portfolio results in 15 MW less small hydro than is currently contracted. The selected capacity results in the lowest cost portfolio that meets WestLight's internal voluntary targets, and the assigned reliability and emissions targets.

To support the description of how these selections are consistent with each relevant statutory and administrative requirement, WestLight has included the text of PU Code Section 454.52(a)(1) below and then describes how the Preferred Conforming Portfolio addresses each of the requirements herein.

Explain how the LSE's Conforming Portfolio is consistent with each relevant statutory and administrative requirement. Specifically, the LSE should address the following relevant statutory and administrative requirements in PU Code Section 454.52(a)(1) and explain how its Preferred Conforming Portfolios satisfy those requirements:

(A) Meet the greenhouse gas emissions reduction targets established by the State Air Resources Board, in coordination with the commission and the Energy Commission, for the electricity sector and each load-serving entity that reflect the electricity sector's percentage in achieving the economywide greenhouse gas emissions reductions of 40 percent from 1990 levels by 2030 (I.e. meet the LSE's GHG benchmarks).

(B) Procure at least 60 percent eligible renewable energy resources by December 31, 2030, consistent with Article 16 (commencing with Section 399.11) of Chapter 2.3.

(C) Enable each electrical corporation to fulfill its obligation to serve its customers at just and reasonable rates.

(D) Minimize impacts on ratepayers' bills.

(E) Ensure system and local reliability on both a near-term and long-term basis, including meeting the near-term and forecast long-term resource adequacy requirements of Section 380, and require sufficient, predictable resource procurement and development to avoid unplanned energy supply shortfalls by taking into account impacts due to climate change, forecasted levels of building and transportation electrification, and other factors that can result in those shortfalls.

(F) Comply with paragraph (1) of subdivision (b) of Section 399.13 (I.e., at least 65 percent of the LSE's RPS procurement for each compliance period shall be from its contracts of 10 years or more in duration or in its ownership or ownership agreements for eligible renewable energy resources).

(G) Strengthen the diversity, sustainability, and resilience of the bulk transmission and distribution systems, and local communities.

(H) Enhance distribution systems and demand-side energy management.

(I) Minimize localized air pollutants and other greenhouse gas emissions, with early priority on disadvantaged communities identified pursuant to Section 39711 of the Health and Safety Code.

(J) Maintain a diverse portfolio of energy resources, which may include eligible energy resources procured by the Department of Water Resources.

WestLight's Preferred Portfolio is consistent with each relevant statutory and administrative requirement stated in Public Utilities Code Section 454.52(a)(1), as described below:

(A) Meet the greenhouse gas emissions reduction targets

WestLight's Preferred Portfolio 2045 GHG emissions of 0.150 MMT (calculated using the CSP Calculator) are below WestLight's assigned benchmark of 0.151 MMT. The Preferred Portfolio also performs better than WestLight's 2030, 2035, and 2040 GHG emissions benchmarks. Please see Section III.c for more detailed information on WestLight's Preferred Portfolio emissions results.

(B) Procure at least 60% eligible renewable energy resources

WestLight's Preferred Portfolio results in annual renewable energy procurement equal to 100% of its load beginning in 2030, measured as the demand (at generator busbar) in the CSP template, exceeding the SB 100 target of 60% of annual load from renewable energy resources in 2030. In 2045, WestLight's Preferred Portfolio results in net procurement of approximately 105% of annual load from renewable energy resources.

(C) Enable each electrical corporation to fulfill its obligation to serve its customers at just and reasonable rates

WestLight's rates are currently set at 5% below PG&E's rates. As detailed in Section III.e below, WestLight is committed to serving its customers at reasonable rates. In addition to setting rates that are competitive with PG&E, WestLight works to minimize rate volatility by constructing a balanced and conservatively hedged power supply portfolio, building financial reserves,[11]utilizing a rate stabilization fund, and minimizing rate changes to once per year when possible.

(D) Minimize impacts on ratepayers' bills

The MATCH model optimizes for portfolios that meet assigned objectives at least cost based on the inputs and assumptions. The Preferred Portfolio is the least cost option for meeting the requirements of the IRP and WestLight's adopted internal goals.

(E) Ensure system and local reliability on both a near-term and long-term basis, including meeting the near-term and forecast long-term resource adequacy requirements

11 WestLIght Financial Reserves Policy: https://www.westlightenergy.org/wp-content/uploads/2024/11/Policy-18-Financial-Reserves-Feb-2021.pdf

WestLight evaluated the reliability of its portfolios using two metrics:

- The volume of system RA provided through the portfolio compared to the Reliability Procurement Requirements assigned by the CPUC, as determined in the RDT;
- Evaluation of the portfolio using the CPUC's Slice-of-Day RA methodology

The results of this analysis are described further in Section III.f and indicate that the Preferred Portfolio helps ensure system and local reliability by satisfying the reliability requirements of the IRP under the marginal ELCC framework. In developing its portfolio, WestLight utilized the CPUC assigned load forecast, which incorporates expected impacts from climate change, transportation electrification, building electrification, and other factors affecting future electricity demand. WestLight's supplemental evaluation of its portfolio under a 24-hour RA framework provided additional insights regarding charging sufficiency and reliability of its portfolio, as well as potential challenges in designing a portfolio to simultaneously meet two different reliability standards. WestLight will continue to procure and optimize resources as necessary to satisfy the near-term reliability RA requirements under the 24-hour Slice-of-Day Framework.

Please see Section III.f for a more thorough discussion of the System Reliability Analysis.

(F) Ensure that at least 65% of RPS procurement is from long-term contracts.

WestLight's internal guideline is for 60-85% of its retail sales to be procured through mid and long-term contracts of 5 years or more. WestLight's minimum long-term contracting requirement is the statutory RPS minimum. The statutory long-term RPS contracting requirement refers to the portion of the RPS compliance period requirement that must come from long-term contracts, whereas WestLight's target applies to its entire retail load. Table 20 below compares WestLight's internal goal against the requirement to procure 65% of RPS procurement from long-term contracts.

Table 20: RPS Long-term Contract Requirements Compared to WestLight Targets

	2028	2030	2035	2040	2045
California RPS Target	55%	60%	60%	60%	60%
WestLight Internal RPS Target	90%	100%	100%	100%	100%
Long-Term Required (65% of RPS)	36%	39%	39%	39%	39%
WestLight Minimum Long-Term Target	36%	39%	39%	39%	39%
WestLight Maximum Long-Term Target	85%	85%	85%	85%	85%

WestLight Preferred Portfolio % Long-Term[12]	86%	98%	112%	111%	118%

WestLight's Preferred Portfolio results in a higher percentage of long-term contracts than the target range established through WestLight's internal planning process. For the model years 2035, 2040, and 2045, the calculated long-term contracting percentage exceeds not only WestLight's internal planning targets but also 100% of retail sales. This result is driven in part by differences between the RPS compliance methodology and the IRP modeling framework. Under the RPS program, long-term contracting requirements are calculated as renewable generation relative to retail sales, whereas the IRP models resources at the generator busbar and therefore includes generation needed to serve transmission and distribution losses. In addition, the current market for new resources largely consists of long-term contracting opportunities, which further increases the share of long-term contracts in WestLight's Preferred Portfolio.

While the current market for new resources largely consists of long-term contracting opportunities, WestLight continues to view a balanced mix of short-, medium-, and long-term procurement as an important component of risk mitigation and portfolio management. As WestLight progresses through the planning horizon, it expects to utilize a mix of contract term lengths, including procurement from both new and existing resources, to achieve reliability and GHG emissions targets while maintaining flexibility and managing risk.

(G) Strengthen the diversity, sustainability, and resilience of the bulk transmission and distribution systems, and local communities.

WestLight's Preferred Portfolio supports the diversity, sustainability, and resilience of the bulk transmission and distribution system by adding capacity from a variety of resource types as well as significant storage resources. WestLight has performed an analysis of the Preferred Portfolio with respect to the impacts to and reliance on the transmission system, as discussed further in Section III. m. WestLight's Preferred Portfolio uses the assigned load forecast from the CPUC, which is based on the 2024 IEPR Demand Forecast Update – Planning Forecast. Relative to the 2025 IEPR Planning Forecast, the 2024 IEPR Update assumes more aggressive adoption of load modifiers, while the 2025 IEPR Planning Forecast reflects recent federal policy changes that may moderate electrification growth. Utilizing this higher forecast in planning results in increased resource buildout and assumes the transmission and distribution system will need to accommodate higher electrification-driven load growth.

WestLight's Preferred Portfolio includes out-of-state wind resources that will require additional transmission infrastructure to be built in order for those resources to be delivered to California. WestLight believes that expanding and strengthening the transmission system is critical to achieving the decarbonization of the electric system mandated in SB 100.

12 Calculated to be consistent with RPS compliance methodology, that is, generation from long-term contracts, excluding storage losses, as a percentage of retail sales

In addition, WestLight has a number of programs that support strengthening the resilience of the grid. For example, WestLight's electrification programs emphasize "right-sizing" or optimization of the available service capacity of a given building to avoid unnecessary service upgrades. Service upgrades increase the need for grid infrastructure, often in response to "peaky" demand profiles, and increase rates, in addition to numerous customer-side project costs and delays. By "right-sizing" electrification investments, WestLight is helping to reduce the need for service connections and thus reduce the strain on the distribution system and reduce the need for distribution system upgrades.

WestLight's transportation and building electrification programs provide design guidelines, technical assistance, and financial support for maximizing EV charging and comprehensive residential electrification. These programs use best-in-class methods and technologies to deliver electrification benefits within available service capacity whenever possible. These strategies also support flatter load profiles which benefit grid stability.

In addition, WestLight has an expanding set of programs to actively shape and improve load shapes.

Specific programs WestLight operates that deliver grid benefits include:

- GovPV solar + storage for public buildings: Installation of solar and storage systems on local government facilities.
- Residential Solar & Storage: Installation of solar and storage on single-family homes.
- FLEXmarket: Pay-for-performance program for energy efficiency that provides larger incentives for efficiency in peak periods.
- EV Ready: EV charging program focused on multi-family buildings that emphasizes load shaping and grid-friendly, low-power charging.
- Home Upgrade: Residential electrification program that emphasizes right-sized electrification.
- EV Charging: WestLight led a multi-year managed charging pilot on load shaped EV charging[13].

For a full list of WestLight programs, see Table 38.

Additionally, WestLight engages in programs and/or projects that focus on smaller in-front-of-the-meter (FTM), Distribution-Connected Resources (DCRs) on the scale of approximately 1 to 20 MWs. Like DERs, DCRs can provide significant benefit not only to local communities (in the form of local environmental and economic benefits) but also to the system as a whole (in the form of transmission and distribution grid benefits). WestLight provides additional detail on these programs and projects in the Action Plan Section IV.a.vii.

(H) Enhance distribution systems and demand-side energy management.

As discussed above in (G), WestLight has several programs that enhance distribution systems and demand-side energy management. WestLight is also launching a Virtual Power Plant (VPP) that will assist in achieving these objectives. These efforts are described further in Section IV.a below.

13 Report available at https://www.westlightenergy.org/pce-resources/pce-ev-managed-charging-pilot-results/

(I) Minimize localized air pollutants and other greenhouse gas emissions, with early priority on disadvantaged communities

WestLight's Preferred Portfolio performs better than its assigned GHG benchmarks. WestLight does not procure electricity directly from any natural gas or other fossil-fueled generation resources. Fifteen of WestLight's executed PPAs are for resources located in DACs, including ten contracts for new resources. By entering long-term PPAs with WestLight, these projects will deliver renewable power to WestLight's customers, while improving air quality, providing economic benefits, and creating hundreds of jobs in the projects' regions. Please refer to Section III.d below for further details.

(J) Maintain a diverse portfolio of energy resources, which may include eligible energy resources procured by the Department of Water Resources.

WestLight's Preferred Portfolio maintains a diverse mix of energy resources, including solar, wind, geothermal, and storage, throughout the planning horizon. Selected resources are located across California and the broader Western Interconnection, as described further in Section II.b, Tables 14, 15, and 16. This diversity supports achievement of reliability and greenhouse gas emissions reduction targets while reducing portfolio cost and risk.

LSEs were not required to include resources that may be procured by the Department of Water Resources (DWR) under AB 1373 in the development of their Preferred Portfolios. However, WestLight evaluated the potential impacts of centralized procurement on its portfolio and has included an analysis of those impacts in Section IV.a.

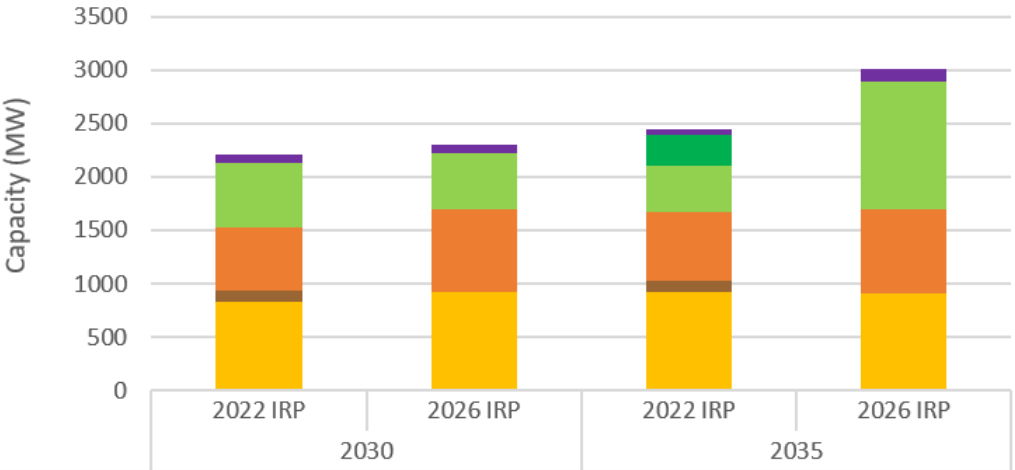
Comparison to WestLight's 2022 IRP – 25 MMT by 2035 Portfolio

A comparison of WestLight's 2026 Preferred Portfolio and 2022 Preferred Portfolio is shown in Figure 15 below. The portfolios are broadly similar in the 2030 model year, with the primary differences being higher levels of solar and storage and less wind in the 2026 Preferred Portfolio. In its 2026 modeling, WestLight constrained the availability of wind resources in 2030 based on its assessment of market conditions and the interconnection queue, resulting in greater selection of solar and storage resources.

The differences are more pronounced in the 2035 model year. WestLight's 2022 Preferred Portfolio included offshore wind beginning in 2035, whereas the 2026 modeling did not assume offshore wind would be commercially available by that date. As a result, the 2026 Preferred Portfolio relies more heavily on geothermal and onshore wind resources, which were identified as the most cost-effective resources in the model.

In addition, the load forecast used in the 2026 IRP is approximately 50% higher than that used in the 2022 IRP for 2035. While other modeling assumptions also influence portfolio composition, the higher forecast load is a significant driver of the approximately 25% increase in resource capacity selected in the 2026 Preferred Portfolio in 2035.

Figure 15: Comparison of 2022 IRP and 2026 IRP Cumulative Capacity



	2030		2035	
	2022 IRP	2026 IRP	2022 IRP	2026 IRP
Geothermal	84	80	49	121
Offshore Wind	0	0	288	0
Onshore Wind	603	527	433	1189
Storage	592	772	646	787
Solar Thermal	100	0	100	0
Solar PV	816	904	916	904
Small Hydro	16	15	11	11

c. GHG Emissions Results

Table 21 below presents the GHG emissions associated with the Preferred Portfolio. The CSP Calculator was used to estimate the emissions. WestLight's Preferred Portfolio performs better in reducing GHG Emissions in comparison to its assigned GHG Benchmark, reflecting WestLight's internal goal of achieving 100% renewable energy on an annual basis by 2030 through strategic procurement that prioritizes hourly emissions reductions.

WestLight uses a custom hourly load shape, storage dispatch profiles, and renewable resource generation profiles in the CSP Calculator for its Preferred Portfolio. A detailed explanation of how its load shape and production profile were developed is included in Section II.b.

Table 21: GHG Emissions Results from CSP Calculator (8 MMT Target)

	2028	2030	2035	2040	2045
Assigned Load Forecast (GWh)	3,899	4,452	5,998	7,181	7,957
8 MMT GHG Benchmark (MMT CO_2)		0.359	0.310	0.280	0.151
WestLight Preferred Portfolio Emissions (MMT CO_2)	0.131	0.226	0.253	0.212	0.150

d. Local Air Pollutant Minimization and Disadvantaged Communities

i. Local Air Pollutants

Table 22 below identifies the estimated emissions associated with the Preferred Portfolio based on the calculations in the CSP Calculator.

Table 22: Preferred Portfolio Criteria Air Pollutants (8 MMT Scenario)

	2028	2030	2035	2040	2045
NOx (tonnes/yr)	16	22	27	14	15
PM2.5 (tonnes/yr)	8	14	17	14	13
SO2 (tonnes/yr)	1	1	2	1	1

WestLight does not currently procure and does not plan to procure electricity directly from any fossil-fueled power plants. WestLight's only contribution to air pollutants is a result of reliance on system power, and an explanation of its plans to reduce its reliance on system power is described further in the Action Plan section below. The criteria pollutant emissions above from specified imports of coal generation are calculated for informational purposes but are not included in the total emissions because these emissions occur outside of California.

ii. Focus on Disadvantaged Communities

For the purposes of its IRP, WestLight defined disadvantaged communities consistent with the definition provided in the IRP filing requirements, based on the following CalEPA's designation:[14]

I. Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0 (1,984 tracts).

II. Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores (19 tracts)

III. Census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen 4.0 (307 tracts).

IV. Lands under the control of federally recognized Tribes.[15]

Please refer to Table 23 below for a list of the census tracts and locations of disadvantaged communities. WestLight identified seven census tracts in San Mateo County in the top 25% of impacted census tracts in CES 4.0, thereby meeting this definition of disadvantaged community. There were an additional 2 census tracts in San Mateo County that qualified as disadvantaged in CES 3.0 that are included as well. WestLight

14 SB 535 Disadvantaged Communities | OEHHA (ca.gov)

15 For purposes of this designation, a Tribe may establish that a particular area of land is under its control even if not represented as such on CalEPA's DAC map and therefore should be considered a DAC by requesting a consultation with the CalEPA Deputy Secretary for Environmental Justice, Tribal Affairs and Border Relations.

identified five census tracts in the City of Los Banos that are in the top 25% of impacted census tracts in CES 4.0, including one census tract that was in the top 5% of cumulative pollution burden scores in CES 4.0. CES 5.0 has recently been released which resulted in the addition of 3 new disadvantaged census tracts. Six census tracts that qualified in CES 3.0 and/or CES 4.0 have either been removed and shifted into neighboring census tracts, or have dropped out of the top 25th Poverty Percentile, deeming these census tracts ineligible for future enrollment in WestLight's DAC-GT program. The new census tracts have been added in Table 23 and the ones from CES 3.0 and CES 4.0 that will become ineligible are in bold. Additionally, Figure 16 below provides a map to the location of each census tract in San Mateo County, and Figure 17 provides a map to a location of each census tract in the City of Los Banos.

Table 23: WestLight's Disadvantaged Communities[16],

Census Tract	Approximate Location	CES 4.0 Percentile Range	Customer Accounts Served by WestLight	Qualification	Map Label
6047002201	Los Banos, Merced	95-100%	84	Top 5% in CES 4.0	1
6047002302	**Los Banos, Merced**	**85-90%**	**2,917**	**Top 25% in CES 4.0**	**2**
6047002202	**Unincorporated Merced County area**	**85-90%**	**439**	**Top 25% in CES 4.0**	**3**
6047002100	Unincorporated Merced County area	85-90%	1,058	Top 25% in CES 4.0	4
6081602100	South San Francisco, San Mateo	80-85%	1,012	Top 25% in CES 4.0	5
6081610201	Redwood City, San Mateo	80-85%	8	Top 25% in CES 4.0	6
6047002000	Unincorporated Merced County area	80-85%	0	Top 25% in CES 4.0	7
6081602300	South San Francisco, San Mateo	80-85%	1,036	Top 25% in CES 4.0	8
6081606200	**San Mateo, San Mateo**	**75-80%**	**2,052**	**Top 25% in CES 4.0**	**9**
6081612000	**East Palo Alto, San Mateo**	**75-80%**	**1,377**	**Top 25% in CES 4.0**	**10**

16 Table 23 includes data from oehha.ca.gov/calenviroscreen/report/calenviroscreen-30, under CalEnviroScreen 3.0 Data and Additional Materials - ces3results.xlxs (updated June 2018)

6081604101	**San Bruno, San Mateo**	**75-80%**	**2,552**	**Top 25% in CES 4.0**	**11**
6081610202	**Redwood City, San Mateo**	**75-80%**	**1**	**Top 25% in CES 4.0**	**12**
6081611900	East Palo Alto, San Mateo	70-75%	2,018	Top 25% in CES 3.0	13
6081604200	San Bruno, San Mateo	65-70%	1,115	Top 25% in CES 3.0	14
6047002301	Los Banos, Merced County	75-80%	6,759	Top 25% in CES 5.0	1
6047002303	Los Banos, Merced County	80-85%	N/A	Top 25% in CES 5.0	2
6081602202	South San Francisco, San Mateo	75-80%	3,284	Top 25% in CES 5.0	5-8

Figure 16: Map of DACs in San Mateo County (Numbers correlate to "Map Label" in Table 23) with Caltrain line shown in purple.

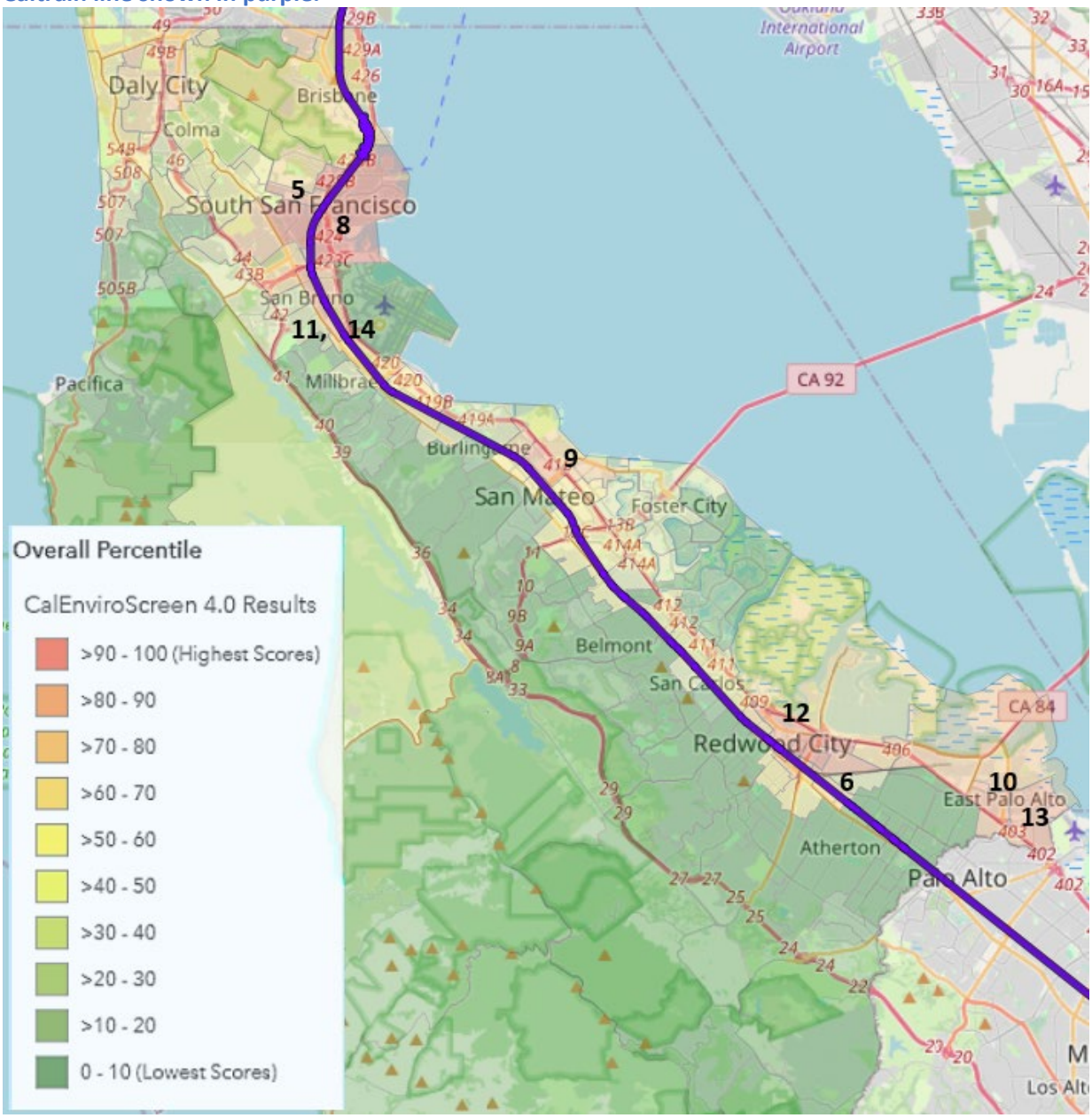
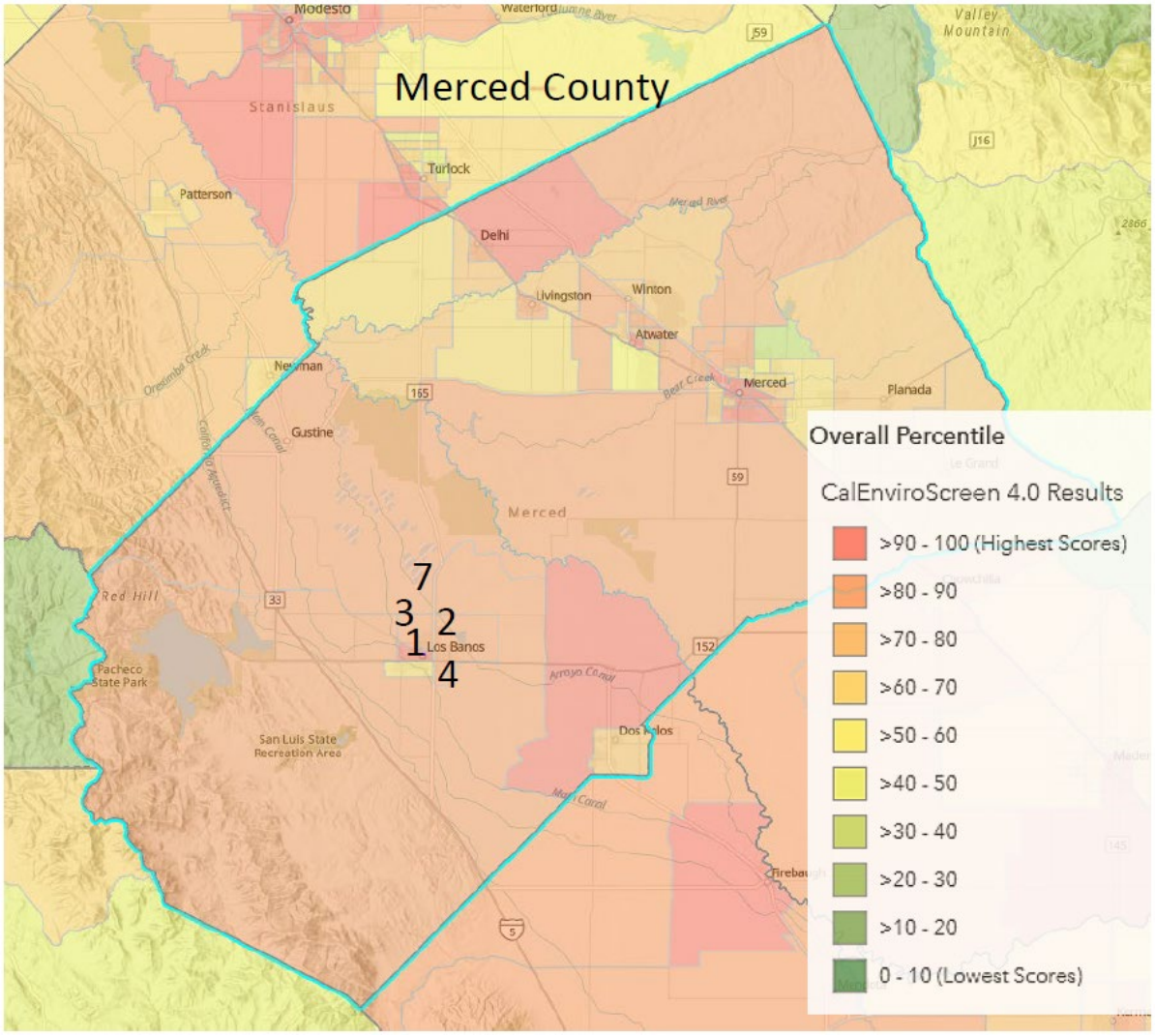


Figure 17: Map of DACs in the portion of Merced County that WestLight serves (City of Los Banos) (Numbers correlate to "Map Label" in Table 23)



WestLight estimates that it serves approximately 17,500 customer accounts, including residential and non-residential, serving a population of approximately 45,000 people, in DACs located within its service territory. This represents roughly 15.4% of WestLight's total residential customer accounts. Of these DAC customers, 2,660 accounts, or about 15% of WestLight's total DAC accounts, participate in WestLight's DAC-GT program, which provides clean energy to income qualified residential customers at a 20% discount.

Additionally, WestLight's Preferred Conforming Portfolio advances the statutory requirement to minimize localized air pollutants and greenhouse gas emissions, particularly in disadvantaged communities, through targeted procurement of 100% renewable electricity and innovative tariff design. Through its Green Transit Tariff, WestLight supplies Caltrain's electrified rail system with 100% renewable energy, displacing diesel fuel use that has historically contributed to air pollution along the corridor. Caltrain's electrification is projected to reduce annual emissions by approximately 250,000 metric tons of CO_2, equivalent to removing roughly 55,000 cars from the road, while significantly improving air quality for communities

along the corridor[17]. A recent study out of UC Berkeley showed that "the new electric trains reduced riders' exposure to the carcinogen black carbon by an average of 89%, and significantly reduced ambient black carbon concentrations within and around the San Francisco station[18]". Figure 16 above shows the Caltrain corridor runs through many of the most burdened census tracts, including 7 DACs in WestLight's service area.

WestLight's procurement strategy further enhances these outcomes by lowering the cost of electrification. The Green Transit Tariff allows Caltrain to generate maximum credits in the California Air Resources Board Low Carbon Fuel Standard Program and also compensates Caltrain for electricity exported back to the grid through regenerative braking – a first-of-its-kind compensation model designed to advance transit electrification. The Green Transit Tariff is available to other local transit agencies, and WestLight hopes to further reduce local air pollutants throughout the service area. By aligning renewable procurement with cost-effective electrification, WestLight's portfolio delivers measurable emissions reductions and improved public health outcomes in disadvantaged communities, consistent with PU Code Section 454.52(a)(1).

Power Procurement in DACs

WestLight does not procure electricity directly from any natural gas or other fossil-fueled generation resources. Further, there are no polluting electricity generation resources located in the DACs in WestLight's service territory identified above.

WestLight fully recognizes the need to help mitigate the impacts of air pollution in regions of the state where communities have been disproportionately impacted by the existing generating fleet as well as the need to bring economic benefits to communities with high levels of poverty and unemployment. Consistent with this recognition, WestLight has executed long-term power purchase agreements (PPAs) to build new clean energy resources with ten projects in disadvantaged communities across the state, including six renewable energy projects – two solar projects located in Merced County, a solar project located in Kings County, two solar plus storage projects located in Fresno County, and a geothermal project located in Imperial County – and four storage projects, including one in Riverside County, two in Los Angeles County, and one in Kern County. WestLight also has contracts with five existing clean energy resources located in DACs, including two wind resources in Kern and Solano Counties and three hydroelectric resources in Shasta County. By entering into PPAs with WestLight, these projects will deliver renewable power to WestLight's customers, while improving air quality, providing economic benefits and creating hundreds of jobs in the projects' region.

Each of the five new solar projects and the four new storage projects used or are using a project labor agreement (PLA) with local unions for the construction of the projects. The geothermal project used prevailing wage for construction of the project.

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17 https://www.caltrain.com/media/32757/download?inline#:~:text=In%20addition%2C%20electrification%20will%20eliminate,the%20state's%20emissions%20reduction%20goals.&text=Reduced%20Engine%20Noise%20Emanating%20from,less%20than%20diesel%20train%20engines

18 https://news.berkeley.edu/2025/04/16/electric-trains-are-quieter-more-reliable-than-diesel-new-study-finds-theyre-healthier-too/

A PLA is a pre-hire collective bargaining agreement with one or more labor organizations that establishes the terms and conditions of employment for a specific construction project. Consistent with WestLight's Sustainable Workforce policy, WestLight believes support of local businesses, union labor, and apprenticeship and pre-apprenticeship programs that create employment opportunities are important components of building and sustaining healthy and sustainable communities. As part of its procurement process, WestLight collects information from project owners on expected labor impacts. This information is used to evaluate potential workforce impacts of proposed projects with the goal of promoting fair compensation, fair worker treatment, multi-trade collaboration, and support for the existing wage base in local communities where contracted projects will be located.

Additionally, WestLight's solicitation materials for its renewable procurements include specific criteria targeted at understanding the impacts of projects on disadvantaged communities. Respondents to RFOs are required to reply to questions regarding their outreach efforts, and any DAC, workforce development, and community benefits impacts associated with their projects. Specific questions include the following:

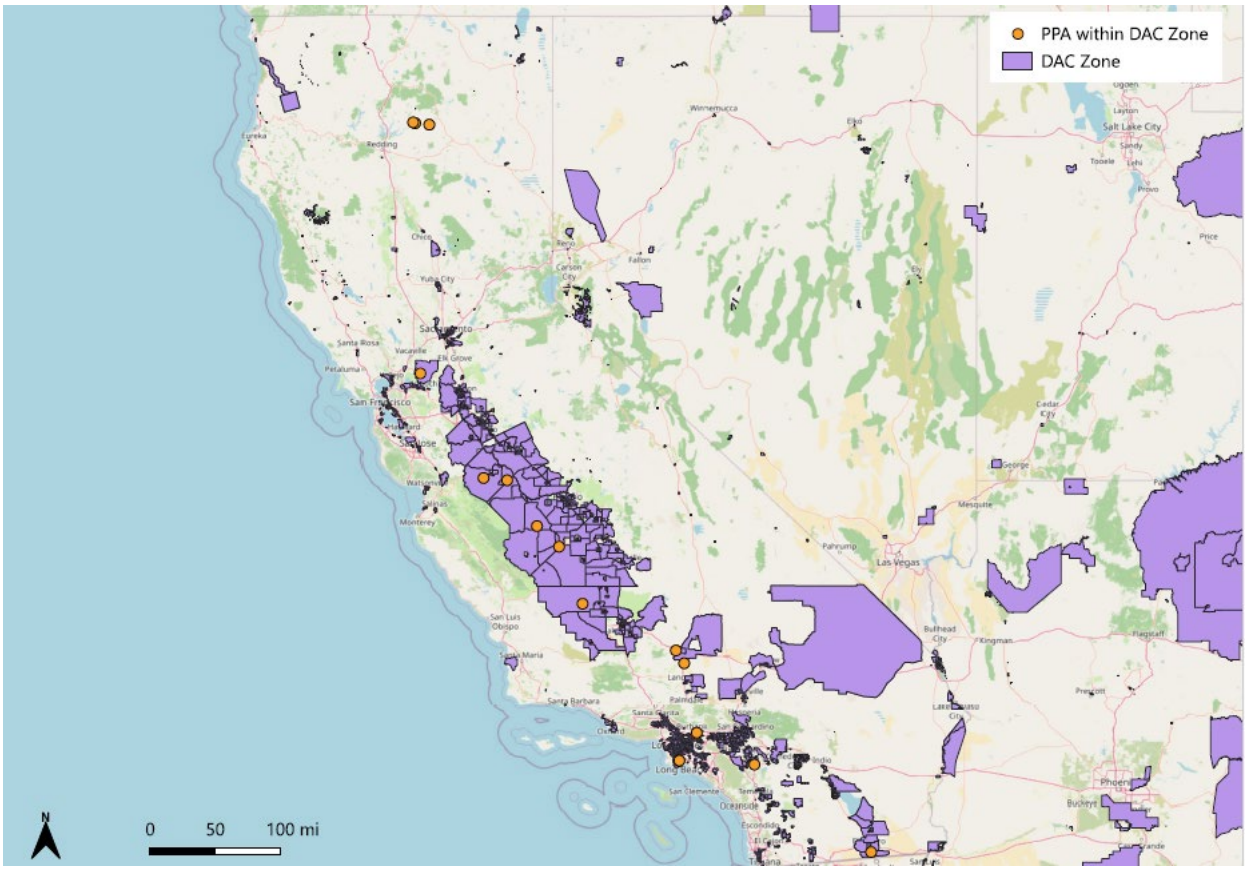
- Is your project located within a Disadvantaged Community (DAC)?
- Does your project demonstrate benefits to DACs?
    - If 'Yes', please describe the benefit
- Has the bidder consulted with local Native American tribes about whether the proposed project footprint is on lands that may contain cultural resources?
    - If the answer is 'Yes', please explain and provide supporting documentation, including a timeline of outreach and consultation activities, and responses from tribal members.
- Has your project secured or will plan to secure a 5-trade project labor agreement or similar workforce agreement?
    - If the answer is 'Yes' or 'Planned for the Future', does the PLA/workforce agreement have a targeted hire program in place for placing Equity Priority Workers (ex: underemployed, custodial single parent, veteran of the US Military, etc.)
- Regardless of whether or not your project is located in a DAC, have you conducted outreach to the communities around the project location?
    - If the answer is 'Yes' or 'Planned in the Future', please describe the community outreach, including outreach methods (i.e. door knocking, phone banking, internet, social media, mailings, physical notices posted), the languages spoken in communities surrounding the proposed project and the languages in which materials been made available, state the number of responses by community members, describe substantive responses, and describe any changes to the project undertaken in response to community responses.
    - If the answer is 'Yes' or 'Planned in the Future', please provide a timeline of community outreach activities to date and planned in the future.
    - If the developer has conducted community outreach, was the community notified of how their input was used?
    - If the answer is 'Yes' or 'Planned in the Future', has the developer partnered with local Community-Based Organizations (CBOs) in its outreach activities?
- Has your project secured a community benefits agreement (CBA)?
- Please describe any community benefits agreements your project has secured or will secure and the status of the agreements.

- If a Community Benefits Agreement has been or will be negotiated, please describe how benefits will be measured and reported, and/or if an oversight committee will monitor the progress of delivery of community benefits.

WestLight has developed rubrics for each topic area and grades responses to each individual question against criteria designed for that specific question, which can include quality of response and alignment with industry best practice. For example, for the Community Benefits topic area, projects are awarded more points if responders provide a detailed timeline of community outreach, involve trusted messengers like CBOs in their outreach, and include details on how benefits from Community Benefits Agreements or Community Benefits Plans will be measured.

WestLight has conducted a geographic analysis of its contracted projects that are within DAC boundaries, and is providing this analysis in Figure 18 and a description of its projects in this section.

Figure 18: WestLight Power Procurement in Disadvantaged Communities



Wright Solar is a 200 MW new solar project currently operating in Merced County, less than 100 miles south of San Mateo County. The facility is located in a disadvantaged community that ranks in the 85th overall percentile on CalEnviroScreen 4.0. The project produces power equivalent to that used by approximately 73,000 households. The construction of Wright Solar over the course of 2018 and 2019 produced approximately 180 jobs and resulted in over $2.7 million of sales and use tax in the county of Merced. The Wright Solar project also has a CBA in place with Merced County. As part of this CBA, the project makes an annual payment of $25,000 to Merced County' General Fund.

Dos Palos Solar is a 3 MW new solar project currently operating in Merced County, roughly 100 miles south of San Mateo County. The facility is located in a disadvantaged community that ranks in the 80th overall percentile on CalEnviroScreen 4.0. Dos Palos produces power equivalent to that used by over 1,000 households. The project produced approximately 30 jobs during construction and utilized union labor. This project was procured to serve the needs of WestLight's DAC-GT customers, which is described further above in Section III.b.

Mustang Two Solar is a 100 MW new solar project currently operating in Kings County, roughly 150 miles south of San Mateo County. The facility is located in a disadvantaged community that ranks in the 92nd overall percentile on CalEnviroScreen 4.0. The project produces power equivalent to that used by over 40,000 households. The project owner estimates that approximately $3.1 million was spent locally on materials and services, $3.6 million in tax revenue will go to Kings County and $8.1 million in tax revenue will go to the state.

Darden III and Darden IV are two new solar plus storage facilities, each 42.28 MW of solar and 45.74 MW of 4-hour battery storage. The projects are currently under construction in Fresno County, less than 150 miles south of San Mateo County. Darden III and IV are located in a disadvantaged community that ranks in the 83rd overall percentile on CalEnviroScreen 4.0. The projects will produce power equivalent to that used by over 16,000 households. The projects will create approximately 1,600 union labor jobs during construction.

Heber 2 Geothermal is a 26 MW new geothermal project currently operating in Imperial County, nearly 500 miles south of San Mateo County. The facility is located in a disadvantaged community that ranks in the 84th overall percentile on CalEnviroScreen 4.0. The project produces power equivalent to that used by nearly 30,000 households. The project paid prevailing wage for all construction work and created approximately 54 jobs during construction.

Nova Power III is a 50 MW new 4-hour storage project currently operating in Riverside County, approximately 450 miles south of San Mateo County. The facility is located within 5 miles of a disadvantaged community that ranks in the 82nd overall percentile on CalEnviroScreen 4.0.

San Gabriel II is a new storage project that includes a 10 MW, 8-hour battery and a 65 MW, 4-hour battery currently under development in Los Angeles County, approximately 300 miles south of San Mateo County. The facility is located in a disadvantaged community that ranks in the 83rd overall percentile and 100th cumulative pollution burden percentile on CalEnviroScreen 4.0. The project will have a PLA and is estimated to create approximately 130 jobs during construction.

Willow Rock is a 500 MW, 8-hour new compressed air storage project from which WestLight is contracted for 15 MW of offtake. The project is currently under development in Kern County, approximately 250 miles south of San Mateo County and is located within 5 miles of a disadvantaged community that ranks in the 77th overall percentile on CalEnviroScreen 4.0. The project will have a PLA.

Voyager Wind II is a 63.175 MW existing wind project operating in Kern County, approximately 250 miles south of San Mateo County. The facility is located within 5 miles of a disadvantaged community that ranks in the 77th overall percentile and 95th cumulative pollution burden percentile on CalEnviroScreen 4.0. The project produces power equivalent to that used by nearly 30,000 households.

Shiloh Wind is a 150 MW existing wind project operating in Solano County, approximately 50 miles northeast of San Mateo County. Shiloh Wind is located in a disadvantaged community that ranks in the 78th percentile on CalEnviroScreen 4.0. The project is producing power equivalent to that used by over 55,000 households. Shiloh Wind pays approximately $1M per year in Property Taxes.

Hatchet Creek is a 7.5 MW existing hydroelectric project operating in Shasta County, approximately 250 miles north of San Mateo County. The project is located within 5 miles of land under the control of federally recognized Tribes. Hatchet Creek produces power equivalent to that used by over 2,000 households.

Roaring Creek is a 2 MW existing hydroelectric project operating in Shasta County, approximately 250 miles north of San Mateo County. The project is located within 5 miles of land under the control of federally recognized Tribes. Roaring Creek produces power equivalent to that used by nearly 800 households.

Burney Creek is a 3 MW existing hydroelectric project operating in Shasta County, approximately 250 miles north of San Mateo County. The project is located within 5 miles of land under the control of federally recognized Tribes. Burney Creek produces power equivalent to that used by nearly 800 households.

Collectively, these projects demonstrate WestLight's commitment to procuring clean energy resources that provide benefits to disadvantaged communities while supporting California's clean energy transition. In addition, WestLight Energy has consistently advocated for transmission and local generation solutions to allow retirement of the many highly polluting gas plants in DACs retained for local reliability. Although these issues are not acute in WestLight Energy's territory, this issue remains a top environmental justice concern in California.

e. Cost and Rate Analysis

WestLight's rates are set by its Board of Directors. Since inception, WestLight's goal has been to offer rates that are at parity or lower than PG&E rates. WestLight's default retail product is called ECOplus and rates for this product are currently set at 5% below PG&E's rates while providing customers with electricity that is supplied entirely from renewable or carbon-free sources through 2029. WestLight's goal is to supply the ECOplus product with energy sources that are 100% renewable on an annual basis beginning in 2030. WestLight's long-term success depends on effectively managing costs, maintaining competitive customer rates, and preserving its financial sustainability.

To meet these goals, WestLight takes several actions to procure the lowest cost portfolio and protect its customers from unexpected price increases.

- Competitive procurement: WestLight engages in competitive procurement processes to secure the lowest cost resources possible for its customers.

- Financial reserves: WestLight maintains cash reserves at least equivalent to 180 days of total operating expenses, which can help WestLight manage risk and remain financially solvent.[19]
- Credit rating: WestLight obtained an investment grade credit rating in 2019, and currently maintains two investment grade credit ratings: A3 from Moody's and A- from S&P Global. This helps WestLight to secure the lowest cost power resources for its customers.
- Rate Stabilization: In May 2024, the WestLight Board of Directors approved establishment of a Rate Stabilization Fund pursuant to Governmental Accounting Standards Board (GASB) Statement No. 62. to support customer rate stability and mitigate future rate volatility.
- Risk Management: WestLight is subject to cost volatility and market price risk in meeting load requirements in the CAISO market. WestLight manages this risk through forward procurement of fixed price contracts for energy. WestLight Energy uses a portfolio risk management approach in its power purchasing program, seeking low-cost supply as well as diversity among technologies, production profiles, project sizes, project locations, counterparties, term lengths and timing of market purchases to cost average over time, including remaining cognizant of the value of open market positions. In 2024, WestLight's Board adopted an Energy Risk Policy[20], which establishes a formal governance and risk management framework for energy procurement activities. The ERP defines risk management responsibilities, oversight structures, internal controls, and transaction authorities to ensure procurement activities are conducted in a manner consistent with WestLight's financial objectives and risk tolerance.

Considering these goals, WestLight analyzed the modeled cost of its Preferred Portfolio. Overall, WestLight 's expected costs increase over time, largely reflecting the higher costs associated with new resource additions. WestLight notes that the cost results of the model outputs are sensitive to market conditions, and uncertainty increases in later years. These uncertainties are discussed further in the barriers analysis in the Action Plan below.

In order to evaluate the cost uncertainty and associated risk of its Preferred Portfolio, WestLight used a stochastic analysis to determine the probability that its costs would exceed certain thresholds. The stochastic analysis results in a probability distribution curve of potential portfolio costs. These results are summarized here by showing the 5th, 50th, and 95th percentile costs from the stochastic analysis.

WestLight's expected portfolio costs for its Preferred Portfolio are depicted in Tables 24 and 25 below. A description of the cost components is provided below.

Table 24: Portfolio Total Cost Results (Nominal $M)

	2028	2030	2035	2040	2045
Median (P50)	$332	$436	$656	$955	$1,179
Lower Cost Estimate (P5)	$310	$425	$637	$937	$1,160
Higher Cost Estimate (P95)	$359	$451	$673	$983	$1,195

19 Financial Reserves Policy: https://www.westlightenergy.org/wp-content/uploads/2024/11/Policy-18-Financial-Reserves-Feb-2021.pdf

20 https://www.westlightenergy.org/wp-content/uploads/2025/02/Policy-23-Energy-Risk-Policy-November-2024.pdf

Table 25: Portfolio Weighted Average Cost Results (Nominal $/MWh)

	2028	2030	2035	2040	2045
Median (P50)	$78	$90	$100	$123	$136
Lower Cost Estimate (P5)	$73	$88	$97	$120	$134
Higher Cost Estimate (P95)	$84	$93	$103	$125	$138

For each portfolio, costs are comprised of the following components:

Market Cost of Customer Load:
WestLight Energy buys load to serve customers at the PG&E DLAP. The cost of this load is determined using the hourly day ahead and real-time imbalance CAISO market prices for the PG&E DLAP. For the stochastic analysis, WestLight assumed load volumes remain fixed but CAISO market prices for the PG&E DLAP vary.

Contract Costs:
WestLight Energy buys renewable energy under several contracting structures, primarily long-term PPAs with a fixed price over the project term. WestLight Energy pays a fixed price for the renewable energy generated by its contracted projects. For the stochastic analysis, WestLight assumed contract costs do not vary.

Market Revenue from Energy Generation:
WestLight Energy sells its renewable energy into the CAISO market at each contracted project delivery point, which generates revenue for WestLight Energy. If market prices at a particular node during a particular interval are negative and WestLight Energy chooses not to curtail generation at that node during that hour, then WestLight Energy would pay CAISO for the injection of that energy into the system. For the stochastic analysis, WestLight assumed resource generation varies with weather variability, and market prices vary.

REC and GHG-free Attribute Costs:
If WestLight Energy's portfolio does not provide enough renewable and/or carbon-free energy through long-term PPAs to meet its targets, it would contract REC and GHG-free energy via short-term contract structures such as index-plus contracts. Under these contracting structures, WestLight Energy pays the market price for the energy plus an attribute premium. In the 2026 IRP, WestLight Energy's Preferred Portfolio meets 100% of its annual load with renewable resources in all years except 2028, the only year in which its Preferred Portfolio includes net purchases of REC or GHG-Free attributes. The prices of these products were derived from Ascend's Market Intelligence forecast and are updated to reflect WestLight Energy's most current assessment of the market.

Capacity Market Costs:
If WestLight Energy's portfolio does not provide enough resource adequacy through long-term PPAs, it would contract for capacity via short-term contract structures for resource adequacy. Short-term capacity market costs are based on WestLight Energy's assessment of the resource adequacy market, supported by broker quotes and third-party evaluations of market pricing, while long-term forecasts are derived from Ascend's Market Intelligence.

Other Costs:

WestLight's portfolio costs include several additional cost categories, including CAISO administrative and ancillary services charges, Congestion Revenue Rights (CRR) costs, and forecasting services. These costs are necessary to support reliable market participation, manage transmission congestion risk, and ensure accurate forecasting for portfolio operations.

f. System Reliability Analysis

In this section, WestLight describes its methods for evaluating system reliability and how its Preferred Portfolio contributes to system reliability.

WestLight defines reliability as the ability of a resource portfolio to meet customer load and maintain adequate operating reserves across all hours and seasons, including periods of system stress, renewable variability, and extreme weather conditions. Reliable portfolios must provide not only sufficient capacity, but also sufficient energy and operational flexibility to ensure resources remain available when needed. Accordingly, reliability should be evaluated not solely through peak demand conditions, but through a portfolio's ability to serve load throughout the year under a range of operating conditions.

The transition to variable energy resources, especially wind and solar, will require an evolution of reliability evaluation beyond a peak load analysis. Reliability assessment of low carbon resources will also need to evaluate serving load across all hours, since resources to meet load during the solar window will not be the same as resources used to meet evening ramping or overnight load. The CPUC's 24-hour Slice-of-Day framework used in the RA program meets this criterion of tracking the performance of resource portfolios in meeting load in all hours, as well as energy sufficiency of storage.

However, the CPUC's current reliability planning is conducted under multiple coexisting frameworks, including Effective Load Carrying Capability (ELCC), marginal ELCC, and the 24-hour Slice-of-Day construct. While each methodology may theoretically provide some useful insight into system reliability, they are not fully aligned and can produce differing signals regarding the reliability contribution of resources. In particular, marginal ELCC approaches, which estimate the incremental contribution of additional resources as system conditions evolve, may undervalue certain resource types—especially storage and hybrid resources—as penetration increases. ELCC methodologies are highly sensitive to assumptions of the precise resource mix and may not provide accurate results when used to evaluate a portfolio sharply different from the portfolio used to generate the ELCC values. Since the value of each resource type under ELCC methodologies depends critically on the full portfolio of resources, the valuation of each LSE's portfolio could shift because of what other LSEs do or do not procure.

For example, under the marginal ELCC framework, an LSE may procure sufficient energy to charge all its storage resources, but if other LSEs do not, then the energy deficiency caused by other LSEs will devalue the storage resources of the LSE with sufficient charging, forcing additional generation procurement by that LSE. This dynamic shifts significant costs onto the customers of the LSE with adequate charging resources because of the deficiencies of other LSEs' procurement. This inherent characteristic of ELCC methodologies can create significant cost shifts in which a LSE can fully meet its own customers' load in all hours, yet still be required to procure additional resources because of the make up of other LSEs' portfolios. This procurement outcome may be driven in part by portfolio-wide assumptions embedded within the ELCC methodology rather than solely by the reliability characteristics of the individual LSE portfolio. On the other hand, the Slice-of-Day framework evaluates resource sufficiency based on the

operational capabilities of an LSE's resources on an hourly basis including the ability to meet load in all hours and ensure adequate charging of storage resources.

As a result, the same portfolio may appear sufficient under one framework while requiring additional procurement under another. WestLight's own reliability analysis, which includes a supplemental Slice-of-Day evaluation in addition to the required marginal ELCC approach under the IRP filing requirements, demonstrates this point. The divergence of these two reliability frameworks introduces complexity into long-term planning and procurement, as load-serving entities must simultaneously satisfy multiple reliability constructs that are based on different assumptions about resource performance and system needs. Without further alignment, these frameworks may create duplicative or conflicting procurement signals, increasing costs without proportionate reliability benefits. WestLight therefore views this as both a modeling and policy consistency issue that warrants continued refinement as the Commission advances reliability and clean energy objectives.

The primary metric used to evaluate WestLight's Preferred Portfolio is an analysis of its September NQC using the capacity counting rules established in the 2024-2027 IRP Filing Requirements. According to this metric, WestLight's Preferred Portfolio meets its reliability need in all years of the study period (2026 to 2045). In WestLight's modeling of its Preferred Portfolio, the GHG emissions target, rather than the reliability requirements, was the binding constraint driving resource additions through 2045.

The Reliability summary analysis from the Reliability tab of the Resource Data Template for the Preferred Portfolio is presented below as Figure 19 and Figure 20, and demonstrates how WestLight's Preferred Portfolio will meet its assigned reliability need in all years.

Figure 19: LSE Capacity by Resource Type Chart from the Reliability Tab of the RDT – WestLight Preferred Portfolio

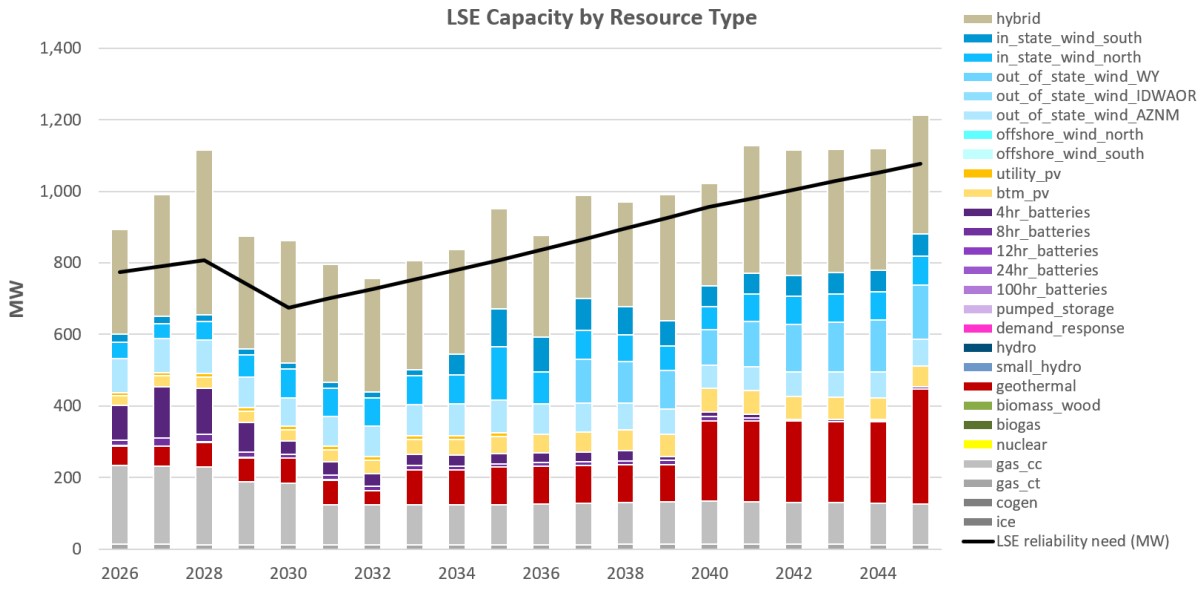


Figure 20: LSE Capacity by Contract Status from the Reliability Tab of the RDT – WestLight Preferred Portfolio

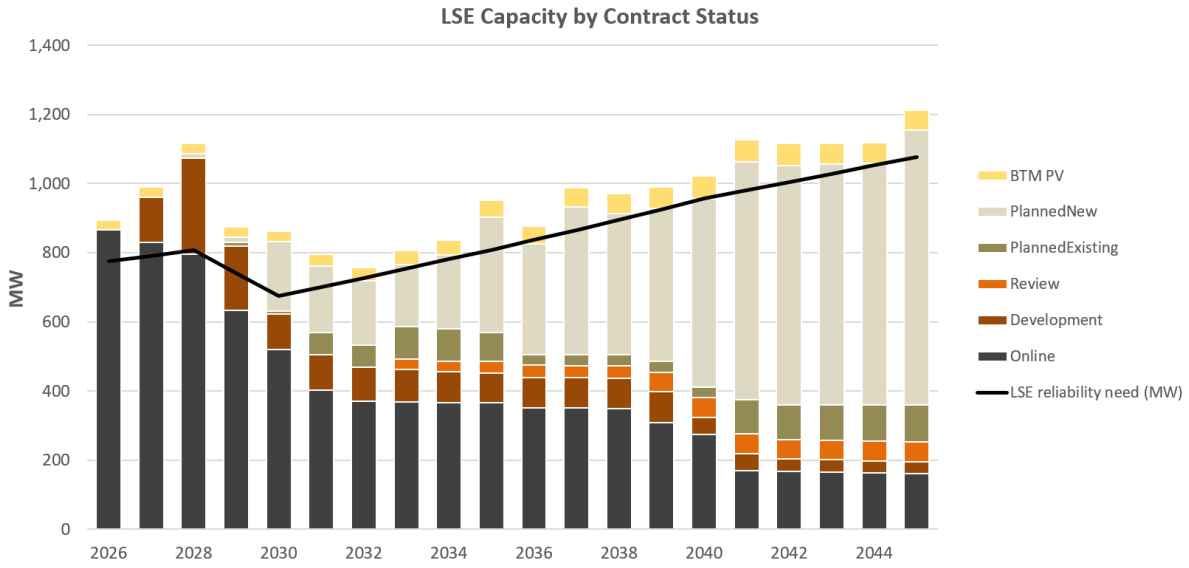


Table 26: Load and Resource Table by Resource Type from the Resource Data Template

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
LSE reliability need (MW)	**775**	**791**	**807**	**741**	**674**	**701**	**727**	**754**	**781**	**808**	**837**	**866**	**896**	**926**	**956**	**980**	**1,004**	**1,028**	**1,053**	**1,078**
ELCC by resource type (effective MW)																				
hybrid	293	341	461	316	343	330	318	305	292	279	284	289	293	353	286	357	351	345	339	333
in_state_wind_south	23	21	18	16	16	15	16	17	57	107	97	88	78	69	60	57	58	59	60	61
in_state_wind_north	45	42	53	61	80	80	81	81	81	148	88	82	76	69	63	76	77	79	80	81
out_of_state_wind_WY	-	-	-	-	-	-	-	-	-	-	-	122	115	108	100	128	133	139	145	151
out_of_state_wind_IDW AOR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_AZN M	95	95	94	86	79	82	84	87	90	92	87	81	76	70	65	67	69	71	73	74
offshore_wind_north	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_south	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
utility_pv	8	9	10	10	10	11	11	11	11	11	-	-	-	-	-	-	-	-	-	-
btm_pv	28	30	30	30	31	34	38	41	44	47	51	55	58	62	66	65	63	62	60	58
4hr_batteries	97	143	129	83	38	36	34	32	30	28	28	28	28	12	12	12	1	1	1	1
8hr_batteries	14	23	21	16	10	14	13	11	10	9	9	10	11	11	12	8	5	5	5	5
12hr_batteries	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24hr_batteries	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100hr_batteries	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
pumped_storage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
demand_response	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hydro	1	1	1	1	1	1	1	1	-	-	-	-	-	-	-	-	-	-	-	-
small_hydro	0	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
geothermal	56	56	69	67	70	70	39	98	98	105	106	106	106	104	225	226	227	227	228	322
biomass_wood	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
biogas	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
nuclear	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_cc	220	219	218	176	173	111	112	112	112	113	114	116	117	118	120	119	118	116	115	114

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
LSE reliability need (MW)	**775**	**791**	**807**	**741**	**674**	**701**	**727**	**754**	**781**	**808**	**837**	**866**	**896**	**926**	**956**	**980**	**1,004**	**1,028**	**1,053**	**1,078**
ELCC by resource type (effective MW)																				
gas_ct	13	13	13	12	12	12	11	11	11	11	12	12	13	13	14	13	13	13	13	12
cogen	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ice	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LSE total supply (effective MW)	**894**	**991**	**1,116**	**875**	**863**	**796**	**757**	**807**	**837**	**951**	**876**	**988**	**971**	**991**	**1,022**	**1,127**	**1,116**	**1,117**	**1,119**	**1,214**
Net capacity position (+ve = excess, -ve = shortfall) (effective MW)	**120**	**200**	**309**	**134**	**189**	**95**	**30**	**53**	**56**	**143**	**39**	**122**	**75**	**65**	**66**	**147**	**112**	**89**	**66**	**136**

Table 27: Load and Resource Table by Contract Status from the Reliability Tab of the RDT

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
LSE reliability need (MW)	**775**	**791**	**807**	**741**	**674**	**701**	**727**	**754**	**781**	**808**	**837**	**866**	**896**	**926**	**956**	**980**	**1,004**	**1,028**	**1,053**	**1,078**
ELCC by contract status (effective MW)																				
Online	866	831	796	633	520	402	370	369	367	365	352	351	349	308	275	170	168	166	163	161
Development	-	130	277	187	102	104	99	95	90	86	87	88	89	90	49	49	35	35	35	35
Review	-	-	-	-	-	-	-	28	28	36	36	36	36	57	57	57	57	57	58	58
PlannedExisting	-	-	-	10	10	63	63	95	95	84	31	31	31	31	31	98	100	102	104	106
PlannedNew	-	-	13	15	200	193	187	180	213	333	320	429	408	443	544	689	692	696	700	796
BTM PV	28	30	30	30	31	34	38	41	44	47	51	55	58	62	66	65	63	62	60	58
LSE total supply (effective MW)	**894**	**991**	**1,116**	**875**	**863**	**796**	**757**	**807**	**837**	**951**	**876**	**988**	**971**	**991**	**1,022**	**1,127**	**1,116**	**1,117**	**1,119**	**1,214**
Net capacity position (+ve = excess, -ve = shortfall) (effective MW)	**120**	**200**	**309**	**134**	**189**	**95**	**30**	**53**	**56**	**143**	**39**	**122**	**75**	**65**	**66**	**147**	**112**	**89**	**66**	**136**

WestLight also evaluated its Preferred Portfolio under the 24-hour Slice-of-Day RA framework as a supplemental reliability metric. This additional analysis examines whether portfolio resources can meet hourly reliability needs throughout the day and maintain sufficient charging capability for storage resources and also provides useful insight into how much of WestLight's RA needs would be met with its Preferred Portfolio. To generate hourly RA obligations for each month of the model years, WestLight used its internal peak load forecast, developed using a "1-in-2" weather methodology, and scaled the results to its share of the CAISO's Total Reliability Need (TRN). WestLight then used the Slice-of-Day exceedance profiles approved by the CPUC for the 2026 resource adequacy program to calculate the RA value of its selected portfolio.

The results of the Preferred Portfolio under Slice-of-Day accounting show that the portfolio cannot meet the 24-hour reliability needs in all hours. The primary driver of this result is not a shortage of installed battery capacity, but rather insufficient charging capability to fully utilize the portfolio's storage resources. Despite having significant battery RA capacity, limited charging capacity leaves much of the battery value locked out of the portfolio, unable to count towards meeting reliability obligations. Because WestLight's internal peak load forecast shows a winter peak, this issue is especially problematic in winter months, where limited charging capacity renders hundreds of MW of battery unusable in the RA portfolio. For example, in January 2030, there is less than 100 MWh of excess RA capacity in solar hours, leaving almost 4,000 MWh of battery locked out of the portfolio. The problem persists in the summer months, where increased solar values provide for higher charging capacity, but still not enough to completely utilize the battery RA.

This challenge may become increasingly important statewide over time as California's load profile continues to evolve. Current ELCC methodologies and IRP planning assumptions remain heavily influenced by summer peak conditions, while electrification of buildings and transportation is expected to increase winter demand and reduce the relative prominence of summer peaks. Because charging sufficiency is more constrained during winter months, portfolios that appear adequate under summer-focused reliability metrics, such as the 2024-2027 IRP which uses the September marginal ELCC framework, will face increasing challenges in fully utilizing battery capacity during periods of winter system stress.

The figures below display the performance of WestLight's Preferred Portfolio under a Slice-of-Day framework for representative months in 2030 and 2035.

Figure 21: January 2030 Slice-of-Day Position

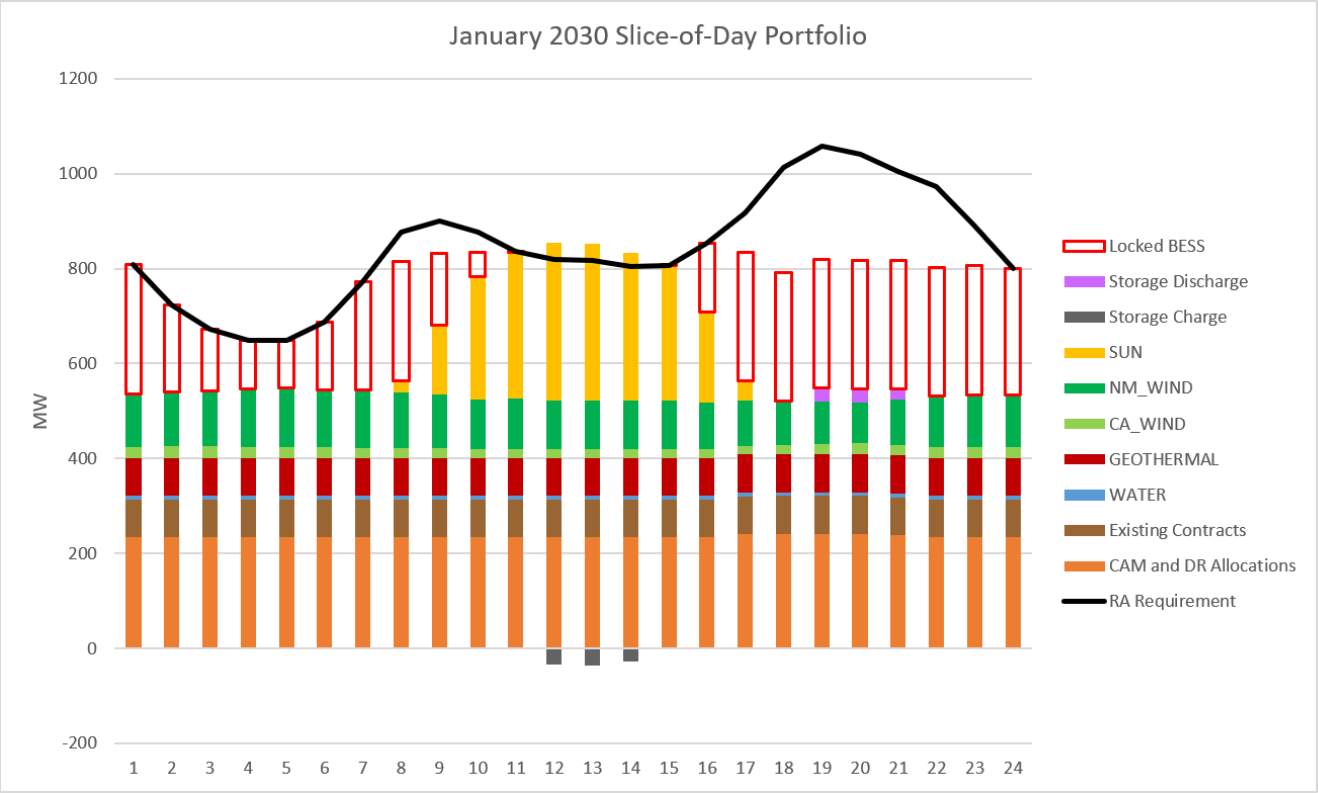


Figure 22: September 2030 Slice-of-Day Position

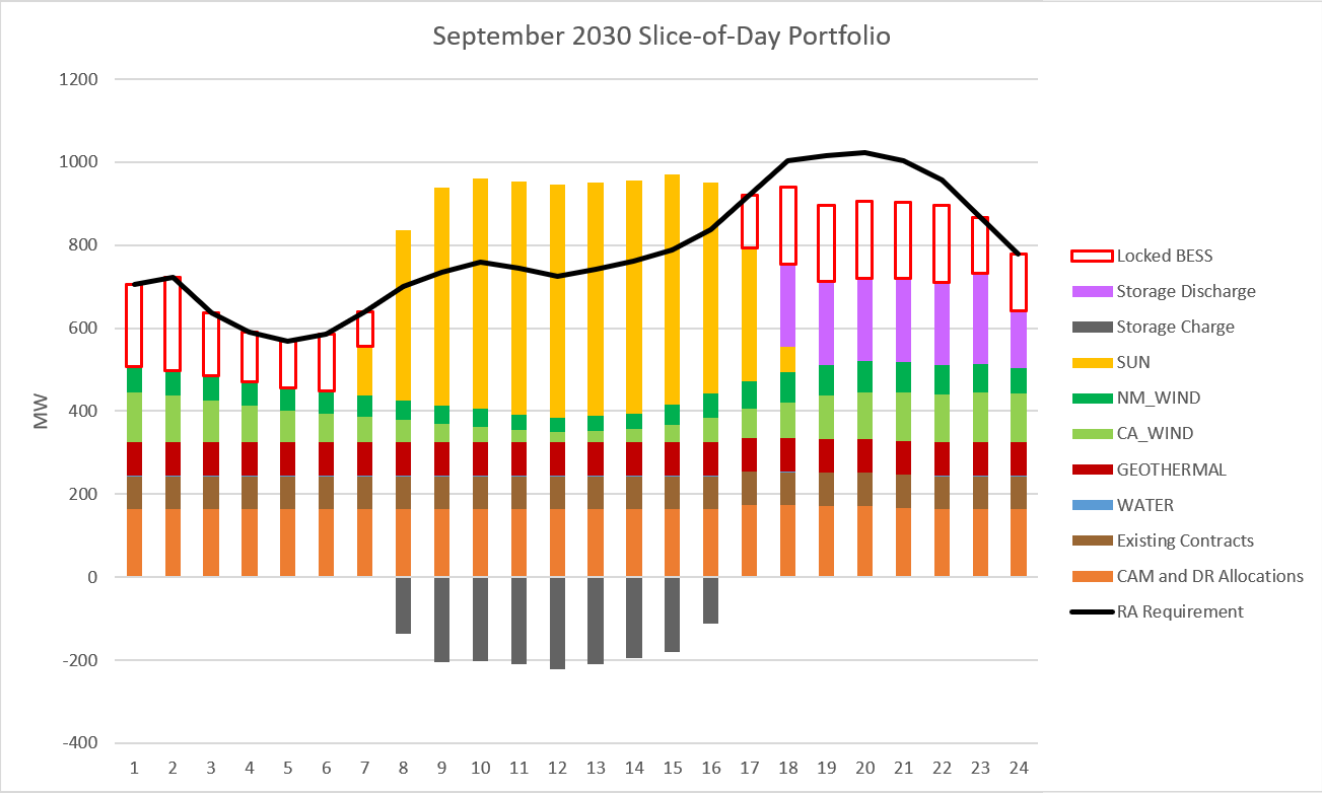


Figure 23: January 2035 Slice-of-Day Position

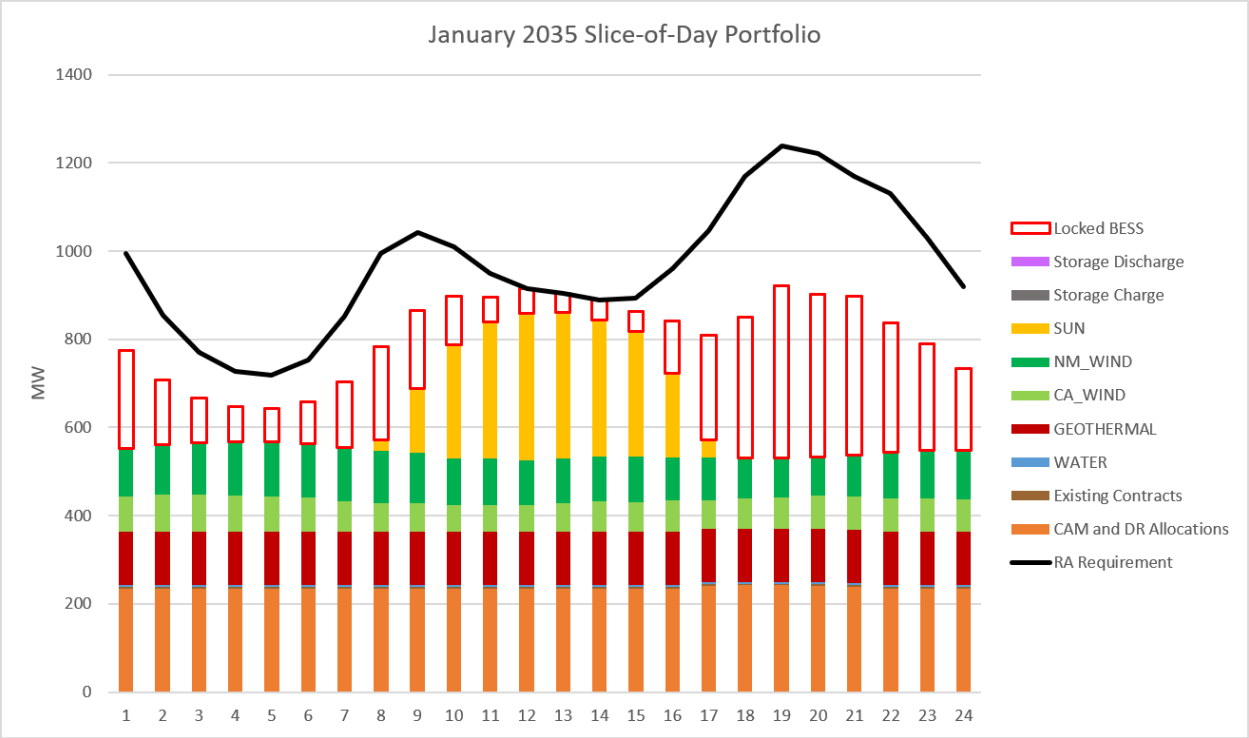
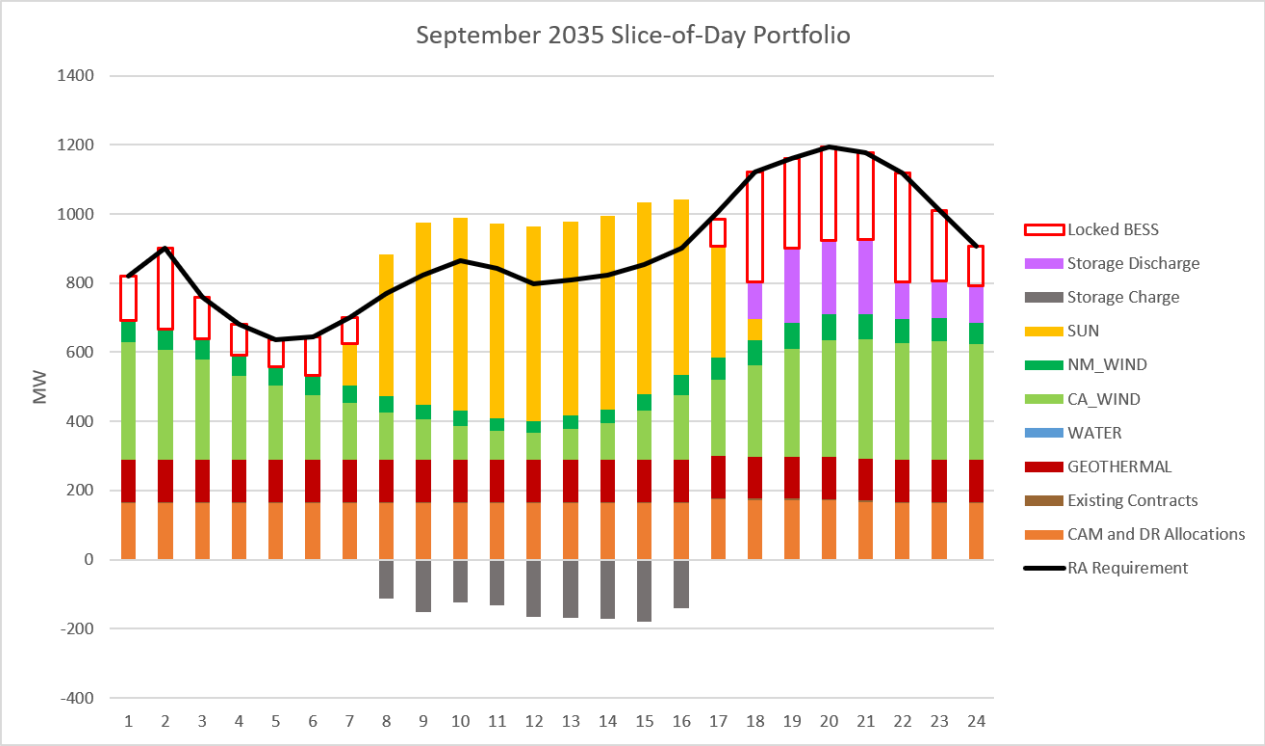


Figure 24: September 2035 Slice-of-Day Position



WestLight Energy emphasizes that continued use of multiple potentially conflicting reliability methodologies—including ELCC, marginal ELCC, and the Slice-of-Day framework—will continue to create inconsistent planning signals and drive inefficient and more costly procurement outcomes, especially if ELCC accounting incentivizes portfolios that do not match reliability needs in a Slice-of-Day framework. Greater coordination across these frameworks, along with sufficient transparency and implementation stability, will help reduce regulatory uncertainty and enable load-serving entities to make cost-effective, long-term investments in clean and reliable resources.

g. Existing Resource Planning

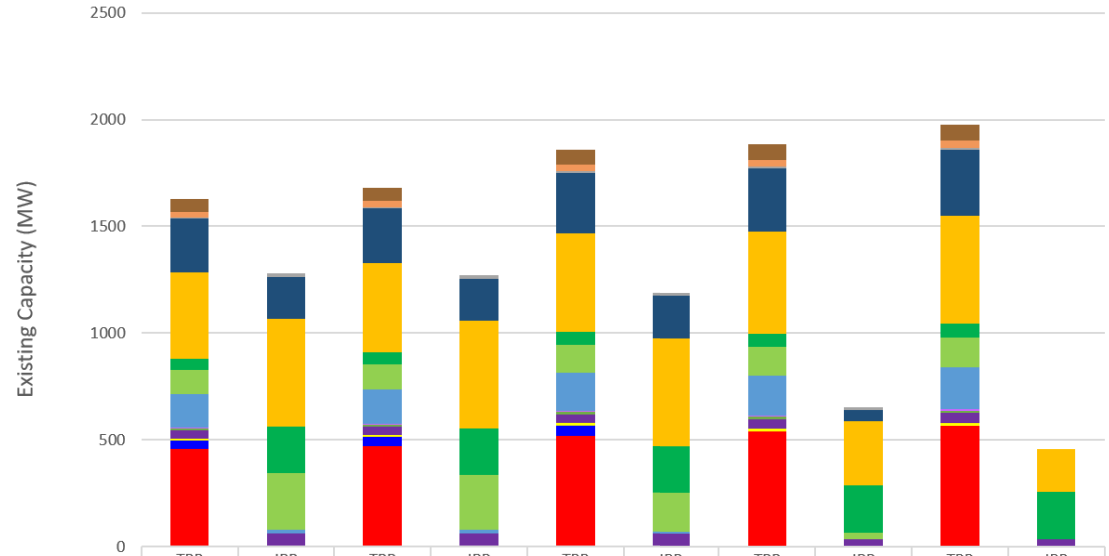
WestLight's Preferred Portfolio includes a significant amount of capacity from new resources. In 2030, WestLight's Preferred Portfolio is projected to be 2,298 MW, and includes 1,270 MW of existing resources, defined as resources in the RDT with contract statuses of "online" and "planned existing." In 2045, the Preferred Portfolio is projected to be 3,440 MW, of which 455 MW will be resources already existing today.

This projected transition toward predominantly new resources reflects WestLight's long-standing strategy to direct customer value toward incremental clean energy development, reliability resources, and long-term portfolio transformation. At the same time, legacy cost recovery obligations, including the Power Charge Indifference Adjustment (PCIA) and Financial Security Requirements (FSR), remain an important planning consideration because they affect the share of customer revenues available for new procurement. To the extent that revenues and financial capacity are diverted to PCIA and FSR these resources will not be available to procure the new resources California needs to maintain a clean and reliable grid. As a result, existing resource planning must balance historical system cost responsibilities with the need to accelerate investment in the next generation of clean and reliable resources.

WestLight has compared the existing resources in its portfolio to the existing[21] resources in the 2025-2026 TPP, as shown in Figure 25. WestLight's Preferred Portfolio depends heavily on new resources, and the proportion of existing resources in its portfolio declines over time as its current contracts expire, which WestLight expects to replace with new contracts. Relative to its load share of the 2025-2026 TPP, WestLight's Preferred Portfolio has significantly less reliance on existing resources.

21 For the analysis here, WestLight is using capacity summarized in the RESOLVE Results Viewer for the IRP Least Cost Portfolio, specifically CAISO Baseline (Existing & In-Development) Capacity.

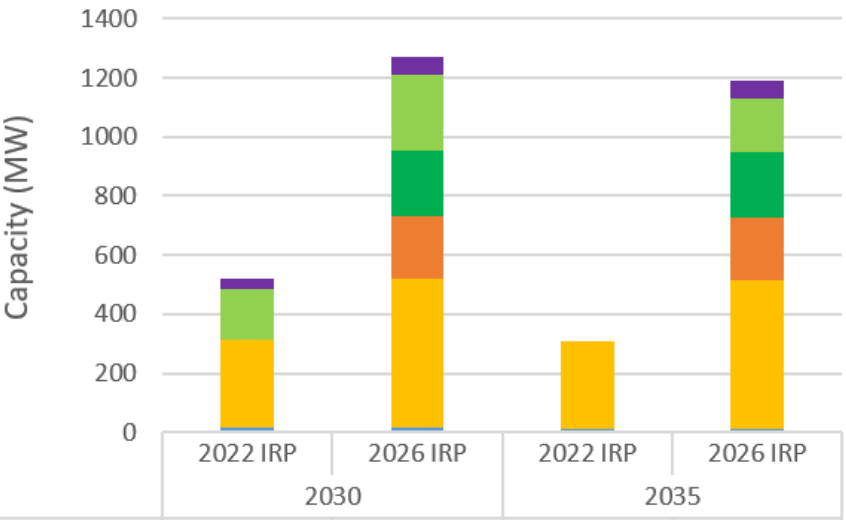
Figure 25: WestLight's Load Share of Existing Resources in the 2025-2026 TPP versus its Preferred Portfolio for the 2026 IRP



	2028		2030		2035		2040		2045	
	TPP	IRP	TPP	IRP	TPP	IRP	TPP	IRP	TPP	IRP
Shed DR	59	0	61	0	68	0	70	0	74	0
Location Constrained Storage (12-hr)	28	0	29	0	32	0	34	0	35	0
Li-ion Battery (8-hr)	5	15	5	15	6	15	6	15	6	0
Li-ion Battery (4-hr)	250	197	258	197	285	197	297	50	311	0
Solar	404	505	417	505	461	505	479	303	503	200
Out-of-State Wind	53	220	55	220	61	220	63	220	66	220
In-State Wind	113	266	116	257	128	180	134	30	140	0
Hydro	158	15	163	15	180	11	187	0	196	0
Biogas	5	0	5	0	6	0	6	0	6	0
Biomass	9	0	10	0	11	0	11	0	12	0
Geothermal (Enhanced)	0	0	0	0	0	0	0	0	0	0
Geothermal	36	61	38	61	42	61	43	35	45	35
Nuclear	11	0	11	0	12	0	13	0	14	0
CHP	41	0	42	0	46	0	0	0	0	0
Natural Gas	455	0	470	0	519	0	540	0	566	0

WestLight also compared the existing resources in its 2026 Preferred Portfolio to those in its 2022 Preferred Portfolio. WestLight's 2026 Preferred Portfolio includes more capacity from existing resources than its 2022 Preferred Portfolio, due to additional contracts it has executed with new battery storage, solar, and wind resources in the past three years that are now online and in its current portfolio.

Figure 26: Existing Resources in WestLight's 2022 IRP versus 2026 IRP



	2030		2035	
Geothermal	35	61	0	61
In-State Onshore Wind	170	257	0	180
Out-of-State Onshore Wind	0	220	0	220
Storage	0	212	0	212
Solar PV	300	505	300	505
Small Hydro	16	15	11	11

WestLight has executed contracts with the existing resources in its Preferred Portfolio. WestLight assumes contract extensions for a portion of the existing resources it has under contract, specifically for certain wind and geothermal resources. In other words, for the purposes of the Preferred Portfolio, WestLight is not assuming most existing resources will be re-contracted when they expire. WestLight believes these assumptions are appropriate and represents a conservative view of the market for existing resources and overall portfolio costs for its IRP analysis.

For purposes of its IRP modeling, WestLight conservatively assumes that existing contracted resources do not continue beyond their current contract terms unless an extension has been specifically modeled. In practice, however, WestLight may seek to re-contract with existing resources where commercially available and cost-effective. These opportunities may support WestLight's broader procurement strategy of maintaining a balanced mix of short-, medium-, and long-term contracts, including procurement from existing resources, while still achieving reliability and greenhouse gas emissions targets.

h. Hydro Generation Risk Management

The potential for frequent and prolonged in-state and west-wide drought and the impacts to hydro-electric generation poses a manageable risk in the near term and no direct risk in the long term since WestLight's Preferred Portfolio reduces reliance on large hydroelectric resources with the objective of phasing out large hydroelectric resources from the portfolio by 2030. WestLight's Preferred Portfolio currently includes about 15 MW of small hydroelectric capacity, decreasing to 11 MW in 2035 and 0 MW

in 2040 due to contract expiration. These small hydro resources play a minor role in a portfolio of more than 1.6 GW in 2028, and 3 GW in 2035.

Electrical generation from hydroelectric facilities depends on the volume of water available to flow through turbine generators. A lack of precipitation in drought years creates low water availability and hence lower hydro generation output. Hydro systems without large reservoirs that can store water for multiple years and that can average out generation over time are at particular risk. California's hydro generation system is vulnerable to drought and has experienced lower-than-average hydro generation during droughts in 2007-2009, 2012-2016 and 2020-2022.

WestLight manages its risk to hydro generation fluctuation and prices by signing contracts from resources in both California and the Pacific Northwest, signing primarily firm delivery contracts and minimizing the volume procured through unit contingent contracts. WestLight also contracts for hydro resources through a mix of counterparties and for varying terms to manage risk associated with counterparty default on hydro resources. Finally, WestLight conducts statistical modeling on the volume of hydro it expects to be delivered for any unit contingent contracts, taking into account snowpack and precipitation levels and historical generation in similar years.

The risks that in-state drought pose to WestLight's portfolio is consistent with the amount of hydro generation and level of risk borne by the 2025-2026 TPP with updates prior to 2030 and significantly less than the 2025-2026 TPP with updates after 2030. This is due to WestLight's internal goal to phase out large hydro power by 2030 through procurement of additional renewable resources. During 2028, the sole study year in which large hydro was considered, approximately 431 GWh is included in the Preferred Portfolio. This is less than WestLight's load share of large hydro and imported hydro expected to be available in 2028, per the CSP Calculator. However, in later years, WestLight plans to include zero large hydroelectric generation in its portfolio, which will eliminate the direct risk of drought to its portfolio. There will continue to be effects of drought on its portfolio, through elevated market prices, which WestLight plans to mitigate through its hedging strategy and risk procedures, including net open position targets for future years and requirements around concentration and market risk.

Table 28: Comparison of Large Hydro Reliance in the CSP versus WestLight's Preferred Portfolio

	2028	2030	2035	2040	2045
WestLight Energy Load Share of Available Large and Imported Hydro per the CSP Calculator (GWh)	454	469	519	539	565
Large Hydro Included in WestLight Energy's Preferred Portfolio (GWh)	423	0	0	0	0

In its 2022 IRP, WestLight anticipated phasing out large hydroelectric resources by 2025 as part of its strategy to transition toward a 100% renewable portfolio. Since that time, market conditions, including increased costs and limited availability of certain RPS-eligible resources, have affected the feasibility and cost effectiveness of achieving this transition within the originally anticipated timeframe. WestLight's Preferred Portfolio for its 2026 IRP continues to utilize large hydroelectric resources through 2029 in order to balance affordability and customer cost impacts while maintaining alignment with Board approved objectives.

i. Long-Duration Storage Planning

Energy storage is critical to California meeting its reliability and environmental objectives. With respect to reliability objectives, energy storage can help the State meet its capacity needs, which will be amplified by the retirement of natural gas-fired power plants. Energy storage provides energy by shifting electricity from periods of surplus generation to periods when renewable generation is insufficient to serve load. This capability is particularly valuable during times of day when solar and/or wind generation is limited. In addition, energy storage can provide ancillary services, including regulation services required by CAISO to maintain grid frequency and support reliable system operations. Energy storage can help California meet its renewables and GHG goals by charging when there is excess renewable generation, thereby avoiding the need to curtail renewable energy generation, and discharging when the emissions intensity of the grid is highest, helping to displace generation from emitting fossil resources.

As California's reliability needs evolve beyond traditional peak-hour capacity requirements toward longer-duration, multi-hour, and overnight reliability needs, WestLight views long-duration storage as an increasingly important component of the future resource mix. In addition to supporting resource adequacy requirements, long-duration storage can enhance portfolio flexibility, improve utilization of renewable generation, and reduce dependence on conventional fossil resources during extended periods of system stress. However, existing market conditions and RA program rules make long-duration storage less cost-effective than combining multiple shorter-duration contracts to achieve the same system benefits at lower cost. From both a reliability and financial perspective, the ability to charge these resources are critical to their deployment. With potential system-level shortfalls of generation capacity to charge storage generally, further LDES procurement would exacerbate this concern absent procurement or retention of significant generation capacity, such as Diablo Canyon Power Plant. Furthermore, artificially restricting charging capability below real-world performance as adopted in the RA program threatens to undermine the economic value of these resources, which undermines both affordability and the financial resources available to procure further resources.

CPUC Decision 21-06-035, "the MTR Order," requires LSEs, including WestLight Energy, to procure specific resources on a specific timeline and includes a requirement for WestLight to procure approximately 24 MW of nameplate capacity of 8-hr storage ("long-duration") resources. CPUC Decision 23-02-040, the "Supplemental MTR Order" revised the required online dates for the long duration storage and firm clean resources to June 1, 2028. WestLight collaborated with 12 other CCAs to issue a joint Request for Information for long-duration storage resources in 2020. Later in 2020, WestLight participated in California Community Power (CC Power)'s Request for Offers for Long-Duration Storage Resources. As a result of that RFO, WestLight contracted for approximately 15 MW of a lithium-ion long-duration storage resource through CC Power. In 2024, WestLight contracted for an additional 10 MW of lithium-ion long-duration storage, and in 2026, contracted for 15 MW of compressed air long-duration storage through CC Power, exceeding its MTR requirements. CPUC Decision 26-02-057 ordered new procurement for the 2029-2032 timeframe, including a requirement that 25% of the ordered capacity come from either long-duration storage or firm clean resources. WestLight's total obligation under this order is 114 MW NQC, including 29 MW from long-duration storage or firm clean resources. Based on the limited availability of geothermal resources in the development queue, development challenges associated with WestLight's existing geothermal contracts, and results from recent RFOs seeking firm capacity, WestLight does not view additional geothermal procurement as commercially feasible until after 2032. As a result, WestLight expects compliance with this portion of the procurement order to rely primarily on long-duration storage resources, which, as already discussed, will exacerbate charging sufficiency issues on the grid and is less cost-effective than stacking two short-duration storage resources. Depending on ELCC values the 29 MW

NQC of long-duration storage could be between 32 MW (using MTR ELCCs for 2028) and 91 MW (using IRP Filing Requirement ELCCs for 2032) of nameplate capacity.

WestLight included its contracted long-duration storage resources as inputs to its IRP modeling. WestLight also included a variety of long-duration storage durations as candidate resources in its modeling, including 8-hour storage, 12-hour storage, 24-hour storage, and 100-hour storage, along with additional capacity from its compressed air long-duration storage. The Preferred Portfolio is the result of a portfolio optimization that determines the least-cost portfolio that meets the specified targets, including the regulatory requirements of the IRP and WestLight's voluntary goals. The IRP filing requirements for this IRP did not require LSEs to model compliance with the new procurement order D.26-02-057. The modeled optimal portfolio did not select additional long-duration storage as a cost-optimal resource beyond what WestLight has already contracted. Although WestLight's IRP modeling did not identify incremental long-duration storage as necessary to satisfy reliability or GHG requirements, Decision 26-02-057 established an additional procurement requirement for such resources as a matter of policy.

In its 2022 IRP, WestLight's portfolio included 11 MW of 8-hr compressed air storage, 50 MW of 12-hr thermal storage, and 24 MW of 8-hr storage as ordered under the MTR. WestLight's 2026 IRP includes 25 MW of 8-hr lithium-ion storage and 15 MW of 8-hr compressed air storage. WestLight's model did not select additional long-duration storage beyond what has been contracted and instead selected additional generating resources like geothermal and wind, and a solar plus storage resource, in order to meet the reliability and GHG emissions targets at least cost.

WestLight's experience also demonstrates that LSEs are already capable of actively procuring innovative long-duration storage resources through existing market structures, including bilateral contracting, joint procurement efforts, and portfolio optimization processes. This clearly indicates there is no need for central procurement of such resources. Long-duration storage and other firm clean resources may also represent viable pathways for satisfying recently adopted and emerging CPUC procurement requirements related to system reliability and clean energy needs. At the same time, the appropriate resource mix may depend on the final structure and implementation of those requirements, including any interaction with Diablo Canyon extension policies, associated resource adequacy allocations, or the treatment of clean energy attributes. Accordingly, WestLight supports maintaining procurement flexibility so that LSEs can pursue the most cost-effective combination of long-duration storage, firm clean resources, demand-side resources, and other reliability solutions while continuing progress toward California's decarbonization objectives.

j. Clean Firm Power Planning

Clean Firm Power will be critical to enabling the transition of the California electricity system away from fossil fuels and to clean power. WestLight is particularly interested in clean renewable baseload resources, such as geothermal, to support California's transition to a 100% clean electricity system by 2045 and to provide reliable carbon free energy that better aligns with WestLight's load profile.

However, based on the CAISO interconnection queue, developers do not appear to be providing the volumes of clean firm resources that would be required to decarbonize California's grid cost effectively. Although the solar and storage that predominate the queue could be used, such an approach would be far from cost optimal. Thus, it is imperative that the Commission and other state leaders pursue effective strategies to incentivize and facilitate the deployment of clean firm resources.

The MTR and Supplemental MTR orders discussed above also require LSEs including WestLight Energy to procure clean firm power by 2028. CPUC Decision 24-02-047 acknowledged delays and commercial challenges for long lead time resources and allowed for additional compliance flexibility for long lead time resources to come online, until June 1, 2031. WestLight is required to procure approximately 20 MW of nameplate capacity from new clean firm resources by 2031. WestLight has actively pursued these resources and has currently contracted with 33 MW of incremental[22] nameplate geothermal, thus meeting its MTR requirements.

To the extent existing resources such as Diablo Canyon continue to provide firm capacity and zero-emitting energy, future procurement requirements should appropriately account for those contributions in order to avoid duplicative customer costs and unnecessary incremental procurement burdens. At the same time, WestLight notes that the portfolio value of associated energy or environmental attributes may differ among load-serving entities depending on renewable goals, customer preferences, and procurement strategies. WestLight therefore supports transparent treatment of costs, attributes, and allocation structures, including flexible or voluntary approaches where feasible. In compliance with statute, WestLight did not include Diablo Canyon in its IRP portfolio modeling. WestLight separately evaluated the potential value of receiving a Diablo Canyon Cost Allocation Mechanism (CAM) allocation following the current extended operations period. Based on this analysis, WestLight estimates that a Diablo Canyon CAM allocation in 2031 would reduce its Resource Adequacy (RA) procurement costs by approximately $3.5 million for that year.

WestLight has included existing and new construction clean firm resources in its portfolio modeling, and the model selects clean firm resources to be included in its portfolio in order to meet WestLight's voluntary 100% renewable goal and the assigned GHG emissions targets. WestLight's modeling inputs, including cost and resource availability assumptions, are consistent with the 2026-2027 TPP and market conditions as of Spring 2026. These assumptions were informed in part by recent results from CC Power's solicitation for clean generation and capacity resources, which received proposals for both conventional geothermal and Enhanced Geothermal Systems (EGS). WestLight's preferred portfolio includes 35 MW of existing geothermal and 323 MW of new geothermal in 2045. Of the 323 MW new geothermal resources in its Preferred Portfolio, 18 MW are from EGS. Through WestLight's iterative modeling process, clean firm resources emerged as increasingly important by 2045 for achieving GHG emissions targets under a fully clean electricity portfolio at least cost, particularly during overnight and winter peak periods. This became more apparent when WestLight utilized its custom load shape in the CSP Calculator, which exhibits higher winter peaks than the default CSP load profile. The winter-peaking characteristics of WestLight's load increased the value of clean firm generation in maintaining reliability and reducing reliance on net system power during periods of lower variable renewable output. While solar and battery storage remain important portfolio resources, they were less effective at reducing emissions during overnight and winter peak periods when solar generation is limited and storage resources face duration and charging constraints. Under these conditions, the portfolio relied more heavily on net system power to serve load, making it more difficult to achieve lower emissions outcomes in the CSP Calculator. Ultimately building more clean firm resources was selected as more cost effective than building excess solar plus storage, even given higher contract prices for clean firm resources. These results are consistent

22 WestLight defines "incremental" geothermal as geothermal capacity incremental to the CPUC's D.21-06-035 baseline generator list

with other results that suggest clean firm resources become increasingly important for affordability as renewable energy content of the energy mix approaches 100%[23].

In WestLight's 2022 IRP, the Preferred Portfolio included 49 MW of geothermal resources by 2035, compared to 121 MW in the 2026 IRP Preferred Portfolio. This increase is driven by several factors, including the higher load forecast used in the 2026 IRP modeling and updated assumptions regarding the relative cost and availability of certain resource types. In particular, assumptions related to the significantly higher cost of offshore wind development relative to 2022 IRP assumptions resulted in geothermal resources emerging as a more cost-effective option in the modeling results.

WestLight's contracted clean firm resources includes capacity from resources outside of CAISO since there is currently limited development within California. These resources must be imported into CAISO. In order for imported resources to qualify for resource adequacy inside CAISO, they must be paired with Import Capability where they are imported. Import Capability is allocated by CAISO to LSEs depending on contracts and requested imports and is subject to the Maximum Import Capability (MIC) at each intertie. If LSEs collectively request more Import Capability at a given intertie than the Maximum Import Capability, CAISO allocates amounts pro rata to LSEs based on various criteria. WestLight conducted a comprehensive transmission assessment, including evaluation of potential transmission upgrades required for increased MIC to allow resource adequacy eligibility for these imported resources. The results of that assessment are presented in Section III.m.

Currently, internal analyses suggest that the assessment of the Maximum import Capability may be unduly conservative, underestimating the full ability of the system to simultaneously deliverable imports. Furthermore, the current bilateral market of allocated Import Capability does not appear to be effective in matching import rights to contracted imports, with large volumes of import capability appearing to go unused or strategically held in reserve by market participants. WestLight is actively involved in pursuing enhancements to the MIC process to ensure that transmission capacity is fully utilized for actual energy flows and California can import the clean firm resources needed to ensure reliability and decarbonization.

WestLight anticipates that it will need more Import Capability than the current Maximum Import Capability at several of the interties where it plans to import its clean firm power, hence its initiating the CAISO stakeholder process for MIC reforms, along with its partners Shell, CalCCA, and Six Cities.

WestLight incorporates considerations related to Import Capability availability and transmission deliverability into its long-term procurement planning to manage reliability and resource adequacy risks associated with imported resources. WestLight supports transmission upgrades that would increase Maximum Import Capability at several interties, including IID-SDGE andIID-SCE, which may serve to alleviate these concerns.

23 J.C.S. Long, E. Baik, J.D. Jenkins, C. Kolster, K. Chawla, A. Olson, A. Cohen, M. Colvin, S.M. Benson, R.B. Jackson, D.G. Victor, and S.P. Hamburg, California Needs Clean Firm Power, and So Does the Rest of the World: Three Detailed Models of the Future of California's Power System All Show That California Needs Carbon-Free Electricity Sources That Don't Depend on the Weather (Environmental Defense Fund, Stanford University, Princeton University, and Energy & Environmental Economics, 2021)

California Community Power Geothermal Coordination

CC Power recognizes the long-term need for clean firm power for its members, and recently announced Geothermal Exploration, Offtake and Development Engagement (GEODE) agreements with three geothermal developers with innovative approaches to development targeted at unlocking scale-up of in-state geothermal capacity[24]. CC Power sees these proactive relationships between offtakers and industry as pivotal in overcoming the commercial and infrastructure challenges geothermal opportunities face. Additionally, as a joint procurement entity representing 30,000 GWh of collective annual load, CC Power is able to engage with a larger diversity of developers and opportunities with different risk profiles than what could be pursued by an individual load serving entity.

CC Power GEODE Agreement Capacity

WestLight's IRP includes its participation in CC Power's GEODE agreements, which are expected to deliver [redacted] of total capacity in the early 2030s. The GEODE agreements are principally focused on development opportunities in Northern California that both avoid import constraints and directly offset power costs for CC Power's members. CC Power has coordinated with its GEODE partners in representing expected development opportunities in the IRP. [redacted] Atlantica and XGS are planning to deploy advanced closed-loop technology, which both enables development beyond the geologic constraints of conventional hydrothermal development and minimizes water requirements. Closed-loop technology has been demonstrated in the field and recently through commercial development in Germany[25]. Through its GEODE agreement, Zanskar is applying its unique capabilities leveraging artificial intelligence and modeling to discover new hydrothermal systems. [redacted] The GEODE projects are represented with online dates in the early 2030s but could be accelerated if transmission is readily available. GEODE projects are reported as "Review" status in the RDT to reflect the active commercial discussions between CC Power and developers on specific project opportunities.

CC Power Enhanced Geothermal System (EGS) Capacity

WestLight's IRP also includes its participation in CC Power's engagement with [redacted], a developer of a near-field [redacted] enhanced geothermal system (EGS) project [redacted]. CC Power is currently under exclusivity for this project, which has site control and is planning to build upon Fervo Energy's success in applying EGS technology to development in Nevada and Utah. This project is represented with an online date in 2033 but could be accelerated if transmission is made readily available. This project is also reported as "Review" status in the RDT given the advanced nature of commercial discussions.

CC Power Strategic Geothermal Capacity Coordination

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24 See "CC Power Signs 3 GEODE Agreements to Incentivize California Geothermal Development" (April 13, 2026) at https://cacommunitypower.org/cc-power-signs-3-geode-agreements-to-incentivize-california-geothermal-development/

25 See "Eavor's First-of-Its-Kind Closed-Loop Geothermal Project Produces Grid Power in Germany" (January 8, 2026) at https://www.powermag.com/eavors-first-of-its-kind-closed-loop-geothermal-project-produces-grid-power-in-germany/

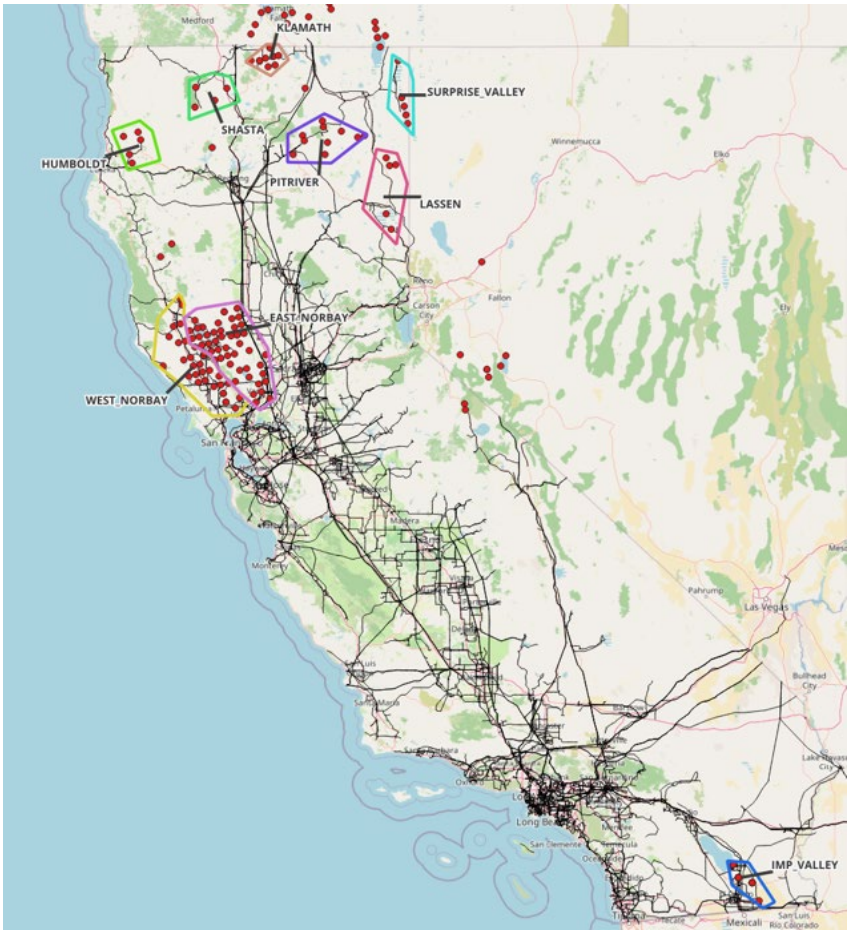
WestLight has coordinated with CC Power on representing geothermal capacity needs beyond the opportunities described above. Collective, CC Power entities are anticipating nearly 500 MW of additional geothermal development need to meet 2045 needs. A key challenge with geothermal development is that even with next-generation technologies, the best opportunities are locationally constrained. Accordingly, it's critical that transmission is proactively planned to areas that are commercially viable for both developers and offtakers. CC Power strongly discourages the Commission from taking the default approach of mapping resource potential to areas with sufficient transmission capacity and instead work to support infrastructure that provides access to high-quality resource areas as recommended by American Clean Power[26].

In the interest of providing a consistent indication of development areas with both high-quality resources and commercial offtake interest, CC Power members have taken a methodical process to mapping and representing long-term geothermal needs. First, CC Power has leveraged one of the best available datasets on next-generation geothermal potential: supply curves from Wilson Ricks and Jesse Jenkins' May 2025 study on national-scale adoption of EGS[27]. The Ricks & Jenkins study leverages the recent Stanford thermal modeling already used by the Commission, but also specifically characterizes near-field EGS resources—which are likely to be the first and most economical projects to be developed. CC Power applied both technological and economic filters to the supply curve data (depth <= 4.5 km, temperature <= 275C, inferred LCOE <= $100/MWh, project capacity > 50 MW). Data points that met CC Power's filter criteria are represented as the red dots in Figure 27 below.

26 See page 10-11 of "American Clean Power – California Opening Comments on the Proposed Decision Requiring 2029-2032 Electric Resource Procurement and Transmitting Portfolios for the 2026-27 Transmission Planning Process" at https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M598/K100/598100948.PDF

27 Paper at https://zero.lab.princeton.edu/wp-content/uploads/2025/06/Ricks-Jenkins-2025-Pathways-to-national-scale-adoption-of-enhanced-geothermal-Joule.pdf; leveraged datasets available at https://zenodo.org/records/15485307

Figure 27. CC Power Strategic Geothermal Mapping



Using the filtered data, CC Power identified clusters of opportunities with distinct transmission needs: West North Bay, East North Bay, Humboldt, Shasta, Klamath, Pit River, Surprise Valley, Lassen, and Imperial Valley (see colored polygons in Figure 27). CC Power members strongly prefer resources in CAISO due to import capacity constraints, and accordingly did not carry Imperial Valley, Klamath, and Shasta further in the analysis. Although Surprise Valley and Lassen are currently outside the CAISO, CC Power is encouraged by the 2026-27 focus on adding import capacity to the Hilltop substation in Northeastern California and sees a lot of synergies with creating better access to Northern Nevada resources and in-state wind. Based on the supply curve filtering, the six remaining areas of interest individually represent 0.8 to 13.5 GW each of theoretical capacity. CC Power has represented its interest using two tiers: the East North Bay and West North Bay with 150 MW of total interest (out of 10+ GW theoretical capacity each) and the other four areas with 50 MW of interest (out of 0.8 to 1.6 GW of theoretical capacity each). WestLight's IRP includes its share of these opportunities with a substation designated that is indicative of the resource area's transmission needs. Given their pre-commercial nature, these projects are listed as "PlannedNew" but flagged for retention priority given the need to proactively plan transmission. CC Power will continue developing relationships with industry to further commercialize this capacity.

k. Non-CAISO, including Out-of-State, Wind Planning

Out-of-state wind can offer several advantages over in-state wind. Specifically, it generally offers higher capacity factors and production profiles that differ from resources available in California. These production profiles are a better fit for WestLight's portfolio, as their generation profile better complements solar resources. These attributes can make out of state wind an attractive resource. However, the higher cost and risk associated with interconnection and import rights are a concern. Additionally, WestLight's Board has expressed concern around whether union labor would be used to construct of out of state wind projects and whether these projects would be subject to the same level of environmental siting analysis and permitting as in-state projects.

WestLight included several out-of-state wind resources as candidate resources in its 2026 IRP modeling, and 330 MW of Wyoming wind was selected in 2040 and additional 70 MW was selected in 2045. WestLight also included its contracted New Mexico wind project, Sunzia, in its modeling. The Sunzia project has built its own transmission to deliver energy to California and utilizes the CAISO's Subscriber Participating Transmission Owner (SPTO) structure. WestLight supports the SPTO framework and recognizes its potential to facilitate the development and delivery of out-of-state clean energy resources needed to support California's long-term clean energy and reliability goals. The Wyoming wind would require construction of new transmission facilities, [redacted], which represents a significant risk. And, similar to the discussion of out-of-CAISO firm clean power, a Wyoming wind project would be subject to Import Capability allocations in order to qualify for resource adequacy.

WestLight notes that the long-term viability of out-of-state wind resources depends significantly on transmission development, intertie deliverability, and MIC availability. Recent stakeholder processes have increasingly recognized the need to enhance MIC frameworks so that load-serving entities can secure import capability when and where needed. WestLight is one of a group of CAISO stakeholders that is leading efforts at continued MIC reform and expansion efforts, along with transmission upgrades that improve practical and commercially viable access to high-quality out-of-state renewable resources. Better alignment between procurement planning and import deliverability would help reduce portfolio risk and expand cost-effective clean energy options for customers. WestLight conducted a comprehensive transmission assessment, including evaluation of potential transmission upgrades required for MIC expansion associated with out-of-state wind resources. The results of that assessment are presented in Section III.m. [redacted]

In its 2022 IRP WestLight selected 326 MW of out of state wind in its portfolio by 2035. In its 2026 Preferred Portfolio, WestLight includes 220 MW of out of state wind in its 2035 portfolio, which corresponds to the out of state wind that it has already contracted. Additional out of state wind was not selected as a cost-optimal resource until 2040.

l. Offshore Wind Planning

Offshore wind is a promising resource that can offer several advantages over onshore wind. The generation profiles tend to have higher capacity factors and are anti-correlated with solar generation profiles, making offshore wind an important complement to California solar resources. Offshore wind has been successfully implemented in other areas of the world, however the process to implement it in

California is still in the early stages and currently subject to potentially severe development challenges. In 2023, the California Legislature passed AB 1373, which authorized the CPUC to determine the need for centralized procurement of certain long lead-time clean energy resources, including offshore wind, and, if warranted, direct the California Department of Water Resources (DWR) to procure those resources on behalf of load-serving entities. The 2025-2026 TPP with updates does not include any offshore wind capacity, likely due to the high levelized cost of energy of offshore wind resources. However, the complete assumptions for the IRP Inputs and Assumptions include the central procurement ordered by AB 1373, which includes offshore wind procurement in the statewide portfolio.

WestLight included offshore wind as a potential resource in its modeling beginning in 2040. However, the model did not select offshore wind to be included in its portfolio in any year. Offshore wind is significantly more expensive than other candidate resources and doesn't provide corresponding benefits to offset the higher costs. Instead of offshore wind, WestLight's modeling selects onshore wind or enhanced geothermal resources. Even when onshore wind and geothermal resources are unavailable, the model selects over-building solar plus storage rather than building offshore wind at the current forecasted prices.

WestLight is dedicated to clean and reliable electric system and acknowledges the potential of offshore wind. To support offshore wind development in California, WestLight, as a member of California Community Power, executed a Memorandum of Understanding with CADEMO in April 2024. CADEMO is a 60 MW offshore wind facility planned for development in the Morro Bay region. The project will act as a pilot project to test and demonstrate the processes necessary for wider deployment of offshore wind resources in California. Real and significant challenges face the development of offshore wind, including implementation and feasibility challenges, which the CADEMO project will test, providing real-world data and experience to inform the potential expansion of offshore wind. WestLight encourages the CPUC to incorporate real-world data on offshore wind and make decisions to achieve the state's carbon goals in the most cost-effective way possible. SB 100 does acknowledge that the 2045 carbon goals are contingent on cost effectiveness.

AB 1373 directs DWR to procure offshore wind according to a specified timeline and provides for cost recovery from ratepayers. WestLight has concerns regarding the use of centralized procurement mechanisms for resources that may ultimately be funded by customers regardless of cost, local procurement preferences or existing resource commitments. Offshore wind is a promising technology with the potential to contribute to California's long-term clean energy goals; however, affordability should remain an important consideration in resource procurement decisions. Given California's already high electricity rates, procurement requirements for high-cost resources should be carefully evaluated to ensure that anticipated benefits justify the associated costs.

The limited development of offshore wind in California is driven primarily by project maturity, development challenges, and current project economics rather than a lack of buyer interest. Centralized procurement requirements may therefore have limited ability to address the underlying barriers to deployment. In addition, centralized procurement reduces local control over resource planning and procurement decisions by requiring load-serving entities to support procurement activities that may not align with their individual portfolio needs or existing procurement commitments. WestLight encourages the state to pursue approaches that balance long-term resource development objectives with customer affordability, local procurement flexibility, and recognition of resources already procured by load-serving entities.

WestLight's 2022 IRP included 288 MW of offshore wind in 2035. In the 2026 IRP, offshore wind is not selected by RESOLVE in the CPUC's least cost portfolio, nor is it selected in WestLight's own modeling. Both the CPUC and WestLight are modeling a system that meets climate and reliability goals at least cost without using offshore wind. The non-selection of offshore wind reflects the much higher costs of developing offshore wind, and the lack of commensurate benefits relative to other onshore resources such as geothermal or onshore wind.

m. Transmission Planning

WestLight conducted a transmission analysis to assess whether the transmission system can support delivery of the resources included in its Preferred Portfolio and to identify potential transmission constraints or upgrade needs associated with those resources.

a. Resources with flexible locations

Table 29 - Planned Resources with Flexible Locations shows planned resource quantities identified in the RDT and represent proposed MW allocations within broader study areas that can remain flexible for future refinement through the CPUC and CAISO busbar mapping process. For these resources that are not yet contracted or tied to specific interconnection queue positions, WestLight recognizes that some flexibility remains for staff-led refinement or relocation during transmission modeling and busbar mapping efforts, provided such adjustments do not materially impact procurement feasibility, commercial viability, or deliverability assumptions.

Table 29: Planned Resources with Flexible Locations

Project Name	Technology	2028 Capacity (MW)	2030 Capacity (MW)	2035 Capacity (MW)	2040 Capacity (MW)	2045 Capacity (MW)
PVHybrid_Desert	Solar PV		314	314	434	663.5
Storage_Hybrid_Desert	Hybrid Storage		314	314	434	663.5
SCE_Northern_Wind	Onshore Wind			214	214	214
PGE_NGBA_Wind	Onshore Wind			165	165	165
SCE_NOL_Wind	Onshore Wind			108	108	108
San_Diego_Wind	Onshore Wind			85	85	85
SCE_Eastern_Wind	Onshore Wind			72	72	72
PGE_GBA_Wind	Onshore Wind			22	22	22
PGE_Kern_Wind	Onshore Wind			22	22	22
SCE_EOP_Wind	Onshore Wind			21	21	21

PGE_NE_CA_Wind	Onshore Wind					51
Additional Ormat Geothermal - Nevada	Geothermal		1.54	1.54	1.54	1.54

For projects in Table 29 the proposed areas and procurement ratios are consistent with the Base Case CPUC transmitted to CAISO for the 2026–2027 TPP cycle. In addition, CAISO's 2025 TPD heatmap generally shows available TPD capacity in the areas where WestLight is proposing the largest portion of its planned MW procurement, notable exceptions including the Desert and SCE Eastern regions. By assigning procurement amounts to these areas, WestLight's intent is to make best use of planned and existing transmission infrastructure that may become available through anticipated withdrawals from the interconnection queue. WestLight's portfolio includes significant quantities of solar PV and hybrid storage resources located within the Desert study area, growing from approximately 630 MW by 2030 to more than 1.3 GW by 2045. Desert regions are attractive development areas due to resource quality, real estate availability, permitting viability, community support, and existing transmission infrastructure. WestLight believes the level of desert resource development reflected in its portfolio is consistent with current commercial interest and developer expectations. As such, WestLight encourages the CPUC to view these portfolio assumptions as a meaningful signal of likely future development activity and to consider whether corresponding transmission planning and policy-driven upgrades are warranted to support that anticipated growth.

Looking far forward, to the CAISO 20-Year Transmission Outlook, CAISO identifies numerous conceptual transmission reinforcements across California and the Western Interconnection. Rather than restating the full list, WestLight highlights below the projects most relevant to its long-term portfolio, particularly within the Desert study area where the majority of WestLight's planned resource capacity is expected to be developed. These projects represent significant long-term critical-path transmission investments that will require substantial planning, permitting, and construction efforts. Accordingly, early consideration of these transmission corridors will be important to ensure they can support California's evolving resource portfolio and WestLight's long-term procurement needs.

Table 30: Transmission Upgrades in Desert Study Area

20-Year Outlook Project	Description	Status
New Palo Verde – Imperial Valley 500 kV line	Supports Greater Imperial, Riverside/Palm Springs solar, Arizona solar, and assumed imports of ~2,882 MW of out-of-state wind injected at Palo Verde. (California Independent System Operator)	Not yet recommended by a CAISO TPP
New Trout Canyon – Lugo 500 kV line	Supports Southern Nevada solar, Eldorado resources, and assumes ~3,500 MW of out-of-state wind injected at Eldorado. It relieves the Eldorado–Lugo corridor. (California Independent System Operator)	CAISO approved this as a policy-driven project in the 2025–2026 Transmission Plan, and it is now in the competitive solicitation phase.

b. Planned and contracted resources with fixed locations, contracted imports need MIC

WestLight notes that certain planned and contracted resource categories are inherently geographically constrained and therefore should be treated as location-specific for transmission planning purposes. In particular, WestLight has significant geothermal procurement activities currently underway, and these resources can only reasonably be developed in areas with viable geothermal steam reservoirs. Accordingly, the geothermal locations identified by WestLight should be considered investment-grade assumptions for long-term transmission planning and busbar mapping purposes, rather than resources that can be flexibly relocated during modeling refinement.

Table 31: Planned and Contracted Resources with Fixed Locations

Plan	Project Name	Technology	2028 MW	2030 MW	2035 MW	2040 MW	2045 MW	Location	Representative Point of Interconnection
Planned	[redacted]	Geothermal			[redacted]	[redacted]	[redacted]	Lassen County, CA	[redacted]
Planned	[redacted]	Geothermal			[redacted]	[redacted]	[redacted]	Sonoma County, CA	[redacted]
Planned	[redacted]	Geothermal			[redacted]	[redacted]	[redacted]	Lake County, CA	[redacted]
Planned	[redacted]	Geothermal			[redacted]	[redacted]	[redacted]	Inyo County, CA	[redacted]
Planned	[redacted]	Geothermal			[redacted]	[redacted]	[redacted]	Lake County, CA	[redacted]
Planned	[redacted]	Geothermal			[redacted]	[redacted]	[redacted]	Lake County, CA	[redacted]
Planned	[redacted]	Geothermal				[redacted]	[redacted]	Lake County, CA	[redacted]
Planned	[redacted]	Geothermal			[redacted]	[redacted]	[redacted]	New Mexico	[redacted]
Contracted	Fish Lake Geothermal	Geothermal	2.31	2.31	2.31	2.31	2.31	Esmeralda, NV	Import - In Development NV Energy Silver Peak 55kV

Contracted	Ormat Geothermal Portfolio - Dogwood	Geothermal	4.28	4.28	4.28	4.28	4.28	Imperial, CA	Import - In Development CAISO delivery at IID-SDGE_ITC or IID-SCE_ITC
Contracted	[redacted]	Geothermal	1.19	5.13	5.13	5.13	5.13	[redacted]	[redacted]
Contracted	Whitegrass	Geothermal	6	6	6	6	6	Lyon, NV	Import - In Development [redacted]
Planned	CCPower StrategicGeo NGBA East	Geothermal				73	73	Lake County, CA	Redbud 115 kV
Planned	CCPower StrategicGeo NGBA West	Geothermal				63.4	73	Sonoma County, CA	Cloverdale 115 kV
Planned	CCPower StrategicGeo Humboldt	Geothermal					23.4	Humboldt County, CA	Maple Creek 115 kV
Planned	CCPower StrategicGeo Surprise Valley	Geothermal					23.4	Modoc County, CA	Hilltop 345 kV
Planned	CCPower StrategicGeo Lassen	Geothermal					23.4	Lassen County, CA	Shaffer 345 kV (LMUD/NVE)

Planned	CCPower StrategicGeo PitRiver	Geothermal					23.4	Shasta County, CA	Hat Creek 2 230 kV
Planned	SCE WY Wind	Onshore Wind				330	400	Wyoming	Planned import WY to SCE - Eldorado

WestLight emphasizes that achievement of California's long-term reliability and decarbonization goals will require proactive transmission planning sufficient to support geographically constrained clean energy resources, including geothermal generation and regional import resources. California policy frameworks and planning studies have consistently identified geothermal generation as a critical clean firm reliability resource, and statewide decarbonization targets are expected to require development of a substantial portion of the geothermal potential identified by the U.S. Geological Survey (USGS). Many of the geothermal resources reflected in WestLight's portfolio, both within and outside the CAISO balancing authority area, represent new generation development that will require additional deliverability and transmission infrastructure to fully contribute toward California's 2045 policy objectives.

WestLight appreciates CPUC staff's efforts in the 2026–2027 TPP to identify unaccounted-for TPD associated with long lead-time resources and transmit those quantities to CAISO for consideration in transmission planning studies intended to preserve future deliverability. WestLight believes this framework represents an important evolution beyond reliance on residual MIC availability and after-the-fact import capability expansion by proactively incorporating long lead-time resource needs into the TPP process and associated transmission upgrade assessments. Continued refinement of this approach may help ensure that geographically constrained best-fit resources, including geothermal and out-of-state wind resources, remain commercially viable and deliverable as California advances toward its long-term reliability and decarbonization goals.

Given WestLight's contracted import portfolio, ongoing geothermal procurement efforts, and the State's increasing need for diverse clean and reliable resources, WestLight respectfully encourages the CPUC to continue expanding consideration of these resource types within the IRP-to-TPP planning process, including through base case assumptions and transmission studies that evaluate deliverability needs before resource development is constrained by limited available import capability. Such an approach would be consistent with California's broader regionalization and market integration objectives, including EDAM and DAME, while supporting reliability, affordability, and efficient utilization of transmission infrastructure across the Western Interconnection.

Also, in the 2022-2023 TPP CAISO identified upgrades needed to enable MIC expansion that was, at that time, directed by the CPUC. WestLight considers the upgrades below, which originated in that analysis, as necessary for its portfolio.

Table 32: Transmission Upgrade Projects for MIC Expansion

TP Project ID	Project	PTO
2223-P-10	Mira Loma-Mesa Upgrade	SCE

2223-P-17	Serrano-Alberhill-Valley 500 kV 1 Line Upgrade	SCE
2223-P-21	Vista-Etiwanda 230 kV 1 Line Upgrade	SCE
2223-P-08	IV-North of Songs 500 kV line	SDG&E
2223-P-19	Upgrade on Hoodoo Wash-North Gila and Hassayampa-North Gila Transmission Lines	SDG&E
2223-P-12	North of Songs-Sorreno 500 kV Line	Lotus Infrastructure Global Operations
2223-P-11	North Gila–Imperial Valley 500 kV line	HWT
2223-P-08	IV-North of Songs 500 kV line and North of Songs Substation	HWT

WestLight's long-term portfolio includes Wyoming wind resources beginning in the 2040–2045 timeframe, which are likely to be delivered via the TransWest Express transmission project. The TransWest Express transmission project, currently under development and construction, is intended to deliver up to 3,000 MW of Wyoming wind generation to western markets, including California. As such, TWE can provide an important transmission pathway supporting future development and deliverability of Wyoming wind resources that are consistent with WestLight's long-term procurement assumptions.

c. Contracted Resources with CODs After Spring 2024

Table 33 - Resources Contracted with CODs After Spring 2024

Plan	Project Name	Technology	2028 MW	2030 MW	2035 MW	2040 MW	2045 MW	Queue Position	Location	Point of Interconnection	COD	Deliverability
Contracted	Wright Storage 4hr	Storage	80	80	80	80	80	[redacted]	Merced, CA	PG&E Q779 Switching Station bus connection to the Los Banos – Panoche #1 230 kV Transmission Line	Planned COD 10/21/2026	Deliverability studied, allocation locked
Planned	SandHill	Onshore Wind	50	50	80	80	80	[redacted]	Alameda, CA	Delta Switching Yard – Tesla 230kV line	Planned COD [redacted]	Deliverability studied, allocation locked
Contracted	Tumbleweed Storage 8hr	Storage	14.77	14.77	14.77	14.77		Q1217	Kern, CA	Whirlwind Substation 230kV	Planned COD 6/1/26	Deliverability studied, allocation locked
Contracted	WillowRock Storage 4hr	Storage			15	15	15	Q1782	Kern, CA	Whirlwind Substation 230kV	Planned COD 7/1/2030	Deliverability studied, allocation locked
Contracted	Darden Solar	Solar PV	84.56	84.56	84.56			[redacted]	Fresno, CA	PG&E Los Banos-Midway #3 500kV Transmission Line	Planned COD 6/1/2028[28]	Deliverability studied, allocation locked

28 Queue COD is accelerated compared to contract COD. WestLight is including contract COD in this table

Plan	Project Name	Technology	2028 MW	2030 MW	2035 MW	2040 MW	2045 MW	Queue Position	Location	Point of Interconnection	COD	Deliverability
Contracted	Darden Storage 4hr	Storage	91.48	91.48	91.48			[redacted]	Fresno, CA	PG&E Los Banos-Midway #3 500kV Transmission Line	Planned COD 6/1/2028[29]	Deliverability studied, allocation locked
Contracted	Gabriel Storage 4hr	Storage	65	65	65	65		[redacted]	Los Angeles, CA	Rio Hondo Substation 220kV Bus	Planned COD 6/1/2027[30]	Deliverability studied, allocation locked
Contracted	Gabriel Storage 8hr	Storage	10	10	10	10		[redacted]	Los Angeles, CA	Rio Hondo Substation 220kV Bus	Planned COD 6/1/2027[31]	Deliverability studied, allocation locked
Contracted	Arica Solar	Solar Plus Storage Hybrid	100	100	100	100		Online	Riverside, CA	SCE Red Bluff 230 kV	3/26/2024	Deliverability studied, allocation locked
Contracted	Arica Hybrid Storage	Solar Plus Storage Hybrid	50	50	50	50		Online	Riverside, CA	SCE Red Bluff 230 kV	3/26/2024	Deliverability studied, allocation locked
Contracted	Chaparral Solar	Solar Plus Storage Hybrid	102	102	102			Online/ Q1215 Q1319	Kern, CA	Whirlwind 220 kV	5/8/2025	Deliverability studied, allocation locked

29 Ibid.

30 WestLight is including contract COD for this resource, which is in advance of the planned Queue COD. This resource is undergoing a CAISO Limited Operation Study (LOS)

31 Ibid.

Plan	Project Name	Technology	2028 MW	2030 MW	2035 MW	2040 MW	2045 MW	Queue Position	Location	Point of Interconnection	COD	Deliverability
Contracted	Chaparral Hybrid Storage	Solar Plus Storage Hybrid	52	52	52			Online/ Q1215 Q1319	Kern, CA	Whirlwind 220 kV	5/8/2025	Deliverability studied, allocation locked
Contracted	Lockhart Storage 4hr	Storage	45	45	45			Online/ 0043CONV Q1617 Q1775	San Bernardino, CA	SCE Kramer 220 kV	4/1/2026	Deliverability studied, allocation locked
Planned	Additional Ormat Geothermal - Nevada	Geothermal		1.54	1.54	1.54	1.54	Will either go to a Vegas Node or Utah/IPP Node	Nevada	Nevada	not in interconnection queue yet LLR	no clear transmission plan for this yet, WestLight has no MIC, Ormat has to assign specific resources into the contract, which is "more likely to be eligible for MIC in the 2030 timeline"
Contracted	Nova Storage 4hr	Storage	50	50	50			Q1645	Riverside, CA	SCE 500kV Valley Substation	Not online yet but NCQ sheet has FC on other tab	Deliverability studied, allocation locked

For contracted resources executed after formation of the Spring 2024 IRP baseline portfolio, WestLight recognizes that certain associated transmission assumptions and deliverability needs may not yet be fully incorporated into prior CAISO TPP studies or baseline busbar mapping efforts. WestLight did consider available interconnection queue information, transmission capability assessments, and project study results when choosing these resources. The resources identified in Table 33 are executed procurement commitments made after formation of the baseline portfolio. WestLight therefore encourages the CPUC and CAISO to consider these contracted resources during future busbar mapping, deliverability preservation efforts, and transmission planning studies so that transmission planning assumptions appropriately reflect actual procurement commitments and the transmission infrastructure necessary to support their successful interconnection and deliverability.

d. Resources Contracted with CODs Before Spring 2024

Table 34 - Resources Contracted with CODs Before Spring 2024

Project Name	Technology	2028 Capacity (MW)	2030 Capacity (MW)	2035 Capacity (MW)	2040 Capacity (MW)	2045 Capacity (MW)	Point of Interconnection
Heber 2	Geothermal	26	26	26	0	0	Mirage 230 kV, MIC locked until 2037
Bidwell Ditch	Small Hydro	2	2	0	0	0	Private 60 kV tap to PG&E transmission line
Burney Snow Mountain	Small Hydro	3	3	3	0	0	SPI 230 kV tap to PG&E's Pit #3 – Pit #1 230 kV line
Calwind	Onshore Wind	8.71	0	0	0	0	AR1946 Pinwheel 12 kV
Clover	Small Hydro	0.99	0.99	0	0	0	Private 60 kV tap to PG&E transmission line, cedar creek
Coram 1	Onshore Wind	7.5	7.5	0	0	0	Tempest 12kV distribution out of Midwind 12kV Substation
Coram 2	Onshore Wind	3	3	0	0	0	Puff 12kV distribution line out of Midwind 12kV Substation
Coram 3	Onshore Wind	3	3	0	0	0	Windhub-Dutchwind-Flowind 66kV distribution line out of Dutchwind 66kV Substation
DosPalos Solar	Solar PV	3	3	3	3	0	Dos Palos Substation
Geysers	Geothermal	35	35	35	35	35	N/A Portfolio
Hatchet Creek	Small Hydro	7.5	7.5	7.5	0	0	Private 230 kV tap to PG&E transmission line, Cove rd
Mustang 2	Solar PV	100	100	100	0	0	PG&E Mustang Switching Station 230kV

Roaring Creek	Small Hydro	2	2	0	0	0	Private 230 kW tap to PG&E transmission line, Cove rd
Shiloh	Onshore Wind	150	150	150	0	0	PG&E Birds Landing Substation
Sky River	Onshore Wind	30.2	30.2	30.2	30.2	0	SCE 220 kV Highwind Substation
Voyager 2	Onshore Wind	63.175	63.175	0	0	0	SCE Windhub Substation
Wright Solar	Solar PV	200	200	200	200	200	Los Banos – Panoche #1 230kV line

For contracted resources that were already online or otherwise included in the IRP baseline portfolio formation process, WestLight notes that associated transmission needs have generally already been contemplated through prior IRP and CAISO TPP processes. The IRP baseline utilized for the 2025 Inputs & Assumptions was formed using online resources reflected in the CAISO Master Generating Capability List as of Spring 2024, together with in-development resources identified through December 2023 LSE filings and subsequent minimum-build assumptions. As a result, many currently contracted resources reflected in WestLight's portfolio have already been incorporated into statewide transmission planning assumptions and associated reliability and deliverability assessments.

Table 35 shows a unique project that has a COD after Spring 2024 but was included in the 2022-2023 TPP base case. No further consideration is needed to secure this project's deliverability.

Table 35: Contracted Resources with Studied and Secured Deliverability

Project Name	Technology	2028 MW	2030 MW	2035 MW	2040 MW	2045 MW	Location	Point of Interconnection	Deliverability
Sunzia	Onshore Wind	220	220	220	220	220	Lincoln, Torrance, and Guadalupe, NM	Palo Verde - 500 kV Pinal Central Substation	MIC is locked until 2040

WestLight evaluated available information regarding transmission deliverability, interconnection status, and transmission upgrade requirements for contracted and planned resources using CAISO and CPUC planning materials, interconnection study information, and in-service schedules for planned transmission, and current transmission capability. Transmission needs vary by resource type, location, and stage of development. Some contracted resources are located in areas where transmission upgrades have already been identified and placed into service, some contracted resources are still waiting on in flight transmission upgrades to secure full capacity deliverability status. In Table 36 WestLight has identified the following transmission upgrades as specifically necessary for generators in the portfolio, including resources outside of the CAISO balancing authority area.

Table 36: Transmission Upgrades required to support WestLight's portfolio

ID	Network Upgrade	PTO	Study	Type of Upgrade	In-service Year at Approval in Transmission Plan	Expected CPUC Filing	Current Expected Construction Start	Current Expected In-Service Date
C14P2-FGR06	Transient Stability: Updated dynamic models required	PG&E	C14	Reliability			TBD	TBD
C14P2-GGR14	Birds Landing Sw Sta 230 kV CB 212, 412 overload mitigation	PG&E	C14	Reliability			TBD	TBD
C14P1-GGR09	Tesla 230 kV Bus Overstress (2 CB with Line relocations)	PG&E	C14	Reliability		Jan 2029	Apr 2031	Apr 2031
C14P2-FGR04	Los Banos 500 kV circuit breakers 822, 832 & 842 overstress	PG&E	C14	Reliability		Apr 2026	Sep 2026	Sep 2026
C14P2-GGR17	Midway 230 kV reactor replacement: Replace existing 9 ohm Midway 500/230 kV reactors with 13 ohm reactors	PG&E	C14	Reliability		Sep 2028	Mar 2029	Mar 2029
2122-R-12	Series Compensation on Los Esteros-Nortech 115 kV Line	PG&E	2022-2023 Transmission Plan	Reliability	Dec 2028	TBD	Jan 2026	Apr 2026
2425-R-11	Konocti – Eagle Rock 60 kV Line Reconductoring	PG&E	2017-2018 Transmission Plan	Reliability	Dec 2021	TBD	Apr 2030	May 2030
2223-R-23	Tesla 115 kV Bus Reconfiguration Project	PG&E	2023-2024 Transmission Plan	Reliability	May 2034	TBD	Nov 2027	Jun 2028
1213-P-02	Lugo – Eldorado series cap and terminal equipment upgrade	SCE	2012-2013 Transmission Plan	Policy	2016	May 2018	Dec 2020	Jun 2026

ID	Network Upgrade	PTO	Study	Type of Upgrade	In-service Year at Approval in Transmission Plan	Expected CPUC Filing	Current Expected Construction Start	Current Expected In-Service Date
1314-P-01	Lugo-Mohave series capacitor upgrade	SCE	2013-2014 Transmission Plan	Policy	2016	May 2018	Dec 2020	Jun 2026
2223-P-09	Lugo-Victor-Kramer Upgrade (1/3) Add 3rd Lugo 500/230 kV Transformer	SCE	2022-2023 Transmission Plan	Policy	2028	Exempt	Jan 2028	Jun 2029

To better understand the transmission requirements associated with each resource, and identify which specific transmission needs the contracted resources needed, WestLight reviewed each project's CAISO queue position, point of interconnection (POI), applicable group study reports and restudies, and applicable transmission constraints. WestLight also reviewed CAISO Net Qualifying Capacity (NQC) lists, interconnection study materials, and other publicly available CAISO resources to assess whether the transmission and deliverability necessary to support each resource have already been established or whether additional transmission development may be required. A summary of this assessment is provided in the table above.

WestLight notes that several transmission upgrades relevant to resource deliverability, including the Konocti–Eagle Rock 60 kV Line Reconductoring Project, the Lugo–Mohave Series Capacitor Upgrade, and the Lugo–Victor–Kramer Upgrade (including addition of a third Lugo 500/230 kV transformer), have experienced substantial extensions to their original planned implementation timelines. Given the importance of these projects to supporting resource deliverability, reliability, and policy goals, WestLight respectfully encourages the CPUC to continue affording these projects appropriate priority within ongoing transmission planning and oversight processes to the extent practicable, and enable the Participating Transmission Owners (PTOs) to pursue construction and implementation of these upgrades as expeditiously as reasonably possible and, where feasible, evaluate opportunities to accelerate project development schedules. Timely completion of these transmission investments will help reduce reliability uncertainty.

As California increasingly relies on geographically diverse renewable resources, clean firm resources, storage, and imports, transmission planning has become a critical determinant of whether procurement objectives can be achieved in practice. WestLight supports continued improvement in alignment among CPUC Integrated Resource Planning assumptions, CAISO Transmission Planning Process studies, interconnection timelines, and actual LSE procurement activity. Given the scale of future transmission investment under consideration, timely and well-coordinated planning will be important to reduce portfolio risk, avoid unnecessary customer costs, and enable resources such as offshore wind, geothermal, and out-of-state renewables to contribute to California’s clean energy and reliability goals.

In particular, WestLight has partnered with Sonoma Clean Power and a team from the Zero lab at Princeton University to develop and advocate for planning methods that can incorporate large scale uncertainties to develop a least-regrets resource portfolio and transmission plan that would be robust to major uncertainties, such as changes in resource availability and retirements, the success or failure of offshore wind, changes to renewable incentives, etc. By planning for a range of foreseeable eventualities, rather than a single deterministic prediction (which can result in major stranded costs or mismatches should that single prediction be wrong), these robust planning methods should realize major savings for Californians .

IV. Action Plan

a. Proposed Procurement Activities and Potential Barriers

WestLight’s mission is to provide affordable, clean electricity and advance local solutions that lower costs, reduce pollution, and strengthen community resilience. The Preferred Portfolio identifies the most cost-effective way to achieve WestLight’s mission, internal targets, and the assigned reliability and GHG emissions targets of the IRP process and includes a significant amount of new resources including wind, geothermal, solar, and energy storage resources.

WestLight takes a multi-pronged approach to implementing its annual and long-term clean energy goals for RPS and carbon-free non-RPS eligible resources. This implementation includes issuing Requests for Proposals (RFPs) or RFOs, participating in jointly issued RFPs / RFOs, engaging in bilateral negotiations and exploring partnerships to develop clean energy resources. WestLight varies the timing of its clean energy procurement activities to ensure a diversification of counterparties, prices, and term and to meet short-term needs based on actual load.

As described in Section II.a, WestLight's procurement activities are guided by Board-adopted policies, including its Energy Risk Policy, renewable energy and procurement policies, and workforce and sustainability objectives. Together, these policies establish a framework for balancing affordability, reliability, emissions reductions, and risk management in its procurement decisions. Consistent with this framework, WestLight seeks to maintain a diverse portfolio of resources. Procurement decisions consider a range of factors, including technology type, generation profile, project location, contract term, and market risk. WestLight's procurement strategy is designed to support achievement of its reliability and clean energy objectives while maintaining flexibility to adapt to evolving market, financial, and regulatory conditions.

WestLight intends to implement its Preferred Portfolio through a combination of bilateral procurement, competitive solicitations, and joint procurement activities. Consistent with the procurement policies and risk management framework described in Section II.a, WestLight will continue to evaluate opportunities to procure resources that support its reliability, affordability, and clean energy objectives.

WestLight evaluates resources on a least-cost best-fit basis to determine the most cost-effective way to meet its renewable energy goals with the resources available.

In evaluating bids, WestLight considers quantitative criteria such as:

- Project economic value, including energy, attributes, and capacity (net of curtailment and degradation),
- Contract cost
- Forecasted congestion, curtailment, and market revenue risks
- Contract term
- Contribution to meeting WestLight's time-coincident goals
- Contribution to meeting WestLight's procurement requirements under IRP procurement orders, including D.19-11-016, D.21-06-035,D.23-02-040, and D.26-02-057.
- Alignment with WestLight's risk management strategies, including spatial diversification of its supply portfolio

WestLight also considers qualitative criteria such as:

- Project viability and development risk:
  - Project status regarding interconnection, site control, permits
  - Technology viability
  - Financial stability of project owner/developer
  - Approach/discussion on EPC contracting
- Project team experience
- Project location
- Environmental impacts and related mitigation requirements

        - Whether projects deliver multiple benefits for air, water, and nature and avoid impacts to important lands, species, and waters
        - Whether projects are in areas zoned for renewable energy development or in high-conflict areas
        - Whether projects have recycling and decommissioning plans for project technology

- Disadvantaged Communities
    - Whether projects are located within DACs, can demonstrate DAC workforce and community development benefits, and have conducted outreach to DAC communities.
        - Whether projects are located within California, particularly projects located within or close to San Mateo County and the City of Los Banos
    - Workforce Development
        - Potential workforce impacts of proposed projects with the goal of promoting fair compensation, fair worker treatment, multi-trade collaboration, and support of the existing wage base in local communities where contracted projects will be located
    - Community Benefits
        - Efforts by the developer to incorporate community feedback in the planning and development process, commitment to community sponsorships, community benefits plans, and community benefits agreements in areas surrounding the project site.

WestLight issues regular procurements to manage exposure to market risk. In alignment with WestLight's evaluation criteria described above and its procurement strategies described in Section II.a, WestLight targets a diversity of contract term lengths, resource additionality, and resource technologies to develop a diverse, cost-effective, and low-risk power portfolio. WestLight values short-term contracts (less than 5 years in length) to help manage future uncertainty in load, supplies, and regulatory requirements. WestLight see a valuable role for existing renewable resources in its portfolio, which may be more feasible to contract under short-term contracts than new resources.

A key component of WestLight's procurement strategy is participation in CC Power joint procurement. Through CC Power, member agencies are able to jointly procure large-scale and emerging clean energy resources, diversify development and commercial risks, and achieve economies of scale that may not be available through individual procurements. WestLight has utilized CC Power as a primary procurement vehicle for compliance with the long lead-time resource requirements established under D.21-06-035 and D.23-02-040, specifically for long-duration energy storage and firm clean resources. Consistent with the results of its Preferred Portfolio modeling, WestLight anticipates that joint procurement efforts through CC Power will continue to be an important pathway for securing firm clean resources, including geothermal and emerging geothermal technologies.

In addition to its participation in CC Power, WestLight continues to conduct its own competitive solicitations to meet its procurement objectives. Recent examples include a 2024 solicitation for renewable energy and storage resources to support WestLight's goal of serving customer load with 100 percent renewable energy by 2030, and a solicitation to allocate Commercial Interest points in CAISO's Queue Cluster 15 process, consistent with Interconnection Process Enhancements.

WestLight plans to continue similar procurement activities on an approximately annual basis to fulfill the procurement of new resources identified in its Preferred Portfolio, and anticipates releasing its next RFO in Q4 of 2026 or Q1 of 2027.

Any contracts with a term longer than five years must be approved by WestLight's Board. These approvals take place during public Board meetings which provide opportunity for members of the public to comment on the proposed contract.

Additional details on WestLight's action plans regarding specific areas are detailed in the sections below.

i. The LSE should provide responses for each of the following resource categories: Resources to meet IRP mandated procurement requirements, including D.21-06-035 and D.23-02-040:

In June 2021, the CPUC issued D. 21-06-035, establishing procurement requirements for load-serving entities, including WestLight, to procure specified resources on prescribed timelines. The CPUC subsequently adopted additional procurement requirements through Decision 23-02-040. WestLight's procurement obligations under Decisions 21-06-035 and 23-02-040 are identified in Table 37 below.

Table 37: WestLight's D.21-06-035 and D.23-02-040 Procurement Requirements

Compliance Date	Capacity
08/01/2023	38 MW
06/01/2024	117 MW
06/01/2025	51.4 MW[32]
06/01/2025 (Zero-emitting generation, generation paired with storage, or demand response)	47 MW* (subset of 2023, 2024, and 2025 capacity, not additive)
06/01/2026	35 MW
06/01/2027	35 MW
06/01/2028 (Long Duration Storage)	19 MW
06/01/2028 (Firm Clean Resources)	19 MW

WestLight has procured sufficient resources to meet its requirements under D.21-06-035 and D.23-02-040, including generic, zero-emitting generation/generation paired with storage, firm clean resources,

32 WestLight's original 2025 requirement under D.21-06-035 was 28 MW. WestLight submitted AL-031-E for a baseline swap to count two resources on the baseline toward its 2023 requirements, and added a commensurate amount to its 2025 requirements.

and long-duration storage. A portion of these resources have achieved commercial operation and the remainder are in various stages of development.

1,000 MW of firm zero-emitting resource requirements

WestLight has contracted for 26 MW of repowered geothermal capacity from Heber 2 Geothermal, 14 MW of which is incremental and qualifies as firm zero-emitting resource under D.21-06-035. WestLight contracted this resource following participation in Ormat's Request for Bids in 2021. This project has achieved commercial operation. WestLight has secured import allocation at the delivery point for this resource.

Additionally, WestLight has contracted for up to 24 MW of new geothermal capacity through its share of two executed contracts, Fish Lake geothermal and Ormat portfolio, from CC Power. These resources were identified through a solicitation completed in early 2022. WestLight also contracted with a 6 MW geothermal project, Whitegrass No.2, in 2022. These projects all face development challenges. These include federal policy risks regarding Foreign Entity of Concern (FEOC) requirements, permitting and environmental risks, and commercial risks associated with a limited supply of geothermal development opportunities, all of which increase cost and uncertainty surrounding project viability. Despite these challenges, WestLight still expects to be able to meet its firm clean resource requirements under D.21-06-035 and D.23-02-040.

1,000 MW of long-duration storage resource requirements

WestLight has contracted for approximately 15 MW of new long duration storage capacity through its share of an executed contract from CC Power with Tumbleweed Storage. This resource was identified through a solicitation completed in 2021. Tumbleweed Storage achieved commercial operation on June 1, 2026.

WestLight has contracted for 10 MW of new long duration storage capacity with the San Gabriel Project II. The project is expected to achieve commercial operation by June 1, 2027, and will fulfill the remainder of WestLight's long-duration storage requirements under D.21-06-035. WestLight receives regular progress reports from the developer on project development status, and no significant risks have been identified.

2,500 MW of zero-emissions generation, generation paired with storage, or demand response resource requirements. All other procurement requirements

WestLight is required to procure 47 MW of zero-emissions generation, generation paired with storage, or demand response resources. WestLight has met these procurement requirements with the Arica Solar plus Storage and Chaparral Solar plus Storage resources, both of which are now online.

ii. Plans for resources that are currently non-candidate in CPUC's IRPs not described above

WestLight's Preferred Portfolio includes an 8-hour Advanced Compressed Air Energy Storage (A-CAES) resource that is not currently represented as a candidate resource in the CPUC's IRP modeling framework, which only considers 8-hr litihium ion storage technologies, or 12-hr location constrained storage. Because WestLight has already executed a contract for this resource, it was included as an existing portfolio input to the modeling and included as part of the Preferred Portfolio. WestLight will continue to

support development of this project and monitor progress toward commercial operation. Additional information on this resource is provided below in Section iv. Other Energy Storage.

In addition, WestLight intends to continue pursuing BTM distributed energy resource initiatives, including customer-sited solar and storage, and virtual power plants. While these resources are not reflected as selectable candidate resources in the current IRP framework, they remain an important component of WestLight's broader strategy to improve resilience and grid flexibility.

iii. Other renewable and/or zero carbon resources not described above

WestLight's plans for procuring renewable and zero carbon resources are described in Section IV.a above.

iv. Other energy storage not described above

WestLight's plans for procuring energy storage are described in Section IV.a above.

v. Other demand response not described above

Currently WestLight has approximately 550 residential systems actively dispatching daily for a total of 1.6MW / 3.1MWh. This program is with a residential solar and storage provider that has been providing daily load modification to WestLight since 2022.

WestLight's strategic plan includes launching at least one 10 MW virtual power plant (VPP) that delivers value to customers, communities, and the grid by 2030. WestLight has contracted with Lunar Energy, a Distributed Energy Resource Management System (DERMS) to coordinate the VPP service. At this time integration work is proceeding to integrate residential storage systems being deployed under WestLight's income-qualified residential solar and storage program. The VPP system will allow for more dynamic dispatch of assets for grid needs. Other dispatchable asset classes will be explored and ultimately integrated if deemed viable.

DERMS integrations for distributed energy resources are not yet standardized. As a consequence, integration is done differently by each manufacturer, though some integrators are seeking to create common interfaces and processes. Due to the heterogeneity, costs are high and timelines are unpredictable. Certain asset classes such as water heaters are largely unproven or have low yield, or recruitment of relevant participants is prohibitively challenging (EVs). Fixed storage and thermostats for HVAC (commercial and residential) are likely the most viable near term reliable distributed dispatchable assets.

The effects of Demand Response programs that have already been developed are included in WestLight's IRP analysis via their impacts to WestLight's overall load shape. However, additional Demand Response programs were not evaluated in WestLight's IRP analysis due to lack of available inputs and assumptions for additional program deployment. WestLight plans to pursue additional Demand Response going forward and will incorporate the effects of this in the next IRP cycle.

vi. Other energy efficiency not described above

WestLight is applying to the CPUC to become a full "apply-to-administer" Energy Efficiency (EE) provider. CCAs have a statutory right to administer such EE programs and approval is expected in 2027 for programs to launch beginning in 2028. Consistent with the 2024-2027 IRP Filing Requirements, WestLight assumed the Energy Efficiency load modifier volumes assigned to WestLight by the CPUC in its IRP analysis. WestLight includes a description of its planned EE programs in this section even though different levels of EE could not be assumed when modeling its Preferred Portfolio.

The portfolio of EE programs planned include:

- Multifamily Strategic Energy Management (SEM) - Works with multifamily property owners and managers to build long-term energy management practices. Through energy coaching, building energy data tools, and peer learning, participants identify operational improvements, low- and no-cost savings opportunities, and ways to improve comfort for residents. The program also helps properties identify electrification readiness and load flexibility opportunities. By supporting ongoing energy management and providing performance-based incentives for verified savings, the program helps reduce energy costs and emissions while improving building performance for residents and owners. From 2028–2031, the program is expected to deliver 1.5 million net first-year kWh, and engage approximately 60–75 multifamily buildings in multi-year SEM cohorts.
- Non-Residential SEM - Engages commercial, agricultural, public sector, and industrial customers through a dedicated energy coaching model that builds long-term capacity for operational and behavioral energy management. The program offers a six-year curriculum with energy coaching, cohort learning, and real-time energy data tools to help participants identify operational improvements, load flexibility opportunities, and electrification readiness. Through performance-based incentives and continuous improvement practices, the program supports sustained energy savings, reduced GHG emissions, and long-term decarbonization outcomes. From 2028–2031, the program is expected to deliver 19.6 million net first-year kWh in savings while serving approximately 40–60 large-load customers.
- Commercial Direct Install (DI) - Provides a turnkey, no or low-cost solution for commercial customers, delivering onsite energy and electrification readiness assessments and direct installation of energy-saving measures. From years 2028-2031, the program expects to deliver 419,675 first year net kWh and serve approximately 300 customers.
- Residential DI - Provides no-cost in-home energy assessments and installation of energy-saving measures that improve comfort, health, and safety for residents. Energy Advisors and trusted community partners help households understand energy use, identify electrification opportunities, and connect to other programs and incentives. The program focuses on underserved and hard-to-reach customers while building long-term energy awareness and engagement. From 2028–2031, the program is expected to deliver 18,658 net first-year kWh and complete approximately 2,000 in-home assessments and direct installs.
- Renter Marketplace - Provides Equity customers, renters, and small and micro businesses with easy access to discounted energy-efficient and clean energy products through an online platform that simplifies incentives and purchasing. The marketplace offers curated product recommendations, multilingual support, and concierge assistance to help underserved customers adopt renter-friendly technologies like plug-in induction stoves, window heat pumps, and

efficient appliances. From 2028–2031, the program is expected to deliver 2.9 million net first-year kWh and reach approximately 2,600 equity customer purchases.

- FLEXMarket (expanded) - Offers measure-agnostic incentives that encourage aggregators to submit projects that reduce peak load and deliver verified energy savings. Using a pay-for-performance structure, the program rewards projects based on measured results while supporting load flexibility and electrification solutions. From 2028–2031, the program is expected to deliver 7.8 million net first-year kWh savings across approximately 140 buildings.
- Refrigerant Workforce, Education, and Training (WE&T) - Builds local contractor capacity to support refrigerant recovery, recycling, and the transition to low-global warming potential (low-GWP) refrigerants. The program provides small and independent HVAC contractors with no-cost training, equipment starter kits, certification support, and connections to refrigerant buyback markets that create new revenue opportunities. By partnering with workforce organizations and community colleges, the program expands access to training while supporting compliance with California refrigerant regulations and reducing Hydrofluorocarbon (HFC) emissions. The goal is to reduce GHG emissions from improperly handled refrigerant and through the transition to low-GWP refrigerant. By 2031, the program aims to recruit and train 75+ local small and independent contractors.
- Integrated Demand Side Management (IDSM)- Encourages load shifting by coordinating behind-the-meter battery systems through WestLight's Distributed Energy Resource Management System (DERMS). Residential and municipal participants receive performance-based incentives for discharging batteries during peak demand periods, helping reduce grid stress and improve local resilience. The program uses automated measurement and verification to track energy shifted from peak to off-peak hours while providing guidance on battery optimization and energy management. The program aims to enroll 522 customers (496 residential, 26 municipal) with battery systems by 2031.

Once the application is approved, WestLight will run competitive solicitations for partners to execute these programs. WestLight expects a ramp up period as the programs are put into place with increasing impact of these programs coming in the latter part of the four year term (2028-2031).

vii. Other distributed generation not described above

WestLight's service territory includes approximately 25,000 NEM accounts with an estimated 260MWac of solar power capacity. In addition, the service territory has approximately 8,000 accounts with battery storage systems with approximately 80MWac of power capacity.

WestLight's strategic plan includes a target of accelerating distributed energy resource adoption by adding at least 15 MW of local solar and 35 MWh of storage at customer sites. These goals will be achieved primarily through its residential and local government solar and storage programs with storage systems integrated into a WestLight VPP.

DAC-GT

The Disadvantaged Communities Green Tariff (DAC-GT)[33] program enables income-qualified residential customers living in DACs who may be unable or unwilling to install solar on their roof to access 100% renewable energy through a community solar (or community solar and storage) project. Participating customers also receive a 20% discount on their electric bill. The program is overseen by the California Public Utilities Commission (CPUC) and modeled after the existing Green Tariff portion of the Green Tariff/Shared Renewables Programs. It is available to customers who meet the income eligibility requirements for the California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs and live in Disadvantaged Communities (DAC).[34]

WestLight currently administers 6.008 MW of DAC-GT program capacity, providing approximately 2,600 customers with a flat 20% monthly bill discount compared to their otherwise applicable tariff. Since 2022, WestLight's DAC-GT program has provided over $2.5 million in bill discounts to eligible participants. WestLight's DAC-GT capacity is met through a 3 MW solar interim resource[35] and a 3 MW solar dedicated resource called Dos Palos Clean Power, which came online in 2025. These resources are included in WestLight's IRP analysis. Dos Palos Clean Power received significant support from local community leaders and elected officials, including the office of State Senator Caballero and the City of Los Banos Mayor Amabile.[36] The ongoing support from City of Los Banos and Merced County leaders demonstrates that Dos Palos Clean Power directly strengthens the economic conditions of local communities through customer bill savings, productive use of fallowed farmland, and local-hiring preferences to improve rural economic development opportunities, in addition to the environmental benefits that the project provides.

Community Microgrids

WestLight submitted two applications under PG&E's Microgrid Incentive Program (MIP) in December 2025 to request funding for multi-customer, community-based microgrids (Community Microgrids) in its service area. Community Microgrids are energy systems that power multiple customers and critical facilities within a defined boundary through a solar and battery energy storage system that is directly connected to the utility's distribution grid. The microgrid operates in parallel with the distribution grid during normal conditions (also called "Blue Sky Mode") but can disconnect from the larger grid and operate in "Island Mode" during times when the larger grid experiences an outage.

WestLight proposed two microgrids along the coast of San Mateo County, an area that is considered a Disadvantaged and Vulnerable Community (DVC) and experiences frequent and sustained power outages. The most likely application to receive funding is the Pescadero Community Microgrid. The Pescadero Community Microgrid covers the entire town of Pescadero, including several critical facilities (a fire station, 3 schools, a local community NGO) as well as over 100 residences and businesses. The Pescadero Community Microgrid will be anchored around a ~1.5 MW solar and 8 MWh storage system which will provide more than 72 hours of backup power.

33 WestLight Green Access Program, https://www.westlightenergy.org/residential/rates-billing/green-access-program/

34 https://oehha.ca.gov/calenviroscreen/sb535

35 WestLight launched an RFO in November 2025 to replace the interim resource with a new dedicated resource.

36 See https://losbanosenterprise.com/local-news/2025/los-banos-leaders-celebrate-wastewater-treatment-plant-solar-project/, https://thewestsideexpress.com/2025/05/11/joint-peninsula-clean-energy-renewable-america-dos-palos-solar-project-comes-online/, https://www.westlightenergy.org/news-releases/joint-peninsula-clean-energy-renewable-america-dos-palos-solar-project-comes-online/

If awarded funding, WestLight will collaborate with PG&E and community partners on the development of the Community Microgrid which would come online in 2029 at the earliest. The project would be funded through the MIP and supported by contributions from WestLight, San Mateo County, and potentially other sources. Because of the pending status of the MIP application at the time of conducting the IRP analysis, any potential community microgrids were not included in this IRP analysis.

viii. Transportation electrification, including any investments that correspond to different levels than what is included in Integrated Energy Policy Report (IEPR)

In this IRP, WestLight utilized the assigned annual volume of electric vehicle load but applied its own internal electric vehicle load shape. The IEPR and WestLight forecast similar volumes of EV load in the near term through 2030, but the IEPR forecasts higher demand in the later forecast years.

WestLight's service territory is a region of high electric vehicle adoption. An estimated 70,000+ personal plug-in electric vehicles are in operation out of roughly 550,000 total personal vehicles as of Q4 2025. The region also includes an additional 60,000 commercial vehicles across light-, medium-, and heavy-duty classes. In 2024, 40% of new personal vehicle sales were plug-ins, outpacing the state average. It is anticipated that new private vehicles sales will be nearly entirely plug-in electric in advance of the state's 2035 target. However, internal forecasts suggest that existing private gasoline-powered vehicles will still account for approximately 45% to 65% of vehicles on the road during that timeframe, or roughly 250,000 to 350,000 vehicles.

Fleet conversions have been very modest, but local governments are increasingly preparing to meet Air Resource Board Advanced Clean Fleets requirements. Nearly all local municipal fleets are receiving EV transition assistance from WestLight or other providers at this time.

EV charging to support the growing number of electric vehicles is primarily in residential single-family homes. Data is limited on chargers installed in other locations, but industry data indicates an estimated 8,000 chargers across public, workplace and multifamily segments. The overall charge port gap, the difference between chargers expected to be installed by 2035 and the projected need by the California Energy Commission, is projected at roughly 35,000 chargers, with a particularly acute gap in multifamily. In other words, current deployment trajectories fall well short of the infrastructure needed to support the all-electric vehicle fleet envisioned by the CEC, requiring a substantial acceleration in charger deployment. WestLight's programs seek to close this gap by accelerating charger deployment, with a particular emphasis on expanding charging access for multifamily residents and other underserved customer segments. Finally, e-bikes have generated substantial interest. While widespread data on alternative mobility electrification is unavailable, WestLight's programs have provided incentives for 3,000+ e-bikes to-date.

WestLight's strategy in transportation focuses on private vehicle electrification with an emphasis on the low-income community. Transportation electrification delivers significant economic benefits to EV adopters.

Specific programs are as follows:

1. **Reach Codes**: WestLight has had an extremely successful program supporting local governments in adopting code enhancements which support EV readiness. To date approximately 20 local cities adopted local codes that accelerated widescale EV readiness for new multifamily and expanded EV readiness in commercial construction ahead of the most recent state code. By 2035, the reach codes and state code are anticipated to result in 19,000 new charge ports, assuming development continues consistent with historical trends.

2. **EV Charging Incentives and Technical Assistance**: This program supports EV charging in multi-family, workplace and public segments. It includes a special emphasis on multi-family charging through advanced design assistance that "right-sizes" infrastructure through power management and low-power charging to maximize cost-effective port installations. Notably, several state programs, including the CEC's Communities in Charge Program (CIC) now incentivize the installation of Level 1 chargers in assigned parking at multifamily properties, a core component of WestLight's program.

3. **Used EV Rebate**: This program provides incentives for the purchase of used electric vehicles for income-qualified customers and a "hotline" for income-qualified individuals.

4. **E-Bikes**: WestLight provides incentives to income-qualified residents for the purchase of e-bikes with point-of-sale rebates.

5. **Fleets**: The fleets program is focused on local government fleets providing technical assistance for developing an infrastructure plan for local agencies. The program will provide incentives and bridge agencies towards meeting state requirements.

WestLight has developed an in-depth analysis characterizing the transportation sector in the service territory and defining a strategy for maximizing decarbonization by 2035. The plan includes complementing state and federal funding and incentives with an additional $30M to $40M in direct investment in transportation electrification through 2035, assuming projected budget capacity. In addition to the above investments, WestLight is planning an aggressive EV load shaping program which can generate an estimated additional $40M to $50M in CPUC-directed and/or wholesale market funds over the same period of time for further investment in electrification. The plan calls for continued scaling of the above programs particularly to advance EV charging in multi-family and ensure that low-income residents have access to EVs, e-bikes and other modes of electric transportation.

ix. Building electrification, including any investments that correspond to different levels than what is included in Integrated Energy Policy Report (IEPR)

Consistent with the 2024-2027 IRP Filing Requirements, WestLight assumed the Building Electrification (BE) load modifier volumes assigned to WestLight by the CPUC in its IRP analysis. WestLight includes a description of its BE programs in this section even though different levels of BE could not be assumed when modeling its Preferred Portfolio.

WestLight has approximately 300,000 residential units and 8,046 commercial buildings with 194 million square feet of space. 60% of housing units are over 50 years old and 40% of units are rentals, with a heavy concentration of rentals in the multi-family segment (85%). 62% of building methane gas use is in the residential sector with the majority for space and water heating. Electrification of the built environment

is in the earliest stages. Over 50,000 residential accounts in the service territory are electric-only, though this includes multifamily buildings which have central gas water heating systems and homes that may receive propane or other portable fuels. Water and space heating are predominantly gas combustion, 97% and 67% respectively in the residential sector. Through WestLight's incentive programs begun in 2021, over 5,000 gas-to-electric appliance replacements have been installed

WestLight's strategy in building electrification focuses on advancing local codes covering all building types as well as offering incentive programs that focus on small residential (single-family and small multifamily) with self-contained home systems.

Specific programs are as follows:

1. **Reach Codes**: WestLight has had an extremely successful program supporting local governments in adopting code enhancements for all-electric new construction. Nearly all cities adopted local codes that strongly encouraged all-electric construction in most segments ahead of the state code. In addition, the program has begun working with local governments on existing building reach codes with 4 cities adopting such codes to-date.
2. **Developer Technical Assistance**: This program provides no-cost technical assistance to builders, developers, and designers primarily for new construction. To date over 100 firms have been provided with substantive assistance with a portfolio of sector specific experts.
3. **Home Upgrade**: Provides incentives, on-bill finance and technical assistance for single-family home electrification. Program includes "self-serve" option, turnkey "full-service", including no-cost upgrades for income-qualified customers, and emergency water heater replacements. Emphasizes right-sizing to avoid unnecessary service upgrades.
4. **Commercial Electrification**: Expected to launch in early 2027, this program will provide incentives for commercial electrification of off-the-shelf HVAC, water heating and cooking systems.

WestLight has developed an in-depth analysis characterizing the building sector in the service territory and defining a strategy for maximizing decarbonization by 2035. The plan includes complementing state and federal funding and incentives with an additional $180M or more in direct investment in building electrification through 2035, assuming projected budget capacity. In addition to the above investments, WestLight is planning to aggressively leverage conventional and innovative finance strategies to aid customers in making the conversion. The plan calls for larger incentives for residents with less capacity to bear costs in addition to higher initial incentives which are expected to decline as the market matures and costs decline.

x. Potential Centralized Procurement, pursuant to AB-1373

WestLight believes load-serving entities should remain the primary entities responsible for procuring resources to serve their customers, given their direct accountability for cost, reliability, and portfolio

design. CCA procurement teams also have significant and sophisticated contracting expertise that would be difficult to replicate at a CPE that would have to build this expertise from scratch. CCAs and other LSEs have already demonstrated the ability to contract for geothermal, long-duration storage, and other long lead-time resources through bilateral procurement, joint powers authority structures, and competitive solicitations.

To the extent centralized procurement is pursued under AB 1373, it should be targeted to circumstances where it provides clear market-development, logistical, or cost advantages that cannot be efficiently achieved through individual LSE procurement, as demonstrated by substantial evidence. In addition, any centralized procurement framework should provide transparency regarding costs and benefits, avoid shifting development or timing risk onto LSEs, and preserve flexibility for existing procurement strategies.

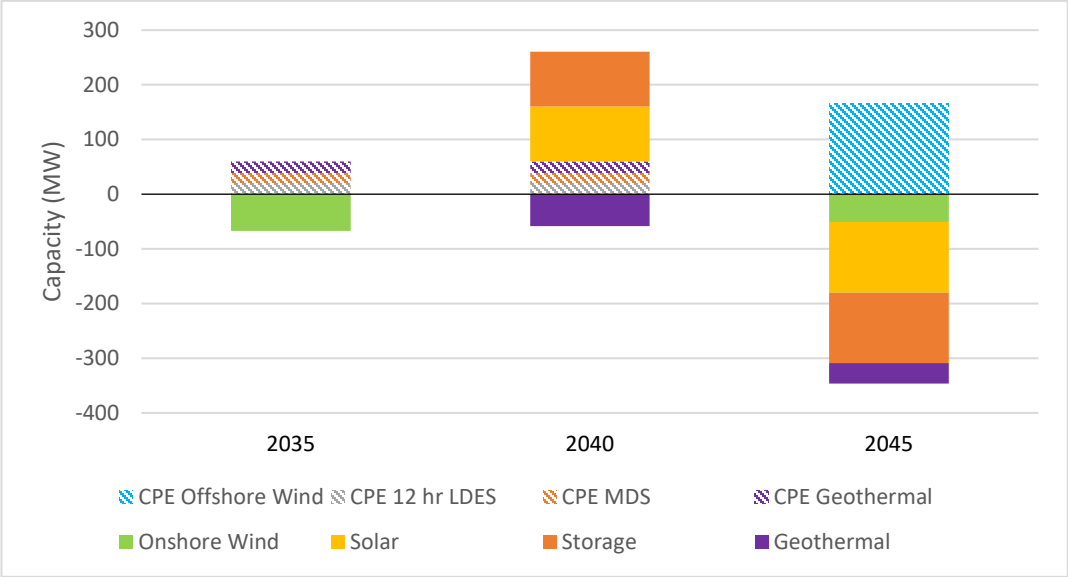
Many of the principal barriers facing long lead-time resources relate not to lack of procurement authority or willingness, but to transmission availability, interconnection timelines, permitting complexity, and commercial readiness. Addressing the barriers facing long-lead-time resources will remain critical regardless of procurement structure.

As part of the 2024-2027 Filing Requirements, WestLight was allocated its load share of proposed centrally procured resources pursuant to AB 1373. These allocations, expressed as nameplate capacity, included 19 MW of 12-hour long duration energy storage (LDES), 19 MW of multiday storage LDES, 165 MW of offshore wind, and 22 MW of geothermal resources. WestLight evaluated how inclusion of these resources would affect its Preferred Portfolio if they were procured by DWR and allocated to WestLight's portfolio.

Because the geothermal and storage resources are assumed to come online during the first half of the 2030s, their impacts to WestLight's portfolio would first appear in the 2035 model year. In 2035, the centrally procured geothermal resources displace 67 MW of onshore wind resources in WestLight's Preferred Portfolio. In 2040, the 67 MW of onshore wind are added back into the portfolio, and the mix of additional geothermal and solar + storage resources are tweaked, with 59 MW fewer strategic geothermal resources and 100 additional MW of solar and 4hr storage resources.

The impacts are more significant in 2045, when the 165 MW offshore wind allocation reduces the need for approximately 129 MW each of solar PV and hybrid storage resources, 51 MW of onshore wind, and 37 MW of geothermal. As discussed in Section III.l, offshore wind provides a generation profile that is complementary to solar resources and can contribute meaningfully to portfolio diversity and emissions reductions. However, the overall costs of the portfolio with the centrally procured resources were higher than WestLight's Preferred Portfolio.

Figure 28: Cumulative Change in WestLight Energy's Preferred Portfolio with AB 1373 Resources



xi. Other

WestLight does not have other plans in addition to what has already been discussed in the above sections of the Action Plan.

Potential Barriers

Each of the resource types discussed above faces significant potential barriers and risks. Market, regulatory, financial, resource viability and operational barriers can affect WestLight's ability to achieve the Preferred Portfolio described in this IRP. WestLight does not expect to fully realize this Preferred Portfolio; instead, it expects to adapt to the real-world conditions as they change, and continue to procure and operate the least-cost least-risk portfolio in pursuit of its mission to provide affordable, clean electricity and advance local solutions that lower costs, reduce pollution, and strengthen community resilience. Below, WestLight discusses potential barriers and risks to achieving its Preferred Portfolio.

- Resource availability
    - One of the most fundamental barriers that LSEs in California face is a lack of diverse resources, specifically, a lack of any potential new resources other than solar and storage. WestLight's Preferred Portfolio contains significant quantities of capacity from new wind and geothermal resources which, despite their high desirability, may not actually be available in the market. These resources could theoretically be developed due to the existence of favorable natural conditions and resource potential and are presented to LSEs as potential selections for their portfolios. However, WestLight has observed that these resources are challenging to develop, facing permitting and local opposition, as well as development costs that exceed planning assumptions. WestLight has selected these resources to signal to the state and to the market that these are the best-fit resources for WestLight's portfolio, if these resources can be developed at reasonable costs.

- Without diverse resources, California will be forced to achieve the policy goals of SB100 with solar plus storage. This would require substantial solar overbuild to meet winter energy needs and would lead to over-generation of solar energy during summer months, resulting in increased curtailment, higher costs, and higher risk than a portfolio with a more diverse resource mix.

- PCIA and Financial Security Requirements (FSR)
  - California CCAs face a unique challenge in implementing local clean energy and customer affordability objectives due to the financial impacts and uncertainty associated with the Power Charge Indifference Adjustment (PCIA). WestLight supports the underlying principle of preventing cost shifting between customer groups; however, the PCIA framework has resulted in significant cost and risk shifting from bundled customers to CCA customers. The magnitude and trajectory of PCIA charges can affect customer rates, procurement decisions, and the financial resources available to support local programs and clean energy investments.
  - One area of particular concern is the treatment of utility-owned generation resources within the PCIA framework. Under current implementation, costs of utility-owned generation assets can continue to be recovered through the PCIA even after their original costs have been recovered or when the resources are repowered. WestLight believes that cost recovery mechanisms should appropriately align resource costs with the customers receiving the benefits of those resources. Where such resources could be decommissioned, these costs can be avoided, and so are no longer appropriate for inclusion for recovery in the PCIA. Similarly, where resources are retained or procured to meet broader system reliability needs, cost allocation mechanisms should recognize the system-wide benefits provided by those resources.
  - The PCIA also presents portfolio management challenges for CCAs because it functions as a fixed-price contract associated with procurement decisions made by the IOUs prior to customer departure. As a result, CCAs must manage their own procurement activities in conjunction with an existing portfolio of resources and financial obligations over which they have limited visibility and control. This can complicate efforts to align procurement strategies with local policy objectives and evolving market conditions.
  - WestLight estimates that PG&E's 2016 vintage PCIA functions as a fixed-price hedge of approximately 30% to 40% of its annual load, and will eventually stabilize at approximately 15% of its annual load given the current treatment of utility-owned generation resources. As a result, if WestLight pursues a portfolio, such as its Preferred Portfolio described in this IRP using bundled PPA contracts to serve 100% of its annual load, it will effectively be operating a portfolio that supplies 115% - 140% of its annual load needs. This oversupply is not optimal from a risk management perspective and increases exposure to market conditions and reduces procurement flexibility. In effect, CCAs must manage customer load using both the resources they procure and a legacy portfolio embedded in the PCIA, regardless of whether those resources align with the CCA's procurement objectives or continue to represent the most cost-effective means of serving customer load. A more risk-aware portfolio composition would limit long-term contracts to 60% to 85% of total annual load and fill in the remainder of supply needs with short- and medium-term contracts. This diversity of contract terms would allow LSEs to manage technology, market, and load migration risks by providing some flexibility in near-term years. Instead, the current implementation of the PCIA forces CCA customers to be over-hedged with long-term contracts from the PCIA, while simultaneously "erasing" these contracts from the IOUs' portfolios, and providing IOUs with short-term market

positions that reduce risks to bundled customers while increasing risks to departed customers. That is, the PCIA allows IOUs to operate their portfolios with an optimal blend of short and long-term contract positions, while forcing CCAs to operate their portfolios with a high-risk over-exposure to long-term contracts.
    - Furthermore, the Commission's recent actions that shift greater costs onto CCA customers will have a dampening effect on the major contribution of reliability and decarbonization resources that CCAs have procured. These CCA resources have at times been necessary to keep California on target to meet its goals as other entities have fallen short, but the ability of CCAs to continue to be a vigorous engine of the renewable energy transition is undermined when the Commission shifts additional costs onto CCA customers.
    - A similar dynamic has operated with Commission decisions to increase CCA financial security requirements, which serve to divert CCA financial capacities away from resource procurement and toward providing excessive levels of insurance that provide no benefit to California ratepayers.
- Supply Chain
    - The development of the new resources in WestLight's Preferred Portfolio is dependent on international supply chains to procure key equipment and materials. These supply chains have been strained in recent years and are expected to continue to struggle to meet the needs of California's explosive growth in new resources. For example, high voltage transformers, which are required to step up facility generation to transmission-level voltages, have a current lead-time of 2 to 3 years. Steel, aluminum, solar panels, wind turbines, and lithium cells also have faced longer and longer lead times and higher prices as demand outpaces the global supply chain. The supply chain issues are further exacerbated by recent trade war tariffs and new Foreign Entity of Concern (FEOC) restrictions that disincentivize imports from critical global manufacturing regions.
- Interconnection
    - Even projects that successfully navigate development, permitting, financing, and supply chain challenges may experience significant delays to commercial operation due to delays in the construction of required interconnection facilities by Transmission Owners. Because these facilities are often outside the control of project developers and load-serving entities, such delays create uncertainty regarding project schedules, online dates, and compliance with procurement requirements.
    - WestLight has observed that the incentives and accountability mechanisms associated with Transmission Owner interconnection work are not always aligned with timely project completion. In some cases, developers have expressed interest in self-performing portions of the required interconnection work to accelerate project schedules but are limited by Transmission Owners in doing so. As a result, interconnection-related delays remain a significant risk to resource development and can impede the timely deployment of clean energy resources.
- Federal Opposition
    - The current federal administration has opposed clean energy development through several avenues, with the overall effect of reducing the pool of resources that are available for contracting. The reduction in supply creates additional upward pressure on long-term contract prices. Federal opposition could also lead to the failure of contracted projects, a risk which WestLight is closely monitoring.
- Tax Credit Availability

- Renewable and clean energy development has been supported by tax credits for the past two decades that are now poised to expire. Resources with later CODs are priced without the benefits of tax credits, which increases long-term contract prices by around 30%. Despite the hopes that economies of scale would reduce the costs for these technologies over time, recent tightening of supply due to federal policy coupled with increasing demand has seen upward price pressure, which is only exacerbated by the expiration of the tax credits.

- Tariffs
  - Recent imposition of tariffs on certain imported materials and equipment has further increased the cost of developing new clean resources. Although the courts have overturned certain tariffs, it is unclear if projects will be able to recover tariff payments from the federal government, further complicating the ability for tariff invalidation to help reduce resource development costs and ultimately, costs borne by rate payers.
- Permitting
  - Permitting challenges continue to provide headwinds for clean energy projects. Federal permitting processes are openly hostile to clean energy development, but even clean-energy- neutral or supportive state and local jurisdictions can still challenge and delay resource development through long and uncertain bureaucratic processes.
- Developer market power
  - Dynamics in the long-term contract market have shifted in recent years towards favoring developers. CPUC procurement mandates, combined with the limited availability of preferred resource types such as wind and geothermal, create market conditions that increase developers' leverage over load-serving entities in contract negotiations. Market power allows developers of these desirable technologies to increase long-term contract prices beyond the objective cost of developing these projects, leading to unnecessary cost burden on rate payers.
- LSE procurement autonomy
  - CCAs were formed to provide local control over procurement decisions to serve local load. Procurement mandates, cost allocation mechanisms, and more recent centralized procurement initiatives have reduced the degree of autonomy CCAs have over their procurement decisions. CCAs are proactive and sophisticated procurement entities that are committed to achieving SB100 goals while protecting ratepayers from unnecessarily high costs. Consequently, CCAs have used their autonomy to advance statewide goals largely on a faster timeline than state planners have envisioned. Undermining that autonomy risks undermining statewide goals. The primary challenge associated with certain long-lead time resources, including offshore wind and geothermal, has not been a lack of buyer interest, but rather the limited availability of commercially mature projects capable of entering into long-term offtake agreements. CCAs that have already procured resources consistent with reliability and SB 100 objectives should not be required to bear higher costs associated with centrally procured resources that are duplicative of procurement they have already completed.
- TPD availability
  - A critical factor in whether a resource will be economic to develop is the ability of the resource to be allocated deliverability, which allows the resource to provide resource adequacy. CAISO administers the deliverability studies and allocations, which are highly complex and difficult to predict. Deliverability in CAISO is scarce in the regions where resource development is more achievable, and highly linked to the approval and completion of transmission upgrades. While CAISO has released the Point of

Interconnection Heat Map, which helps stakeholders understand the current available deliverability at interconnection points throughout the CAISO system, there is currently no easy-to-use tool to evaluate when future deliverability will become available at a given node, given completion of previously approved transmission upgrades. The lack of easy-to-use information on future deliverability makes it difficult to predict whether projects with future CODs will be able to secure deliverability and thus provide resource adequacy, which increases contracting risk for load-serving entities.

- Large Loads, Data centers
    - The rapid emergence of large data center load introduces significant uncertainty into long-term resource planning and procurement. Uncertainty regarding the timing, location, and magnitude of data center development complicates load forecasting and can result in procurement decisions based on speculative demand. Planning processes should clearly distinguish forecast load associated with committed development from speculative demand to avoid unnecessary procurement and cost burdens on ratepayers. Data center load forecasts should be assigned to the load-serving entities expected to serve those customers, rather than allocated proportionally across all LSEs. Pro rata allocation of speculative data center load may result in unnecessary procurement and increased costs for customers who will never receive service from those facilities.
    - Increased electricity demand from data centers may drive higher costs for critical electrical equipment, and clean energy resources. It is difficult for load-serving entities, which have an obligation to limit costs to ratepayers, to compete for scarce geothermal resources against large commercial customers with fewer capital or affordability constraints. New geothermal development that may be facilitated by the state should serve California's existing electricity load and statutory reliability and emissions reduction requirements before supporting discretionary new loads, and the CPUC should recognize this dynamic of competitive imbalance when designing procurement programs and issuing procurement orders that rely on firm clean resources.
- Regulatory uncertainty
    - The ability to achieve WestLight's Preferred Portfolio could be inhibited by regulatory intervention in the procurement process. The Reliable and Clean Power Procurement Programs (RCPPP) will likely play a large role in determining how procurement is done over the next twenty years but is currently still in the development stage. Depending on how the RCPPP is structured, WestLight may be more or less likely to achieve its portfolio goals. Uncertainty surrounding what procurement may or may not be ordered forces caution in moving ahead with aggressive procurement that may end up being uncredited or duplicated by procurement orders.
    - WestLight notes that increasing overlap among multiple regulatory frameworks can create conflicting planning signals and reduce procurement efficiency. Examples include evolving ELCC methodologies, Slice-of-Day and 24-hour Resource Adequacy constructs, changing central procurement structures, new reliability procurement orders, and cost allocation proceedings such as PCIA. While each proceeding may address legitimate policy objectives, overlapping changes implemented on differing timelines can increase customer costs and risks, complicate contracting decisions, and make long-term portfolio planning more difficult. Greater coordination, transparency, and implementation stability across proceedings would improve the ability of load-serving entities to make timely and cost-effective clean energy investments.
    - Regulatory changes are often implemented on timelines that do not align with project development cycles, contract terms, or transmission buildout schedules, which can create

avoidable execution risk. WestLight encourages greater long-term policy stability so that customer dollars and staff resources can be focused on actual clean energy procurement and implementation rather than adapting to shifting compliance frameworks.

- Operational risks
    - Once a resource comes online, it faces a distinctly different set of risks than a resource in development. Owner/operator solvency, climate/meteorological variability, and maintenance risks could all affect WestLight's portfolio. However, WestLight sees the largest operational risk to its portfolio as stemming from congestion and curtailment in the wholesale market. Because of the lack of diversity in the CAISO supply stack, solar generation has proliferated and wholesale market prices during solar hours tend to be very low and often negative. WestLight predicts that periods of negative prices will increase and the magnitude of the negative prices will increase over time. These dynamics will lead WestLight and other resource schedulers to curtail generation to avoid negative prices. Curtailment and negative pricing will impact future costs as well as the ability to achieve future clean energy targets, because facilities will likely under-generate relative to "standard" solar and wind capacity factors – but due to market dynamics, not meteorological variation.

b. Disadvantaged Communities (DACs)

LSE Activities & Programs Impacting DACs

WestLight's ECOplus customers historically received a 5% discount relative to PG&E's electric service rate, providing immediate bill savings to customers seeking to reduce their monthly electricity costs. In addition, WestLight provided customers with a 10% discount relative to PG&E's generation rates for most of 2025 and a portion of 2026. On average, WestLight customers save at least $5 per month on electric generation costs compared to PG&E customers. Since its inception in 2016, WestLight has delivered more than $226 million in cumulative customer bill savings, including a $300 bill credit distributed in 2023 to approximately 40,000 CARE and FERA customers, including customers residing in DACs.

WestLight also supports customer participation in bill management and arrearage relief programs administered in coordination with PG&E. Customers experiencing financial hardship may be eligible for programs such as the Arrearage Management Plan (AMP). In recent years, WestLight has increased outreach to AMP-eligible customers to encourage enrollment and reduce outstanding arrearages. WestLight additionally prioritizes AMP participants when selecting customers for enrollment in its DAC-GT program, described further in Sections III.b and III.d. WestLight also worked with PG&E to expand Budget Billing to include the WestLight generation portion of customer bills, allowing customers to smooth monthly electricity payments and reduce seasonal bill volatility, particularly during summer months in warmer climate zones.

In addition to direct bill savings and bill management support, WestLight administers a variety of customer programs focused on transportation electrification, building decarbonization, and energy resilience. These programs help reduce criteria air pollutants by supporting the adoption of clean electric technologies and reducing reliance on fossil fuel combustion in the transportation and building sectors. WestLight does not currently procure and does not plan to procure electricity directly from fossil-fueled generation resources. Consistent with its Preferred Portfolio results, WestLight plans to continue procuring a diverse mix of renewable and storage resources, increasing the share of customer load served by dedicated contracted

resources and further reducing air pollutant emissions associated with system power purchases. As discussed in Section III.d.ii, WestLight's Green Transit Tariff represents an innovative approach to reducing greenhouse gas and criteria air pollutant emissions through coordinated renewable energy procurement and transportation electrification. By supplying Caltrain's electrified rail system with 100% renewable electricity and pioneering a first-of-its-kind tariff that also compensates regenerative braking exports, WestLight has demonstrated how electricity procurement can directly support cleaner transportation and improved air quality in disadvantaged communities. WestLight will continue expanding innovative procurement strategies that achieve both decarbonization and local public health benefits. While the Green Transit Tariff represents one example of WestLight's innovative approach to reducing emissions, WestLight also advances these objectives through a broad portfolio of customer programs targeted toward disadvantaged and underserved communities. Many of WestLight's programs are income-qualified or designed to serve underserved customer segments, including low-income customers, customers residing in DACs, and multifamily residents. Table 38 below provides a description of these programs.

Table 38: Overview of WestLight Programs Available to all customers, including those located within a DAC

Program	Description	Status
Community Solar Green Tariff (CSGT) and Disadvantaged Community Green Tariff (DAC-GT)	Pursuant to D.18-06-027, CCAs have developed and implemented their own DAC-GT and CS-GT programs to promote the installation of renewable generation among residential customers in disadvantaged communities (CalEnviroScreen DACs)	Approximately 2,600 customers are currently enrolled and receiving a 20% bill discount from participation.
Distributed Generation: GovPV Solar + storage for public buildings	Local government solar and storage program that facilitates and finances deployment of solar and storage on local government sites. Launched in 2020.	To date, 36 sites have 5 MW of solar installed with storage being developed for approximately half the sites.
Distributed Generation: Residential solar + storage	Facilitates installation of solar and storage systems on single-family homes. The program is currently focused on income-qualified customers being provided no-cost system with SGIP funds. The program is intended to broaden to all customers later this year.	Installations at over 200 low-income customers is in-progress. Nearly 600 additional homes are currently being dispatched for grid services under a prior version of the program. New battery systems will be integrated into a virtual power plant system.
Transportation: Used EV Rebate	This program provides incentives for the purchase of used electric vehicles for income-qualified customers. The program also provides an "EV advisor" hotline for questions related to EVs. Launched in 2019.	Over 1,300 income-qualified rebates have been provided since inception in 2019. Nearly 500 rebates were provided for new EVs in a prior version of the program.
Transportation: E-Bikes	This program provides incentives to income-qualified residents for the purchase of e-bikes with point-of-sale rebates. Launched in 2021.	To date over 2,100 rebates to low-income customers.
Transportation: "EV Ready"[37] - EV Charging Incentives and Technical Assistance	This program provides incentives and technical assistance for the installation of EV charging at multi-family, workplace and public locations. It includes a special emphasis on multi-family charging through advanced design assistance that "right-sizes" infrastructure through power	To date the program has installed nearly 2,400 ports, two-thirds of which are at multi-family buildings.

[37] https://www.westlightenergy.org/business/rebates-offers-business/ev-ready-program/

	management and low-power charging to maximize cost-effective port installations. Launched in 2020.	
Buildings: Home Upgrade	Provides incentives, on-bill finance and technical assistance for single-family home electrification. Program includes "self-serve" option, turnkey "full-service", including no-cost upgrades for income-qualified customers, and emergency water heater replacements. Emphasizes right-sizing to avoid unnecessary service upgrades.	Nearly 6,200 measures supported including over 350 income-qualified homes. Nearly 50 all-electric homes have been completed in "full service" offering.
FLEXmarket	This is a pay-for-performance program aimed at load shaping energy efficiency in the commercial sector. The program pays out incentives based on metered performance using the Avoided Cost Calculator as the basis of incentive value. Launched 2022.	11 commercial projects were completed in the first iteration of the program. Second iteration launching shortly.
Buildings: Developer Technical Assistance	This program provides no-cost technical assistance to builders, developers and designers primarily for new construction. Launched 2020.	To date over 100 firms have been provided with assistance.
Buildings: Public Building electrification	Provides grants and financing for electrification of local government buildings. Launched in 2024.	To date projects in 5 local agencies have been awarded and are in progress. 2 projects have been completed, including a municipal pool electrification project.
Transportation: Public Fleets	Provides technical assistance to local government fleets for developing a vehicle replacement and infrastructure plan. Program includes load shaping assistance in a partnership with The Mobility House. Launched in 2022.	To date, 15 agencies are enrolled with projects in-progress and 2 projects already completed
Building electrification Reach Codes	Program supporting local governments in adopting code enhancements for all-electric existing construction. Initiated in 2019 with a focus on new construction, now the program focuses on existing construction.	To date 4 cities have adopted local codes that encourage electrification of space and water heating in existing construction.

Since disadvantaged communities based on the CalEnviroScreen definition make up a relatively small portion of WestLight's customer base, WestLight often expands the definition of eligible customers for the purposes of its programs to include eligibility based on income, customers on specific rates, and by using locally tailored wealth qualifications criteria. WestLight currently serves

37,664 accounts enrolled in the California Alternate Rates for Energy (CARE) program and 1,993 accounts enrolled in the Family Electric Rate Assistance (FERA) program. Eligibility criteria vary by program based on administrative considerations, program design, and target outcomes. In general, WestLight utilizes a combination of income-based screening, such as CARE/FERA or area median income thresholds, and, for certain high-benefit programs, additional wealth-based criteria, such as liquid assets, property ownership, and housing characteristics to better target resources to customers with the greatest need. This approach allows WestLight to balance equitable program access with effective allocation of resources, particularly in cases where geographic definitions of DAC may not fully capture local socioeconomic conditions.

Outreach Activities in DACs

Community Outreach Grant Program

WestLight provides annual grants to community-based organizations to expand its engagement with hard-to-reach customers, including low-income, non-English-speaking, and other households from disadvantaged communities. These trusted local organizations provide information to customers about WestLight and its offerings in multiple languages. Grantees also help customers enroll in energy discount programs (e.g., CARE and LIHEAP) and adopt e-bikes, electric vehicles, and electric appliances. Additionally, these partners facilitate workshops, focus groups, and other opportunities to solicit feedback directly from its customers to improve WestLight's services. In 2026, WestLight awarded $550K in grants to 16 community-based organizations. Since 2018, WestLight has awarded $2.8 million in grants to 25 nonprofits.

In 2025, outreach grantees provided information about WestLight to 13,000+ customers in person and directed 21,000+ visits to its website. These partners helped enroll 1,110+ households in energy programs, including bill discounts and rebates for electric transportation and electric appliances.

Additional Outreach Initiatives

In 2026, WestLight has launched a new model of customer engagement through the Community Feedback Forum - a series of meetings designed to gather meaningful input from residents, nonprofit leaders, and other WestLight customers about its programs and services. An objective of the Community Feedback Forum is to provide interactive, flexible, and accessible forums for community listening. Meetings are offered in English and Spanish in a hybrid format.

c. LSEs' Tribal Customers

There are no federally recognized tribal governments or tribal lands located within WestLight's service territory in San Mateo County or the City of Los Banos, and WestLight does not currently serve any tribal government customers. While WestLight has not conducted tribal-specific outreach related to this IRP filing, WestLight's resource solicitation processes include qualitative evaluation criteria related to tribal and cultural resource considerations, including whether project developers have consulted local Native American tribes regarding potential impacts to lands that may contain cultural resources.

d. Procurement Products

WestLight may utilize the following procurement products, consistent with its Energy Risk Policy, to procure resources, serve customer load, and manage risks associated with its Preferred Portfolio.

Table 39: WestLight Procurement Products

Product	Description of Product
Power Purchase Agreements (PPA)	A contractual agreement for the purchase of energy from a generating resource that bundles physical electricity, RECs, and Resource Adequacy Capacity.
Financial Electricity (Inter-SC Trade or IST)	Contractual or market-based transactions related to electricity that involve financial settlement but do not require the physical delivery of power, submitted to and cleared by the CAISO
Tolling Agreements	A contract in which one party (the toller) pays the project owner for the right to control dispatch or charging and discharging of the facility. The toller receives the energy, environmental attributes, and market revenues, while the owner operates and maintains the project in exchange for a fixed and/or variable tolling payment.
Resource Adequacy Capacity	Capacity (in MWs) that is eligible to be counted toward compliance with the California Public Utilities Commission (CPUC) and the California Independent System Operator's (CAISO's) Resource Adequacy Program, which ensures sufficient reliable resources are available to meet peak electricity demand and maintain grid reliability. Load-Serving Entities (LSEs) are required to meet System and Flexible Resource Adequacy obligations, which may be satisfied with capacity from electric power generation or demand-side resources.
Mid-Term Reliability Capacity	Capacity that is eligible to be counted toward compliance with the California Public Utilities Commission's Mid-Term Reliability procurement requirements, as established in Decisions D.21-06-035, D.23-02-040, and any subsequent decisions requiring the procurement of incremental capacity.
Maximum Import Capability (MIC) or Import Allocation Rights (IAR)	The maximum amount of electricity capacity (in MWs) that can be reliably imported into California from outside the CAISO balancing authority area over the transmission system during peak demand conditions, and that is eligible to be counted toward Resource Adequacy compliance.
Specified Source Power	Electricity and associated attributes that are traceable to specific generating facilities through an auditable contract trail or equivalent verification mechanism, such as a tradable commodity or tracking system, that provides commercial verification that the attributes claimed have been sold once and only once. Specified Source Power may be from facilities owned or controlled by WestLight or supported by executed contractual documentation. Examples of Specified Source Power that WestLight transacts are Renewable Energy Certificates (RECs) and Green House Gas (GHG) Free attributes.
Renewable Energy Credits (RECs)	Credits that represent the renewable energy attributes associated with the generation of one megawatt-hour (MWh) of electricity from

	an eligible renewable energy resource that qualifies for the California Renewables Portfolio Standard (RPS).
Green House Gas (GHG) Free attributes	Attributes associated with the generation of one megawatt-hour (MWh) of electricity from a zero-emissions resource (e.g. large hydro, nuclear) that otherwise does not qualify for the California Renewables Portfolio Standard (RPS)
Ancillary Services	Energy products contracted to help maintain grid stability and reliability in CAISO. There are four types of ancillary services products: regulation up, regulation down, spinning reserve, and non-spinning reserve.
Convergence Bids	The purchase or sale of energy in the day-ahead market with the explicit requirement to buy or sell it back in the real-time market using convergence bidding, also called virtual bidding.
Congestion Revenue Rights (CRRs)	Financial instruments used to offset congestion costs that occur in the day-ahead market process. CRRs are made available through allocations and may be transacted through auctions and bilateral trades.

The utilization of these products may evolve over the planning horizon based on market conditions, portfolio composition, and operational needs.

e. Commission Direction of Actions

WestLight Energy's Board of Director's oversees and governs WestLight's planning and procurement activities. This IRP was approved by WestLight's Board of Directors on July 23, 2026, and the resolution documenting this approval is attached as Appendix D.

WestLight requests that the Commission certify the completeness of WestLight Energy's IRP detailing WestLight's Preferred Portfolio, as summarized above and detailed in the completed Resource Data Template and Clean System Power Calculator.

WestLight encourages the Commission to provide a clear, durable, and coordinated long-term procurement framework through the Reliable and Clean Power Procurement Program (RCPPP) and related procurement proceedings. As procurement requirements evolve, continued alignment among Integrated Resource Planning, Resource Adequacy requirements, and the RCPPP will be important to avoid conflicting planning signals and unnecessary customer costs. Any programmatic approach should be responsive to changes in demand that are driven by electrification, climate-induced load changes, as well as load migration. Moreover, any programmatic approach should allow LSEs to manage their portfolio risk by allowing a variety of resource types and contract lengths, according to an LSE's adopted risk policy. The programmatic approach should support the maintenance of contracts with existing resources, as well as contracts with new resources, especially by supporting a mix of long-term and short-term contract structures. Short-term contracts preserve procurement flexibility, allowing LSEs to incorporate new technologies and take advantage of future cost declines as resources mature and market conditions evolve. Moreover, a programmatic approach should not penalize LSEs that have already developed a robust clean portfolio that provides the reliability and emissions reductions benefits required to serve that LSE's customers. A failure to account for these early actors risks introducing serious cost shifts when early

moving LSEs that have filled their portfolios are then called on to procure additional resources that will be actually used to meet the load of other LSEs.

WestLight further believes load-serving entities should remain the primary entities responsible for serving their customers' resource needs, with centralized procurement used selectively where it provides clear market development, logistical, or cost advantages. Future procurement direction, including under the RCPPP, should reflect commercial readiness, transmission availability, interconnection timelines, customer affordability, and early procurement actions already taken by load-serving entities.

v. Lessons Learned

WestLight Energy appreciates staff's time and efforts implementing the 2024-2027 Integrated Resource Planning process. California has aggressive goals that are challenging to implement, which currently appear to strain the already tenuous affordability of electricity in California. WestLight applauds the CPUC's solicitation of feedback for ways to potentially improve the IRP process to ensure that the Commission and LSEs can achieve state policy goals in the most prudent way possible.

The state policy goals pursued by the CPUC are often summarized as safety, reliability, and decarbonization, *implemented in a cost-effective manner* (emphasis added). Inspection of this statement shows that affordability is not a co-equal goal with the first three; but rather a consideration for implementation.

Expensive electricity rates prevent natural electrification because customers know they will pay more to use electric appliances than gas appliances. High electric rates also put economic strain on low-income customers and build resentment towards government policy objectives that are driving up rates. WestLight encourages the CPUC to consider affordability as a co-equal objective alongside safety, reliability, and decarbonization. Maintaining customer affordability is critical not only for ratepayer protection, but also for sustaining public support for the investments necessary to achieve California's long-term climate and reliability objectives. To that end, WestLight offers the following suggestions:

Acknowledge uncertainty in load forecasting
Recent iterations of the IEPR load forecast have shown high fluctuations in projections related to data center speculation. Low quality data was submitted by stakeholders and used in published load forecasts and was subsequently revised. For example, in WestLight's service territory, the published IEPR load forecast shows data center load in WestLight's service territory associated with interconnection applications that, upon inspection, are either 1) not in WestLight's service territory, or 2) associated with multi-family housing projects, not data centers. Because IEPR demand forecasts are used to inform CPUC IRP planning and procurement requirements, forecast uncertainty has direct implications for customer costs. The CEC should continue refining its treatment of large new loads and other uncertain sources of demand growth by distinguishing between verified and speculative load projections and working closely with CCAs and other LSEs to validate project status and expected energization timelines. Forecasts should transparently reflect uncertainty rather than relying solely on deterministic assumptions, helping ensure that procurement and infrastructure decisions are aligned with realistic load growth expectations.

IRP Procurement Mandates and the Reliable and Clean Power Procurement Program
Recent procurement orders have demonstrated the risks associated with adding resource-specific procurement constraints late in the planning process without sufficient opportunity for analysis of

potential market and reliability impacts. In the most recent procurement order, the addition of a long lead-time resource requirement effectively functioned as a long-duration storage mandate due to the limited availability of commercially mature geothermal resources. WestLight's own reliability analysis demonstrates that portfolios can contain substantial battery capacity that is unable to fully contribute to reliability needs due to insufficient generating resources that provide charging energy. Procurement requirements that further increase storage deployment without considering charging sufficiency will exacerbate this issue and lead to unintended reliability and affordability consequences.

WestLight encourages the CPUC to keep future procurement requirements as simple and technology-neutral as possible. Procurement requirements that focus on reliability, emissions reductions, and other planning objectives, rather than prescribing specific resource types, allow load-serving entities to identify the most cost-effective portfolio solutions while reducing the risk of developer market power and unintended resource concentration.

WestLight also supports the CPUC's continued development of the Reliable and Clean Power Procurement Program (RCPPP). A durable long-term procurement framework has the potential to reduce reliance on ad hoc procurement orders, provide greater certainty to market participants, and better align resource development with California's long-term reliability, affordability, and decarbonization objectives.

Align Reliability Planning with the Resource Adequacy Proceeding.
Since the prior filing cycle, California's reliability planning framework has continued to evolve through Effective Load Carrying Capability (ELCC) methodologies, Slice-of-Day constructs, Resource Adequacy reforms, and the development of the Reliable and Clean Power Procurement Program (RCPPP). WestLight encourages continued alignment across these frameworks so that load-serving entities receive consistent and actionable planning signals. Since having two independent planning standards can only increase costs (if the two standards align, there is no change to procurement, but if they differ, additional procurement will be needed to meet both standards), and given that ELCC-denominated procurement orders appear to have induced procurement that has been misaligned with statewide needs, WestLight strongly encourages moving the IRP program to a Slice-of-Day methodology that better captures grid dynamics and does not trigger over procurement or cost shifting amongst LSEs. Greater coordination would improve procurement efficiency, reduce unnecessary complexity, and better support timely investment in reliable clean resources.

Fully incorporate and plan for responsiveness to possible outcomes of CPE procurement.
The current portfolio described in the Inputs and Assumptions assumes that no procurement is achieved by the CPE for long-lead time resources. Thus, if the CPE does indeed procure long-lead time resources, the portfolio described in the Inputs and Assumptions will be larger than needed to cost-effectively meet SB100 goals. The CPUC should carefully monitor CPE procurement activity and adjust procurement goals in the IRP and RCPPP proceedings such that SB100 goals are achieved in the most cost-effective way, avoiding unnecessary capacity over-build.

Plan for multiple scenarios – Build the least-regrets solution.
Current IRP modeling is done using deterministic modeling techniques, which assume a single future scenario and attempt to determine the optimal resource mix under that single future. While deterministic modeling is computationally simpler, it does not fully capture the uncertainty inherent in long-term resource planning since actual future conditions will inevitably differ from a single scenario.

In order to achieve SB 100 goals, California is about to make large investments in both supply-side resources and distribution and transmission infrastructure, which will ultimately be financed by end-use customers. Using deterministic planning to make decisions about which investments are "optimal" will lead to stranded investments if the future does not proceed exactly according to the deterministic scenario, especially considering the large uncertainties faced by planners. Uncertainties in the magnitude of future load, the availability and costs of different resources, and the effects of changing weather patterns on resource generation mean that the stakes for making the best investment decisions are high, and deterministic modeling alone is not an appropriate basis for making long-term resource planning decisions.

Recent advances in modeling theory and computational abilities have given rise to a more sophisticated modeling approach known as "decision making under uncertainty", or "DMUU". This modeling approach considers a range of uncertainties in the modeled inputs and finds the lowest cost solution considering all the uncertainties. Recent demonstrations of these techniques show that the cost of the "DMUU" solution is marginally higher than the deterministic solution, but reduces future costs by orders of magnitude by selecting infrastructure investments that are adaptive and flexible to future uncertainty, avoiding stranded investments in infrastructure that are only necessary in one possible future that never materializes.[38]

WestLight encourages the CPUC to support and adopt DMUU techniques into the IRP process. First, the CPUC should delineate the range of uncertainty in the input and assumptions used in the IRP modeling. The CPUC should then use DMUU techniques to select a resource portfolio that is robust to future uncertainty and avoids stranded investment costs by being adaptable, flexible, and realistic. The CPUC should also coordinate with and support the CAISO in adopting DMUU techniques within the Transmission Planning Process to support the approval of transmission upgrades that will be the most cost-effective investment across a range of uncertainties. Finally, the CPUC should require IOUs to use DMUU techniques when evaluating and requesting approval of distribution system investments.

Align imports and import capacity (MIC) planning.
The current portfolio developed by the CPUC for the Inputs and Assumptions shows reliance on out-of-state resources to achieve the state's SB100 goals. However, the CPUC instructed CAISO in the 2025-2026 TPP to not plan for imported resources, despite their inclusion in the portfolio[39].

This creates a disconnect between resource planning and transmission planning. If CAISO does not plan for imported resources, it will not identify or approve transmission upgrades needed to increase import capability at intertie locations. WestLight is already observing limitations in available import capacity for out-of-CAISO resources, and these constraints will become more pronounced over time if transmission planning assumptions surrounding imports do not align with resource planning assumptions. Imported resources tend to be more diverse than in-state resources and will likely play a critical role in cost-effectively achieving the state's SB100 goals.

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[38] Mantegna, G., Dimanchev, E., Pecci, F., Patankar, N., & Jenkins, J. (2026). *Uncertainty-aware grid planning in the real world: A method enabling large-scale, two-stage adaptive robust optimization for capacity expansion planning* (arXiv:2603.00394). arXiv. https://doi.org/10.48550/arXiv.2603.00394

[39] D.25-02-026 at 62

LSEs would also appreciate an easy-to-use resource that shows existing and planned imports and MIC availability by year and transmission upgrade completion. The import capacity available at each intertie will increase as certain in-CAISO transmission upgrades come online, however, it is very difficult to track how that capacity will grow over time, and thus it is difficult to contract with out-of-CAISO resources with future delivery dates.

Ground busbar mapping in CAISO interconnection queue realities.
There are resources in the CAISO interconnection queue that cannot get deliverability because there is no mechanism to trigger certain transmission upgrades that will relieve constraints. LSEs provide resource preferences to CPUC in the IRP process, which CPUC uses as an input to busbar mapping in the TPP. However, LSE preferences are only one side of the commercial process that leads to successful resource development. LSEs are not developers, and they do not know where the most viable sites are located for development. The CPUC's over-reliance on broad geographic preferences stated by LSEs in the IRP causes the busbar mapping process and subsequently, the TPP, to be overfit to LSEs preferences, ignoring the other side of the resource development process, represented by resources in the CAISO interconnection queue. The CPUC should find a way to incorporate the presence of resources in the interconnection queue and requests for deliverability into the busbar mapping process and allow that commercial interest to influence the transmission planning process and create deliverability.

Incorporate demand-side resources in the Integrating Resource Planning process: demand management, distributed energy resources, and distribution connected resources.
WestLight is limited in its ability to develop DCRs because of current market conditions and regulatory treatment leading to a divergence between how resource costs and benefits are measured.

On resource costs, WestLight acknowledges that DCRs typically have higher development cost because smaller (1MW – 20MW) systems do not benefit from economies of scale like 200MW – 1GW+ utility-scale procurement does. This is particularly relevant when it comes to interconnection costs and costs associated with achieving Full Capacity Deliverability Status (FCDS). It is essential that DCRs achieve FCDS or an equivalent capacity accreditation so that LSEs can receive resource adequacy (RA) credit for the resource. However, the current deliverability allocation process is an ill fit for projects of this size and type (i.e., it is typically cost prohibitive for DCRs to achieve FCDS).

On the benefit side, however, DCR electricity generation is compensated based on wholesale market prices following the same rules and compensation mechanisms as large-scale FTM projects even though these projects often have additional benefits that are not valued under the traditional least-cost best-fit procurement methodology. More specifically, DCRs can offset proximate load, thus mitigating the need for costly upgrades to the transmission and distribution grid, and moreover can provide positive non-energy impacts (NEIs) such as improving local air quality and assisting the workforce development goals of communities. However, none of these benefits are currently being valued under the existing market mechanisms and regulatory frameworks.

WestLight supports the following specific policy recommendations to appropriately value these resources:

Count DCRs as Load Modifiers in the Year-Ahead RA Forecast
Each year, CPUC-jurisdictional LSEs are required to submit year-ahead load forecasting data to the CEC and CPUC. The Year-Ahead load forecast form requires LSEs to forecast retails sales of

electricity and peak demand for the upcoming calendar year. The form also asks LSEs to document forecasted capacity values of each type of load modifier (e.g. BTM PV, Battery Storage, Energy Efficiency, Light-Duty and Medium-Duty EV, etc.) which the CEC and CPUC account for when setting the LSE's year ahead Resource Adequacy (RA) obligation. In other words, load modifier values can reduce the capacity an LSE needs to procure from the bulk transmission system. As RA prices have been relatively volatile in recent years[40], and since increasing load forecasted in the IEPR may add upward pressure to RA prices, load-modifiers provide an alternative to supply side costs, assist the reliability of the bulk transmission system, and enhance distribution systems.

WestLight supports initiatives to expand the resource types that qualify as load modifiers[41] because of the numerous local and system benefits mentioned above. Specifically, WestLight supports the initiative to study how DCR generation could be measured and recorded as a load modifier in the IEPR and YARA forecast template. When DCRs are sited close to load, they can offset the need for LSEs to procure electricity from the bulk-transmission system thereby producing the same effect as BTM load modifiers. Hence, DCRs should be able to receive the same treatment as BTM load modifiers under the CEC's Peak Demand Forecasting process.

Consider NEIs in Electricity Supply Modeling

The Production Cost Model (PCM) and the Capacity Expansion Model (CEM) frameworks represent the state's most robust and transparent resource modeling processes and form the basis of the IRP. However, these electricity supply models were designed for centralized, fossil fuel, dispatch-oriented generation[42] which makes them incapable of including many essential non-energy impacts (NEIs) that DERs or DCRs could provide (e.g., local air quality, resilience, household energy cost, water and workforce impacts)[43]. The current versions of PCM and CEM models used by the state in the IRP proceeding do not attempt to model the ways that larger deployment rates of DERs and DCRs could both impact supply-side costs and local economic development, environmental benefits, and resilience. Instead, the models rely on static input assumptions of DERs based on forecasts, rate design, and existing program adoption rates which constrain their benefits in statewide resource planning.

On May 19, 2026, the CEC hosted a Staff Webinar on Integrating NEI Metrics in Supply Modeling[44] where CEC staff explained that the current models miss negative impacts of generation resources on local communities such as higher rates of diesel particulate matter and/or the negative impacts that nitrogen oxide pollution bears on people living near fossil-fuel power plants.

40 https://cal-cca.org/resource-adequacy/

41 Joint Comments on 2026 IEPR Update, https://efiling.energy.ca.gov/GetDocument.aspx?tn=269324&DocumentContentId=106404

42 Staff Webinar on Integrating NEI Metrics in Supply Modeling, Slide 17 & 18

43 Staff Webinar on Integrating NEI Metrics in Supply Modeling, Slide 19

44 Staff Webinar on Integrating NEI Metrics in Supply Modeling available here, https://efiling.energy.ca.gov/GetDocument.aspx?tn=270022&DocumentContentId=107174

WestLight concurs with the initial findings of the CEC and recommends that the existing electricity supply model analysis be updated (e.g. improved modeling constraints and objectives)[45] to incorporate the holistic impacts of electricity generation, including both costs and NEIs. This would enable the State to better evaluate how BTM DERs and DCRs can strengthen the electricity system while also helping solve localized concerns such as pollution, economic development and resilience.

Evaluate and Credit Transmission and Distribution Grid Benefits to DCRs

As mentioned above, DCRs are often located closer to load than large-scale FTM generation resources. They can often directly serve load within the same distribution and transmission constraints, which has two benefits for the grid infrastructure. First, DCRs help avoid the need for transmission line build-out and alleviate potential transmission congestion costs by siting generation closer to load. Second, DCRs can have specific locational benefits by deferring or mitigating upgrades to the distribution grid that otherwise would have to occur in the area.

Ordered by D.21-02-006, the IOUs offered the Distribution Investment Deferral Framework (DIDF) Partnership Pilots ("Pilots") until D.24-10-030 suspended the Pilots.[46] The Pilots were initially designed to procure BTM DERs to avoid or defer utility distribution investments but they also incorporated FTM DCRs to solve the same issues.[47] Despite its many shortcomings, the DIDF Pilots demonstrated that DERs and DCRs can indeed mitigate distribution investments, leading to specific and quantifiable costs savings for the utility. Unfortunately, the DIDF Partnership Pilots were suspended in D.24-10-003 and despite ongoing discussions under the Commission's High DER Proceeding (R.21-06-017), no new mechanism has been created to date to value the grid upgrade deferral value that DERs and DCRs can provide. The Commission should establish a mechanism that appropriately values the transmission and distribution benefits provided by DCRs and DERs so that their benefits can be reflected in resource procurement and planning decisions.

Allow for a firm timeline for portfolio development.

WestLight is strongly interested in providing the Commission with robust and extremely well-analyzed portfolios to support the Commission in its efforts but needs sufficient time in which to perform that analysis and needs to be able to plan when the work will be able to occur. Uncommunicated delays affect LSEs' ability to manage their work schedules to ensure the modeling is both up-to-date and completed on time. While WestLight certainly understands the challenges in foreseeing every possible issue that arises while several dozen LSEs engage in the IRP process, WestLight recommends increasing staffing or other resources or reconsidering the timelines and structures for the IRP process. In general, the critical requirements and major parameters, such as load forecasts, required data inputs including available resources, costs, and reliability targets, required targets, and required portfolios must be finalized at least 8 to 10 months in advance to allow for robust portfolio development. WestLight believes this will be in the best interest of the overall process so that LSE IRPs can be of the highest quality and usefulness to the Commission.

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45 NEI Integration Approaches – Supplemental Information, https://efiling.energy.ca.gov/GetDocument.aspx?tn=270338&DocumentContentId=107530

46 D.24-10-030, Finding of Fact 17

47 Read more at https://www.latitudemedia.com/news/inside-the-battery-projects-redefining-pges-grid-upgrade-playbook/?shem=rimspwouoe

WestLight also encourages increased transparency regarding core planning assumptions, including load growth forecasts, electrification impacts, large new loads, resource development expectations, and transmission availability. As planning outcomes increasingly depend on uncertain future conditions, transparent assumptions and scenario analysis will improve stakeholder confidence and produce more durable planning outcomes.

Develop a centralized project database to minimize repetitive data collection.
Many of the data points required to be input in the RDT are redundant with data that should already have been collected and recorded by the CPUC. Specifically, for online resources with CAISO resource IDs, the CPUC should have access to the nameplate capacity, technology type, capacity area, location, commercial operation date, and contract term. Asking LSEs to continuously re-input the same data for the same resource across various filings invites data input errors and is an inefficient use of staff time. The CPUC should develop a centralized project database that contains quality-assured and quality-controlled data for each project. LSEs should be able to provide CPUC with a resource ID, and then CPUC can use the database to look up the relevant project information.

Glossary of Terms

Alternative Portfolio: *LSEs are permitted to submit "Alternative Portfolios" developed from scenarios using different assumptions from those used in the Preferred System Plan with updates. Any deviations from the "Conforming Portfolio" must be explained and justified.*

Approve (Plan)*: the CPUC's obligation to approve an LSE's integrated resource plan derives from Public Utilities Code Section 454.52(b)(2) and the procurement planning process described in Public Utilities Code Section 454.5, in addition to the CPUC obligation to ensure safe and reliable service at just and reasonable rates under Public Utilities Code Section 451.*

Balancing Authority Area (CAISO): *the collection of generation, transmission, and loads within the metered boundaries of the Balancing Authority. The Balancing Authority maintains load-resource balance within this area.*

Baseline resources: *Those resources assumed to be fixed as a capacity expansion model input, as opposed to Candidate resources, which are selected by the model and are incremental to the Baseline. Baseline resources are existing (already online) or owned or contracted to come online within the planning horizon. Existing resources with announced retirements are excluded from the Baseline for the applicable years. Being "contracted" refers to a resource holding signed contract/s with an LSE/s for much of its energy and capacity, as applicable, for a significant portion of its useful life. The contracts refer to those approved by the CPUC and/or the LSE's governing board, as applicable. These criteria indicate the resource is relatively certain to come online. Baseline resources that are not online at the time of modeling may have a failure rate applied to their nameplate capacity to allow for the risk of them failing to come online.*

Candidate resource: *those resources, such as renewables, energy storage, natural gas generation, and demand response, available for selection in IRP capacity expansion modeling, incremental to the Baseline resources.*

Capacity Expansion Model: *a capacity expansion model is a computer model that simulates generation and transmission investment to meet forecasted electric load over many years, usually with the objective of minimizing the total cost of owning and operating the electrical system. Capacity expansion models can also be configured to only allow solutions that meet specific requirements, such as providing a minimum amount of capacity to ensure the reliability of the system or maintaining greenhouse gas emissions below an established level.*

Certify (a Community Choice Aggregator Plan)*: Public Utilities Code 454.52(b)(3) requires the CPUC to certify the integrated resource plans of CCAs. "Certify" requires a formal act of the Commission to determine that the CCA's Plan complies with the requirements of the statute and the process established via Public Utilities Code 454.51(a). In addition, the Commission must review the CCA Plans to determine any potential impacts on public utility bundled customers under Public Utilities Code Sections 451 and 454, among others.*

Clean System Power (CSP) methodology*: the methodology used to estimate GHG and criteria pollutant emissions associated with an LSE's Portfolio based on how the LSE will expect to rely on system power on an hourly basis.*

***Community Choice Aggregator**: a governmental entity formed by a city or county to procure electricity for its residents, businesses, and municipal facilities.*

***Conforming Portfolio**: the LSE portfolio that conforms to IRP Planning Standards, the 2045 LSE-specific GHG Emissions Benchmark, use of the LSE's assigned load forecast, use of inputs and assumptions matching those used in developing the Reference System Portfolio, as well as other IRP requirements including the filing of a complete Narrative Template, a Resource Data Template and Clean System Power Calculator*.

***Effective Load Carrying Capacity**: a percentage that expresses how well a resource is able avoid loss-of-load events (considering availability and use limitations). The percentage is relative to a reference resource, for example a resource that is always available with no use limitations. It is calculated via probabilistic reliability modeling, and yields a single percentage value for a given resource or grouping of resources.*

***Effective Megawatts (MW):** perfect capacity equivalent MW, such as the MW calculated by applying an ELCC % multiplier to nameplate MW.*

***Electric Service Provider**: an entity that offers electric service to a retail or end-use customer, but which does not fall within the definition of an electrical corporation under Public Utilities Code Section 218.*

***Filing Entity**: an entity required by statute to file an integrated resource plan with CPUC.*

***Future**: a set of assumptions about future conditions, such as load or gas prices.*

***GHG Benchmark (or LSE-specific 2045 GHG Benchmark)**: the mass-based GHG emission planning targets calculated by staff for each LSE based on the methodology established by the California Air Resources Board and required for use in LSE Portfolio development in IRP.*

***GHG Planning Price:** the systemwide marginal GHG abatement cost associated with achieving a specific electric sector GHG planning target.*

***Integrated Resources Planning Standards (Planning Standards)**: the set of CPUC IRP rules, guidelines, formulas and metrics that LSEs must include in their LSE Plans.*

***Integrated Resource Planning (IRP) process**: integrated resource planning process; the repeating cycle through which integrated resource plans are prepared, submitted, and reviewed by the CPUC*

***Long term**: more than 5 years unless otherwise specified.*

***Load Serving Entity**: an electrical corporation, electric service provider, community choice aggregator, or electric cooperative.*

***Load Serving Entity (LSE) Plan**: an LSE's integrated resource plan; the full set of documents and information submitted by an LSE to the CPUC as part of the IRP process.*

***Load Serving Entity (LSE) Portfolio**: a set of supply- and/or demand-side resources with certain attributes that together serve the LSE's assigned load over the IRP planning horizon.*

***Loss of Load Expectation (LOLE):** a metric that quantifies the expected frequency of loss-of-load events per year. Loss-of-load is any instance where available generating capacity is insufficient to serve electric demand. If one or more instances of loss-of-load occurring within the same day regardless of duration*

are counted as one loss-of-load event, then the LOLE metric can be compared to a reference point such as the industry probabilistic reliability standard of "one expected day in 10 years," i.e. an LOLE of 0.1.

Maximum Import Capability: a California ISO metric that represents a quantity in MWs of imports determined by the CAISO to be simultaneously deliverable to the aggregate of load in the ISO's Balancing Authority (BAA) Area and thus eligible for use in the Resource Adequacy process. The California ISO assess a MIC MW value for each intertie into the ISO's BAA and allocated yearly to the LSEs. A LSE's RA import showings are limited to its share of the MIC at each intertie.

Net Qualifying Capacity (NQC): *Qualifying Capacity reduced, as applicable, based on: (1) testing and verification; (2) application of performance criteria; and (3) deliverability restrictions. The Net Qualifying Capacity determination shall be made by the California ISO pursuant to the provisions of this California ISO Tariff and the applicable Business Practice Manual.*

Non-modeled costs*: embedded fixed costs in today's energy system (e.g., existing distribution revenue requirement, existing transmission revenue requirement, and energy efficiency program cost).*

Nonstandard LSE Plan*: type of integrated resource plan that an LSE may be eligible to file if it serves load outside the CAISO balancing authority area.*

Optimization*: an exercise undertaken in the CPUC's Integrated Resource Planning (IRP) process using a capacity expansion model to identify a least-cost portfolio of electricity resources for meeting specific policy constraints, such as GHG reduction or RPS targets, while maintaining reliability given a set of assumptions about the future. Optimization in IRP considers resources assumed to be online over the planning horizon (baseline resources), some of which the model may choose not to retain, and additional resources (candidate resources) that the model is able to select to meet future grid needs.*

Planned resource: *any resource included in an LSE portfolio, whether already online or not, that is yet to be procured. Relating this to capacity expansion modeling terms, planned resources can be baseline resources (needing contract renewal, or currently owned/contracted by another LSE), candidate resources, or possibly resources that were not considered by the modeling, e.g., due to the passage of time between the modeling taking place and LSEs developing their plans. Planned resources can be specific (e.g., with a CAISO ID) or generic, with only the type, size and some geographic information identified.*

Qualifying capacity*: the maximum amount of Resource Adequacy Benefits a generating facility could provide before an assessment of its net qualifying capacity.*

Preferred Conforming Portfolio*: the conforming portfolio preferred by an LSE as the most suitable to its own needs; submitted to CPUC for review as one element of the LSE's overall IRP plan.*

Preferred System Plan: *the Commission's integrated resource plan composed of both the aggregation of LSE portfolios (i.e., Preferred System Portfolio) and the set of actions necessary to implement that portfolio (i.e., Preferred System Action Plan).*

Preferred System Portfolio: *the combined portfolios of individual LSEs within the CAISO, aggregated, reviewed and possibly modified by Commission staff as a proposal to the Commission, and adopted by the Commission as most responsive to statutory requirements per Pub. Util. Code 454.51; part of the Preferred System Plan.*

Short term*: 1 to 3 years (unless otherwise specified).*

***Staff**: CPUC Energy Division staff (unless otherwise specified).*

***Standard LSE Plan**: type of integrated resource plan that an LSE is required to file if it serves load within the CAISO balancing authority area (unless the LSE demonstrates exemption from the IRP process).*

***Transmission Planning Process (TPP)**: process conducted by the California Independent System Operator (CAISO) to identify potential transmission system limitations and areas that need reinforcements over 10-year and 15-year horizons.*

ATTACHMENT B

RDT Certification Form – Verification Declaration

Load Serving Entity Full Name:	WestLight Energy
Load Serving Entity Abbreviation:	WESTLIGHT
Submission Type:	IRP Biennial Planning
Date of Filing:	8/10/2026

Note: Consistent with Rules 1.1 & 1.11 of the CPUC's Rules of Practice and Procedure, this Procurement Showing has been verified by an officer of the corporation or organization, who expressly certifies, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this showing;
2. I have reviewed, or have caused to be reviewed, this showing;
3. Based on my knowledge, information, or belief, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, information, or belief, this filing contains all of the information required to be provided by CPUC orders, rules, and regulations.

LSE Officer

Title:	Chief Executive Officer
Name:	Shawn Marshall
Email:	smarshall@westlightenergy.org
Phone:	650-474-5002
Signature:	Shawn Marshall box SIGN 4P85R5W4-18Z8RYRQ

Backup Contact Information

Title:	Associate Manager, Power Resources
Name:	Shayna Levia
Email:	slevia@peninsulacleanenergy.com
Phone:	650-761-6784
Signature:	box SIGN 4678QKQ1-18Z8RYRQ

Load Serving Entity Information

LSE Address Line 1:	400 South El Camino Real
LSE Address Line 2:	Suite 1400
LSE City:	San Mateo
LSE State:	CA
LSE Zip:	94402

lse_unique_contract_id	resource	alternative_resource_name	contract_status	project_interconnection_position	interconnection_substation	marginal_addition	marginal_addition_to	total_nameplate_capacity	contracted_nameplate_capacity	sep_contracted_mw_nqc	contract_gwh_annual	is_hybrid_paired	can_charge_from_grid
PCE50005	VICPAS_2_SOCSR1	SOL CATCHER BESS PV1	Online		NA			100	100	0	293.84	ExistingSolarExistingStorage	YES
PCE50004	DSFLWR_2_W9CSB1_SUN	WILLY 9 CHAP 1	Online	1319	NA			102	102	39.7	295.05	ExistingSolarExistingStorage	NO
PCE50008	_NEW_GENERIC_SOLAR_1AXIS	DARDEN	Development	1949	NA			1150	42.28	0	120.32	NewSolarNewStorage	YES
PCE50009	_NEW_GENERIC_SOLAR_1AXIS	DARDEN	Development	1949	NA			1150	42.28	0	120.32	NewSolarNewStorage	YES
Dos Palos Solar	DOSPAL_1_DPSSR1	DOS PALOS CLEAN POWER	Online					3	3	0	7.95	NotHybrid	
PCE50002	CABALO_2_M2WSR2	MUSTANG 2 WHIRLAWAY SOLAR	Online		NA			100	100	47.5	284	NotHybrid	
PCE50003	WRGTSR_2_WSFSR1	WRIGHT SOLAR FREEMAN	Online		NA			200	187.06	74.96	527	ExistingSolarNewStorage	YES
PCE40001	HATLOS_6_BWDHY1	BIDWELL DITCH	Online					2	2	1.2	11	NotHybrid	
PCE40004	CLOVER_2_UNIT	CLOVER CREEK	Online					1	1	0.1	4	NotHybrid	
PCE40003	COVERD_2_HCKHY1	HATCHET CREEK	Online					7.5	7.5	0	17	NotHybrid	
PCE40002	COVERD_2_RCKHY1	ROARING CREEK	Online					2	2	0	6	NotHybrid	
PCE40005	SPBURN_7_SNOWMT	BURNEY CREEK HYDRO	Online					3	3	0	7	NotHybrid	
PCE70005	BRDSLD_2_SHILO1	SHILOH I WIND PROJECT	Online					150	150	36.9	398	NotHybrid	
PCE70005_extension	BRDSLD_2_SHILO1	SHILOH I WIND PROJECT	PlannedExisting					150	150	36.9	398	NotHybrid	
PCE70006	JAWBNE_2_SRWWD2	SKY RIVER WIND REPOWER B	Online					30.2	30.2	6.4	116	NotHybrid	
PCE70007	VOYAGR_2_VOYWD2	VOYAGER WIND 2	Online					63.175	63.175	13.4	212	NotHybrid	
PCE70007_extension	VOYAGR_2_VOYWD2	VOYAGER WIND 2	PlannedExisting					63.175	63.175	13.4	212	NotHybrid	
PCE70010	NZWIND_6_CALWND	WIND RESOURCE I	Online					8.71	8.71	1.9	22	NotHybrid	
PCE70014	_NEW_GENERIC_WIND_OOS_AZNM	SUNZIA WIND NORTH	Online	wind_import_existing	500 kv Pinal Central Substation			3515	65.6	19.68	220.62	NotHybrid	
PCE70015	_NEW_GENERIC_WIND_OOS_AZNM	SUNZIA WIND SOUTH	Online	wind_import_existing	500 kv Pinal Central Substation			3515	154.4	46.31	512.24	NotHybrid	
PCE70014_extension	_NEW_GENERIC_WIND_OOS_AZNM	SUNZIA WIND NORTH	PlannedExisting	wind_import_existing	500 kv Pinal Central Substation			3515	65.6	19.68	220.62	NotHybrid	
PCE70015_extension	_NEW_GENERIC_WIND_OOS_AZNM	SUNZIA WIND SOUTH	PlannedExisting	wind_import_existing	500 kv Pinal Central Substation			3515	154.4	46.31	512.24	NotHybrid	
PCE70013_Coram1	MIDWD_7_CORAMB	CELLC 7.5 MW TEHACHAPI PROJECT	Online					7.5	7.5	1.6	12	NotHybrid	
PCE70013_Coram2	MIDWD_2_WIND2	CORAM ENERGY	Online					3	3	0.6	12	NotHybrid	
PCE70013_Coram3	DTCHWD_2_BT3WND	BROOKFIELD TEHACHAPI 3	Online					4.5	3	1	31	NotHybrid	
Sand Hill	PGE_NGBA_Wind	SAND HILL C	PlannedNew					50	50	50	167	NotHybrid	
New Sand Hill	PGE_NGBA_Wind	SAND HILL C	PlannedNew					30	30	30	100	NotHybrid	
PCE30001	GEYSER_7_UNIT18	GEYSERS UNIT 18 (HEALDSBURG)	Online					72	35	35	307	NotHybrid	
PCE30001_extension	GEYSER_7_UNIT18	GEYSERS UNIT 18 (HEALDSBURG)	PlannedExisting					72	35	35	307	NotHybrid	
PCE30002	SIGHEB_6_HE2SCEDYN	HEBER 2	Online		Mirage 230 kV			28	26	26	232.02	NotHybrid	
PCE30004_Dogwood	_NEW_GENERIC_GEOTHERMAL	DOGWOOD GEOTHERMAL	Development	geothermal_import_planned	CAISO delivery at IID-SDGE_ITC			25	4.275	4.28	33.01	NotHybrid	
[redacted]	_NEW_GENERIC_GEOTHERMAL		Development	[redacted]	[redacted]							NotHybrid	
PCE30004_Nevada	_NEW_GENERIC_GEOTHERMAL		Development	geothermal_import_planned	TBD							NotHybrid	
[redacted]	_NEW_GENERIC_GEOTHERMAL		Development	[redacted]	[redacted]			[redacted]				NotHybrid	
PCE30003	_NEW_GENERIC_GEOTHERMAL	FISH LAKE GEOTHERMAL	Development	geothermal_import_planned	Silver Peak 55 kV Substation			13	2.31	2.31	19.49	NotHybrid	
PCE30005	_NEW_GENERIC_GEOTHERMAL	Whitegrass	Development	geothermal_import_planned	[redacted]			6	6	6	50.43	NotHybrid	
PCE50005_Storage	VICPAS_2_SOCBT1	SOL CATCHER BESS 1	Online		NA			50	50	50	-	ExistingSolarExistingStorage	YES
PCE50004_Storage	DSFLWR_2_W9CSB1_LESR	WILLY 9 CHAP 1	Online	1319	NA	70	DSFLWR_2_W9CSB1	52	52	52	-	ExistingSolarExistingStorage	NO
Tumblewood_2026-2041	TUMBWD_2_WISBT4	Tumblewood Energy Storage	Online	1217	NA			75	14.77	14.77	-	NotHybrid	
Nova_2024-2039	ROMOLA_5_MPBBT3	MENIFEE POWER BANK 3	Online		NA			50	50	50	-	NotHybrid	
Lockhart_2024-2039	LCKHTS_2_LH1BT1	LOCKHART SOLAR BESS 1	Online		NA			45	45	45	-	NotHybrid	
Gabriel 4 hr _2027-2042	_NEW_GENERIC_BATTERY_STORAGE	San Gabriel II 4 hr	Development	[redacted]	NA			65	65	65	-	NotHybrid	
Gabriel 8 hr _2027-2042	_NEW_GENERIC_BATTERY_STORAGE	San Gabriel II 8 hr	Development		NA			10	10	10	-	NotHybrid	
storage addition to PCE50003	_NEW_GENERIC_BATTERY_STORAGE	WRIGHT STORAGE	Development		NA	80	WRGTSR_2_WSFSR1	200	80	80	-	ExistingSolarNewStorage	YES
PCE50008_hybridstorage	_NEW_GENERIC_BATTERY_STORAGE	DARDEN	Development		NA			1150	45.74	45.74	-	NewSolarNewStorage	YES
PCE50009_hybridstorage	_NEW_GENERIC_BATTERY_STORAGE	DARDEN	Development		NA			1150	45.74	45.74	-	NewSolarNewStorage	YES
Willow Rock_2030-2050	_NEW_GENERIC_BATTERY_STORAGE	WILLOWROCK	Development	1782	NA			50	15	15	-	NotHybrid	
PVHybrid_Desert	_NEW_GENERIC_SOLAR_1AXIS		PlannedNew		NA			314	314	83.995	986	NewSolarNewStorage	YES
Storage_Hybrid_Desert	_NEW_GENERIC_BATTERY_STORAGE		PlannedNew		NA			314	314	314	-	NewSolarNewStorage	YES
PVHybrid_Desert_addition_2040	_NEW_GENERIC_SOLAR_1AXIS		PlannedNew		NA			120.041	120.041	32.1109675	382	NewSolarNewStorage	YES
Storage_Hybrid_Desert__addition_2040	_NEW_GENERIC_BATTERY_STORAGE		PlannedNew		NA			120.041	120.041	120	-	NewSolarNewStorage	YES
PVHybrid_Desert_addition_2045	_NEW_GENERIC_SOLAR_1AXIS		PlannedNew		NA			237.538	229.429	61.3722575	733	NewSolarNewStorage	YES
Storage_Hybrid_Desert_addition_2045	_NEW_GENERIC_BATTERY_STORAGE		PlannedNew		NA			237.538	229.429	229.429	-	NewSolarNewStorage	YES
SCE_Northern_Wind	SCE_Northern_Wind		PlannedNew		NA			214	214	45.4322	469.20	NotHybrid	
PGE_NGBA_Wind	PGE_NGBA_Wind		PlannedNew		NA			165	165	40.6065	376.38	NotHybrid	
SCE_NOL_Wind	SCE_NOL_Wind		PlannedNew		NA			108	108	22.9284	237.22	NotHybrid	
San_Diego_Wind	SDGE_Imperial_Wind		PlannedNew		NA			85	85	18.0455	186.70	NotHybrid	
SCE_Eastern_Wind	SCE_Eastern_Wind		PlannedNew		NA			72	72	15.2856	202.61	NotHybrid	
PGE_GBA_Wind	PGE_GBA_Wind		PlannedNew		NA			22	22	5.4142	55.53	NotHybrid	
PGE_Kern_Wind	_NEW_GENERIC_WIND_CA		PlannedNew		NA			22	22	5.4142	48.32	NotHybrid	
SCE_EOP_Wind	SCE_EOP_Wind		PlannedNew		NA			21	21	4.4583	55.99	NotHybrid	
PGE_NE_CA_Wind	PGE_Northeast_CA_Wind		PlannedNew		NA			51	51	12.5511	116.34	NotHybrid	
[redacted]	PGE_Northeast_CA_Geothermal		Review		[redacted]			[redacted]				NotHybrid	
	PGE_NGBA_Geothermal		Review									NotHybrid	
	PGE_NGBA_Geothermal		Review									NotHybrid	
	SCE_NOL_Geothermal		Review									NotHybrid	
	PGE_NGBA_Geothermal		Review									NotHybrid	
	PGE_NGBA_Geothermal		Review									NotHybrid	
	PGE_NGBA_Geothermal		Review									NotHybrid	
	PGE_NGBA_EGS_NF		Review									NotHybrid	
	SCE_Eastern_Geothermal		Review									NotHybrid	
CCPower_StrategicGeo_NGBA_East	PGE_NGBA_Geothermal		PlannedNew		Redbud 115 kV			150	73.0	73.019	550.50	NotHybrid	
CCPower_StrategicGeo_NGBA_West	PGE_NGBA_Geothermal		PlannedNew		Cloverdale 115 kV			150	63.4	63.377	477.81	NotHybrid	
CCPower_StrategicGeo_NGBA_West_additional	PGE_NGBA_Geothermal		PlannedNew		Cloverdale 115 kV			150	9.6	9.642	71.41	NotHybrid	
CCPower_StrategicGeo_Humboldt	PGE_NGBA_Geothermal		PlannedNew		Maple Creek 115 kV			50	23.4	23.440	173.61	NotHybrid	
CCPower_StrategicGeo_SurpriseValley	PGE_Northeast_CA_Geothermal		PlannedNew		Hilltop 345 kV			50	23.4	23.440	173.61	NotHybrid	
CCPower_StrategicGeo_Lassen	PGE_Northeast_CA_Geothermal		PlannedNew		Shaffer 345 kV (LMUD/NVE)			50	23.4	23.440	173.61	NotHybrid	
CCPower_StrategicGeo_PitRiver	PGE_Northeast_CA_Geothermal		PlannedNew		Hat Creek 2 230 kV			50	23.4	23.440	173.61	NotHybrid	
SCE_WY_Wind	SCE_Wyoming_Wind		PlannedNew		SCE-Eldorado			330	330	330	1156.51	NotHybrid	
SCE_WY_Wind_addition	SCE_Wyoming_Wind		PlannedNew		SCE-Eldorado			70	70	70	245.32	NotHybrid	
non_storage_cam_CCGT	_EXISTING_GENERIC_COMBINED_CYCLE		Online		NA				[redacted]		-	NotHybrid	
non_storage_cam_Peaking	_EXISTING_GENERIC_PEAKER		Online		NA						-	NotHybrid	
storage_cam	_EXISTING_GENERIC_BATTERY_STORAGE		Online		NA						-	NotHybrid	
gated_executed_existing_RA_contracts_CCGT_2026-2	_EXISTING_GENERIC_COMBINED_CYCLE		Online		NA						-	NotHybrid	
gated_executed_existing_RA_contracts_CCGT_2026-2	_EXISTING_GENERIC_COMBINED_CYCLE		Online		NA						-	NotHybrid	
aggregated_executed_existing_RA_contracts_storage	_EXISTING_GENERIC_BATTERY_STORAGE		Online		NA						-	NotHybrid	
GHG Purchase Placeholder 2028	_SUPPLIERS_CHOICE		PlannedExisting		NA			0	0	0	431	NotHybrid	
PCC1_Sale_MSCG_CY 2028_11.7.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	50	NotHybrid	
PCC1_Sale_CEA_CY2028_11.7.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	50	NotHybrid	
PCC1_Sale_CEA_CY2027_11.7.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	25	NotHybrid	
PCC1_Sale_Anaheim_CY2026_1.8.2026	_SUPPLIERS_CHOICE		Online		NA			0	0	0	100	NotHybrid	
PCC1_Sale_Anaheim_CY2026_4.1.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	50	NotHybrid	
PCC1_Sale_Ava_CY 2026_10.22.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	23	NotHybrid	
PCC1_Sale_MSCG_Bal 2026_4.6.2026	_SUPPLIERS_CHOICE		Online		NA			0	0	0	50	NotHybrid	
PCC1_Sale_NextEra_Bal 2026_1.15.2026	_SUPPLIERS_CHOICE		Online		NA			0	0	0	20	NotHybrid	
PCC1_Sale_NRG_Bal 2026, CY2027_2.4.2026	_SUPPLIERS_CHOICE		Online		NA			0	0	0	50	NotHybrid	
PCC1_Sale_OCPA_CY2026_11.12.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	45	NotHybrid	
PCC1_Sale_OCPA_CY 2026_5.21.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	50	NotHybrid	
PCC1_Sale_Roseville_CY 2027_11.10.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	35	NotHybrid	
PCC1_Sale_SCP_CY2027_7.23.2026	_SUPPLIERS_CHOICE		Online		NA			0	0	0	70	NotHybrid	
PCC1_Buy_SCP_CY2027_7.23.2026	_SUPPLIERS_CHOICE		Online		NA			0	0	0	70	NotHybrid	
GHG Free_Buy_MID_CY_2026_12.16.2024	_SUPPLIERS_CHOICE		Online		NA			0	0	0	330	NotHybrid	
GHG-Free_Buy_BP_CY2025-26_4.8.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	125	NotHybrid	
GHG-Free_Buy_CCMS_CY2026 & CY2027_11.6.2024	_SUPPLIERS_CHOICE		Online		NA			0	0	0	50	NotHybrid	
GHG-Free_Buy_Dynasty_CY 2026_2.21.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	25	NotHybrid	
GHG-Free_Buy_MSCG_Bal 2026_2.4.2026	_SUPPLIERS_CHOICE		Online		NA			0	0	0	50	NotHybrid	
GHG-Free_Buy_MSCG_Bal 2026_5.7.2026	_SUPPLIERS_CHOICE		Online		NA			0	0	0	100	NotHybrid	
GHG-Free_Buy_NRG_Bal 2025 CY 2026_2.19.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	25	NotHybrid	
GHG-Free_Buy_PGE_CY 2026_12.18.2025	_SUPPLIERS_CHOICE		Online		NA			0	0	0	700	NotHybrid	
PCE50010	GOOSLK_1_SOLAR1	GOOSE LAKE	Online		NA			12	3	0	8	NotHybrid	

total_generator_mw	contracted_generator_mw	total_storage_mw	contracted_storage_mw	solar_technology_sub_type	storage_technology_sub_type	total_storage_depth_mwh	contracted_storage_depth_mwh	viability_cod_reasonableness	viability_technical_feasibility	viability_financing_sitecontrol	resource_mix	s_d1911016_vamo_ghgfree	buy_sell_own	counterparty
100	100	50	50	1Axis	Li	200	200							non-LSE supplier
102	102	52	52	1Axis	Li	208	208							non-LSE supplier
1150	42.28	1150	45.74	1Axis	Li	4600	182.96	4	3	5				non-LSE supplier
1150	42.28	1150	45.74	1Axis	Li	4600	182.96	4	3	5				non-LSE supplier
														non-LSE supplier
200	187.06	80	80	Fixed	Li	320	320							non-LSE supplier
														non-LSE supplier
														non-LSE supplier
														non-LSE supplier
														non-LSE supplier
								1	2	1				
								1	2	1				
														non-LSE supplier
								3	3	4				non-LSE supplier
								1	3	2				non-LSE supplier
								1	3	2				non-LSE supplier
								1	3	2				non-LSE supplier
								4	3	4				non-LSE supplier
								2	3	3				non-LSE supplier
100	100	50	50	1Axis	Li	200	200							non-LSE supplier
102	102	52	52	1Axis	Li	208	208							non-LSE supplier
					Li	600	118.16							non-LSE supplier
					Li	200	200							non-LSE supplier
					Li	180	180							non-LSE supplier
					Li	260	260	4	3	5				non-LSE supplier
					Li	80	80	4	3	5				non-LSE supplier
200	187.06	80	80	Fixed	Li	320	320	4	3	5				non-LSE supplier
1150	42.28	1150	45.74	1Axis	Li	4600	182.96	4	3	5				non-LSE supplier
1150	42.28	1150	45.74	1Axis	Li	4600	182.96	4	3	5				non-LSE supplier
					Other	400	120	3	2	4				non-LSE supplier
314	314	314	314	1Axis	Li	1256	1256	1	2	1				
314	314	314	314	1Axis	Li	1256	1256	1	2	1				
120.041	120.041	120.041	120.041	1Axis	Li	480.164	480.164	1	2	1				
120.041	120.041	120.041	120.041	1Axis	Li	480.164	480.164	1	2	1				
229.429	229.429	229.429	229.429	1Axis	Li	917.716	917.716	1	2	1				
229.429	229.429	229.429	229.429	1Axis	Li	917.716	917.716	1	2	1				
								1	2	1				
								1	2	1				
								1	2	1				
								1	2	1				
								1	2	1				
								1	2	1				
								1	2	1				
								1	2	1				
								1	2	1				non-LSE supplier
								1	2	1				non-LSE supplier
								1	2	1				non-LSE supplier
								1	1	3				non-LSE supplier
								1	1	3				non-LSE supplier
								1	1	1				non-LSE supplier
								1	1	1				non-LSE supplier
								1	1	3				non-LSE supplier
								1	2	1				non-LSE supplier
								1	1	1				non-LSE supplier
								1	1	1				non-LSE supplier
								1	1	1				non-LSE supplier
								1	1	1				non-LSE supplier
								1	1	1				non-LSE supplier
								1	1	1				non-LSE supplier
								1	2	1				
												CAM		
												CAM		
					Li		28.16					CAM		
					Li		16.4							
											hydro, 100%			
											see notes		Sell	non-LSE supplier
											see notes		Sell	Clean Energy Alliance
											see notes		Sell	Clean Energy Alliance
											see notes		Sell	City of Anaheim Public Utilities
											see notes		Sell	City of Anaheim Public Utilities
											see notes		Sell	Ava Community Energy
											see notes			non-LSE supplier
											see notes			non-LSE supplier
											see notes			non-LSE supplier
											see notes		Sell	Orange County Power Authority
											see notes		Sell	Orange County Power Authority
											see notes		Sell	Roseville Elelctric
											geothermal, 100%		Sell	Sonoma Clean Power Authority
											see notes		Buy	Sonoma Clean Power Authority
											hydro, 100%		Buy	Merced Irrigation District
											hydro, 100%		Buy	non-LSE supplier
											hydro, 100%		Buy	Constellation New Energy Inc
											hydro, 100%			non-LSE supplier
											hydro, 100%			non-LSE supplier
											hydro, 100%			non-LSE supplier
											hydro, 100%			non-LSE supplier
											hydro, 100%	GHG-free PCIA	Buy	Pacific Gas & Electric
													Buy	Marin Clean Energy

generator_supplier	developer_name	capacity_area	capacity_sub_area	cpuc_approval_ref	county	COD_year	COD_month	COD_day	contract_start_date_year	contract_start_date_month	contract_start_date_day	contract_end_date_year	contract_end_date_month	contract_end_date_day	contract_execution_date_year	contract_execution_date_month	contract_execution_date_day	tx_upgrades
	CLEARWAY	SCE			RiversideCounty	2026	4	1	2026	4	1	2041	3	31	2021	10	29	NA
	LEEWARD	PacGE			KernCounty	2024	1	1	2024	1	1	2040	3	30	2021	9	27	NA
	INTERSECT	PacGE			FresnoCounty	2028	6	1	2028	6	1	2040	5	31	2025	9	9	NO
	INTERSECT	PacGE			FresnoCounty	2028	6	1	2028	6	1	2040	5	31	2025	9	9	NO
	RENEWABLE AMERICA	PacGE			MercedCounty	2025	3	14	2025	3	14	2045	3	13	2022	9	2	NA
	IDEMITSU	GreaterFresno			FresnoCounty	2020	11	11	2020	11	11	2035	11	10	2017	8	25	NA
	CLENERA	PacGE			MercedCounty	2020	1	3	2020	1	3	2046	10	20	2017	9	3	NA
		PacGE			ShastaCounty	1987	2	22	2017	3	9	2034	3	8	2017	1	26	NA
		PacGE			ShastaCounty	1986	2	21	2018	4	1	2033	3	31	2018	1	26	NA
		PacGE			ShastaCounty	1986	12	5	2017	3	9	2037	3	8	2017	1	26	NA
		PacGE			ShastaCounty	1986	12	5	2017	3	16	2034	3	15	2017	1	26	NA
		PacGE			ShastaCounty	1990	3	1	2024	1	1	2038	12	31	2022	10	28	NA
		PacGE			SolanoCounty	2006	5	1	2024	1	1	2030	12	31	2020	10	23	NA
		PacGE			SolanoCounty	2006	5	1	2031	1	1	2035	12	31				NA
		SCE			KernCounty	2021	9	17	2021	9	17	2041	9	16	2020	11	30	NA
		SCE			KernCounty	2018	12	19	2021	1	1	2028	12	31	2020	12	18	NA
		SCE			KernCounty	2018	12	19	2029	1	1	2034	12	31				NA
		SCE			KernCounty	1984	12	1	2023	1	1	2028	12	31	2022	12	21	NA
	PATTERN	PNM			NewMexico	2026	5	23	2026	5	23	2041	5	22	2025	9	9	NA
	PATTERN	PNM			NewMexico	2026	5	23	2026	5	23	2041	5	22	2025	9	9	NA
	PATTERN	PNM			NewMexico	2041	5	23	2041	5	23	2046	5	22				NA
	PATTERN	PNM			NewMexico	2041	5	23	2041	5	23	2046	5	22				NA
		SCE			KernCounty	2011	10	1	2026	3	1	2031	2	28	2025	8	29	NA
		SCE			KernCounty	2011	10	1	2026	3	1	2031	2	28	2025	8	29	NA
		SCE			KernCounty	2011	10	1	2026	3	1	2031	2	28	2025	8	29	NA
	IGNIS	PacGE			AlamedaCounty	[redacted]												NA
	IGNIS	PacGE			AlamedaCounty													NA
		PacGE			SonomaCounty	2022	7	1	2022	7	1	2032	6	30	2021	8	26	NA
		PacGE			SonomaCounty	2032	7	1	2032	7	1	2046	6	30				NA
	ORMAT	IID			ImperialCounty	2023	1	1	2023	1	1	2038	12	31	2022	3	24	NA
	ORMAT	IID			ImperialCounty	2027	9	1	2027	9	1	2047	8	31	2022	5	31	YES
	ORMAT	[redacted]			[redacted]										2022	5	31	YES
	ORMAT					2030	1	1	2030	1	1	2050	12	31	2022	5	31	YES
	ORMAT														2022	5	31	YES
	OPEN MOUNTAIN ENERGY	NEVP			Nevada	2027	7	1	2027	7	1	2047	6	30	2022	5	31	NO
	OPEN MOUNTAIN ENERGY	NEVP			Nevada	[redacted]									2022	10	27	YES
	CLEARWAY	SCE			RiversideCounty	2024	4	1	2024	4	1	2041	3	31	2021	10	29	NA
	LEEWARD	PacGE			KernCounty	2025	3	31	2025	3	31	2040	3	30	2021	9	27	NA
	REVRENEWABLES	BigCreekVentura			KernCounty	2026	6	1	2026	6	1	2041	5	30	2022	1	24	NA
	CALPINE	LABasin			RiversideCounty	2024	8	1	2024	8	1	2039	7	31	2022	12	14	NA
	TERRAGEN	SCE			SanBernardinoCount	2024	7	10	2024	7	10	2039	7	9	2023	5	1	NA
	AYPA	LABasin	LA Basin Western		LosAngelesCounty	2027	6	1	2027	6	1	2042	5	31	2024	6	28	YES
	AYPA	LABasin	LA Basin Western		LosAngelesCounty	2027	6	1	2027	6	1	2042	5	31	2024	6	28	YES
	STELLAR RENEWABLE	PacGE			MercedCounty	2026	10	21	2026	10	21	2046	10	20	2025	6	11	NO
	INTERSECT	PacGE			FresnoCounty	2028	6	1	2028	6	1	2040	5	31	2025	9	9	NO
	INTERSECT	PacGE			FresnoCounty	2028	6	1	2028	6	1	2040	5	31	2025	9	9	NO
	HYDROSTOR	SCE			KernCounty	2030	12	31	2030	12	31	2050	12	30	2026	2	4	NO
		SCE			KernCounty	2030	1	1	2030	1	1	2045	12	31				NA
		SCE			KernCounty	2030	1	1	2030	1	1	2045	12	31				NA
		SCE			KernCounty	2039	1	1	2039	1	1	2055	12	31				NA
		SCE			KernCounty	2039	1	1	2039	1	1	2055	12	31				NA
		SCE			KernCounty	2041	1	1	2041	1	1	2059	12	31				NA
		SCE			KernCounty	2041	1	1	2041	1	1	2059	12	31				NA
		SCE			KernCounty	2034	1	1	2034	1	1	2049	12	31				NA
		PacGE			SolanoCounty	2035	1	1	2035	1	1	2049	12	31				NA
		SCE			InyoCounty	2035	1	1	2035	1	1	2049	12	31				NA
		SDGE			ImperialCounty	2035	1	1	2035	1	1	2049	12	31				NA
		SCE			RiversideCounty	2035	1	1	2035	1	1	2049	12	31				NA
		PacGE			AlamedaCounty	2035	1	1	2035	1	1	2049	12	31				NA
		PacGE			KernCounty	2035	1	1	2035	1	1	2049	12	31				NA
		SCE			SanBernardinoCount	2035	1	1	2035	1	1	2049	12	31				NA
		PacGE			LassenCounty	2041	1	1	2041	1	1	2059	12	31				NA
	[redacted]	PacGE			LassenCounty	[redacted]												NA
		[redacted]			SonomaCounty													NA
					LakeCounty													NA
		SCE			InyoCounty													NA
		[redacted]			LakeCounty													NA
					LakeCounty													NA
					LakeCounty													NA
					LakeCounty													NA
		PNM			NewMexico													NA
		NorthCoastNorthBay			LakeCounty	2040	1	1	2040	1	1	2054	12	31				NA
		NorthCoastNorthBay			SonomaCounty	2040	1	1	2040	1	1	2054	12	31				NA
		NorthCoastNorthBay			SonomaCounty	2045	1	1	2045	1	1	2059	12	31				NA
		PacGE			HumboldtCounty	2045	1	1	2045	1	1	2059	12	31				NA
		PacGE			ModocCounty	2045	1	1	2045	1	1	2059	12	31				NA
		PacGE			LassenCounty	2045	1	1	2045	1	1	2059	12	31				NA
		PacGE			ShastaCounty	2045	1	1	2045	1	1	2059	12	31				NA
		PACE			Wyoming	2037	1	1	2037	1	1	2054	12	31				NA
		PACE			Wyoming	2041	1	1	2041	1	1	2054	12	31				NA
						2026	1	1	2026	1	1	2045	12	31				NA
						2026	1	1	2026	1	1	2045	12	31				NA
						2026	1	1	2026	1	1	2045	12	31				NA
						2026	1	1	2026	1	1	2030	12	31				NA
						2026	1	1	2026	1	1	2028	12	31				NA
						2026	1	1	2026	1	1	2035	12	31				NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2028	1	1	2028	1	1	2028	12	31				NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2028	1	1	2028	1	1	2028	12	31	2025	11	7	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2028	1	1	2028	1	1	2028	12	31	2025	11	7	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2027	1	1	2027	1	1	2027	12	31	2025	11	7	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2026	2	1	2026	2	1	2026	12	31	2026	1	8	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2026	1	1	2026	1	1	2026	12	31	2025	4	1	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2026	1	1	2026	1	1	2026	12	31	2025	10	22	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2026	7	1	2026	7	1	2026	12	31	2025	4	6	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2026	1	15	2026	1	15	2026	12	31	2026	1	15	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2026	3	1	2026	3	1	2027	12	31	2026	2	4	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2026	1	1	2026	1	1	2026	12	31	2025	11	12	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2026	1	1	2026	1	1	2026	12	31	2025	5	21	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2027	1	1	2027	1	1	2027	12	31	2025	11	10	NA
ht Energy (formerly Peninsula Clean Energy Authority)					NA	2027	1	1	2027	1	1	2027	12	31	2026	7	23	NA
Sonoma Clean Power Authority					NA	2027	1	1	2027	1	1	2027	12	31	2026	7	23	NA
Merced Irrigation District					NA	2026	1	1	2026	1	1	2026	12	31	2024	12	16	NA
BP Energy Company					NA	2025	4	8	2025	4	8	2026	12	31	2025	4	8	NA
Constellation New Energy Inc					NA	2026	1	1	2026	1	1	2027	12	31	2024	11	6	NA
Dynasty Power Inc.					NA	2026	1	1	2026	1	1	2026	12	31	2025	2	21	NA
Morgan Stanley Capital Group, Inc.					NA	2026	2	4	2026	2	4	2026	12	31	2026	2	4	NA
Morgan Stanley Capital Group, Inc.					NA	2026	5	7	2026	5	7	2026	12	31	2026	5	7	NA
NRG Business Marketing LLC					NA	2025	2	19	2025	2	19	2026	12	31	2025	2	19	NA
Pacific Gas & Electric					NA	2026	1	1	2026	1	1	2026	12	31	2025	12	18	NA
		PacGE			KernCounty	2026	8	1	2026	8	1	2030	12	31	2026	6	29	NA

tx_upgrade_date_year	tx_upgrade_date_month	tx_upgrade_date_day	tx_upgrade_description	d2106035_procurement_cat	mtr_tranche1_NQC	mtr_tranche2_NQC	mtr_tranche3_NQC	mtr_tranche4_NQC	mtr_tranche5_NQC	mtr_tranche6_NQC	mtr_NQC_ZE_gen_paired_dr	mtr_bridge_to	contract_changed	previous_COD_year	previous_COD_month	previous_COD_day	remediation_plan
			Seeking Transmission Service Rights to Imperial Valley 230kV substation. Ormat will need to self-build new IID switching station to be transferred to IID														
2027	11	30	[redacted]														
			[redacted]														
			[redacted]														
			SCE is expected to complete upgrades to the interconnection by H2 2029.														

signed_contract	notice_to_proceed	public_contract	buying_energy_capacity	NQC_reporting_source	procurement_origin	planned_project_retention_priority	csp_resource_category	csp_annual_2028	csp_annual_2030	csp_annual_2035	csp_annual_2040	csp_annual_2045	macro_supertype	notes
YES	NO	YES	EnergyOnly	Calculated	RFO		RPS Resource Custom Profile (GWh)	293.84	289.36	281.91	275.94	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	295.05	290.55	283.06	0.00	0.00	physical	
YES	NO	YES	EnergyOnly	Calculated	Bilateral, internal goal		RPS Resource Custom Profile (GWh)	120.32	119.12	116.11	0.00	0.00	newgeneric	
YES	NO	YES	EnergyOnly	Calculated	Bilateral, internal goal		RPS Resource Custom Profile (GWh)	120.32	119.12	116.11	0.00	0.00	newgeneric	
YES	NO	YES	EnergyOnly	Calculated	RFO, DAC-GT		RPS Resource Custom Profile (GWh)	7.95	7.83	7.63	7.46	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	283.99	279.59	272.27	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	527.22	519.02	505.37	494.44	478.05	physical	adding a stub year at the end of contract term to align
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	11.44	11.44	0.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	3.54	3.54	0.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	16.51	16.51	16.51	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	5.62	5.62	0.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	Bilateral		RPS Resource Custom Profile (GWh)	6.71	6.71	6.71	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	Bilateral		RPS Resource Custom Profile (GWh)	398.10	398.10	0.00	0.00	0.00	physical	
NO	NO	NO	EnergyCapacity	Calculated			RPS Resource Custom Profile (GWh)	0.00	0.00	398.10	0.00	0.00	physical	5 year extension
YES	NO	YES	EnergyCapacity	Calculated	Bilateral		RPS Resource Custom Profile (GWh)	116.02	116.02	116.02	116.02	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	212.48	0.00	0.00	0.00	0.00	physical	
NO	NO	NO	EnergyCapacity	Calculated			RPS Resource Custom Profile (GWh)	0.00	212.48	0.00	0.00	0.00	physical	5 year extension
YES	NO	YES	EnergyCapacity	Calculated	Bilateral		RPS Resource Custom Profile (GWh)	21.69	0.00	0.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO, D2106035, internal goal		RPS Resource Custom Profile (GWh)	220.62	220.62	220.62	220.62	0.00	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	RFO, D2106035, internal goal		RPS Resource Custom Profile (GWh)	512.24	512.24	512.24	512.24	0.00	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated			RPS Resource Custom Profile (GWh)	0.00	0.00	0.00	0.00	220.62	newgeneric	5 year extension
NO	NO	NO	EnergyCapacity	Calculated			RPS Resource Custom Profile (GWh)	0.00	0.00	0.00	0.00	512.24	newgeneric	5 year extension
YES	NO	YES	EnergyCapacity	Calculated	Bilateral		RPS Resource Custom Profile (GWh)	12.42	12.42	0.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	Bilateral		RPS Resource Custom Profile (GWh)	12.42	12.42	0.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	Bilateral		RPS Resource Custom Profile (GWh)	31.05	31.05	0.00	0.00	0.00	physical	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	167.41	167.41	167.41	167.41	167.41	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	100.45	100.45	100.45	newresolve	
YES	NO	YES	EnergyCapacity	Calculated	RFO		RPS Resource Custom Profile (GWh)	306.60	306.60	0.00	0.00	0.00	physical	
NO	NO	NO	EnergyCapacity	Calculated			RPS Resource Custom Profile (GWh)	0.00	0.00	306.60	306.60	306.60	physical	15 year Geysers contract extension
YES	NO	YES	EnergyCapacity	Calculated	RFB		RPS Resource Custom Profile (GWh)	232.02	232.02	232.02	0.00	0.00	specifiedimport	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		RPS Resource Custom Profile (GWh)	33.01	33.01	33.01	33.01	33.01	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		RPS Resource Custom Profile (GWh)	9.23	9.23	9.23	9.23	9.23	newgeneric	[redacted]
YES	NO	YES	EnergyCapacity	Calculated	D2106035		RPS Resource Custom Profile (GWh)	0.00	11.85	11.85	11.85	11.85	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		RPS Resource Custom Profile (GWh)	0.00	30.38	30.38	30.38	30.38	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		RPS Resource Custom Profile (GWh)	19.49	19.49	19.49	19.49	19.49	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		RPS Resource Custom Profile (GWh)	50.43	50.43	50.43	50.43	50.43	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	RFO		Storage Resource Custom Profile (MW)	50.00	50.00	50.00	50.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO		Storage Resource Custom Profile (MW)	52.00	52.00	52.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		Storage Resource Custom Profile (MW)	14.77	14.77	14.77	14.77	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		Storage Resource Custom Profile (MW)	50.00	50.00	50.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		Storage Resource Custom Profile (MW)	45.00	45.00	45.00	0.00	0.00	physical	
YES	NO	YES	EnergyCapacity	Calculated	RFO, D2106035, internal goal		Storage Resource Custom Profile (MW)	65.00	65.00	65.00	65.00	0.00	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	RFO, D2106035, internal goal		Storage Resource Custom Profile (MW)	10.00	10.00	10.00	10.00	0.00	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		Storage Resource Custom Profile (MW)	80.00	80.00	80.00	80.00	80.00	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	Bilateral, internal goal		Storage Resource Custom Profile (MW)	45.74	45.74	45.74	0.00	0.00	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	Bilateral, internal goal		Storage Resource Custom Profile (MW)	45.74	45.74	45.74	0.00	0.00	newgeneric	
YES	NO	YES	EnergyCapacity	Calculated	D2106035		Storage Resource Custom Profile (MW)	0.00	0.00	15.00	15.00	15.00	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated		FALSE	RPS Resource Custom Profile (GWh)	0.00	986.24	967.89	947.83	927.77	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated		FALSE	Storage Resource Custom Profile (MW)	0.00	314.00	314.00	314.00	314.00	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated		FALSE	RPS Resource Custom Profile (GWh)	0.00	0.00	0.00	381.91	373.86	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated		FALSE	Storage Resource Custom Profile (MW)	0.00	0.00	0.00	120.04	120.04	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated		FALSE	RPS Resource Custom Profile (GWh)	0.00	0.00	0.00	0.00	732.85	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated		FALSE	Storage Resource Custom Profile (MW)	0.00	0.00	0.00	0.00	229.43	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	469.20	470.05	470.05	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	376.38	376.38	376.38	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	237.22	237.22	237.22	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	186.70	186.70	186.70	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	202.61	202.61	202.61	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	55.53	55.53	55.53	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	48.32	48.32	48.32	newgeneric	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	55.99	55.99	55.99	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	0.00	0.00	116.34	newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00	[redacted]			newresolve	[redacted]
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00				newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00				newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00				newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00				newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00				newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00				newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00				newresolve	
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00	0.00	550.50	540.83	newresolve	CC Power coordinated strategic mapping described in
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00	0.00	477.81	469.42	newresolve	CC Power coordinated strategic mapping described in
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00	0.00	0.00	71.41	newresolve	CC Power coordinated strategic mapping described in
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00	0.00	0.00	173.61	newresolve	CC Power coordinated strategic mapping described in
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00	0.00	0.00	173.61	newresolve	CC Power coordinated strategic mapping described in
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00	0.00	0.00	173.61	newresolve	CC Power coordinated strategic mapping described in
NO	NO	NO	EnergyCapacity	Calculated		TRUE	Geothermal (GWh)	0.00	0.00	0.00	0.00	173.61	newresolve	CC Power coordinated strategic mapping described in
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	0.00	1156.51	1156.51	newresolve	connection substation consistent with CPUC modeling
NO	NO	NO	EnergyCapacity	Calculated		TRUE	RPS Resource Custom Profile (GWh)	0.00	0.00	0.00	0.00	245.32	newresolve	connection substation consistent with CPUC modeling
NO	NO	NO	CapacityOnly	Calculated			NA	0.00	0.00	0.00	0.00	0.00	existinggeneric	I.b of WestLight's IRP Narrative for description of CAM
NO	NO	NO	CapacityOnly	Calculated			NA	0.00	0.00	0.00	0.00	0.00	existinggeneric	I.b of WestLight's IRP Narrative for description of CAM
NO	NO	NO	CapacityOnly	Calculated			NA	0.00	0.00	0.00	0.00	0.00	existinggeneric	I.b of WestLight's IRP Narrative for description of CAM
YES	NO	YES	CapacityOnly	In the contract	RFO, bilateral		NA	0.00	0.00	0.00	0.00	0.00	existinggeneric	d short-term RA contracts, aggregated by resource type
YES	NO	YES	CapacityOnly	In the contract	RFO, bilateral		NA	0.00	0.00	0.00	0.00	0.00	existinggeneric	d short-term RA contracts, aggregated by resource type
YES	NO	YES	CapacityOnly	In the contract	RFO, bilateral		NA	0.00	0.00	0.00	0.00	0.00	existinggeneric	d short-term RA contracts, aggregated by resource type
NO	NO	NO	EnergyOnly				Large Hydro (GWh)	422.64	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		RFB		RPS Resource Custom Profile (GWh)	50.00	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		RFB		RPS Resource Custom Profile (GWh)	50.00	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		RFB		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		RFB		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		RFB		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		Bilateral		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		Bilateral		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		Bilateral		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		RFB		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		Bilateral		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		Bilateral		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		RFB		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		Bilateral		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		Bilateral		RPS Resource Custom Profile (GWh)	-	-	-	-	-	supplierschoice	ology types to be determined but will be a mix of solar
YES	NO	YES	EnergyOnly		RFO		Large Hydro (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		RFO		Large Hydro (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		Bilateral		Large Hydro (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		RFO		Large Hydro (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		Bilateral		Large Hydro (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		Bilateral		Large Hydro (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		RFB		Large Hydro (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly		GHG Free PCIA		Large Hydro (GWh)	-	-	-	-	-	supplierschoice	
YES	NO	YES	EnergyOnly	Calculated	Bilateral, DAC-GT		Solar Baseline California (GWh)	8.36	8.36	-	-	-	physical	

LSE Input Highlighted cells in yellow require input from LSEs

Reliability Need - updated with 2025 Filing Requirements release

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
CAISO gross peak (MW)	55,445	56,568	58,624	60,556	62,505	64,292	66,076	68,093	69,939	71,976	73,218	74,668	76,057	77,338
PRM (%)	16%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	14%	14%
CAISO Total Reliability Need (TRN) (MW)	64,088	65,238	67,457	69,522	71,597	73,685	75,771	78,127	80,290	82,674	83,983	85,527	86,996	88,337
CAISO Reliability Procurement Need (RPN) (MW)	53,361	54,394	55,427	50,516	45,606	47,269	48,932	50,595	52,259	53,922	55,180	56,437	57,695	58,953
LSE share of load during critical hours (%)	1.45%	1.45%	1.46%	1.47%	1.48%	1.48%	1.49%	1.49%	1.49%	1.50%	1.52%	1.53%	1.55%	1.57%
LSE reliability procurement requirement (RPR) (MW)	775	791	807	741	674	701	727	754	781	808	837	866	896	926

BTM PV Forecast - updated with 2025 Filing Requirements release

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
Capacity (MW)	384	394	386	394	419	443	465	485	500	515	529	543	557	570

ELCC (%) - updated with 2025 Filing Requirements release

Resource Type	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
in_state_wind_south	20%	18%	15%	15%	15%	16%	17%	18%	19%	19%	18%	16%	14%	12%
in_state_wind_north	30%	28%	26%	31%	35%	35%	35%	35%	35%	35%	33%	31%	28%	26%
out_of_state_wind_WY	44%	44%	44%	41%	37%	38%	39%	40%	41%	41%	39%	37%	35%	33%
out_of_state_wind_IDWAOR	27%	22%	17%	21%	25%	26%	27%	27%	28%	29%	27%	25%	23%	22%
out_of_state_wind_AZNM	43%	43%	43%	39%	36%	37%	38%	40%	41%	42%	39%	37%	34%	32%
offshore_wind_north	62%	65%	69%	63%	57%	55%	53%	51%	48%	46%	44%	42%	40%	38%
offshore_wind_south	42%	45%	47%	39%	30%	29%	28%	26%	25%	23%	22%	20%	19%	18%
utility_pv	8%	9%	10%	10%	10%	11%	11%	11%	11%	11%	11%	12%	12%	13%
btm_pv	7%	8%	8%	8%	7%	8%	8%	8%	9%	9%	10%	10%	10%	11%
4hr_batteries	92%	84%	75%	49%	22%	21%	20%	19%	18%	17%	17%	17%	17%	17%
8hr_batteries	97%	92%	87%	63%	39%	36%	32%	29%	25%	22%	24%	25%	27%	28%
12hr_batteries	94%	92%	91%	69%	47%	42%	37%	32%	27%	22%	24%	25%	27%	28%
24hr_batteries	96%	94%	92%	74%	56%	50%	44%	37%	31%	25%	27%	29%	30%	32%
100hr_batteries	99%	99%	98%	86%	74%	69%	64%	58%	53%	48%	49%	50%	51%	52%
pumped_storage	90%	87%	85%	66%	48%	43%	37%	32%	27%	22%	24%	25%	27%	28%
demand_response	94%	85%	76%	59%	42%	36%	30%	24%	18%	12%	12%	11%	11%	11%
hydro	69%	66%	63%	57%	50%	48%	46%	44%	43%	41%	40%	39%	39%	38%
small_hydro	42%	39%	36%	33%	30%	28%	26%	24%	22%	21%	21%	21%	21%	21%
geothermal	91%	91%	92%	89%	87%	87%	87%	87%	87%	87%	87%	88%	88%	88%
biomass_wood	100%	99%	99%	99%	99%	99%	99%	98%	98%	98%	98%	98%	99%	99%
biogas	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%
nuclear	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
gas_cc	86%	85%	85%	83%	82%	82%	82%	83%	83%	83%	84%	85%	86%	87%
gas_ct	69%	69%	69%	65%	62%	62%	62%	62%	61%	61%	64%	66%	69%	71%
cogen	92%	91%	91%	91%	90%	90%	90%	90%	90%	90%	91%	92%	92%	93%
ice	94%	94%	94%	94%	93%	93%	93%	93%	93%	93%	94%	94%	95%	95%

Contract ELCC (effective MW)

Resource Type	Conrtact Status	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
hybrid	Online	293	274	255	179	104	101	98	95	92	89	91	93	95	97
in_state_wind_south	Online	23	21	18	7	7	5	5	5	6	6	5	5	4	4
in_state_wind_north	Online	45	42	40	46	52	-	-	-	-	-	-	-	-	-
out_of_state_wind_WY	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_IDWAOR	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_AZNM	Online	95	95	94	86	79	82	84	87	90	92	87	81	76	70
offshore_wind_north	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_south	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
utility_pv	Online	8	9	10	10	10	11	11	11	11	11	-	-	-	-
btm_pv	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4hr_batteries	Online	97	89	80	52	24	22	21	20	19	18	17	17	17	1
8hr_batteries	Online	14	14	13	9	6	5	5	4	4	3	3	4	4	4
12hr_batteries	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24hr_batteries	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100hr_batteries	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
pumped_storage	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
demand_response	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hydro	Online	1	1	1	1	1	1	1	1	-	-	-	-	-	-
small_hydro	Online	0	0	0	0	0	0	0	-	-	-	-	-	-	-

geothermal	Online	56	56	56	55	53	53	23	23	23	23	23	23	23	-
biomass_wood	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
biogas	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
nuclear	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_cc	Online	220	219	218	176	173	111	112	112	112	113	114	116	117	118
gas_ct	Online	13	13	13	12	12	12	11	11	11	11	12	12	13	13
cogen	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ice	Online	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hybrid	Development	-	67	207	137	67	64	61	58	56	53	53	54	54	55
in_state_wind_south	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
in_state_wind_north	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_WY	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_IDWAOR	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_AZNM	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_north	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_south	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
utility_pv	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
btm_pv	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4hr_batteries	Development	-	54	49	32	14	14	13	12	11	11	11	11	11	11
8hr_batteries	Development	-	9	9	6	4	9	8	7	6	6	6	6	7	7
12hr_batteries	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24hr_batteries	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100hr_batteries	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
pumped_storage	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
demand_response	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hydro	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
small_hydro	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
geothermal	Development	-	-	13	12	17	17	17	17	17	17	17	17	17	17
biomass_wood	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
biogas	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
nuclear	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_cc	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_ct	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
cogen	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ice	Development	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hybrid	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
in_state_wind_south	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
in_state_wind_north	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_WY	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_IDWAOR	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_AZNM	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_north	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_south	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
utility_pv	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
btm_pv	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4hr_batteries	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8hr_batteries	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12hr_batteries	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24hr_batteries	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100hr_batteries	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
pumped_storage	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
demand_response	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hydro	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
small_hydro	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
geothermal	Review	-	-	-	-	-	-	-	28	28	36	36	36	36	57
biomass_wood	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
biogas	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
nuclear	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_cc	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_ct	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
cogen	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ice	Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hybrid	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
in_state_wind_south	PlannedExisting	-	-	-	10	10	10	11	11	12	-	-	-	-	-
in_state_wind_north	PlannedExisting	-	-	-	-	-	52	53	53	53	53	-	-	-	-
out_of_state_wind_WY	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_IDWAOR	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_AZNM	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_north	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_south	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
utility_pv	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-

btm_pv	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4hr_batteries	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8hr_batteries	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12hr_batteries	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24hr_batteries	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100hr_batteries	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
pumped_storage	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
demand_response	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hydro	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
small_hydro	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
geothermal	PlannedExisting	-	-	-	-	-	-	-	30	30	30	31	31	31	31
biomass_wood	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
biogas	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
nuclear	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_cc	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_ct	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
cogen	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ice	PlannedExisting	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hybrid	PlannedNew	-	-	-	-	172	165	158	152	145	138	140	142	144	201
in_state_wind_south	PlannedNew	-	-	-	-	-	-	-	-	40	101	92	83	74	65
in_state_wind_north	PlannedNew	-	-	13	15	28	28	28	28	28	95	88	82	76	69
out_of_state_wind_WY	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	122	115	108
out_of_state_wind_IDWAOR	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_AZNM	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_north	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_south	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
utility_pv	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
btm_pv	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4hr_batteries	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8hr_batteries	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12hr_batteries	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24hr_batteries	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100hr_batteries	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
pumped_storage	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
demand_response	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hydro	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
small_hydro	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
geothermal	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
biomass_wood	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
biogas	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
nuclear	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_cc	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_ct	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
cogen	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ice	PlannedNew	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LSE total supply (effective MW)		**866**	**961**	**1,086**	**845**	**832**	**762**	**719**	**766**	**793**	**904**	**825**	**934**	**913**	**929**

Load and Resource Table by Resource Type

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
LSE reliability need (MW)	**775**	**791**	**807**	**741**	**674**	**701**	**727**	**754**	**781**	**808**	**837**	**866**	**896**	**926**
ELCC by resource type (effective MW)														
hybrid	293	341	461	316	343	330	318	305	292	279	284	289	293	353
in_state_wind_south	23	21	18	16	16	15	16	17	57	107	97	88	78	69
in_state_wind_north	45	42	53	61	80	80	81	81	81	148	88	82	76	69
out_of_state_wind_WY	-	-	-	-	-	-	-	-	-	-	-	122	115	108
out_of_state_wind_IDWAOR	-	-	-	-	-	-	-	-	-	-	-	-	-	-
out_of_state_wind_AZNM	95	95	94	86	79	82	84	87	90	92	87	81	76	70
offshore_wind_north	-	-	-	-	-	-	-	-	-	-	-	-	-	-
offshore_wind_south	-	-	-	-	-	-	-	-	-	-	-	-	-	-
utility_pv	8	9	10	10	10	11	11	11	11	11	-	-	-	-
btm_pv	28	30	30	30	31	34	38	41	44	47	51	55	58	62
4hr_batteries	97	143	129	83	38	36	34	32	30	28	28	28	28	12
8hr_batteries	14	23	21	16	10	14	13	11	10	9	9	10	11	11
12hr_batteries	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24hr_batteries	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100hr_batteries	-	-	-	-	-	-	-	-	-	-	-	-	-	-
pumped_storage	-	-	-	-	-	-	-	-	-	-	-	-	-	-
demand_response	-	-	-	-	-	-	-	-	-	-	-	-	-	-
hydro	1	1	1	1	1	1	1	1	-	-	-	-	-	-

small_hydro	0	0	0	0	0	0	0	-	-	-	-	-	-	-
geothermal	56	56	69	67	70	70	39	98	98	105	106	106	106	104
biomass_wood	-	-	-	-	-	-	-	-	-	-	-	-	-	-
biogas	-	-	-	-	-	-	-	-	-	-	-	-	-	-
nuclear	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gas_cc	220	219	218	176	173	111	112	112	112	113	114	116	117	118
gas_ct	13	13	13	12	12	12	11	11	11	11	12	12	13	13
cogen	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ice	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LSE total supply (effective MW)	**894**	**991**	**1,116**	**875**	**863**	**796**	**757**	**807**	**837**	**951**	**876**	**988**	**971**	**991**
Net capacity position (+ve = excess, -ve = shortfall) (effective MW)	**120**	**200**	**309**	**134**	**189**	**95**	**30**	**53**	**56**	**143**	**39**	**122**	**75**	**65**

Load and Resource Table by Contract Status

	2026	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**	**2039**
LSE reliability need (MW)	**775**	**791**	**807**	**741**	**674**	**701**	**727**	**754**	**781**	**808**	**837**	**866**	**896**	**926**
ELCC by contract status (effective MW)														
Online	866	831	796	633	520	402	370	369	367	365	352	351	349	308
Development	-	130	277	187	102	104	99	95	90	86	87	88	89	90
Review	-	-	-	-	-	-	-	28	28	36	36	36	36	57
PlannedExisting	-	-	-	10	10	63	63	95	95	84	31	31	31	31
PlannedNew	-	-	13	15	200	193	187	180	213	333	320	429	408	443
BTM PV	28	30	30	30	31	34	38	41	44	47	51	55	58	62
LSE total supply (effective MW)	**894**	**991**	**1,116**	**875**	**863**	**796**	**757**	**807**	**837**	**951**	**876**	**988**	**971**	**991**
Net capacity position (+ve = excess, -ve = shortfall) (effective MW)	**120**	**200**	**309**	**134**	**189**	**95**	**30**	**53**	**56**	**143**	**39**	**122**	**75**	**65**

2040	2041	2042	2043	2044	2045
78,968	79,726	80,523	81,423	82,089	82,936
14%	14%	14%	14%	14%	14%
90,073	90,937	91,846	92,873	93,633	94,599
60,210	60,949	61,688	62,427	63,167	63,906
1.59%	1.61%	1.63%	1.65%	1.67%	1.69%
956	980	1,004	1,028	1,053	1,078

2040	2041	2042	2043	2044	2045
584	598	612	626	639	652

2040	2041	2042	2043	2044	2045
11%	11%	11%	11%	12%	12%
24%	24%	24%	25%	25%	26%
30%	32%	33%	35%	36%	38%
20%	20%	20%	19%	19%	19%
29%	30%	31%	32%	33%	34%
36%	36%	36%	36%	36%	36%
16%	17%	19%	20%	21%	22%
13%	13%	12%	12%	11%	11%
11%	11%	10%	10%	9%	9%
17%	17%	17%	16%	16%	16%
30%	30%	31%	31%	32%	32%
30%	30%	31%	31%	32%	32%
34%	34%	34%	34%	34%	35%
53%	53%	52%	52%	51%	51%
30%	30%	31%	31%	32%	32%
11%	10%	10%	10%	9%	9%
37%	36%	36%	35%	35%	34%
21%	20%	20%	20%	19%	19%
88%	89%	89%	89%	89%	90%
99%	99%	98%	98%	98%	98%
99%	99%	99%	99%	99%	99%
100%	100%	100%	100%	100%	100%
88%	87%	87%	86%	85%	84%
74%	72%	71%	70%	68%	67%
N/A	N/A	N/A	N/A	N/A	N/A
96%	95%	95%	95%	94%	94%

2040	2041	2042	2043	2044	2045
68	37	36	35	34	33
3	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
65	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
1	1	1	1	1	1
4	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
120	119	118	116	115	114
14	13	13	13	13	12
-	-	-	-	-	-
-	-	-	-	-	-
14	13	13	13	13	13
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
11	11	-	-	-	-
7	8	5	5	5	5
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
17	17	17	17	17	17
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
31	31	31	31	31	31
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
204	307	302	297	292	287
56	57	58	59	60	61
63	76	77	79	80	81
100	128	133	139	145	151
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
121	121	121	122	122	215
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
956	**1,063**	**1,052**	**1,056**	**1,059**	**1,156**

2040	**2041**	**2042**	**2043**	**2044**	**2045**
956	**980**	**1,004**	**1,028**	**1,053**	**1,078**
286	357	351	345	339	333
60	57	58	59	60	61
63	76	77	79	80	81
100	128	133	139	145	151
-	-	-	-	-	-
65	67	69	71	73	74
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
66	65	63	62	60	58
12	12	1	1	1	1
12	8	5	5	5	5
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-

-	-	-	-	-	-
225	226	227	227	228	322
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
120	119	118	116	115	114
14	13	13	13	13	12
-	-	-	-	-	-
-	-	-	-	-	-
1,022	**1,127**	**1,116**	**1,117**	**1,119**	**1,214**
66	**147**	**112**	**89**	**66**	**136**

2040	**2041**	**2042**	**2043**	**2044**	**2045**
956	**980**	**1,004**	**1,028**	**1,053**	**1,078**
275	170	168	166	163	161
49	49	35	35	35	35
57	57	57	57	58	58
31	98	100	102	104	106
544	689	692	696	700	796
66	65	63	62	60	58
1,022	**1,127**	**1,116**	**1,117**	**1,119**	**1,214**
66	**147**	**112**	**89**	**66**	**136**

ATTACHMENT C

Emissions Summary

Emissions Total	*Unit*	2028	2030	2035	2040	2045
CO_2	*MMt/yr*	*0.131*	*0.226*	*0.253*	*0.212*	*0.150*
PM2.5	*tonnes/yr*	*8*	*14*	*17*	*14*	*13*
SO_2	*tonnes/yr*	*1*	*1*	*2*	*1*	*1*
NOx	*tonnes/yr*	*16*	*22*	*27*	*14*	*15*

Emissions by resource type

CO_2	*Unit*	2028	2030	2035	2040	2045
Coal	*MMt/yr*	-	-	-	-	-
IFM CHP	*MMt/yr*	*0.08*	*0.08*	*0.09*	-	-
Biogas	*MMt/yr*	-	-	-	-	-
Biomass	*MMt/yr*	-	-	-	-	-
System Power Unadjusted	*MMt/yr*	*0.06*	*0.17*	*0.21*	*0.26*	*0.22*
System Power	*MMt/yr*	*0.05*	*0.15*	*0.17*	*0.21*	*0.15*
Asset Controlling Supplier	*MMt/yr*	-	-	-	-	-
Total	***MMt/yr***	*0.13*	*0.23*	*0.25*	*0.21*	*0.15*
Average emissions intensity	*tCO2/MWh*	*0.034*	*0.051*	*0.042*	*0.030*	*0.019*
Oversupply Emissions Credits	*MMt/yr*	*0.22*	*0.18*	*0.22*	*0.17*	*0.06*

PM2.5	*Unit*	2028	2030	2035	2040	2045
Coal	*tonnes/yr*	-	-	-	-	-
IFM CHP	*tonnes/yr*	*5*	*4*	*5*	-	-
Biogas	*tonnes/yr*	-	-	-	-	-
Biomass	*tonnes/yr*	-	-	-	-	-
System Power	*tonnes/yr*	*3*	*9*	*12*	*14*	*13*
Total	***tonnes/yr***	*8*	*14*	*17*	*14*	*13*
Average emissions intensity	*kg/MWh*	*0.0020*	*0.0031*	*0.0028*	*0.0020*	*0.0016*

SO_2	*Unit*	2028	2030	2035	2040	2045
Coal	*tonnes/yr*	-	-	-	-	-
IFM CHP	*tonnes/yr*	*0*	*0*	*1*	-	-
Biogas	*tonnes/yr*	-	-	-	-	-
Biomass	*tonnes/yr*	-	-	-	-	-
System Power	*tonnes/yr*	*0*	*1*	*1*	*1*	*1*
Total	***tonnes/yr***	*1*	*1*	*2*	*1*	*1*
Average emissions intensity	*kg/MWh*	*0.0002*	*0.0003*	*0.0003*	*0.0002*	*0.0001*

NOx	*Unit*	2028	2030	2035	2040	2045
Coal	*tonnes/yr*	-	-	-	-	-
IFM CHP	*tonnes/yr*	*13*	*13*	*14*	-	-
Biogas	*tonnes/yr*	-	-	-	-	-
Biomass	*tonnes/yr*	-	-	-	-	-
System Power	*tonnes/yr*	*3*	*9*	*13*	*14*	*15*
Total	***tonnes/yr***	*16*	*22*	*27*	*14*	*15*
Average emissions intensity	*kg/MWh*	*0.0042*	*0.0049*	*0.0046*	*0.0020*	*0.0018*

Supply and Demand Balance

Demand Summary	*Unit*	2028	2030	2035	2040	2045
Managed Retail Sales Forecast (assigned to LSE)	*GWh*	*3,899*	*4,452*	*5,998*	*7,181*	*7,957*
Baseline Demand, non-C&I	*GWh*	*1,738*	*1,861*	*2,187*	*2,474*	*2,673*
Baseline Demand, C&I	*GWh*	*2,607*	*2,678*	*3,020*	*3,279*	*3,403*
Electric Vehicle Load	*GWh*	*276*	*490*	*1,173*	*1,758*	*2,192*
Building Electrification	*GWh*	*127*	*247*	*581*	*747*	*879*
Energy Efficiency	*GWh*	*(115)*	*(146)*	*(208)*	*(218)*	*(234)*
Data Center Load	*GWh*	*208*	*352*	*542*	*610*	*647*
Climate Change Impact	*GWh*	*12*	*19*	*35*	*55*	*76*

BTM PV	GWh	(613)	(659)	(806)	(892)	(976)
Demand (at generator bus-bar)	GWh	4,244	4,845	6,528	7,815	8,660

Supply Summary	***Unit***	**2028**	**2030**	**2035**	**2040**	**2045**
Large Hydro	GWh	423	-	-	-	-
Imported Hydro	GWh	-	-	-	-	-
Asset Controlling Supplier	GWh	-	-	-	-	-
Nuclear	GWh	-	-	-	-	-
Biogas	GWh	-	-	-	-	-
Biomass	GWh	-	-	-	-	-
Geothermal	GWh	-	-	309	1,513	2,252
Small Hydro	GWh	-	-	-	-	-
Wind CAISO	GWh	-	-	-	-	-
Wind Out Of State	GWh	-	-	-	-	-
Wind Offshore	GWh	-	-	-	-	-
Solar Utility Scale	GWh	8	8	-	-	-
Solar Distributed	GWh	-	-	-	-	-
Hybrid or Paired Solar and Battery	GWh	-	-	-	-	-
Shed DR	GWh	-	-	-	-	-
Pumped Storage	GWh	-	-	-	-	-
Battery Storage	GWh	-	-	-	-	-
Storage Resource Custom Profile	GWh	(115)	(185)	(194)	(172)	(183)
RPS Resource Custom Profile	GWh	3,948	5,030	6,413	6,475	7,125
GHG-free non-RPS Resource Custom Profile	GWh	-	-	-	-	-
Coal	GWh	-	-	-	-	-
IFM CHP	GWh	144	136	151	-	-

Supply Demand Balance Summary	***Unit***	**2028**	**2030**	**2035**	**2040**	**2045**
LSE Supply, before curtailment and exports	GWh	4,408	4,990	6,680	7,815	9,195
Net Purchases, before curtailment and exports	GWh	(164)	(144)	(151)	0	(535)
Curtailment	GWh	(285)	(572)	(710)	(628)	(875)
Exports	GWh	(73)	(72)	(84)	(95)	(124)
Zero Emissions Power From System	GWh	60	112	178	147	83
Net System Power (incurs emissions)	***GWh***	134	388	464	576	381
Check: Supply equals demand		TRUE	TRUE	TRUE	TRUE	TRUE

Renewable and GHG-Free %	***Unit***	**2028**	**2030**	**2035**	**2040**	**2045**
Retail Sales	GWh	3,899	4,452	5,998	7,181	7,957
RPS-Eligible Delivered Renewable	GWh	3,671	4,467	6,013	7,360	8,502
GHG free	GWh	4,153	4,578	6,191	7,507	8,586
RPS-Eligible Delivered Renewable Percentage	*% of retail sales*	94%	100%	100%	102%	107%
GHG-free Percentage	*% of retail sales*	107%	103%	103%	105%	108%

Notes
Includes both in-CAISO and import emissions
Only In-CAISO emissions
Only In-CAISO emissions
Only In-CAISO emissions

Notes
Included in GHG emissions total
Includes emissions from in-CAISO dispatchable gas and unspecified imports
Includes emissions from in-CAISO dispatchable gas and unspecified imports. After CSP - RESOLVE adjustment.
Includes both in-CAISO and import emissions
Emissions per MWh of sales
When hourly supply exceeds hourly load and system power is on the margin, LSE recieves credit at the system power emissions rate. Impact included in Total.

Notes
Information only, not included in total
In-CAISO emissions only - unspecified import emissions excluded
Only In-CAISO emissions
Emissions per MWh of sales

Notes
Information only, not included in total
In-CAISO emissions only - unspecified import emissions excluded
Only In-CAISO emissions
Emissions per MWh of sales

Notes
Information only, not included in total
In-CAISO emissions only - unspecified import emissions excluded
Only In-CAISO emissions
Emissions per MWh of sales

Sales forecast (before T&D losses increase demand at generator bus-bar)
Summary of active inputs from Demand Inputs tab

Notes
Wind and solar values represent production potential (pre-curtailment). *Curtailment is calculated at the portfolio level (as opposed to the resource level), and is included as a line item below*
Distributed solar generation that is in front of the meter
Negative because storage losses represent net negative energy production *Negative because storage losses represent net negative energy production* *Negative because storage losses represent net negative energy production*

Notes
Represents LSE's net power production, before curtailment and exports reduce the power available to dispace CAISO dispatchable gas/unspecified imports
The net system power that the LSE would consume (positive = consume from system, negative = supply to system) if dispatchable gas/unspecified imports were on the margin at the system level in all hours. For information only - not directly used to calculate LSE em
Power that, if supplied to the system, would not displace CAISO dispatchable gas and/or unspecified import emissions and would instead be curtailed
Power that, if supplied to the system, would not displace CAISO dispatchable gas and/or unspecified import emissions and would instead be exported
Power supplied to meet LSE demand that does not incur emissions. Oversupply conditions at the system level result in surplus zero emissions power in some hours.
Power supplied by the system (or sent back to the system from if negative) in hours when CAISO dispatchable gas and/or unspecified imports are on the margin. The net system power produced or consumed is multiplied by the system power emissions rate in each h

Notes
Represents delivered renewable energy. Not directly comparable to production from an LSE's RPS-eligible resources.
A small fraction of Asset Controlling Supplier imports are not counted as GHG-free
Represents delivered renewable energy. Not directly comparable to production from an LSE's RPS-eligible resources.

ATTACHMENT D

RESOLUTION NO. 2026 - 33

WESTLIGHT ENERGY, COUNTY OF SAN MATEO, AND THE CITY OF LOS BANOS, STATE OF CALIFORNIA

APPROVAL OF THE 2026 CALIFORNIA PUBLIC UTILITIES COMMISSION INTEGRATED RESOURCE PLAN SUBMISSION (ACTION)

RESOLVED, by WestLight Energy of the County of San Mateo, and the City of Los Banos, State of California, ("WestLight") that:

WHEREAS, WestLight Energy was formed as Peninsula Clean Energy on February 29, 2016, and adopted the name WestLight Energy on May 28, 2026; and

WHEREAS, all Load Serving Entities (LSEs) in California are required to produce and submit to the California Public Utilities Commission (CPUC) an Integrated Resources Plan (IRP) on or before August 10, 2026; and

WHEREAS, pursuant to California Public Utilities Code Section 454.52(b)(3), WestLight Energy is required to submit its Integrated Resource Plan to its governing board for approval prior to submission to the CPUC; and

WHEREAS, the Board has been provided with an overview of WestLight Energy's 2026 Integrated Resource Plan, including the planning methodology, modeling results, key policy recommendations, and the documents that comprise the filing to be submitted to the California Public Utilities Commission on or before August 10, 2026; and

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board approves the results of the IRP analysis and the submission of results as presented by staff, or in a form substantially similar to that presented by staff, and directs the CEO, or designee, to prepare and submit the final narrative and data templates to the CPUC on or before August 10, 2026.

Resolution Number: 2026 - 33

Introduced and Passed: **July 23, 2026**

Ayes:

Jasneet Sharma, San Mateo County
Tom McCune, Belmont
Coleen Mackin, Brisbane
Donna Colson, Burlingame
Martha Barragan, East Palo Alto
Patrick Bo Jonsson, Half Moon Bay
Leslie Ragsdale, Hillsborough, *Vice Chair*
Michael Amabile, Los Banos
Betsy Nash, Menlo Park
Anders Fung, Millbrae
Christine Boles, Pacifica
Criag Taylor, Portola Valley
Elmer Martinez Saballos, Redwood City
Marty Medina, San Bruno, *Chair*
Adam Loraine, San Mateo
James Coleman, South San Francisco

Noes:

Absent:

Noelia Corzo, San Mateo County
Rick DeGolia, Atherton
Ken Gonzalez, Colma
Roderick Daus-Magbual, Daly City
Stacy Jimenez, Foster City
John Dugan, San Carlos
Hassan Aburish, Woodside

Abstentions:

Attest:

Brianna Arroyo
box SIGN 13LK7JXQ-4KVJXVVW

Board Clerk, WestLight Energy

On behalf of Nelly Wogberg

Approved:

Marty Medina
box SIGN 4PX9Y979-4KVJXVVW

Board Chair, WestLight Energy