BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIF

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

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PILOT POWER GROUP, LLC
2026 INTEGRATED RESOURCE PLAN

PUBLIC VERSION

CLEAN SYSTEM POWER CALCULATOR AND RESOURCE DATA TEMPLATE WORKBOOKS ARE CONFIDENTIAL AND SUBMITTED TO CPUC DOCKET OFFICE VIA ARCHIVAL GRADE CD-R

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August 10, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

PILOT POWER GROUP, LLC
2026 INTEGRATED RESOURCE PLAN

PUBLIC VERSION

Pursuant to the January 16, 2026 *Administrative Law Judge's Ruling Setting Requirements for Individual Integrated Resource Plans Due June 1, 2026*, the March 9, 2026 *Email Ruling Granting Joint Request for Extension of Load Serving Entity ('LSE') Integrated Resource Plan ('IRP') Filings*, and the March 20, 2026 *Administrative Law Judge's Ruling Correcting Table in January 16, 2026 Filing Requirements Ruling and Confirming August 10, 2026 Integrated Resource Plan Due Date*, Power Group, LLC ("Pilot") submits its 2026 Integrated Resource Plan ("IRP"). The public version of Pilot's 2026 IRP includes a redacted Standard Load-Serving Entity Plan narrative, but the confidential Resource Data Template and Clean System Power Calculator are omitted from the public version.

Should there be any questions regarding this submission, please contact the undersigned.

Dated: August 10, 2026

Respectfully submitted,

/s/

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VERIFICATION

I am an officer of Pilot Power Group, LLC, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters, I believe them to be true.

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

Executed on August 10, 2026 at San Diego, California.

/s/

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Standard LSE Plan

PILOT POWER GROUP, LLC

2026 INTEGRATED RESOURCE PLAN

AUGUST 10, 2026

PUBLIC VERSION

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I. Executive Summary

Since 2001, Pilot Power Group, LLC ("PPG") has served commercial and industrial customers in California's Direct Access ("DA") market. PPG is registered with the California Public Utilities Commission ("CPUC" or "Commission") as an Energy Service Provider ("ESP") and is one category of Load Serving Entity ("LSE") subject to the Commission's Integrated Resource Planning ("IRP") requirements. PPG's role is to enable medium-to-large commercial and industrial users to secure their electricity needs economically — delivering a customer's own contracted supply where it has one, and procuring on the customer's behalf where it does not. In both cases, the objective is the same: best-fit, least-cost, economically sound supply, structured to support each customer's compliance obligations, including under the Commission's IRP program.

PPG's customers are price-sensitive and contract on relatively short contract terms. PPG accordingly does not take long-term speculative supply positions and does not make forward investments in generation or transmission assets on a bet about load it may serve years from now — load beyond roughly the next three years is not contractually committed and cannot be assumed constant. PPG's procurement is disciplined, not compliance-at-any-cost: it pursues economically sound resources that meet its regulatory obligations without imposing uneconomic costs on the very customers those obligations are meant to serve. While PPG complies with long-term Renewables Portfolio Standard ("RPS") requirements, the forward volumes reflected in this plan are therefore indicative rather than committed.

PPG utilized actual and forecast load data in combination with data provided by the Commission, including the Clean System Power ("CSP") Calculator and Resource Data Template ("RDT") outputs, to develop and analyze its current and forecasted position regarding future greenhouse gas ("GHG") benchmarks as they pertain to PPG's current and forecasted 2045 load. After analyzing all data, PPG believes that it has a procurement path to satisfy GHG benchmarks by 2045. PPG's Preferred Conforming Portfolio addresses PPG's proportional share of the 8 million metric ton ("MMT") by 2045 GHG target. This portfolio utilizes a diverse mix of resources to ensure that PPG will satisfy its resource adequacy ("RA") and RPS procurement

mandates. This Preferred Conforming Portfolio meets PPG's GHG benchmark as established in the CSP Calculator.

II. Study Design

PPG utilized the finalized energy and peak demand load forecasts that were developed and approved pursuant to the January 16, 2026 *Administrative Law Judge's Ruling Setting Requirements for Individual Integrated Resource Plans due June 1, 2026* ("IRP Ruling"), and also employed the confidential load forecasts provided by the Commission to develop this Integrated Resource Plan ("IRP"). PPG chose not to provide its own load or load modifier shapes in the CSP Calculator. Instead, PPG utilized the default hourly shape in the CSP Calculator which reflects the 2025 California Energy Commission ("CEC") Integrated Energy Policy Report ("IEPR") demand forecast, weighted by PPG's Managed Retail Sales Forecast information. Accordingly, PPG is not developing Alternative Portfolios and is only developing one Conforming Portfolio.

PPG has produced its Conforming Portfolio to address PPG's proportional share of the 8 MMT by 2045 GHG target. This portfolio conforms to the CPUC's emissions targets and utilizes PPG's assigned load forecasts. PPG has not undertaken to develop any alternate portfolios.

- PPG's Conforming Portfolio achieves emissions equal to PPG's 8 MMT by 2045 GHG Emissions Benchmark.
- PPG utilized its individual load assignment and adjusted its RDT to reflect a more accurate proportion of larger customer loads it serves.
- PPG's Conforming Portfolio uses inputs and assumptions consistent with those to be used by staff to develop the Preferred System Plan. PPG did not utilize its own inputs and/or assumptions for capital cost and financing information.

- According to the completeness definitions provided in the "Filing Requirements Overview" document, PPG has completed all three filing items (the Narrative template, RDT, and CSP Calculator).[1]

PPG's Preferred Conforming Portfolio achieves state GHG, renewable, reliability, and other statutory and Commission-mandated requirements and goals.

PPG's Preferred Conforming Portfolio referred to the most recent year-ahead cost allocation mechanism ("CAM") resource list to account for the costs and benefits of resources subject to the CAM. PPG assumed its future RA obligations are reduced by its proportional share of the RA capacity value reflected in the year-ahead CAM list and used the same methodology to estimate other costs and benefits associated with those resources.

PPG utilized its annual forecast data from the 2045 GHG Emissions Benchmarks based on the planning target set by the IRP Ruling. PPG used the CSP calculator to estimate its GHG emissions across the IRP planning horizon.

a. Objectives

PPG's analytical objectives are to gather knowledge pertaining to its current load in comparison to its current and future GHG benchmarks. This will help PPG identify gaps in achieving future GHG benchmarks and allow PPG to develop an appropriate path to bridge such gaps to ensure it will achieve its GHG benchmarks, as well as other procurement objectives (RA, RPS, etc.). However, as previously noted, PPG serves price-sensitive commercial and industrial customers who do not make long-term commitments to remain with PPG, in a competitive DA market that is administratively growth-constrained. Because PPG does not take speculative positions, the forward procurement outlined in this IRP is indicative of what would satisfy PPG's obligations rather than a committed forward plan; PPG will undertake procurement on a best-fit, least-cost basis as economically sound resources become available.

[1] Integrated Resource Planning (R.25-06-019) 2026 IRP Filing Requirements Filing Requirements Overview, at 1-4, 6.

b. Methodology

i. Modeling Tool(s)

PPG utilized the CPUC-provided modeling tools (the 8 MMT CSP Calculator, and RDT updated on March 19, 2026) to develop its IRP.

ii. Modeling Approach

PPG utilized and followed the methods and guidelines provided by the Commission (when applicable) to develop and evaluate the components of its Preferred Conforming Portfolio. This process included analysis of all output data. PPG did not deviate from the assumptions provided by the Commission, other than adjusting the customer type percentage allocation in the CSP Calculator.

iii. Alternative Assumptions

As stated in Section II.b.ii. above, PPG did not use any alternative assumptions. PPG did adjust the customer type percentage allocation in the CSP Calculator from the Commission-provided assumptions.

III. Study Results

Based on PPG's study design, outlined in Section II, above, PPG provides the following results of its study.

a. Conforming and Alternative Portfolios

As described above, PPG developed one Preferred Conforming Portfolio addressing PPG's proportional share of the 8 MMT by 2045 GHG target. PPG's Preferred Conforming Portfolio consists of:

- Existing resources that PPG contracts with, consistent with definitions provided in the RDT;
- Existing resources that PPG plans to contract with in the future;
- New resources that PPG plans to investigate.

To date, PPG has not contracted directly with new resources as it elected to "opt out" of self-procurement for its proportional share of the 3,300 MW of procurement mandated by the Commission's Decision ("D.") 19-11-016. PPG is still investigating the procurement options associated with its capacity procurement obligations established in D.21-06-035, D.23-02-040, and D.26-02-057 (collectively, the "Mid-Term Reliability Decisions"). The new resources that PPG plans to investigate (via bilateral contracts with the resources) are based on the mix of new resource types identified in the CSP, but PPG has encountered increasing difficulties and setbacks finding such resources in the modest quantities it has been assigned. PPG has issued Requests for Offers ("RFOs") and carefully watched LSE's solicitations in attempts to meets its procurement requirements. PPG remains committed to seeking out and contracting with the most cost-effective resource(s) that also fit its GHG target.

PPG conducts solicitations for resource procurement via email to a list of available resource providers, market participants, and brokers active in the California wholesale market. Furthermore, PPG negotiates and contracts directly with resource owners, developers, and suppliers to meet its loads and satisfy its procurement obligations (RA, RPS, etc.). PPG populated the CSP Calculator and RDT based on the resource options provided in the CSP, which are consistent with PPG's current portfolio mix under contract. Existing generic biomass, geothermal, wind, and solar resources were added to meet the capacity levels set forth in the RDT.

PPG's current contracted RA and RPS resources consist primarily of wind, solar, and thermal resources, primarily located within California and the Pacific Northwest regions. For forecasting purposes, PPG anticipates the continuation of these contractual relationships, and with the same resources, which is represented in PPG's CSP Calculator template. Other than as mandated by regulatory obligations, PPG does not take long-term supply positions absent corresponding customer commitments consistent with its disciplined, non-speculative approach. Because resource availability varies over time, PPG also does not assume that the resource types it has procured in the past will remain available for future procurement on the same terms.

b. Preferred Conforming Portfolio

PPG's Preferred Conforming Portfolio provides a path for PPG to achieve its GHG emissions target while also satisfying RA, RPS, and other statutory and CPUC-mandated requirements. Below, PPG discusses how its Preferred Conforming Portfolio will ensure that PPG: (1) meets the GHG emissions reduction targets established by the California Air Resources Board ("CARB"); (2) meets its 60% RPS target by 2030; (3) meets the RPS program's 65% long-term procurement requirement; (4) provides electricity to its customers at the lowest cost; (5) meets near-term and long-term system and local RA requirements; (6) minimizes localized air pollutants and other GHGs, with early priority on disadvantaged communities; and (7) satisfies other statutory requirements, such as strengthening the diversity, sustainability, and resilience of the bulk transmission and distribution systems, and local communities.[2]

A. PPG's Preferred Conforming Portfolio Meets GHG Emissions Reduction Targets.

PPG's Preferred Conforming Portfolio meets the GHG emissions reduction targets established by CARB, in coordination with the Commission and the CEC, for the electricity sector and each LSE, that reflect the electricity sector's percentage in achieving the economy-wide GHG emissions reductions.

B. PPG's Preferred Conforming Portfolio Meets the Requirements of the RPS Program.

PPG's Preferred Conforming Portfolios comply with the RPS program such that they procure at least 60 percent eligible renewable energy resources by December 31, 2030, consistent with California RPS law. PPG's Draft 2026 RPS Procurement Plan, filed on June 12, 2026, "describes its plans for procuring RPS resources to … achieve both statutory and Commission RPS program requirements, including the overall RPS procurement requirements, portfolio balance requirements, and long-term procurement requirements for each compliance period."[3] PPG specifically addresses meeting the 60% by 2030 requirement along with Senate Bill 100's statutory increases to the RPS targets mandated for each compliance period and the 65

[2] *See* Pub. Util. Code Section 454.52(a)(1).

[3] PPG Draft 2026 RPS Procurement Plan, at 2.

percent long-term procurement obligation that began in 2021.[4] Additionally, PPG's Draft 2026 RPS Procurement Plan outlines how it plans to meet the long-term RPS procurement requirements.[5] PPG's Preferred Conforming Portfolio follows its RPS procurement plans and ensures that PPG will meet the RPS procurement quantity, procurement balance, and the long-term contracting requirements.

C. PPG's Preferred Conforming Portfolio Provides Electricity to its Customers at the Lowest Cost.

PPG carefully considers cost implications of specific resources and timing of procurement. Furthermore, as described in PPG's Draft 2026 RPS Procurement Plan, PPG's "renewable procurement is undertaken to satisfy RPS mandates at the lowest possible cost to its customers …."[6] PPG's Preferred Conforming Portfolio aligns with its renewable and general procurement. These efforts are essential to ensure that PPG can compete in the highly competitive DA market, otherwise PPG's price-sensitive customers are free to obtain electric service from a different provider. As noted elsewhere, long-term procurement presents financial challenges insofar as sellers require security commitments for resources that become a burden to PPG in light of the short-term customer commitments and the increasing costs of project financing. This creates challenges for PPG to maintain favorable rates for its customers.

D. PPG's Preferred Conforming Portfolio Minimizes Impacts on its Customers' Bills.

See Subsection C, immediately above. PPG notes that the template refers to "ratepayers," which is not the applicable term for its DA customers. Under Direct Access, PPG tailors individual contracts for customers and does not offer tariffed rates like the investor-owned utilities ("IOUs"). It is also noteworthy that some of the largest increases to customer bills have been from the utility "wires" rates, not the energy and capacity procurement undertaken by PPG.

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[4] *Id.* at 2-5.

[5] *Id.* at 6-9.

[6] *Id.* at 9.

E. PPG's Preferred Conforming Portfolio Meets Near-Term and Long-Term System and Local RA Requirements.

PPG procures RA based on the existing CPUC requirements, as updated and amended over time, including additional non-year ahead RA reliability requirements. PPG's RA procurement is designed not only to satisfy RA requirements, but to sync with IRP requirements, both for near-term and some long-term procurement goals and standards. Currently, PPG receives both System and Local RA credits given that it opted out of self-procurement, as outlined in D.19-11-016. Additionally, PPG negotiates and contracts directly with resource owners, developers, and suppliers to meet its near-term and long-term system and local RA requirements. Its current contracted RA resources are short-term and are primarily thermal resources located within California. While PPG does not assume these resource types will necessarily remain available for future procurement on the same terms, for forecasting purposes, PPG anticipates the continuation of these contractual relationships. As outlined in greater detail in PPG's CSP Calculator template, PPG plans to satisfy both the near-term and long-term system and local RA requirements.

With respect to the potential impacts due to climate change and building and transportation electrification, those concerns are not particularly relevant to the practical procurement work undertaken by PPG primarily because of the nature of its loads and the shorter-term nature of its customer commitments. To the extent a customer may have future load increases due to electrification, that change will be captured at the time the customer updates its service contract with PPG. Additionally, it should be noted that the CEC's IEPR load forecasting aggregates DA loads by Transmission Access Charge area and does not present data specific to PPG's load characteristics.

F. PPG's Preferred Conforming Portfolio Meets Its RPS Long Term Contracting Requirements.

As noted in Subsection B above, PPG's Conforming Portfolio assumes procurement consistent with the RPS rules, including the long-term procurement requirement from eligible renewable energy resources.[7]

[7] See Draft 2026 RPS Procurement Plan, at 6-9.

G. PPG's Preferred Conforming Portfolio Strengthens the Diversity, Sustainability, and Resilience of the Bulk Transmission and Distribution Systems, and Local Communities.

Public Utilities Code Section 454.52(a)(1)(G) requires that LSEs "[s]trengthen the diversity, sustainability, and resilience of the bulk transmission and distribution systems, and local communities." Since PPG does not own or operate the electric grid, PPG can only indirectly impact grid resilience, diversity, and sustainability through its procurement decisions. PPG's compliance with RPS, GHG, and RA requirements on both a short- and long-term basis will assist in meeting California's ambitious goals and should strengthen the diversity, sustainability, and resilience of the bulk transmission and distributions systems, as well as local communities.

H. PPG's Preferred Conforming Portfolio Enhances Distribution Systems and Demand-Side Energy Management.

Similarly to Subsection G, above, PPG's procurement can only indirectly impact distribution systems. With respect to demand-side energy management, PPG may assist customers with interest in load-side investment opportunities, including demand-side management, but PPG does that work outside of its general procurement and portfolio management efforts. In most cases, PPG's customers may use utility programs (if eligible).

I. PPG's Preferred Conforming Portfolio Minimizes Localized Air Pollutants and Other Greenhouse Gas Emissions, with Early Priority on Disadvantaged Communities.

See the discussion in Section III.d., below.

J. PPG's Preferred Conforming Portfolio Maintains a Diverse Portfolio of Energy Resources.

PPG has resource diversity through its RPS procurement efforts, but given the relatively modest loads served on shorter-term commitments, pursuing resource diversity in and of itself is not a priority. At this time there is no resource allocation from the California Department of Water Resources ("DWR") to PPG.

c. GHG Emissions Results

PPG's Preferred Conforming Portfolio for the 8 MMT GHG target meets PPG's GHG benchmark as established by the CSP Calculator. PPG's Preferred Conforming Portfolio has the following GHG emissions results:

- 0.285 MMT per year for 2028;
- 0.271 MMT per year for 2030;
- 0.259 MMT per year for 2035
- 0.283 MMT per year for 2040; and
- 0.179 MMT per year for 2045.

d. Local Air Pollutant Minimization and Disadvantaged Communities

i. Local Air Pollutants

PPG's Preferred Conforming Portfolio includes the following emissions of local air pollutants:

	2028	2030	2035	2040	2045
PM2.5 (tonnes/yr)	29.6	29.1	18.6	19.3	14.2
SO_2 (tonnes/yr)	6.5	6.2	1.7	1.8	1.3
NO_X (tonnes/yr)	49.9	48.9	24.4	29.2	16.0

Of the three local air pollutants (PM2.5, SO_2, and NO_X), only PPG's contribution to SO_2 emissions are entirely the result of system power procurement. PPG will see a reduction in the system power emissions factor over time as additional renewables and batteries are added to the system, which should directly reduce the fossil fueled contribution to system power.

ii. Focus on Disadvantaged Communities

PPG is committed to the goal of minimizing local air pollutants, with early priority on disadvantaged communities ("DACs"). PPG, to the best of its understanding of the California Environmental Protection Agency's 2026 update of the CalEnviroScreen 5.0 tool, and based on information obtained and analyzed for this IRP filing, serves the following distribution of disadvantaged communities:

Row Labels[8]	Count of MA Zip
0–5%	53
5–10%	44
10–15%	36
15–20%	35
20–25%	38
25–30%	44
30–35%	33
35–40%	51
40–45%	28
45–50%	35
50–55%	38
55–60%	36
60–65%	33
65–70%	36
70–75%	27
75–80%	28
80–85%	30
85–90%	29
90–95%	18
95–100%	32
NA	3
#N/A	23
Grand Total	**730**

The Action Plan Section below demonstrates how PPG considers the impact of its resource procurement on DACs by reducing reliance on system power/fossil-fueled power to reduce its emissions.

1. PPG's Preferred Conforming Portfolios Minimize Localized Air Pollutants and Other GHGs, with Early Priority on Disadvantaged Communities

PPG's Preferred Conforming Portfolio meets GHG emissions reduction targets. Additionally, PPG's IRP describes how it minimizes localized air pollutants, including NOx, PM2.5, and SO_2 emissions. PPG's overall efforts to comply with GHG emissions reduction targets and minimize localized air pollutants are expected to reduce such emissions statewide, including within DACs.

[8] NA = zip code exists in the tool but result was NA; #N/A = the zip code does not exist in the tool.

2. Specific Details on Activities to Address Disadvantaged Communities

Apart from its plans to minimize criteria air pollutants, at this time PPG does not have other specific activities or programs planned to address DACs. However, PPG's broader procurement efforts and compliance with California's RPS, IRP, and RA procurement mandates, as well as efforts to minimize other localized air pollutants, are expected to benefit the state as a whole, including DACs located within California. PPG's efforts to meet accelerating renewable procurement mandates and further reduce emissions going forward will further help to address disadvantaged communities within California.

e. Cost and Rate Analysis

PPG carefully considers cost implications of specific resources and timing of procurement. PPG receives CAM allocations from the CPUC, and the CPUC would develop the methodology for reflecting GHG impacts of the same on ESP portfolios. However, because PPG has bilateral service contracts with customers, it does not develop "rates" per se. Each contract is undertaken on a bilateral basis with provisions that can differ between customers. Nonetheless, PPG's customers are extremely price-sensitive, and it is important for PPG to be as competitive as possible to retain its customers.

PPG assumes its future RA obligations will be reduced by its proportional share of the RA value itemized in the year-ahead CAM list. As such, PPG's IRP accounts for any resources subject to the CAM in their Preferred Conforming Portfolio. PPG's proportional share is assumed static through the IRP planning horizon for the purpose of projecting its share of CAM RA value but will be updated each IRP cycle based on the current proportional share assignment from the Commission's annual RA process, based on information outlined by the CPUC. PPG does not make assumptions or predictions on what resources may be procured on behalf of all load and subject to the CAM in the future.

f. System Reliability Analysis

As an initial matter, PPG takes its RA compliance requirements and program participation seriously. Any future procurement will as a matter of course satisfy RA program requirements and thereby ensure PPG's share of responsibility for system reliability is met. PPG

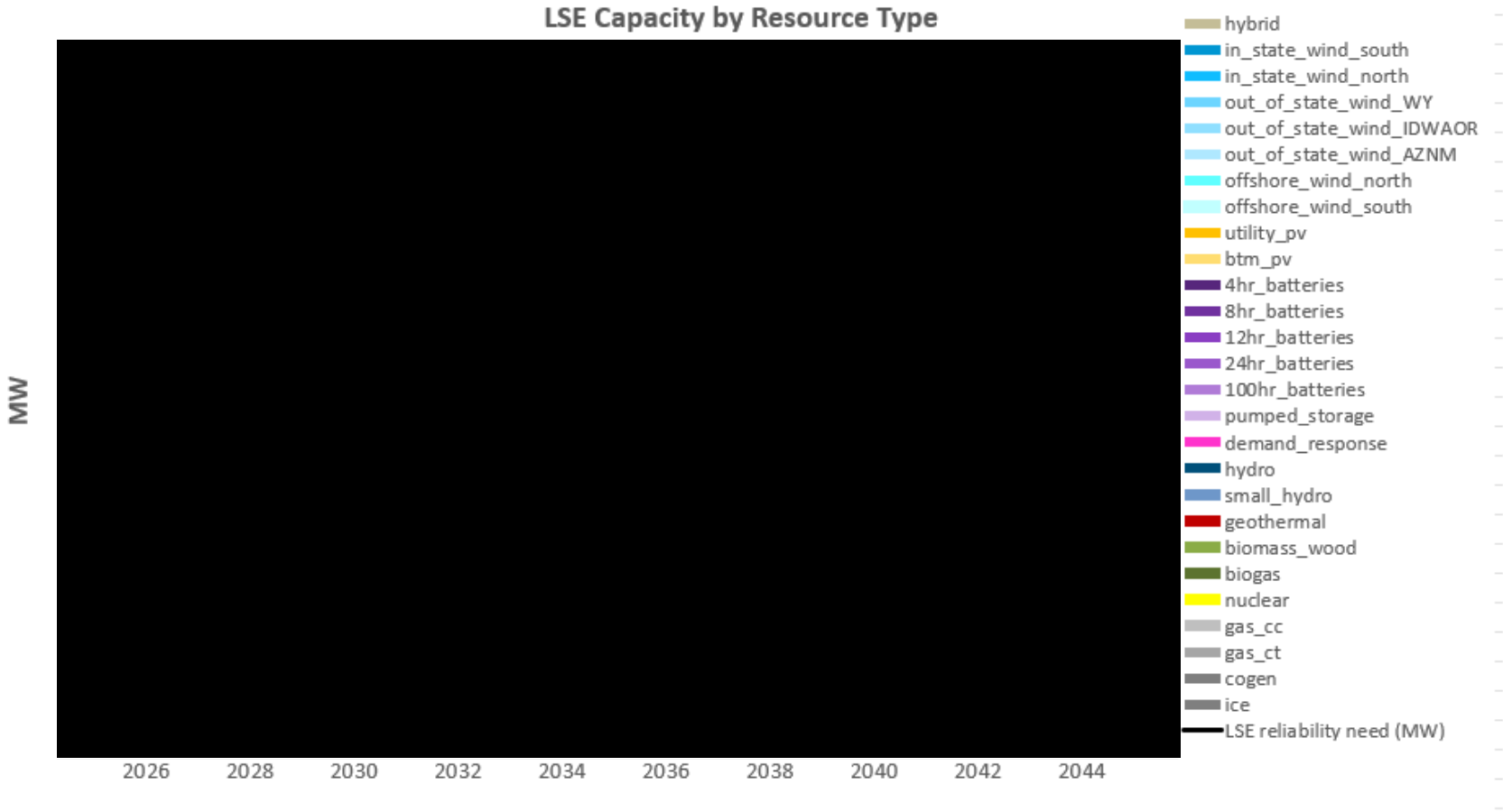
provides its System Reliability Progress Tracking Table below, which is identical to the table in the "dashboard" tab of PPG's Resource Data Template.

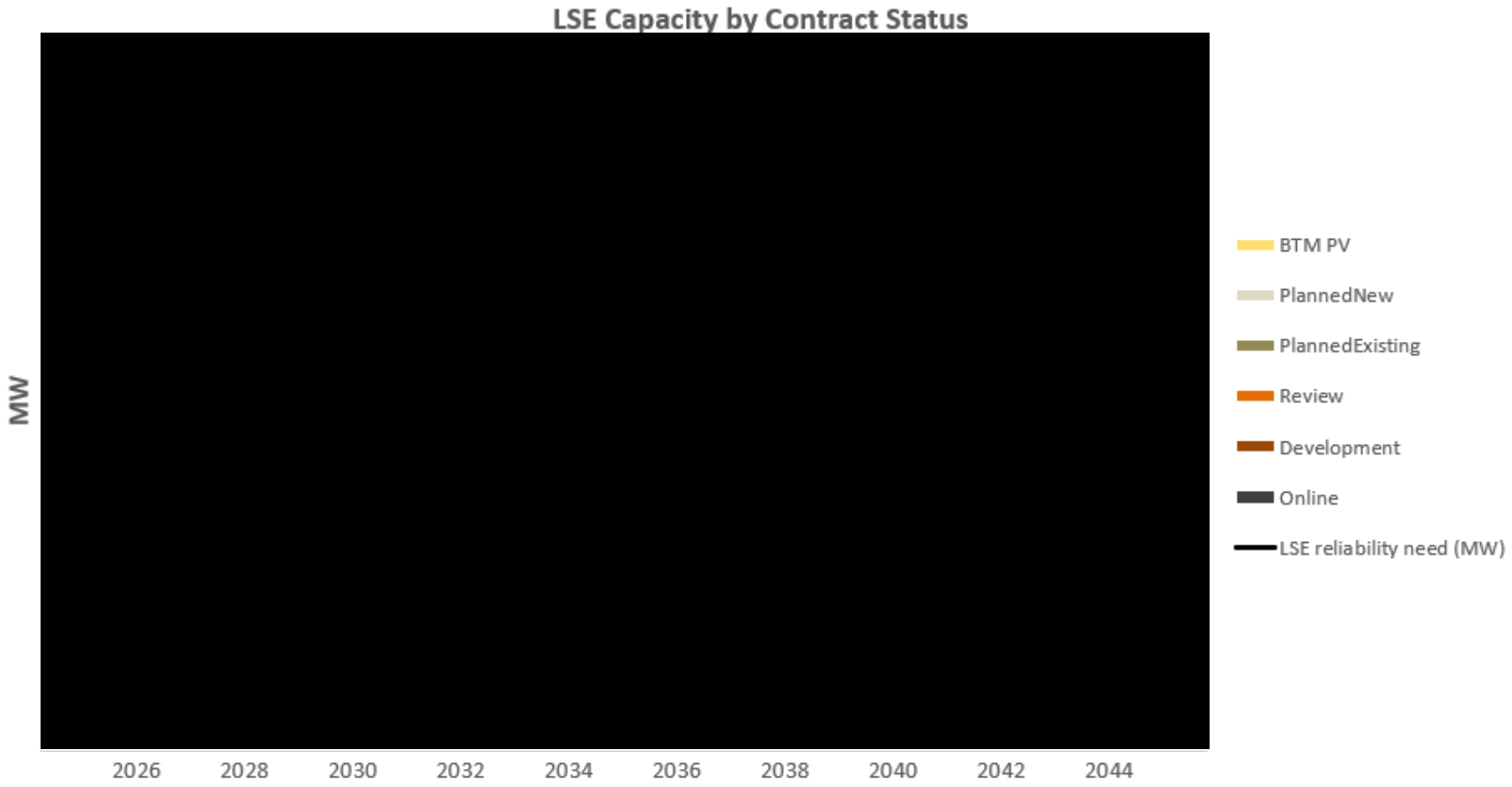
Load and Resource Table by Resource Type

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
LSE reliability need (MW)																				
ELCC by resource type (effective MW)																				
hybrid																				
in_state_wind_south																				
in_state_wind_north																				
out_of_state_wind_WY																				
out_of_state_wind_IDWAOR																				
out_of_state_wind_AZNM																				
offshore_wind_north																				
offshore_wind_south																				
utility_pv																				
btm_pv																				
4hr_batteries																				
8hr_batteries																				
12hr_batteries																				
24hr_batteries																				
100hr_batteries																				
pumped_storage																				
demand_response																				
hydro																				
small_hydro																				
geothermal																				
biomass_wood																				
biogas																				
nuclear																				
gas_cc																				
gas_ct																				
cogen																				
ice																				
LSE total supply (effective MW)																				
Net capacity position (+ve = excess, -ve = shortfall) (effective MW)																				

Load and Resource Table by Contract Status

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
LSE reliability need (MW)																				
ELCC by contract status (effective MW)																				
Online																				
Development																				
Review																				
PlannedExisting																				
PlannedNew																				
BTM PV																				
LSE total supply (effective MW)																				
Net capacity position (+ve = excess, -ve = shortfall) (effective MW)																				


LSE Capacity by Resource Type
MW
2026
2028
2030
2032
2034
2036
2038
2040
2042
2044
hybrid
in_state_wind_south
in_state_wind_north
out_of_state_wind_WY
out_of_state_wind_IDWAOR
out_of_state_wind_AZNM
offshore_wind_north
offshore_wind_south
utility_pv
btm_pv
4hr_batteries
8hr_batteries
12hr_batteries
24hr_batteries
100hr_batteries
pumped_storage
demand_response
hydro
small_hydro
geothermal
biomass_wood
biogas
nuclear
gas_cc
gas_ct
cogen
ice
LSE reliability need (MW)


LSE Capacity by Contract Status
MW
2026
2028
2030
2032
2034
2036
2038
2040
2042
2044
BTM PV
PlannedNew
PlannedExisting
Review
Development
Online
LSE reliability need (MW)

While PPG's Preferred Conforming Portfolio includes capacity shortages relative to its share of California Independent System Operator ("CAISO")-managed coincident peak demand, these shortages are based primarily on currently contracted RA procurement and do not reflect PPG's planned procurement. Further, certain shortages may not address yearly fluctuations in load and may not account for all of PPG's procurement (e.g., as of yet unidentified/assigned RA/RPS, unbundled renewable energy credits ("RECs"), etc.). One other observation is that the current methodology holds each LSE's share of CAISO coincident peak demand constant across the planning horizon, so PPG's peak and reliability obligation rises in step with the system peak forecast – now growing sharply from electrification and new data center load. But PPG's load is not growing. Its medium-to-large commercial and industrial customers have stable consumption tied to their business operations, and PPG does not expect its customer base to grow with system-wide peak. The constant-share assumption therefore inflates PPG's assigned demand forecast by nearly [redacted], requiring it to plan procurement for load it does not expect to serve. As detailed below, PPG plans to fully satisfy its procurement obligations, including capacity, RA, and RPS obligations.

g. Existing Resource Planning

PPG's strategy to meet its procurement requirements focuses on using existing resources. Existing resources present no development risk. PPG's procurement of new capacity resources reflects the segment it serves in the DA market and the short-term nature (often month-to-month) of its customer commitments. PPG is deliberately asset-light: it does not operate a wholesale marketing or generation development affiliate, and it does not enter contracts whose durations far exceed any reasonable expectation of customer retention or that would require it to carry project development risk, security, and financing on a speculative basis. PPG does not have guaranteed cost recovery like the IOUs, nor does it have fixed geographic territories with customers that default into their programs as is the case with community choice aggregators. Because of the difference in the market structure and the segment of very cost-sensitive customers that PPG serves, significantly increasing customer costs to recover procurement costs that likely frontload the developer project costs is not a viable business strategy. In light of these conditions, PPG is striving to find long-term bundled RPS resource procurement, but continues to have concerns that a project contract for higher capacity levels that may be executed soon would not have

enough lead time to become operational or contribute sufficient output to meet the full long-term procurement obligation for the current compliance period.

With respect to a comparison to the 2022 RDT, there were changes to sales contracts, a change to the number of assumed CAM allocations, and a reduction in the assumed number of unique resources in the 2026 RDT.

h. Hydro Generation Risk Management

Generally, PPG structures its procurement to eliminate as much risk as possible. Additionally, PPG monitors generation under its renewable contracts, including contracts with hydro facilities, to ensure that contractual counterparties meet their obligations. This allows PPG to procure additional resources that may be required in the event that hydro generation is lower than expected.

i. Long-Duration Storage Planning

[redacted] Typically, PPG contracts only from resources that are operational given that the nature and quantity of customer commitments are not sufficient to support new project development. [redacted]

j. Clean Firm Power Planning

As previously described, PPG's customer base makes short-term commitments and are very price-sensitive. Because of the segment it serves, PPG continues to focus on operational resources and has not explored contracting for new clean firm resource that are not yet operational. However, given California's policy direction to eschew combustion resources as indicated in the various capacity procurement directives, PPG anticipates exploring such options in the future for its relatively small customer base as those opportunities and compliance requirements arise.

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

Going forward, PPG anticipates procuring additional RECs, both bundled and unbundled, from out-of-state wind facilities, particularly if such RECs can reliably be delivered into a California balancing authority to help PPG satisfy its Portfolio Content Category ("PCC") 1 procurement obligations cost effectively. However, as described throughout this IRP, PPG is not in a position to make long-term procurement decisions for resources that are not currently deliverable into California.

l. Offshore Wind Planning

PPG does not have any procurement plans for offshore wind resources at this time. Should such resources be developed in the future, PPG will investigate availability and cost. PPG notes, however, that a number of offshore wind projects have been hampered by recent developments at the federal level, adding more delay to the timing for any such resources becoming available in the modest quantities that PPG would potentially procure.

m. Transmission Planning

PPG's resource procurement strategy considers the following attributes specific to location: (1) resources located within areas near its customers; 2) resources utilizing existing transmission and infrastructure; and 3) resources that have lower impact to DACs. Presently, PPG does not have sufficient long-term customer load commitments to justify building and owning new generation or transmission facilities. PPG procures from existing facilities or facilities that are about to commence operation. PPG's remaining long-term procurement need is concentrated in mid-term reliability ("MTR") capacity rather than RPS. Since its 2022 IRP filing, PPG has executed two long-term RPS contracts, which, together with other inventory, position PPG to satisfy its RPS long-term procurement obligations through 2032. PPG's remaining long-term procurement challenges are accordingly structural rather than a function of a uniformly tight renewables market: PPG's modest volumes are difficult to match to long-term MTR-eligible supply, as suppliers are generally reluctant to split off portions of a resource in the quantities PPG requires; long-term commitments must be reconciled with PPG's price-sensitive customer base and its short-term commitment profile; and market conditions remain uncertain, as substantial new capacity has come online or entered the development pipeline since 2022 while

anticipated data center demand growth may give rise to new capacity shortages. PPG does not perform analysis of transmission development trends or timing of transmission buildouts when procuring resources since its procurement strategy is of a short-term nature by necessity. Additional details about PPG's specific procurement plans and resources under contract are included in PPG's confidential RDT.

IV. Action Plan

PPG provides additional details about how it will achieve its planned procurement in the sections below.

a. Proposed Procurement Activities and Potential Barriers

i. Resources to meet IRP mandated procurement requirements, including D.21-06-035 and D.23-02-040:

PPG's Preferred Conforming Portfolio is designed to comply with the D.21-06-035, D.23-02-040, and D.26-02-057 procurement obligations, [redacted].

As noted above, PPG has [redacted]

PPG does not have any additional plans to procure resources with requirements outside of what is outlined above.

As noted above, PPG has no current plans for procurement from offshore wind facilities, especially given that there are a number of regulatory and commercial uncertainties at this time.

PPG acknowledges the significant amount of out-of-state wind being brought online in recent months. As stated elsewhere, contracting has proven difficult and PPG regularly monitors evolving resource developments and RFOs.

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

Not applicable. PPG has no plans for resources that are currently non-candidate in the Commission's IRPs beyond those described above

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

PPG has no additional plans for procurement of renewable energy outside of what is already described above.

iv. Other energy storage not described above

PPG has no additional plans for procurement of energy storage outside of what is already described above.

v. Other demand response not described above

PPG has no additional plans for procurement of demand response resources outside of what is already described above.

vi. Other energy efficiency not described above

PPG's customers are commercial industrial and manufacturing facilities that have their own facilities and plant managers that pursue efforts to become energy efficient on an ongoing basis.

vii. Other distributed generation not described above

PPG has no additional plans for procuring or building any distributed generation at this time.

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

As an LSE, PPG has no additional plans for investing in or increasing transportation electrification. To the extent its customers' loads increase with such electrification, PPG will endeavor to serve those loads in a cost-effective manner.

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

PPG has no additional plans for building electrification.

x. Potential Centralized Procurement, pursuant to AB-1373

PPG's Preferred Conforming Portfolio does not currently rely on centrally procured long lead-time resources. Should DWR successfully conduct the centralized procurement identified in D.24-08-064 – offshore wind, geothermal, and long-duration storage – PPG would be allocated a share of those resources' capacity, energy, and associated attributes, as determined by the Commission across all jurisdictional LSEs. PPG would reflect that allocated share in its RDT and CSP Calculator inputs and would reduce its corresponding self-procurement to the extent the allocation satisfies an existing obligation, so as to avoid duplicative procurement. PPG would continue to procure the balance of its RA, RPS, and GHG requirements bilaterally on a best-fit, least-cost basis.

Centralized procurement presents both opportunities and risks for a provider in PPG's position. It could give PPG's customers access to long lead-time resources which is not practical for PPG to contract bilaterally in the modest quantities it is assigned, while diluting the development, financing, and performance risk of those resources across all load. At the same time, because the costs are allocated to all LSEs – including price-sensitive DA customers – on a non-bypassable basis, the net value of centralized procurement to PPG's customers will depend on whether cost allocation is transparent and matched, in both proportion and timing, to the benefits each LSE receives; whether centrally procured resources are credited against IRP procurement obligations rather than layered on top of them; and whether the Commission's reasonableness review effectively contains the cost and performance risk inherent in these emerging resource types. PPG will monitor DWR's solicitations and the Commission's cost-allocation determinations as they develop and will adjust its portfolio and contract planning strategy accordingly.

xi. Other

As an LSE serving competitive DA customers, PPG has no captive load. Its customers contract on short terms, so there is no quantifiable volume of future consumption on which to base procurement over a 20-year horizon. For planning purposes, PPG therefore uses the CPUC-

issued load assumptions for its future demand, and its CSP submissions seek procurement sufficient to meet the required categories – RA, RPS, and low-GHG – consistent with Commission and statutory requirements.

PPG procures through solicitations issued to a list of resource providers and brokers and through direct negotiation with resource owners, developers, and suppliers. It structures contracts to minimize risk: PPG generally contracts only with facilities already operating rather than facilities not yet built, eliminating exposure to construction, permitting, and interconnection delay. PPG monitors production under its contracts and, although it has experienced no counterparty breach or failure to date, retains time to procure replacement resources if generation falls short. For RPS compliance, PPG uses straightforward deterministic and probabilistic analysis to size the modest over-procurement needed to guard against faulty RECs or late-period under-delivery.

PPG employed these methods in developing its Preferred Conforming Portfolio. Specific negotiation details – type, timing, and desired online dates – are generally confidential, particularly given the Commission's limited jurisdiction over ESPs. PPG does not have sufficient customer load to justify building new generation or transmission and accordingly relies on existing or near-operational facilities to reduce procurement risk.

Consistent with the Commission's assumptions and methodologies, PPG's Preferred Conforming Portfolio reflects a diverse resource mix – natural gas (combined-cycle and peaking), renewables (wind, solar photovoltaic, biomass, and small hydro), combined heat and power, and storage (lithium-ion and potentially pumped hydro) – as quantified in its CSP Calculator and RDT. The bulk of reported procurement comes from facilities already online. Where the templates required assuming the availability of resource types PPG has not yet procured, the specific new resources shown are indicative rather than committed; because they are not under contract with PPG, the associated development risks and barriers are borne primarily by the resource developers.

PPG continues to observe market conditions that constrain its ability to secure long-term renewable resources on terms it can accept, including supply-chain and equipment-cost pressures

affecting solar and battery availability and project timing. Its practice of contracting with operating facilities mitigates the permitting, interconnection, and construction-delay risk of new development. The principal residual risk to PPG's compliance is systemic: if statewide generation and transmission are not built in sufficient quantities, PPG's ability to meet its procurement objectives could be materially impaired. PPG does not, however, anticipate the retirement of any resource on which it currently or prospectively relies in a manner that would affect its ability to meet those objectives.

b. Disadvantaged Communities (DACs)

See previous comments regarding DACs in Section III.d., above.

c. LSEs' Tribal Customers

PPG has no tribal customers at the moment and does not presently market its services to tribal customers as a specific customer category, nor has it engaged any tribes related to IRP.

d. Procurement Products

PPG's procurement centers on physical products that directly satisfy its RA, RPS, and energy obligations, supported by standard credit instruments. PPG transacts on a bilateral, over-the-counter basis under industry-standard master agreements (such as WSPP or Edison Electric Institute for physical power and Western Renewable Energy Generation Information System ("WREGIS")-based agreements for renewable attributes). PPG does not use financial derivatives or transact through financial exchanges. The products PPG intends to utilize in connection with its Preferred Conforming Portfolio are:

Product	Description
Physical energy	Bilateral energy purchases where justified. Spot purchases settled through the CAISO markets.
Resource Adequacy capacity	System, Local, and Flexible RA capacity procured bilaterally to meet PPG's CPUC and CAISO RA obligations.
Renewable energy and RECs	Bundled RPS power purchase agreements delivering energy and renewable energy credits (PCC 1), and unbundled RECs (PCC 3) tracked through WREGIS, used to meet PPG's RPS quantity, portfolio-balance, and long-term procurement requirements.

Product	Description
Energy storage capacity	Capacity and RA attributes from battery storage resources, where contracted.

PPG's procurement is exclusively physical and bilateral. It does not use electric or gas financial products, hedging derivatives, or exchange-traded instruments. PPG does not procure natural gas as a commodity; any gas price exposure within gas-fired energy arrangements is borne by the resource counterparty.

With respect to GHG products, PPG holds no Cap-and-Invest allowances and does not transact standalone GHG instruments. Compliance obligations under the Cap-and-Invest Program attach to first deliverers and importers of electricity, not to PPG directly. PPG achieves its GHG benchmarks through the composition of its resource portfolio – its RPS procurement and the declining emissions intensity of system power – and as a recipient of GHG-free energy allocated to it through the applicable IOU processes.

e. Commission Direction of Actions

PPG does not seek any specific direction from the Commission regarding new spending authorizations, changes to existing authorizations, or changes to existing programmatic goals or budgets at this time.

V. Lessons Learned

PPG offers the following observations for the Commission's consideration, each directed at improving the accuracy and fairness of the IRP process and, in turn, the fidelity of the aggregated planning on which the Preferred System Plan depends.

1. Load-growth attribution for Direct Access LSEs. The current methodology assumes that an LSE's proportional share of CAISO managed coincident peak demand remains constant across the planning horizon. As a result, PPG's absolute peak and reliability obligation scales upward with the CAISO system peak forecast—a forecast now growing sharply due to building and transportation electrification and the rapid addition of large new loads such as data centers. PPG's own load is not growing. PPG serves medium-to-large commercial and industrial

customers whose consumption is stable as a function of their business operations, and PPG does not anticipate growth in its customer base commensurate with system-wide peak growth. The constant-share assumption nonetheless produces an assigned demand forecast for PPG that increases by nearly [redacted] over the planning horizon, requiring PPG to plan procurement for load it does not expect to serve.

PPG respectfully suggests that the Commission and the CEC attribute forecast load growth to the load types actually driving it and permit Direct Access LSEs to substantiate load and coincident-peak forecasts that reflect their actual customer characteristics, rather than scaling each LSE's share proportionally with total system peak. This change would facilitate state policy goals in several respects. More accurate load attribution improves the fidelity of the aggregated Preferred System Plan and avoids directing scarce clean resources toward demand that will not materialize. It prevents inflated procurement obligations that raise costs for price-sensitive commercial and industrial customers without any corresponding reliability benefit. And it aligns the process with cost-causation and affordability principles the Commission has emphasized elsewhere: the customers and load types driving peak growth – and the associated resource and grid costs – should be the ones for whom that growth is planned and paid, rather than having those costs fall on stable commercial and industrial load that is not driving the increase.

2. Workable procurement pathways for small LSEs. PPG is regularly assigned procurement quantities that are too modest to transact efficiently. Developers and suppliers seeking to minimize transaction cost and complexity favor larger volumes and fewer offtakers, which can leave an LSE unable to contract on commercially workable terms despite diligent effort. PPG suggests that the Commission continue to develop and preserve mechanisms that give small, non-rate-jurisdictional LSEs a practical path to meet mandated procurement—including voluntary aggregation, standardized small-tranche products, and the option (but not the obligation) to access centralized or backstop procurement where bilateral contracting is impractical. Preserving each LSE's ability to self-procure while offering these alternatives would facilitate state goals by ensuring that mandated resources are actually procured cost-effectively, rather than left unmet or procured at prices that undermine the competitive, least-cost service DA is intended to provide. Relatedly, PPG encourages the Commission to calibrate any

compliance or penalty framework to the circumstances of LSEs assigned modest quantities, so that the framework drives real procurement rather than penalizing outcomes largely outside the LSE's control.

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.*

Index of Attachments

Attachment Number	Attachment Name	Confidentiality Status	Explanation
1	LSE Contact Information form	Public	Attached below.
2	Pilot Power Group Clean System Power calculator workbook "ppg_csp_8mmt_preferred_ conforming_na_confidential_v1"	Confidential	Omitted from Public Version, provided to CPUC IRP Staff via secure file transfer protocol.
3	King City Community Power Resource Data Template workbook "ppg_rdtv3_8mmt_preferred_ conforming_na_confidential_v1"	Confidential	Omitted from Public Version, provided to CPUC IRP Staff via secure file transfer protocol.

Integrated Resource Planning (R.25-06-019)
2026 IRP Filing Requirements
LSE Contact Information Form

Please provide the following information. CPUC staff will contact the person(s) listed here for questions about LSE's filing.

Name of Load Serving Entity (LSE)	Pilot Power Group, LLC
The LSE's abbreviation, provided in the Resource Data Template's workbook in the "lse_names" tab	PPG

Contact Person for Questions about this Filing	
Name	Andy Anderson
Title	Director of Regulatory Compliance
Email	Regulatory@pilotpowergroup.com
Telephone	858-355-9717

Back-Up Contact Person for Questions about this Filing (Optional)	
Name	Richard Chapman
Title	CFO
Email	Regulatory@pilotpowergroup.com
Telephone	858-678-0118

Back-Up Contact Person for Questions about this Filing (Optional)	
Name	Zaheer Dhruv
Title	CEO
Email	Regulatory@pilotpowergroup.com
Telephone	858-678-0118